



STAFF REPORT ACTION REQUIRED

Coordinated Provincial Plan Review – Key Messages, Comments and Recommendations

Date:	September 27, 2016
To:	Planning and Growth Management Committee
From:	Chief Planner & Executive Director, City Planning Division
Wards:	All
Reference Number:	P:\2016\ClusterB\PLN\PGMC\PG16093

SUMMARY

On May 10, 2016, the Province of Ontario released Provincial Plan amendments to the Growth Plan for the Greater Golden Horseshoe; the Greenbelt Plan; the Niagara Escarpment Plan and the Oak Ridges Moraine Conservation Plan. The Province set October 31, 2016 as the commenting deadline with regard to these amendments.

The report gives an overview of the amendments for the two Plans that apply to Toronto; the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan. It also provides staff comments and recommendations for better aligning the proposed Plan amendments with the City's planning policies and implementation practices.

RECOMMENDATIONS

The Chief Planner and Executive Director, City Planning recommends that:

1. City Council express support to the Minister of Municipal Affairs on the general direction taken with regard to the proposed Growth Plan for the Greater Golden Horseshoe and the proposed Greenbelt Plan.
2. City Council request the Minister of Municipal Affairs to revise the proposed Growth Plan as follows:
 - a) revise the definition of “Complete Communities” to include references to affordable housing, parks and open space and other matters, as shown in italicized text:

- "Complete Communities - Places such as mixed-use neighbourhoods or other areas within cities, towns and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living including an appropriate mix of jobs, local stores and services, a full range of housing, *including affordable housing*, ~~and~~ public service facilities and *parks and open space for their residents*. *Complete communities are well-designed, encourage the use of active transportation and support overall quality of life, human health and climate change mitigation*. Complete communities may take different shapes and forms appropriate to their contexts.";
- b) add a new definition of “*Complete Streets*” to clarify the use of this terminology in the Growth Plan as shown in italicized text:
“*Complete Streets - Streets that support and enhance local neighbourhood context and character, incorporate green infrastructure and safely accommodate all transportation users - pedestrians, cyclists, transit riders and motorists of all ages and abilities.*”;
 - c) add the term “Public Service Facilities” to the Section 3 heading title for the infrastructure policies to provide consistency with the PPS 2014 as shown in italicized text: "*Public Service Facilities and Infrastructure to Support Growth*";
 - d) revise Policy 2.2.4 Transit Corridors and Station Areas to:
 - i) allow municipalities to identify in Policy 2.2.4.5 which major transit station areas will be planned at higher densities as shown in italicized text: "Policy 2.2.4.5 - *Municipalities will identify in official plans which major transit station areas will be planned to achieve, by 2041, or earlier, a minimum gross density target of ...*";
 - ii) indicate as part of Policy 2.2.4.5 that the major transit station area minimum gross density targets are only to be considered in relation to the underlying land use designations of official plans;
 - iii) revise Policy 2.2.4.10 to ensure that municipalities are consulted by the Province, prior to the Province choosing to identify additional priority transit corridors or mobility hubs, as shown in italicized text: "Policy 2.2.4.10 – The Province may, *in prior consultation with municipalities*, identify additional priority transit corridors or mobility hubs and planning requirements for priority transit corridors or mobility hubs, to support the optimization of transit investments across the GGH...";
 - e) revise Policy 2.2.4.6 to include all “employment areas” (and not just "prime employment areas") as not being subject to Policy 2.2.4.5, if the minimum density targets, as currently described in Policy 2.2.4.5, remain;
 - f) revise the definition of “Prime Employment Areas” and all affected and related policies to allow for office use;

- g) allow office uses in all employment areas by revising the definition of “Office Parks” to be a designated “Employment Area” and/or “Prime Employment Area” use in an official plan;
- h) revise the definition of “Major Office” to include major office development (4,000 square meters of non-residential floor space or more) that forms part of, or is attached to a mixed-use commercial-residential development;)
- i) add places of worship to the definition of “Sensitive Land Uses” and prohibit places of worship as a sensitive use in both “prime employment” and “employment areas”;
- j) introduce policies that underscore the important role urban design plays in the creation of compact complete communities through encouraging a sense of place, by promoting well-designed built form, streetscape and cultural planning, providing adequately sized parks and open spaces to support intensification, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes;
- k) introduce a vision statement or policies that underscore the importance of liveable conditions of intensification, necessary to continue to attract and support people and result in liveable patterns of development such as adequate sunlight, open space and adequate separation distances between buildings;
- l) revise the definition of "Public Realm" as shown italicized text:
"Public Realm - All spaces to which the public has unrestricted access, such as streets, parks, public squares, and sidewalks, and other elements of the public streetscape network that encourages both mobility and social interaction.";
- m) revise the definition of “Compact Built Form” as shown in italicized text:
"Compact Built Form - A land use pattern that encourages the efficient use of land, walkable neighbourhoods (with well-designed streets, parks, walkways and publicly-accessible open spaces having access to sunlight to support healthy vegetation and human comfort), mixed land uses (residential, retail, workplace and institutional) all within one neighbourhood, proximity to transit, parks and public service facilities and reduced need for infrastructure. Compact built form can include detached and semi-detached houses on small lots as well as townhouses and walk-up apartments, multi-storey commercial developments, and apartments or offices above retail. Walkable neighbourhoods can be characterized by roads streets laid out in a fine-grained, well-connected network, destinations that are easily accessible by active transportation, sidewalks with minimal interruptions for vehicle access, and a pedestrian friendly environment along and between roads streets to encourage active transportation";
- n) revise the wording of Policy 2.2.4.5 c), shown in italicized text, to provide direction that urban form supports the quality of life for people of all ages and

abilities: "2.2.2.5 - In planning for the intensification of built-up areas, municipalities will:

- c) ensure the development of high quality urban form and public open spaces, *which support overall quality of life, including human health, for people of all ages and abilities*";
- o) revise the wording of Policy 2.2.1.3 g) shown in italicized text to include terminology that has not been included in the concept of what creates complete communities: "2.2.1.3 - Applying the policies of this Plan will support the achievement of complete communities that:
 - g) have high quality built form, *landscapes* and publicly-accessible open spaces that are safe and accessible with site design standards that create an attractive, *comfortable* and vibrant public realm.";
- p) add "High Quality Built Form" as a new defined term, shown as italicized text below, to recognize that urban built form is not solely about the aesthetics of places but that it also allows for better interactions between people and between people and their surroundings:

"High Quality Urban Form - A scale and pattern of buildings, streets, parks and open space which is compact, integrated, contextually appropriate and well - designed to support active transportation, pedestrian safety, comfort and amenity and which promotes human and environmental health and sustains a high quality of life.";

- q) strengthen how the proposed Growth Plan addresses cumulative negative impacts to water quality and quantity in downstream municipalities by:
 - i) revising the definition of "Watershed Planning" to explicitly include the consideration of downstream impacts to water quality and quantity as part of watershed planning in order to ensure that development in upstream municipalities doesn't worsen flooding and water quality in downstream municipalities; and
 - ii) revising Policy 3.2.7.1 b) to include an assessment of the cumulative downstream impacts of storm water from existing and planned development shown in italicized text as follows: "Policy 3.2.7.1 b) - Examine the cumulative environmental impacts of stormwater from existing and planned development, *including an assessment of cumulative downstream impacts of stormwater from development, if any*, and how extreme weather events will exacerbate these impacts.";
- r) add a new section called "*Biodiversity*" to Chapter 4 "Policies for Protecting What is Valuable" and include policies to encourage municipalities to consider

- urban biodiversity in their decision making and to develop official plan policies and strategies to address the impacts of the built environment on wildlife, such as migratory birds;
- s) add a new section to Chapter 4 "Policies for Protecting What is Valuable" Policy 4.2 called "*Urban River Valleys*" and include policies to require municipalities within settlement areas to protect, restore and enhance all urban river valleys (not just those that connect to the Greenbelt) and to minimize the adverse impact of activities and land use change on lands adjacent to urban river valleys; and
 - t) revise Policy 4.2.10. 2 a) to add "*green infrastructure and low impact development*" to the strategies municipalities should be encouraged to develop to improve resilience to climate change, as shown in italicized text: "develop strategies to reduce greenhouse gas emissions and improve resilience to climate change through land use planning, planning for infrastructure, including transit and energy, *and green infrastructure and low impact development*, and the conservation objectives in Policy 4.2.9.1".
3. City Council request the Minister of Municipal Affairs to revise the proposed Greenbelt Plan as follows:
- a) use a systems approach to recognize and protect urban river valleys that is consistent with the approach advocated by both the Greenbelt Plan 2005 and the PPS 2014, which recognizes the connectivity of natural features and applies to both public and private land;
 - b) continue to recognize "river valley connections" as contiguous features, as they are currently recognized in the 2005 Greenbelt Plan schedules and policies; and
 - c) add a new policy to Policy 3.2.6 "External Connections" to require municipalities to identify "river valley connections" in their official plans and to work together with the Province, Conservation Authorities, private landowners, First Nations, and other institutions and organizations to recognize the important functions river valley connections provide through public information, awareness and stewardship programs and partnerships.
4. City Council request clarification from the Minister of Municipal Affairs as to the origin of the gross density targets identified in the proposed Growth Plan Policy 2.2.4.5 for "major transit station areas".
5. City Council request the Minister of Municipal Affairs to develop technical guidelines to provide a consistent methodology and reporting structure to measure greenhouse gas emissions and a consistent format for climate change vulnerability risk assessments to assist in the implementation of proposed Growth Plan policies on climate change and integrated planning.

