

Attachment 1: TRCA Draft Comments (ERO #019-0279)

Proposed Changes to the Provincial Policy Statement (PPS)

[ERO 019-0279](#)

Comment Period: July 22, 2019 – October 20, 2019

In the left column - Text proposed by the Province to be added is shown in [GREEN](#)

Text proposed by the Province to be removed is shown in ~~RED~~

In the right column - TRCA Detailed Comments (Draft)

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Section	Policy	TRCA Comments
Part I	Preamble (green text below has been relocated from section 4 Implementation and Interpretation to Preamble)	
	<u>Municipal official plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning. Official plans shall identify provincial interests and set out appropriate land use designations and policies.</u>	Clause 4.7 has been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the weight and intent of these policies has not been diminished by their relocation.
	<u>Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement.</u>	Clause 4.7 has been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the weight and intent of these policies has not been diminished by their relocation.
	<u>Zoning and development permit by-laws are also important for implementation of this Provincial Policy Statement. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and this Provincial Policy Statement.</u>	Clause 4.8 has been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the weight and intent of these policies has not been diminished by their relocation.
	Land use planning is only one of the tools for implementing provincial interests. A wide range of legislation, regulations, policies and programs may also <u>apply to decisions with respect to Planning Act applications and</u> affect planning matters, and assist in implementing these interests.	The Preamble should include the requirements for complete applications that demonstrate consistency with the PPS in order to achieve the Province’s goal to streamline and fast-track priority applications to increase the housing supply.
	<u>In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply. In addition to land use approvals under the Planning Act, infrastructure may also require approval under other legislation and regulations. An</u>	Clauses 4.10 and 4.11 have been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the

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	environmental assessment process may be applied to new infrastructure and modifications to existing infrastructure under applicable legislation.	weight and intent of these policies has not been diminished by their relocation.
	There may be circumstances where land use approvals under the Planning Act may be integrated with approvals under other legislation, for example, integrating the planning processes and approvals under the Environmental Assessment Act and the Planning Act, provided the intent and requirements of both Acts are met.	Clause 4.11 has been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the weight and intent of these policies has not been diminished by their relocation.
	Within the Great Lakes – St. Lawrence River Basin, there may be circumstances where planning authorities should consider agreements related to the protection or restoration of the Great Lakes – St. Lawrence River Basin. Examples of these agreements include Great Lakes agreements between Ontario and Canada, between Ontario and Quebec and the Great Lakes States of the United States of America, and between Canada and the United States of America.	Clause 4.13 has been moved from the Implementation and Interpretation policy section and placed in the Preamble. TRCA has no objection provided that the weight and intent of these policies has not been diminished by their relocation.
Part II	Legislative Authority	
	In respect of the exercise of any authority that affects a planning matter, section 3 of the Planning Act requires that decisions affecting planning matters “shall be consistent with” policy statements issued under the Act.	TRCA supports maintaining the “be consistent with” standard.
	Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government “shall be consistent with” this Provincial Policy Statement.	Clause 4.2 has been moved from the Implementation and Interpretation policy section and placed in Part II. TRCA has no objection provided that the weight and intent of the policy has not been diminished by its relocation.
Part III	How to Read the Provincial Policy Statement	
	Relationship with Provincial Plans	
Part IV	Vision for Ontario’s Land Use Planning System	
	Ontario The Province’s rich cultural diversity is one of its distinctive and defining features. The Provincial Policy Statement reflects Ontario’s diversity. Indigenous communities have a unique relationship with the land and its resources, which includes continues to shape the histories history and cultures economy of Aboriginal peoples, and is based on good land use planning principles that apply in communities across Ontario the Province today. Ontario recognizes the unique role Indigenous communities have in land use planning and development, and the contribution of Indigenous communities’ perspectives and traditional knowledge to land use planning decisions. The Province recognizes the importance of consulting with Aboriginal communities on planning matters that may affect their rights and interests. section 35 Aboriginal or treaty rights. Planning authorities are encouraged to build constructive, cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes and inform decision-making.	TRCA supports the strengthened recognition and acknowledgement of Indigenous communities and their role in land use planning in Ontario, as well as the corresponding role of planning authorities to engage Indigenous communities.