6. City Council advise the Minister of Municipal Affairs that any direction in the proposed Growth Plan to provide detailed mapping of all major planned and existing transportation corridors, intermodal hubs and major ports, all major planned and existing transit corridors and any detailed pre-determination of which adjacent lands require official plan protection around these corridors, is not appropriate within the context of the role of an official plan.
7. City Council request the Minister of Municipal Affairs to issue a Provincial Regulation for “zoning with conditions” which permits a municipality to prescribe the provision of employment space as a condition for the construction of housing in certain locations of the municipality, such as in “urban growth centres” or along "priority transit corridors".
8. City Council request the Minister of Municipal Affairs to work towards aligning the “Big Move” and the “Provincial Mobility Hub Guidelines” with the proposed Growth Plan’s “Major Transit Station Areas” and other transit related policies, in order to achieve clarity with regard to the application of transit policies for the GTA region.
9. City Council advise the Minister of Municipal Affairs that guidance will be required from the Province if municipalities are to develop and implement transportation demand management policies including locally appropriate modal share targets.
10. Council request the Minister of Municipal Affairs to "advance growth planning and support the development of complete communities in Ontario" by providing for more substantial and ongoing levels of funding for municipalities to accelerate the achievement of this Provincial goal.
11. Council advise the Minister of Municipal Affairs that to be consistent with the essential requirement for local context in reporting proposed Growth Plan measures of local performance, the Province identify the types of data to be collected; consult with municipalities; publish guidelines for reporting out on its established indicators and provide the appropriate level of funding needed to undertake the work at the municipal level.
12. City Council request the Minister of Municipal Affairs to broaden the removal provisions in the *Planning Act* of the right to appeal not just population targets and boundaries but any official plan amendments specifically intended to bring municipal official plans into conformity with Provincial Policy and Plans, for which the Province has issued a decision of approval.
13. City Council forward this report to the Minister of Municipal Affairs to post on the Provincial Environmental Bill of Rights Registry (EBR).

Financial Impact

There are no financial impacts from this report.

DECISION HISTORY

On July 31, 2015, City Planning forwarded comments to the Minister of Municipal Affairs and Housing on potential changes to the Growth Plan and the Greenbelt Plan as part of the Province's request for comments on the coordinated review of these Plans. The comments were provided to inform the Province on how the Plans could better meet their objectives. They focused on the need to:

- Address issues related to climate mitigation and adaptation to improve community resiliency, biodiversity and ecosystem health in the face of climate change;
- Provide a policy and implementation context for municipalities to support energy conservation and efficiency; take measures to improve air quality and increase the use of green infrastructure;
- Recognize the importance of local natural heritage systems in supporting the ecological integrity of the larger natural heritage system and in providing natural spaces as part of complete communities;
- Encourage municipalities to develop a biodiversity strategy including strategies to protect migratory wildlife;
- Encourage planning authorities to identify river valleys that connect the Greenbelt to Lake Ontario and other inland lakes and recognize the important ecological and hydrological functions they provide to the Greenbelt while having the Province clarify its interest in having urban river valleys become part of the regulated area of the Greenbelt;
- Implement controls to manage sediment and the flow of rivers that connect to Lake Ontario through Toronto; and
- Prohibit places of worship as a permitted use in employment areas.

Aside from a continuing difference of approach between the City and the Province with regard to how to best recognize the importance, to the long term health of the Greenbelt, of river valley connections between the Greenbelt and Lake Ontario and inland lakes, the intent of the City's comments to the Province in July of 2015, have, for the most part, been captured by the policies of the final proposed Plans.

ISSUE BACKGROUND

The Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan are four provincial land use plans that work together to manage growth, build complete communities, curb sprawl and protect the natural environment. These plans support agriculture and promote economic development in Ontario's Greater Golden Horseshoe. The two Plans that affect the City

of Toronto are the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan.

The Growth Plan for the Greater Golden Horseshoe was introduced in 2006 to guide how and where growth should occur, protect farm land and green spaces, and maximize the benefits of infrastructure investments in the fast-growing, diverse region. The City of Toronto supported the Growth Plan at its inception and continues to support the overall intent of the Growth Plan to this day. Overall, this Plan most impacts the City of Toronto. The Growth Plan policies take precedence over the policies of the Provincial Policy Statement (PPS 2014) to the extent of any conflict, except where the relevant legislation provides otherwise. Where the policies of the Growth Plan address the same, similar, related or overlapping matters as policies in the PPS, applying the more specific policies in the Growth Plan satisfies the requirements of the more general policies in the PPS. The City's Official Plan policies are required to be brought into conformity with both the PPS and the Growth Plan, as the case may be.

Ontario's Greenbelt is an area of permanently protected green space, farmland, forests, wetlands and watersheds. The Greenbelt Plan contains land use designations and policies to govern the lands within the Greenbelt Area. While the majority of the Greenbelt is outside the boundaries of the City of Toronto, it benefits Toronto residents in a number of ways including access to a broad expanse of countryside as well as recreational spaces and opportunities, local food production, enhanced protection of ground and surface waters which flow into Lake Ontario which is the source of Toronto's drinking water. Where there is a conflict between the Greenbelt Plan and the Growth Plan, regarding the natural environment or human health, then the direction that provides more protection to the natural environment or human health prevails. The City's Official Plan policies are also required to be brought into conformity with the Greenbelt Plan. For example, Council recently adopted an official plan amendment (OPA 346), to bring the City's Official Plan into conformity with the in-effect 2005 Greenbelt Belt.

The Province initiated a coordinated review of the four Provincial Plans in February of 2015. As part of the review process, members of the public, stakeholders, municipalities and organizations were able to provide feedback on how the plans were performing and how they could be improved. To support the coordinated review, the Province also appointed an advisory panel. Panel members attended public meetings, reviewed submissions, met with stakeholders, and spoke with experts. The advisory panel made 87 recommendations to help the Plans better meet their objectives.

As noted above, the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan have a direct impact on the City. This report limits its discussion to these two Plans in providing an overview of Plan messages and in making recommendations to Council with regard to policy matters requiring follow-up with the Province given their possible impact on current City planning policy and practice.

COMMENTS

It is the intention of the Province's Coordinated Plan Review that the Provincial Plans function collectively to manage growth, provide for complete communities, support economic development and protect the natural environment.

City Planning staff led a detailed review of the key messages contained in the proposed changes to the Provincial Plans and the impact those changes may have on the City's policies, practices and procedures. The review was undertaken in consultation with staff from Toronto Water, Environment and Energy, Public Health, Parks, Forestry and Recreation, Economic Development and Culture and the City Manager's Office and resulted in a number of recommendations in response to the seven overarching themes around specific policy objectives, identified by the Coordinated Plan Review. They include:

1. Building Complete Communities;
2. Protecting Natural Heritage and Water;
3. Growing the Greenbelt;
4. Addressing Climate Change;
5. Integrating Infrastructure;
6. Improving Plan Implementation; and
7. Measuring Performance, Promoting Awareness and Increasing Engagement.

Building Complete Communities - Key Messages & Proposed Changes

Complete communities are more compact, occupy less land, reduce the costs of infrastructure and offer access to healthy local food. They also provide a range of employment opportunities and a mix of housing with a range of affordability. With all of these characteristics, complete communities contribute significantly to a high quality of life. The Growth Plan for the Greater Golden Horseshoe includes measures to encourage the development of complete communities. For example, municipalities are already required to:

- Develop and grow with a mix of uses, such as residential, employment, cultural, recreational and other uses that contribute to building complete communities;
- Intensify by accommodating a large portion of residential growth in areas that are already built-up, especially around transit and in urban growth centers (existing and emerging downtowns); and
- Protect land used primarily for employment from being converted to non-employment uses, such as housing.

The proposed changes take the Growth Plan further towards building complete communities by:

- Providing more guidance on achieving complete communities and requiring municipalities to plan for sustainable and livable communities;
- Directing municipalities to identify, in planning for the intensification of built-up areas, the appropriate type and scale of development in newly introduced "strategic growth areas";
- Directing municipalities, when dealing with the intensification of built-up areas, to provide for appropriate transition of built form between such areas and to ensure that development is of high quality and includes public open space;
- Requiring municipalities to plan for density targets around major transit stations which support that type of transit;
- Showing priority transit corridors in the Growth Plan where municipalities would focus transit-related planning, zoning and development efforts. New policies also provide the Province with the authority to identify additional priority transit corridors;
- Requiring minimum density targets around transit stations and stops involving subways, light rail and bus rapid transit and express rail or GO;
- Supporting the development of community hubs by encouraging public services to be located together in existing facilities near strategic growth areas, accessible by active transportation and transit;
- Requiring municipalities to identify and protect prime employment areas;
- Prohibiting conversions of prime employment to non-employment uses;
- Permitting conversions from prime employment to other employment and from other employment to non-employment uses through a Municipal Comprehensive Review (MCR) (where through recent changes to the *Planning Act*, the mandatory 5 year period for reviewing employment lands has been removed and where it is now Council's decision to determine when an MCR should be undertaken);
- Strengthening policies regarding the preservation of cultural heritage to align with those in the Provincial Policy Statement (PPS);
- Including additional references to the planning of Public Service Facilities previously defined as community infrastructure;
- Developing an integrated approach to municipal planning for infrastructure and public service facilities that considers the full life cycle costs of these assets;
- Strengthening policies regarding the preservation of cultural heritage to align with those in the Provincial Policy Statement;
- Placing a greater recognition on the link between public health and land use planning; and
- Encouraging green infrastructure and requiring municipalities to adopt official plan climate change policies.

Building Complete Communities - Impact of Proposed Changes

The City of Toronto generally supports the updated policies in the Growth Plan related to building complete communities as follows:

Housing Strategies and Affordable Housing Targets

The City's housing strategy (which is currently being updated) is set out in the Housing Opportunities Toronto (HOT) Affordable Housing Action Plan approved by Council in 2009. The HOT includes affordable housing targets for a range of housing types and these targets are supported by the policies of the Official Plan. The City's current structure of setting out targets in the HOT, which are supported by the City's Official Plan policies, achieves an alignment between planning policy framework and various initiatives and programs that collectively support the City's HOT and housing targets.

Definition of Regional Market Area

The City supports the definition's identification that single tier municipalities in the GGH will normally serve as the regional market area. The City of Toronto faces unique housing issues. When applying the definitions for Affordable Housing and Low and Moderate Income Households for the City of Toronto, the City's geographic boundaries are appropriate to serve as the regional market area, as provided for by the definition.

Integration of Public Service Facility (Community Infrastructure) Planning into Land Use Planning Policies

The growth management policies of the Growth Plan include additional references to the planning of Public Service Facilities previously defined as community infrastructure. These additions include specific references to accommodating growth within settlement areas with existing or planned public service facilities and policies supporting the development of complete communities. Complete communities include public service facilities that are co-located in community hubs and provide a needed supply of parks, trails and other recreation facilities. The Plan also calls for municipalities to develop an integrated approach to planning for infrastructure and public service facilities that considers the full life cycle costs of these assets. The City's current Community Services and Facilities (CS&F) planning framework reflects an integrated planning approach. Changes to the Plan provide support for City Planning's role in infrastructure and public service planning. The policy direction increases the need for the City's operating Divisions and Agencies to engage and contribute to the land use planning processes, as well as to establish necessary implementation measures to achieve intended outcomes.

Broadening the Definition of Complete Communities

The in-effect Growth Plan, 2006, provides for a definition of "complete communities" as follows: "Complete communities meet people's needs for daily living throughout an entire lifetime by providing convenient access to an appropriate mix of jobs, local services, a full range of housing, and *community infrastructure* including *affordable* housing, schools, recreation and open space for their residents. Convenient access to public transportation and options for safe, non-motorized travel is also provided". The revised definition in the proposed Growth Plan reads: "Places such as mixed-use

neighbourhoods or other areas within cities, towns and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living including an appropriate mix of jobs, local stores and services, a full range of housing and public service facilities. Complete communities may take different shapes and forms appropriate to their context”.

The definition should maintain the important references to affordable housing and parks and open space as follows: “Places such as mixed-use neighbourhoods or other areas within cities, towns and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living including an appropriate mix of jobs, local stores and services, a full range of housing including *affordable housing*, public service facilities and *parks and open space* for their residents...” **Recommendation 2.a) of the report.**

The City is currently undertaking work on "Complete Streets" and "Green Streets Technical Guidelines". While the proposed Growth Plan includes a definition of "Complete Communities", it does not define Complete Streets. A definition of "Complete Streets" should be added and can be defined as streets that support and enhance local neighbourhood context and character, incorporate green infrastructure and safely accommodate all transportation users – pedestrians, cyclists, transit riders, and motorists of all ages and abilities. **Recommendation 2.b) of the report.**

Focusing on Public Service Facilities

All references to community infrastructure in the Plan have been changed to public service facilities. The changes provide more explicit policy direction on how planning for public service facilities is to be undertaken. This includes coordination with land use planning and financial planning and strong emphasis on the co-location of facilities in community hubs. The policies prioritize the maintenance and adaptive reuse of existing facilities, and provide general criteria on preferred locations for community hubs. To facilitate the development of community hubs the Plan gives explicit policy direction for municipalities to collaborate and consult with service planning, funding and delivery sectors. City Planning's current Community Services and Facilities (CS&F) planning framework is consistent with the proposed changes to the Growth Plan. However, the proposed changes suggest the need for the City's operating divisions and agencies to demonstrate how their planning processes respond to forecasted growth, provincial land use directions and fiscal constraints. The changes suggest the potential need to more explicitly identify how each division/agency will respond to local growth, emphasizing capital budgeting ahead of site-specific development applications.

Re-Defining Public Service Facilities

The definition for “Public Service Facilities” was established in the PPS 2014. It makes overt reference to the public provision or subsidy of facilities. The definition no longer includes reference to affordable housing, which is now addressed under the Plan's growth management policies, and explicitly states that public service facilities are not infrastructure. The new definition in the proposed Growth Plan provides greater clarity on what should be considered Community Services and Facilities under the City's

planning policies. Generally, City Planning's CS&F practices are consistent with the new definition.

Building Complete Communities - Recommendations for Improvements

Linking Public Service Facilities with Infrastructure to Support Growth

Public services facilities and the programs provided within them are a vital part of a system of social infrastructure that makes communities and neighbourhoods livable. The location of public services facilities such as schools, recreation centres, libraries and other services can be a determining factor in where people choose to live. As such, locally-delivered public service facilities are as important as hard services like sewers, water, roads and transit. Additional context should be added to recognize the role public service facilities play in structuring where and how people live. Among other matters, consideration should be given to including Public Service Facilities in the section heading for the Plan's infrastructure policies to provide consistency with the PPS 2014.

Recommendation 2.c) of the report.

Aligning Provincial Strategic Growth Areas with Municipal Official Plans

If the goal of introducing the concept of “strategic growth areas” in Policy 2.2.2.5. of the Growth Plan, (that include urban growth centres, major transit stations, higher order transit corridors and mobility hubs, among others), is to raise the acknowledgement of the municipality's role through its Official Plan in specifically identifying the appropriate level and scale of development within areas of intensification, then related Growth Plan policies should reinforce this goal. For instance, municipalities should be allowed to identify which major transit stations should be planned for higher densities instead of taking a one size fits all approach currently adopted by the proposed Growth Plan.