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	Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. <u>They also permit better adaptation and response to the impacts of a changing climate, which will vary from region to region.</u> Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change	TRCA supports the Ministry in making an explicit connection between land use and development and adaptation and response to climate change. We do note however, that more efficient development patterns do not always produce straightforward and beneficial outcomes for climate change adaptation. Increasing density in hazardous areas, for example, will exacerbate risk. Additionally, this section seems “greenfield” and new development focused. There should be additional text to specifically address redevelopment and intensification that encourages comprehensive remediation to mitigate risk for community revitalization. Also, see our comments in section 3 regarding the need for updated provincial guidance documents.
1.0	Building Strong Healthy Communities	
1.1	Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns	
1.1.1	Healthy, liveable and safe communities are sustained by:	Consider including agriculture as a contributor to healthy, livable and safe communities.
	h) promoting development and land use patterns that conserve biodiversity; and	Add text to: conserve and enhance biodiversity
	h) consider <u>preparing for</u> the <u>regional and local</u> impacts of a changing climate.	TRCA supports the change and strengthening of language from “consider” to “preparing for” with respect to the impacts of climate change (Section 1.1.1.i). We also support the added text that recognizes there are both “regional and local” impacts of climate change.
1.1.3	Settlement Areas	
	The vitality <u>and regeneration</u> of settlement areas is critical to the long-term economic prosperity of our communities. Development pressures and land use change will vary across Ontario. It is in the interest of all communities to use land and resources wisely, to promote efficient development patterns, protect resources, promote green spaces, ensure effective use of infrastructure and public service facilities and minimize unnecessary public expenditures.	TRCA supports the addition of regeneration of settlement areas and recommends amending the text after “development patterns,” to ..."protect natural and cultural heritage resources, expand and enhance green spaces.... As

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		the population increases, there will be greater pressures on existing green spaces for recreation, green infrastructure, etc.
1.1.3.2	Land use patterns within <i>settlement areas</i> shall be based on:	
	c) minimize negative impacts to air quality and climate change, and promote energy efficiency;	TRCA recommends this sentence be strengthened and reworded as: do not negatively impact air quality or exacerbate climate change....
	d) <u>prepare for the impacts of a changing climate;</u>	TRCA supports the addition of “prepare for the impacts of a changing climate”, which denotes taking action and recognizes the connection between climate change, densities and a mix of land uses. Updates to guidance documents to explain <i>how</i> density and mixed uses can help prepare for the impacts of climate change are recommended.
1.1.3.3	Planning authorities shall identify appropriate locations and promote opportunities for <u>transit-supportive development, accommodating a significant supply and range of housing options through</u> intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.	
	Intensification and redevelopment shall be directed in accordance with the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.	TRCA recommends that this statement remain in the PPS. Providing transit supportive designs should not preclude health and safety, or wise use of resources.
1.1.3.6	New development taking place in <i>designated growth areas</i> should occur adjacent to the existing built-up area and shall <u>should</u> have a compact form, mix of uses and densities that allow for the efficient use of land, <i>infrastructure</i> and <i>public service facilities</i> .	TRCA recommends that “shall” be kept in this policy rather than the proposed change to “should”, in order to protect natural resources and use land most efficiently.
1.1.3.7	Planning authorities shall <u>should</u> establish and implement phasing policies to ensure:	TRCA recommends that “shall” be kept in this policy rather than the proposed change to “should”, in order to protect natural resources and use land most efficiently.
	a) that specified targets for intensification and redevelopment are achieved prior to, or concurrent with, new development within designated growth areas; and	
1.1.3.8	A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:	
	In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.	TRCA recommends that this statement remain in the PPS. Settlement area expansions should take into consideration health and safety, and wise use of resources.