Consulting Municipalities in Setting Regional Priority Transit Corridors

The Growth Plan defines “priority transit corridors” as “emerging higher order transit corridors” identified as a focus for planning and intensification. (Priority transit corridors are shown in Schedule 5 of the Growth Plan). Policy 2.2.4.1 of the Plan then provides that priority transit corridors be delineated in official plans. However, Policy 2.2.4.10 states that the Province may identify additional priority transit corridors or mobility hubs and planning requirements for priority transit corridors or mobility hubs, to support the optimization of transit investments across the GGH. Based on a review of the above policies it is staff's position that if the Province wishes to identify additional priority corridors then municipalities should be consulted to not have these corridors imposed upon them without consideration of existing local municipal transportation infrastructure decisions and deliberations. It is recommended that the policy be amended to permit the Province to identify and delineate priority transit corridors or mobility hubs only in consultation with municipalities. **Recommendations 2.d) i) and 2.d) iii) of the report.**

Adjusting Density Targets for Major Transit Station Areas to Fit With Local Context

A number of new policies have been introduced related to transit corridors and station areas in the proposed Growth Plan. Specifically, the Plan provides that better use of land and infrastructure can be made by directing growth to settlement areas and prioritizing intensification in built-up areas, with a focus on strategic growth areas, including urban growth centres and major transit station areas. Further, the proposed Plan recognizes transit as a first priority for major transportation investments. It sets out a regional vision for transit, and seeks to align transit with growth by directing growth to major transit station areas and other strategic growth areas.

To assist in achieving the transit goals of the Plan, the definition of "Major Transit Station Area" has been changed to include stops in addition to stations. The definition of a major transit station area states that it is the area including and around any existing or planned "Higher Order Transit" station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as areas within an approximate 500m radius of the given transit station, representing about a 10-minute walk. Higher order transit is also now defined as transit that generally operates in its own dedicated right-of-way, outside of mixed traffic, achieving a frequency of service greater than mixed-traffic transit. Higher order transit can include heavy rail (such as subways and inter-city rail), light rail, and buses in dedicated rights-of-way.

Based upon the revised definitions and policies, new targets regarding major transit station areas have been established. The new policies establish specific minimum density targets for major transit station areas, as delineated by municipalities, which are scaled to reflect the type of transit. Policy 2.2.4.5 of the proposed Growth Plan provides that major transit station areas will be planned to achieve, by 2041 or earlier, a minimum gross density target of: 200 residents and jobs combined per hectare for those that are served by subways; 160 residents and jobs combined per hectare for those that are served by light rail transit or bus rapid transit; or 150 residents and jobs combined per hectare for those that are served by express rail service on the GO Transit network. It is not clear what these minimum density targets are based on. It is recommended that the Minister of Municipal Affairs provide clarification as to the origin of these targets.

Recommendation 4. of the report.

There are many issues with the application of blanket density targets solely based on the type of transit infrastructure. This approach does not take into consideration that certain areas may not be appropriate for intensification, even though there may be a subway station within it (e.g. Rosedale Station). There should be a provision in Policy 2.2.4.5 of the Growth Plan that states that these targets need to be considered in relation to the underlying land use designations within official plans, and as mentioned above, municipalities should be allowed to identify which major transit stations, have or will be planned for higher densities.

Based upon the interpretation of the definitions provided above and the new direction set by the Province, City staff have concerns about the changes to the intensification and density targets as the density target would be applicable to all existing or future stations. The City of Toronto has numerous major transit stations and higher order transit stations or stops each with surrounding varying densities. The policy as currently written paints all stations with one brush and does not recognize that each existing station has own unique characteristics and historical context and that some of the subway stations are surrounded by low density land uses in stable neighbourhoods.

The same levels of intensification are not appropriate for all major transit and higher order transit stops. Municipalities should be given the option to select and identify which major transit stations would be subject to the new density and intensification targets. Without this proposed revision, intensification may be forced onto stable communities and around transit stations where high levels of growth are not appropriate. The City recommends that the wording of Policy 2.2.4.5 be amended to provide discretion as to where this level of density is appropriate, and to amend the definition of major transit station area so that the policy is more sensitive to the existing character within the delineated 500m radius of a transit station. **Recommendation 2.d) ii) of the report.**

The proposed Growth Plan's minimum gross density targets for major transit station areas, Policy 2.2.4.6, are excluded for lands within "Prime Employment Areas". However, they do include lands designated as "employment areas". Setting targets which include number of residents and jobs is not appropriate for these areas. By contemplating these types of density targets for employment areas that are not identified as prime employment areas, the non-prime employment areas benefit less from the policy protection afforded prime employment areas as the targets would now implicitly direct residential intensification towards "Employment Areas". Policy 2.2.4.6 should be revised to include all "employment areas" (and not just "prime employment areas") as not being subject to Policy 2.2.4.5, if the minimum density targets, as currently described in Policy 2.2.4.5, remain. **Recommendation 2.e) of the report.**

Setting and Monitoring Appropriate Modal Share Targets

While the City is supportive of Policy 3.2.2.2 c) which provides that "the transportation system within the proposed Growth Plan will be planned and managed to be sustainable and reduce greenhouse gas emissions by encouraging the most financially and environmentally appropriate mode for trip-making", it is staff's experience that determining the most financially mode is a difficult measure to achieve. While the most environmental appropriate mode may be ascertainable, the most financially appropriate mode is difficult to define and delineate. It is recommended that if municipalities are required to apply both tests, then the Province provide guidance and indicators to accompany this policy.

Similarly, Policy 3.2.2.4 b) requires municipalities to develop and implement transportation demand management policies in official plans or other planning documents or programs to increase the modal share of alternatives to the automobile, which may include setting modal share targets. It is staff's opinion that it is not only difficult to set

accurate modal targets but that they are hard to measure and monitor. It is recommended that if municipalities are required to comply with this policy, assistance and guidance will be needed from the Province. **Recommendation 9. of the report.**

Prohibiting Offices in Prime Employment Areas - Official Plan Conformity Issue

The Growth Plan introduces two types of employment areas - “Prime Employment Areas” and “Employment Areas”. Prime employment areas are areas of employment that are designated in an official plan and protected over the long-term for uses that are land extensive or have low employment densities and require these locations, including manufacturing, warehousing and logistics, and appropriate associated uses and ancillary facilities. Prime employment areas do not permit offices, whereas employment areas do. The City's “Economic Health and Employment Lands” official plan policies (OPA 231) were approved by the Province in July of 2014. These policies generally conform with the Growth Plan, with the exception of one important distinction – the prohibition of office use in “prime employment areas”. This prohibition is of concern for the City as the City's Official Plan permits office use in all employment areas of the City. Prohibition in the proposed Growth Plan of office uses in the City's “Core Employment Areas” would bring the City's Official Plan employment policies into non-conformity with the Growth Plan. **Recommendation 2.f) of the report.**

Permitting Office Parks in All Employment Areas to Ensure Their Economic Viability

The Growth Plan defines “Office Parks” as employment areas with significant concentrations of offices with high employment densities. In keeping with the City's employment policies of allowing office uses in all employment type areas – the definition should be expanded to define office parks as a use within employment and prime employment areas, wherein residential uses and other sensitive land uses are prohibited in those office parks located within "prime employment areas" and residential uses are prohibited and other sensitive land uses limited in office parks located within "employment areas". **Recommendation 2.g) of the report.**

Requiring Major Office Space in Mixed-Use Developments

The definition of "major office" in the Growth Plan includes the word “free-standing”. This is problematic because the City has approved successful mixed use developments with significant office developments. The free-standing criteria unnecessarily limits major offices to single use buildings. For example, the City's Maple Leaf Square development has over 18,000 square meters of office, but is not free standing and would not qualify as a major office building. **Recommendation 2.h) of the report.**

The City needs to be able to ensure that office space approved as part of a mixed use development is constructed, including office space that is replaced through the "no net loss" policy of OPA 231. This is a key element for transit-supportive employment growth in a mixed use environment, especially in the Downtown and in the Urban Growth Centres. The City has previously requested the Province to issue a regulation for zoning with conditions prescribing the provision of employment space as a condition for the

construction of housing in certain locations. This request is being reiterated as part of this report. **Recommendation 7. of the report.**

Prohibiting Places of Worship in Employment Areas

Between 2002 and 2012 the number of places of worship in the City's "Employment Areas" increased from 216 to 414. These places of worship are found throughout the Employment Areas, and not just on major roads or the periphery. Almost three-quarters of the places of worship are located on lands proposed to be designated as Core Employment Areas ("prime employment areas" in the proposed Growth Plan), where most of the City's industry is located.

Places of worship should not be permitted in "Employment Areas" for the following reasons:

- The City's finite supply of employment lands should be preserved for employment uses;
- Places of worship may affect the operations of existing and future industry in "employment areas" through complaints under the *Environmental Protection Act* or impacts upon the environmental certificates industries operate under;
- Their inclusion may affect the City's ability to protect employment lands from residential and other conversions outside of a Municipal Comprehensive Review (MCR);
- Their inclusion may affect the City's power to limit appeals to the OMB of Council decisions not to approve the re-designation of lands to non-employment uses; and
- The City's Official Plan permits places of worship in all other official plan designations where development is permitted, offering a broad array of alternative opportunities.

While it is acknowledged that the Growth Plan definition of "Sensitive Land Uses" is consistent with the 2014 PPS, the proposed Growth Plan definition should have the example of places of worship added to it.

The City would also benefit from the prohibition of this "sensitive use" in both its prime or "core" employment and its "employment" areas. **Recommendation 2.i) of the report.**

Strengthening Complete Communities Through High Quality Built Form and Vibrant Public Realm

Under the heading of "Managing Growth" policies have been introduced in the Growth Plan that strive to support the achievement of complete communities that have high quality built form and publicly-accessible and open spaces and parks that are safe and accessible with site design standards that create an attractive and vibrant public realm Policy 2.2.1.3 g). In addition "Public Realm" is defined in the proposed Growth Plan as "All spaces to which the public has unrestricted access, such as streets, parks and sidewalks."

While Staff are supportive of these policies, it is recommended that policies related to the public realm be expanded given that urban design has become an important consideration in land-use planning, and especially in the planning of compact and densified communities. This is evidenced by the fact that recent changes to the *Planning Act* (introduced by Bill 73) have recognized as a provincial interest, the promotion of built form that is well-designed, encourages a sense of place and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant. The proposed Growth Plan now places a greater emphasis on minimizing land consumption through compact built form and building more compact and complete communities but staff note that there are specific areas where the new policy direction regarding compact built form can be further strengthened and better aligned with the *Planning Act*. As built-up areas intensify, the presence and design of a high quality public realm and well-designed spaces, including space between taller buildings, has become increasingly important to sustain a high quality of life.

Encouraging Urban Design Considerations in the Creation of Compact Built Form

The proposed Growth Plan includes important terminology which supports urban design goals and objectives, including but not limited to: complete communities, compact built form, public realm, quality of life, human health, green infrastructure, low impact development, active transportation, high quality built form, high quality urban form and public open space, well-designed, high quality public open space, publicly-accessible open space, appropriate type and scale of development, appropriate transition, pedestrian friendly environments and walkable neighbourhoods. However, further use and explanation of such design-related terminology is encouraged throughout the Plan. Additional terms, such as pedestrian/human comfort and amenity, sunlight access, high quality landscapes, should also be incorporated into the narrative.

It should also be noted that over-intensification of developments with multiple towers and no open space or adequate separation between buildings compromises the notion of complete and liveable vertical communities and is a concern in Downtown Toronto. The projects, while ‘efficient’, pose serious cumulative quality of life concerns by providing inadequate open spaces, sunlight and privacy thereby jeopardizing the viability for further intensification to be able to provide a good quality of life. Greater intensity should continue to be paired with liveable patterns of development.

To provide for a better link between compact built form and the pressure that this type of built form places not only on the supply and quality of the unbuilt environment (i.e. the public realm and the spaces between buildings) but also on its ability to support the overall quality of life, staff recommend that:

- i. policies or a vision be introduced that underscore the important role urban design plays in the creation of compact complete communities through encouraging a sense of place, by promoting well-designed built form, streetscape and cultural planning, providing adequately sized open spaces to support intensification, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes. **Recommendation 2.j) of the report;**

- ii. policies or a vision be introduced that underscore the importance of livable conditions of intensification, necessary to continue to attract and support people and result in livable patterns of development: adequate sunlight, open space and adequate separation distances between buildings. **Recommendation 2.k) of the report;**
- iii. the definition of "Public Realm" be revised to include all spaces to which the public has unrestricted access, such as streets, parks, *public squares, sidewalks, and other elements of the public streetscape network that encourages both mobility and social interaction.* **Recommendation 2.l) of the report;**
- iv. the definition of "Compact Built Form" be revised to include a land use pattern that encourages the efficient use of land and walkable neighbourhoods *with well-designed streets, parks, walkways and publicly-accessible open spaces having access to sunlight to support healthy vegetation and human comfort.* **Recommendation 2.m) of the report;**
- v. the definition of "Complete Communities" be further revised to include the statement that *complete communities are to be well-designed to encourage the use of active transportation and support overall quality of life, human health and climate change mitigation.* **Recommendation 2.a) of the report;**
- vi. the wording of Policy 2.2.4.5 c) be revised to provide direction that urban form supports the quality of life for people of all ages and abilities. **Recommendation 2.n) of the report;**
- vii. the wording of Policy 2.2.1.3 g) be amended to include terminology that has not been included in the concept of what creates complete communities, namely high quality built form, *landscapes* and publicly-accessible open spaces that are safe and accessible with site design standards that create an attractive, *comfortable* and vibrant public realm. **Recommendation 2.o) of the report;** and
- viii. "high quality built form" become a defined term that recognizes that urban built form is not solely about the aesthetics of places but that built form allows for better interactions between people and between people and their surroundings and where the *scale and pattern of buildings, streets, parks and open space is compact, integrated, contextually appropriate and well-designed to support active transportation, pedestrian safety, comfort and amenity, promote human and environmental health and sustain a high quality of life.* **Recommendation 2.p) of the report.**

Protecting Natural Heritage and Water - Key Messages & Proposed Changes

Requiring Watershed Planning

The four plans have common objectives to protect, maintain and improve natural heritage features and water quality and quantity. Natural heritage systems are made up of natural features and areas (e.g., wetlands and woodlands) and the lands linking them. For example, the in-force Greenbelt Plan and Oak Ridges Moraine Conservation Plan restrict development in and near key natural areas such as lakes, streams, wetlands and significant woodlands. In existing settlement areas, the protections in the PPS 2014 for natural heritage systems apply.

The revised Plans provide a stronger policy linkage between the Growth Plan and the Greenbelt Plan to recognize the inter-relationship between growth management and protecting natural heritage resources. Watersheds are the area of land drained by a particular river. By requiring watershed planning across the Greater Golden Horseshoe, the Growth Plan and Greenbelt Plan will be aligned with the Oak Ridges Moraine Conservation Plan. Watershed planning identifies water resource systems and informs planning for water and wastewater servicing and storm water management. This ensures that as communities grow, water quality and quantity is protected, improved or restored. Proposed policies in the plans will encourage municipalities to develop ways to re-use soil excavated from developments (i.e. “fill”) and include sustainable soil management practices in planning approvals. The goal is to sustainably manage excess soil produced by infrastructure and other development projects.

Protecting Natural Heritage and Water - Impact of Proposed Changes

Mitigating Development Impacts Through Stormwater Master Plans and Watershed Planning

Policy 3.2.7 relating to stormwater management in the proposed Growth Plan will ensure that upstream natural heritage and hydrologic features are better protected and more resilient. This will benefit the City and other downstream municipalities and assist in mitigating the potential impacts of further intensification encouraged by the Growth Plan, which will have significant implications for natural systems over time. The City strongly supports the proposed policies which address cumulative impacts and protect upstream natural and hydrologic systems.

Development in watersheds results in cumulative negative impacts to quality and quantity of water in the watercourses and impacts natural features. These cumulative impacts can result in significant financial and environmental impacts to downstream municipalities such as the City of Toronto. The cumulative financial and environmental impacts is anticipated to be exacerbated by climate change. The Growth Plans policies should be further strengthened to allow for stronger storm water controls in new development areas and better preservation of downstream natural systems.

Under the proposed changes to the Growth Plan, future expansions to Toronto's water and wastewater systems will require a comprehensive water or wastewater master plan, or equivalent, informed by watershed planning. The Wet Weather Flow Master Plan puts the City of Toronto in good shape for addressing the new policy. The City is already assessing the impact of extreme weather events and incorporating Low Impact Development and green infrastructure. The policy will help build support for strengthening and expanding these initiatives and perhaps incorporating them into an update of the Wet Weather Flow Master Plan. However, the way the new stormwater management policy is written suggests that it is oriented more towards inland settlement areas, making it less clear as to how it would apply to municipalities on Lake Ontario, and especially municipalities with a relatively mature, stable water and wastewater system such as Toronto.