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1.1.3.9	<u>Notwithstanding policy 1.1.3.8, municipalities may permit adjustments of settlement area boundaries outside a comprehensive review provided:</u>	TRCA recommends that an additional criterion should be added in this section to require an assessment of the impacts on natural heritage and natural hazards in accordance with Clauses 2.1, 2.2, 3.1 and 3.2 of PPS.
	a) <u>there would be no net increase in land within the settlement areas;</u>	
	b) <u>the adjustment would support the municipality’s ability to meet intensification and redevelopment targets established by the municipality;</u>	
	c) <u>prime agricultural areas are addressed in accordance with 1.1.3.8 (c), (d) and (e); and</u>	
	d) <u>the settlement area to which lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands.</u>	
1.1.4.1	<p>1.1.4.1 Healthy, integrated and viable rural areas should be supported by:</p> <p>a) building upon rural character, and leveraging rural amenities and assets;</p> <p>b) promoting regeneration, including the redevelopment of brownfield sites;</p> <p>c) accommodating an appropriate range and mix of housing in rural settlement areas;</p> <p>d) encouraging the conservation and redevelopment of existing rural housing stock on rural lands;</p> <p>e) using rural infrastructure and public service facilities efficiently; Proposed Provincial Policy Statement – July 2019 13</p> <p>f) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;</p> <p>g) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;</p> <p>h) conserving biodiversity and considering the ecological benefits provided by nature; and</p> <p>i) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 2.3.</p>	TRCA recommends amending this policy to link ecological and hydrologic components in h). Suggested rewording: h) conserving biodiversity and considering the ecological “ and hydrologic ” benefits provided by nature, and
1.1.5	Rural Lands in Municipalities	
1.2	Coordination	
	A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies and boards including:	
	a) managing and/or promoting growth and development <u>that is integrated with infrastructure planning;</u>	
	b) economic development strategies;	
	c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;	TRCA recommends adding after managing: “ and protecting ”

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1.2.2	Planning authorities are encouraged to <u>shall engage with Indigenous communities and</u> coordinate <u>on land use</u> planning matters with Aboriginal communities.	TRCA supports the stronger language used to ensure that indigenous communities are included in the planning process. Additionally, the Province should consider providing guidelines for Planning Authorities on purpose, types and degree of engagement with Indigenous communities. The Ministry of Health report, Relationship with Indigenous Communities Guideline, 2018 is one example.
1.2.6.1	<i>Major facilities and sensitive land uses</i> should <u>shall</u> be planned to ensure they are appropriately designed, buffered and/or separated from each other and developed to prevent avoid, or if avoidance is not possible, <u>minimize and</u> mitigate <u>any potential</u> adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term <u>operational and economic</u> viability of <i>major facilities</i> in <u>accordance with provincial guidelines, standards and procedures.</u>	TRCA supports the stronger language in this policy. However, mitigation should also apply to the risks to public health and safety. The policy should be further amended to read: “minimize and mitigate risk to public health and safety...”
1.3	Employment	
1.3.2	Employment Areas	
1.4	Housing	
1.5	Public Spaces, Recreation, Parks, Trails and Open Space	Consider including urban agriculture i.e., community gardens to promote healthy, active communities.
1.6	Infrastructure and Public Service Facilities	
1.6.1	<i>Infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities</i> shall be provided in a coordinated, an efficient and cost-effective manner that considers <u>prepares for the impacts from of a changing climate change</u> while accommodating projected needs.	TRCA supports the Ministry in replacing “considers” with “prepares for the impacts of a changing climate” .
	Planning for <i>infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities</i> shall be coordinated and integrated with land use planning <u>and growth management</u> so that they are:	Consider adding 1.6.1.c “ and resilient to the impacts of climate change ”.
1.6.6	Sewage, Water and Stormwater	
1.6.6.1	Planning for <i>sewage and water services</i> shall:	
	b) ensure that these systems are provided in a manner that: <ol style="list-style-type: none"> 1. can be sustained by the water resources upon which such services rely; 2. <u>prepares for the impacts of a changing climate;</u> 3. is feasible, <u>and financially viable and complies with all regulatory requirements over their lifecycle;</u> and 4. protects human health <u>and safety,</u> and the natural environment; 	TRCA supports the Ministry in adding “prepares for the impacts of a changing climate” in this section to establish a connection between sewage, water and stormwater infrastructure systems and climate change.