Also of note is the requirement for “full life cycle costs of the system”, the definition for which is not provided in the proposed Growth Plan. Additional information would be required to determine what “full life cycle costs” would entail to understand how they could affect the City's infrastructure planning activities.

Recognizing the Relationship Between the Built Environment and Biodiversity

Chapter 4 *Protecting What is Valuable* recognizes the importance of biodiversity in relation to natural and hydrologic features and areas but does not recognize the relationship between biodiversity, particularly migratory species, and the built environment. Each year millions of migratory birds are killed as a result of collisions with buildings. Within the City of Toronto, of the 158 different species known to have been killed in Toronto by collisions with buildings, 64 are in decline. One of the key ways to reduce migratory bird deaths is to reduce light pollution, which also results in energy savings, lower building operating costs and reduced greenhouse gas emissions. Light pollution also has adverse effects on humans and other species. Toronto has developed Bird Friendly Development Guidelines to reduce the impact of the built environment on migratory birds and is developing a light pollution policy to reduce the environmental impact of excessive light.

Protecting Natural Heritage & Water - Recommendations for Improvements

Stormwater Management

In order to assist the City and other municipalities in understanding the impact of the proposed changes on planning, designing, constructing and expanding water and wastewater systems, the Province should provide additional information with regard to what watershed planning entails for municipalities situated on Lake Ontario and how "full life cycle costs of the system" will be defined.

In order to ensure that future development in upstream municipalities does not make flooding and water quality worse in downstream municipalities, the definition of *watershed planning* in the Growth Plan should explicitly include consideration of downstream impacts to water quality and quantity. Staff recommend revising the

definition of *watershed planning* in the Growth Plan to explicitly include the consideration of downstream impacts to water quality and quantity as part of watershed planning in order to ensure that development in upstream municipalities does not worsen flooding and water quality in downstream municipalities. **Recommendations 2.q i) and 2.q ii) of the report.**

Biodiversity

The Growth Plan should be revised to add a section on biodiversity and include policies to encourage municipalities to consider urban biodiversity in their decision making and develop official plan policies and strategies to address the impacts of the built environment on wildlife, such as migratory birds. **Recommendation 2.r) of the report.**

Growing the Greenbelt - Key Messages and Proposed Changes

The Greenbelt Plan permanently protects important natural heritage and agricultural areas from urban sprawl. It also supports a wide range of economic, recreational and cultural opportunities. If approved, the proposed changes to the Greenbelt Plan would add 21 major river valleys and 7 associated coastal wetlands to the Greenbelt Plan's "Urban River Valley" (URV) designation. Under the proposed changes to the Greenbelt Plan, municipal support would not be required to add new lands to the Greenbelt. The regulated URV area would include all land within 60m of the water's edge on either side of the tributary however, the URV policies would apply only to publicly owned lands in these areas (existing land use permissions on privately owned lands in URV areas would not change).

Under the URV policies, existing Official Plan policies would continue to apply provided they have regard to the objectives of the Greenbelt Plan. No additional protection would be provided. Within the City of Toronto, four tributaries are proposed to be designated as URVs: Etobicoke Creek, Humber River (lower Humber, main branch and west branch), Don River (lower Don River, east branch and west branch) and Morningside Creek. Proposed policies in the Greenbelt Plan also support the future addition of other publicly owned lands to the URV designation through municipally initiated amendments.

The proposed policies support a provincially led process to identify additional areas of ecological significance and important water features where urbanization should not occur. This work will build on the Greenbelt Plan by considering connections to the agricultural, natural heritage and water resource systems.

The Province is also looking at the possible expansion of the Greenbelt outside of the Greater Toronto and Hamilton Area where important water resources are under pressure from urban growth.

Growing the Greenbelt - Impact of Proposed Changes

Toronto City Planning has previously commented on the implications of designating URV's as part of the Greenbelt.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2014.PG34.24>

Designating Urban River Valleys in the Greenbelt Plan

The City of Toronto has long supported the goal of protecting urban river valleys. The City also strongly supports the approach taken in the 2005 Greenbelt Plan which identifies "river valley connections" (river valleys that connect the Greenbelt to Lake Ontario and other inland lakes) as contiguous features and provides policies to support these connections on both public and private lands. It is not clear how the URV designation proposed in the Greenbelt Plan further protects these river valleys. River valleys in Toronto are already well protected through the City's Official Plan policies, land use designations, the Ravine and Natural Feature Protection By-law and the TRCA's Regulation. The proposed Greenbelt Plan URV policies will add another layer of regulation without adding any additional protection.

Excluding Private Property From Urban River Valley Greenbelt Plan Policies

The URV designation could be potentially problematic by creating a hierarchy, whereby public lands adjacent to the river are considered to have greater ecological value than private lands or river valleys that connect to the Greenbelt are considered to have more ecological value than those that do not. Conversely, in some areas, such as the lower Humber River Marshes where the URV mapping includes dozens of private properties and extends above the top of bank, there may be an expectation that these private properties should be subject to a higher level of protection when in fact they are not subject to the URV policies.

Both the Greenbelt Plan and Provincial Policy Statement (PPS) advocate a systems approach which aims to protect and manage natural heritage and hydrologic features as part of a larger connected system rather than isolated islands of green. The URV policies only apply to public lands, a portion of the valley feature (e.g., 60 m on either side of the tributary) and some river valleys (e.g., those that connect to the Greenbelt). As a result, the policies leave out significant sections of Toronto river valleys and do not recognize Highland Creek or other smaller tributaries to the Don and Humber Rivers. Greenbelt Plan policies which discourage active recreation and infrastructure corridors in natural features are also at odds with the reality that Toronto's urban river valleys include major recreation uses and infrastructure corridors within the proposed URV corridor.

Understanding Future Impacts of the Urban Valley Corridor Greenbelt Plan Designation

The location of the URV corridor over the long term is also potentially problematic. Under the proposed policy, all land within 60 metres of the water's edge on either side of the tributary would be designated as URV. The location of this corridor will be fixed the day the legislation is adopted; however, rivers/creeks will continue to meander and may be subject to major lateral movements due to extreme rainfall events, or may be

deliberately relocated in order to protect infrastructure or undertake restoration. For example, the proposed URV (Sheet 23 of 50) maps the mouth of the Don River as it appears today; however plans to improve this connection with Lake Ontario will result in the relocation of the river channel in the future. It is not clear how the proposed designation intends to account for these movements.

The Don and Humber Rivers and Etobicoke and Morningside Creek watersheds are highly urbanized and valley lands contain important City infrastructure such as gravity based storm and waste water collection systems and storm water management structures and recreational facilities. This is particularly true for the segment of Morningside Creek tributary (above Morningview Trail) which has been engineered for storm water management. Once lands in these urban river valleys are included in the Greenbelt they can never be removed (except by Provincial Order-in-Council). This has the effect of transferring control over the future of these lands from the City to the Province as these lands will be subject to Greenbelt Plan policies going forward. If future amendments to the Greenbelt Plan put restrictions on what municipalities can do within the URV corridor this could have implications for City water and recreational infrastructure planning, expansion, operations and maintenance which cannot be foreseen at this point in time.

With respect to Policy 6.2.3 of the proposed Greenbelt Plan whereby “All existing, expanded or new infrastructure which is subject to and approved under the *Environmental Assessment Act*, or which receives similar approval is permitted provided it supports the needs of adjacent settlement areas...” - most City subsurface infrastructure in valley lands (e.g., sanitary and storm sewers) are existing, will be subjected mainly to operations and maintenance activities for the foreseeable future and have an approval under the Environmental Compliance Approval (formerly the Certificate of Approval) under the *Ontario Water Resources Act*; watermains in valley lands are subject to an MOECC approval via a Drinking Water License and Permit system under the *Safe Drinking Water Act*. It is not clear if an approval under the *Ontario Water Resources Act* is equivalent to "similar approval" under Policy 3 of Section 6.2 of the proposed Greenbelt Plan. If this is not the case, it may create a significant immediate regulatory burden on both municipalities and on the MOECC, depending on time frames associated with coming into conformity with the Greenbelt Plan.

With respect to Policy 3, Section 6.2, of the proposed Greenbelt Plan, clarification is also needed as to whether watercourses are: recognized as a natural system; included in the definition of infrastructure; or a hybrid of both infrastructure and a natural system. If recognized as a natural system, from a fish habitat management perspective, the municipality, in undertaking works in the channel, is required to get a permit to protect fish habitat from one or more of the following agencies: Federal Department of Fisheries and Oceans, Ontario Ministry of Natural Resources; the local Conservation Authority. Conversely, straightened channels held in that form by a concrete liner or a gabion basket structure, together with armourstone structures (built to prevent valley wall erosion within a channel or its riparian zone) are considered to be watercourse infrastructure.

The City has previously reviewed the implications of identifying lands for URV designation in Toronto river valleys and determined that it would involve substantial time and effort without providing any additional policy protection. City Council recently adopted an Official Plan amendment (OPA 346) to recognize Etobicoke Creek and the Humber and Don Rivers as Greenbelt River Valley Connections (RVC's). The amendment recognizes the important ecological and hydrological functions and park and trail connections provided by RVC's. This approach recognizes the entire river valley connection and is consistent with the 'systems approach' advocated by the 2005 Greenbelt Plan and the PPS which aims to protect and manage the natural heritage system as a connected and integrated natural heritage system.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.PG13.4>

Growing the Greenbelt - Recommendations for Improvements

The Province should use a systems approach to recognize and protect urban river valleys that is consistent with the approach advocated by both the Greenbelt Plan 2005 and the PPS 2014 and which recognize the connectivity of natural systems and apply to both public and private lands **Recommendation 3.a)** by:

- i) continuing to recognize 'river valley connections' as contiguous features as they are currently recognized in the 2005 Greenbelt Plan Schedules and policies **Recommendation 3.b) of the report;**
- ii) adding a new policy to Section 3.2.6 "External Connections" to the proposed Greenbelt Plan to require municipalities to identify river valley connections in their Official Plans and to work together with the Province, Conservation Authorities, private landowners, First Nations, and other institutions and organizations to recognize the important functions river valley connections provide through public information, awareness and stewardship programs and partnerships **Recommendation 3.c) of the report;** and
- iii) adding a new section on Urban River Valleys to Policy 4.2 to the proposed Growth Plan and including policies to require municipalities within settlement areas to protect, restore and enhance all urban river valleys (not just those that connect to the Greenbelt) and to minimize the adverse impact of activities and land use change on lands adjacent to urban river valleys. **Recommendation 2.s) of the report.**

Addressing Climate Change - Key Messages & Proposed Changes

Since most of Ontario's greenhouse gas emissions originate in the transportation, industrial and building sectors, the impact of the four Provincial Plans' policies on these activities has implications for the province's climate change goals. Ontario's Climate Change Strategy identifies improved transportation and land use planning initiatives as key to reducing greenhouse gas emissions. The strategy helps Ontario move towards

“net-zero communities”. These communities use low-carbon or carbon-free sources of energy and offset the release of any greenhouse gas emissions they produce.

The four Plans’ policies support reducing greenhouse gas emissions to address the impacts of climate change. The plans work together to curb urban sprawl and create healthy, walkable, higher-density communities that support transit and have more green space. Since these compact, complete communities are more energy efficient, they also produce fewer greenhouse gas emissions.

The proposed revisions to the plans would require all municipalities in the Greater Golden Horseshoe to incorporate climate change policies in their official plans. These policies would help reduce greenhouse gas emissions and address climate change adaptation goals. Municipalities in the Greater Golden Horseshoe would also be encouraged to inventory greenhouse gas emissions and develop targets to reduce them.

Under proposed new policies in the Growth Plan, Greenbelt Plan (and Oak Ridges Moraine Conservation Plan), municipalities would be required to develop plans for managing stormwater in their settlement areas. These plans would incorporate low-impact development techniques (which manage rainfall at the source) and green infrastructure. Proposals for major developments (e.g., plans of subdivision, settlement area expansions, and secondary plans) would have to be supported by plans for stormwater management. Municipalities would also be required to examine their infrastructure for weaknesses and identify priority actions to increase their resilience and decrease the risks associated with extreme weather events.

Other proposed changes to the plans would also make an important contribution to Ontario’s Climate Change Strategy. These include increased intensification targets, higher density targets for greenfield developments, and enhanced policies that support transit in the Growth Plan. In addition to using less land for growth, the Plan policies are intended to make transit use a sustainable and preferred choice. The enhanced policies pertaining to agriculture and natural heritage (e.g., wetlands and woodlands) would further protect and restore ecosystem services and green infrastructure, helping to mitigate and adapt to the effects of climate change.

In summary, the proposed changes are intended to:

- Require municipalities to incorporate climate change policies in their official plans, consistent with the objectives of the province’s Climate Change Strategy and greenhouse gas reduction targets;
- Encourage municipalities to develop greenhouse gas inventories, emission reduction strategies, and related targets and performance measures;
- Require municipalities to undertake more comprehensive stormwater management planning for their settlement areas and for major developments and to examine their infrastructure for weaknesses associated with climate change;

- Encourage the use of green infrastructure and require low-impact development techniques that include integrating green space in design strategies, landscaping with native plants, and using natural water systems to generate less runoff from developed land; and
- Enhance policies to align with those in the PPS 2014 regarding planning for resilient infrastructure.

Addressing Climate Change - Impact of Proposed Changes

The City supports requiring municipalities to develop policies in their official plans to identify actions that will reduce greenhouse gas emission and address climate change. The City recently revised its environmental policies in the Official Plan (OPA 262) to address climate change and resiliency including requirements that new studies for secondary plans and regeneration areas identify opportunities for green infrastructure and energy conservation and resilience to power disruptions. The Toronto Green Standard (TGS), in place since 2010, requires new development to meet sustainable performance measures to address climate change mitigation (energy efficiency) and adaptation (managing stormwater.)

Addressing Climate Change - Recommendations for Improvements

Municipal approaches to understanding climate change mitigation and adaptation vary and it is important that the Province develop technical guidelines to provide a consistent methodology and reporting structure to measure greenhouse gas emissions and a consistent format for climate change vulnerability risk assessments. This will assist with implementation of proposed Growth Plan policies on climate change (Policy 4.2.10) and integrated planning (Policy 3.2.1). **Recommendation 5 of the report.**

Policy 4.2.10 in dealing with climate change in the proposed Growth Plan refers to strategies to reduce greenhouse gas emissions and address impacts of climate change, but does not include strategies for green infrastructure or low impact development. Growth Plan Policy 4.2.10.2 a) should be revised to encourage municipalities to also develop strategies to improve resilience to climate change through green infrastructure and low impact development. **Recommendation 2.t) of the report.**

Integrating Infrastructure - Key Messages & Proposed Changes

The Growth Plan, the Greenbelt Plan (and the Oak Ridges Moraine Conservation Plan) all have policies that promote a coordinated approach to infrastructure and land use planning. The population and employment forecasts of the Growth Plan are used by municipalities to inform their official plan policies around matters related to transportation, water, wastewater, stormwater management and other infrastructure. The proposed changes to the Plans are intended to ensure a more integrated approach to land use and infrastructure planning.

All major planned and existing transportation corridors (e.g., highways and railroads), intermodal hubs (where goods are moved from one type of transport to another) and major ports are identified in an updated Schedule 6 of the proposed Growth Plan (“Moving Goods”). All major planned and existing transit corridors are shown in an updated Schedule 5 (“Moving People”). The proposed Growth Plan directs municipalities to ensure that these corridors are protected to meet current and projected needs in accordance with transportation and infrastructure corridor policies in the PPS. Municipalities are required to map planned, conceptual, and existing transportation corridors, as well as major ports and intermodal hubs and the higher order transit network including priority transit corridors. Additionally, and to ensure efficient and quick movement of goods and a stronger manufacturing economy, municipalities are required to use provincially established freight-supportive planning practices.

New policies in the Growth Plan also protect existing and planned infrastructure corridors from being impacted by conflicting adjacent land uses policies and encourage the placement of linear infrastructure (e.g., roads, pipes, and electricity transmission wires) all together in the same areas or corridors, where appropriate.

Enhanced density and intensification requirements, particularly around major transit station areas, are intended to ensure "value for money and provide residents with transportation options". Requiring plans for managing stormwater before permitting major development are also intended to help to better align land use with infrastructure planning. Finally, encouraging public services to locate together in existing public buildings are intended to help establish community hubs that integrate services while reducing the cost of constructing new facilities.

The Province suggests that in making the changes described above, Provincial initiatives will be better linked including the “The Big Move” Plan, the implementation of regional express rail service across the region and the ongoing development of the Greater Golden Horseshoe Transportation Plan.

Integrating Infrastructure - Impact of Proposed Changes

Staff would like to advise Council that mapping or “delineating” priority transit corridors at a conceptual level, or identifying and protecting lands that may be needed for future enhancement or expansion of transit infrastructure in memos of understanding between the City and Metrolinx is appropriate, and something the City already undertakes. If this is the intent of the proposed Growth Plan policies, then staff support this approach. However if the intention is that municipalities move towards detailed fine grain mapping of all major planned and existing transportation corridors (e.g., highways and railroads), intermodal hubs (where goods are moved from one type of transport to another) and major ports as identified in an updated Schedule 6 of the proposed Growth Plan (“Moving Goods”) and all major planned and existing transit corridors are shown in an updated Schedule 5 (“Moving People”) and a detailed pre-determination of what adjacent lands would be in need of official plan protection around these corridors, then this intention would not represent good planning in terms of the appropriateness of pre-

identifying or pre-designating all such corridors and the adjacent affected lands, in an official plan.

There are too many competing land use planning documents and guidelines, current and emerging, that aren't necessarily aligned right now with regard to integrating land use planning and transit planning at the municipal level, to make detailed mapping a useful land use planning exercise. For example, the Mobility Hub Guidelines have no statutory authority. They are intended to be a tool to explain the mobility hub vision and provide direction on how to move toward its successful implementation. The guidelines do not supersede municipal plans, including official plans, and are not to be interpreted as prevailing over municipal official plans. Where there is a conflict between the Growth Plan for the Greater Golden Horseshoe and the guidelines, the Plan prevails. In practice, The Big Move broadly defines the geographic scope of a mobility hub to be an area within a 10 minute walk or within an 800 metre radius around identified regional rapid transit stations. What isn't clear is which "major transit station areas" defined in the proposed Growth Plan form part of mobility hubs and why major transit station areas in the proposed Growth Plan are defined as the areas within an approximate 500 metre radius of a transit station, representing about a 10 minute walk.

Integrating Infrastructure - Recommendations for Improvements

If it is the Province's intention that municipalities move towards detailed mapping of all major planned and existing transportation corridors, intermodal hubs and major ports as identified in the updated Schedule 6 ("Moving Goods") and all major planned and existing transit corridors shown in an updated Schedule 5 ("Moving People") of the proposed Growth Plan and a detailed pre-determination of which adjacent lands require official plan protection around these corridors, the City will not be supportive of this direction as it is not appropriate within the context of the role of an official plan.

Recommendation 6. of the report.

The Province should be encouraged to work towards aligning the "Big Move" and the "Provincial Mobility Hub Guidelines" with the proposed Growth Plan's "Major Transit Station Areas" and other transit related policies, in order to achieve clarity re the application of transit policies for the GTA region. **Recommendation 8. of the report.**

Many matters related to implementing and monitoring the implementation of an enhanced integrated approach to land use and infrastructure planning require additional resources at the municipal level. Municipalities would benefit from more Provincial support in this regard than the current "Places to Grow Implementation Fund" provides. Staff encourage Council to request the Minister of Municipal Affairs to "advance growth planning and support the development of complete communities in Ontario" by providing for more substantial and ongoing levels of funding for municipalities to accelerate the achievement of this Provincial goal. **Recommendation 10. of the report.**

The Province should support municipalities' efforts to implement the Growth Plan and other Plans by sheltering official plan conformity amendments from appeals to the OMB,

expediting the appeal process in addition to providing funds and greater Provincial support for municipalities' defense.

City Council should request the Minister of Municipal Affairs to broaden the removal provisions in the recently amended *Planning Act* of the right to appeal not just population targets and boundaries but any official plan amendments specifically intended to bring municipal official plans into conformity with provincial policy and plans, for which the Province has issued a decision of approval. **Recommendation 12. of the report.**

Measuring Performance, Promoting Awareness and Increasing Engagement - Key Messages & Proposed Changes

The Growth Plan, Greenbelt Plan, (and the Oak Ridges Moraine Conservation Plan) are implemented by local governments through the municipal planning process. Municipalities must amend their official plans to conform with these plans within specific, but differing timeframes. The province proposes to coordinate when these revised plans will come into effect. The deadline for municipalities to conform with the Growth Plan will be set to give municipalities, stakeholders and provincial ministries sufficient time to implement the range of changes proposed.

Generally, any decisions made on land use planning matters on or after the effective dates of revised plans will be subject to the revised policies. Decisions made before the effective date will have to conform with the existing plans.

Many of the proposed changes aim to make the policies in the Plans consistent and fully integrated with each other and the PPS 2014. To support the implementation of all of the proposed changes to the four plans, guidance materials will be produced for the following areas that impact Toronto:

- Standard methodology for land needs assessment;
- Mapping of a natural heritage system outside of the Greenbelt Area;
- Watershed planning and stormwater management; and
- Developing greenhouse gas inventories, targets and emission reduction strategies.

In summary the proposed changes are intended to:

- Align with other provincial initiatives which complement the land use planning framework in the region (e.g., Ontario's Great Lakes Strategy and source water protection plans);
- Clarify in the Growth Plan how municipalities allocate and plan to accommodate their forecasted growth to ensure opportunities for intensification, support for transit and the development of complete communities are maximized;

- Have municipalities revisit their existing targets. Revised policies will also require that any alternative target for a municipality be publicly requested by its council; and
- Require upper- and single-tier municipalities to measure and report on implementation.

To meet this goal, the province will work with stakeholders, municipalities, conservation authorities, First Nations and Métis communities, experts and the general public to monitor the implementation and progress of the plans. In addition, upper- and single-tier municipalities will have to report regularly on plan implementation. The Province will also now have the authority to obtain data directly from municipalities on implementation.

Measuring Performance, Promoting Awareness and Increasing Engagement - Impact of Proposed Changes

Staff are not supportive of an open-ended request for data that may or may not be exclusive to the performance indicators necessary for the Province to undertake its measurements. Experience with the “Ontario Municipal Benchmarking Initiative”, i.e. the rebranded “Municipal Benchmarking Network”, has demonstrated that there is considerable variation across municipalities as to information sources, policies, outcome measures and influencing factors necessitating that indicators be reported about taking into account the local context. The existing Provincial policy planning framework sets out specific areas of exclusive municipal responsibility in monitoring and reporting. For example, the proposed Growth Plan forecasts were amended to remove the earlier forecast years to enable each municipality to determine its own path and progress to achieving the forecasts. By way of another example the Province provided a technical background paper regarding “urban growth centres” but the Growth Plan explicitly left it to municipalities to determine their urban growth centre boundaries in their official plans. Lastly, staff experience has been that inconsistent measures and reporting out of context has at times unnecessarily complicated the defense of Municipal Comprehensive Reviews before the Ontario Municipal Board potentially compromising Provincial objectives in Plan implementation.

To be consistent with the essential requirement for local context in reporting Growth Plan measures of local performance, the Province should identify what types of data is to be collected; consult with municipalities; publish guidelines for reporting out on its established indicators and provide the appropriate level of funding needed to undertake the work at the municipal level, as previously outlined in the report.

Measuring Performance, Promoting Awareness and Increasing Engagement - Recommendations for Improvements

Staff advise Council that to be consistent with the essential requirement for local context in reporting proposed Growth Plan measures of local performance, the Province should

identify what types of data is to be collected; consult with municipalities; publish guidelines for reporting out on its established indicators and provide the appropriate level of funding needed to undertake the work at the municipal level. **Recommendation 11. of the report.**

CONCLUSION

The Province is proposing extensive amendments to the four Provincial Plans that form part of the Province's coordinated review of its Provincial Plans. The proposed Provincial Plans were posted on the Environmental Bill of Rights Registry with a commenting deadline date of October 31, 2016.

In response to the request for comments, City Planning staff led a detailed review of the proposed changes to the Provincial Plans and the impact those changes may have on the City's policies, practices and procedures. The review was undertaken in consultation with staff from Toronto Water, Environment and Energy, Public Health, Parks, Forestry and Recreation, Economic Development and Culture and the City Manager's Office.

The report gives an overview of the amendments for the two Plans that apply to Toronto; the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan and provides staff comments and recommendations for better aligning the proposed Plan amendments with the City's planning policies and implementation practices. (See Recommendations 1 to 13 of the report).

City Planning staff will continue to monitor the Province's Coordinated Provincial Plan consultation process and apprise Council of future outcomes.

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SIGNATURE

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