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1.6.6.7	<p>Planning for stormwater management shall:</p> <p>a) <u>be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;</u></p> <p>b) minimize, or, where possible, prevent increases in contaminant loads;</p> <p>c) minimize <u>erosion and</u> changes in water balance, and erosion <u>prepare for the impacts of a changing climate through the effective management of stormwater;</u></p> <p>d) not increase <u>mitigate</u> risks to human health and, safety and, property damage <u>and the environment;</u></p> <p>e) maximize the extent and function of vegetative and pervious surfaces; and</p> <p>f) promote stormwater management best practices, including stormwater attenuation and re-use, <u>water conservation and efficiency</u>, and low impact development.</p>	<p>TRCA supports this addition to the PPS.</p> <p>TRCA recommends that an additional policy or reference to promote the value and benefits of the natural and green infrastructure be included in 1.6.6.7 (the two are different – see proposed definition of natural infrastructure).</p> <p>There may be unintended consequences if this policy is changed as currently proposed. The proposed policy seems to suggest that development may increase risk to health and safety through stormwater management provided those risks are mitigated. This implies a hard engineering approach to address risk concerns. The PPS should maintain the principle that any increase in risk associated with hazard lands is prohibited. Replacing no increase with mitigating gives an impression that an increase in risk in one location can be acceptable if risk is lowered in another. TRCA recommends maintaining the wording of “not increase” first and foremost, but encourage mitigation where possible/feasible.</p> <p>As suggested above, this policy could be amended to reference the benefits and promotion of “natural and green infrastructure”.i.e. Maximize the hydrologic benefits, extent and functions of natural heritage systems, including wetlands, vegetative and pervious surfaces, and</p> <p>TRCA supports that “water conservation and efficiency” has been added under stormwater management best practices.</p>
1.6.7	<p>Transportation Systems</p>	<p>Given that connections to climate change have been added throughout the PPS, it appears that reference to preparing for a changing climate is lacking in Sections 1.6.7 (Transportation Systems), 1.6.8 (Transportation and Infrastructure Corridors), and 1.6.11 (Energy Supply). Consider adding similar</p>

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		references to climate change in relation to the planning of transportation systems and corridors, and energy supply.
1.6.7.2	Efficient use shall <u>should</u> be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	TRCA recommends that the stronger language “Shall” not be replaced by “should”.
1.7	Long-Term Economic Prosperity	
1.7.1	Long-term economic prosperity should be supported by:	
	i) <u>sustaining and enhancing the viability of the agricultural system through protecting agricultural resources, minimizing land use conflicts</u> , providing opportunities to support local food, and promoting maintaining and improving the sustainability of agri-food network and agri-product businesses by protecting agricultural resources, and minimizing land use conflicts;	Consider adding “ and urban agriculture ” following “local food” in 1.7.1i.
	j) promoting energy conservation and providing opportunities for development of renewable <u>increased energy supply systems and alternative energy systems, including district energy;</u>	The proposed change to “increased energy supply” (Section 1.7.1.j) appears to promote the increase of energy supply as the end-goal regardless of energy source. Since some energy sources can exacerbate climate change, TRCA suggests the Ministry consider amending the policy to “ promoting energy conservation and providing opportunities for increased supply of low carbon energy sources ”.
1.8	Energy Conservation, Air Quality and Climate Change	
1.8.1	Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and <u>preparing for impacts of a changing climate</u> change-adaptation through land use and development patterns which:	
	f) promote design and orientation which <u>maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and</u> <ol style="list-style-type: none"> 1. maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and 2. maximizes opportunities for the use of renewable energy systems and alternative energy systems; and 	This policy would benefit from the Ministry providing additional guidance on how the items listed under 1.8.1 (e.g., compact form) contribute to preparing for the impacts of climate change. TRCA recommends the Ministry consider retaining the language of “maximizes opportunities for the use of renewable energy systems and alternative energy systems” (Section 1.8.1.f.1) but amending it to: “ maximizes opportunities for decentralized low carbon energy supply systems. ”

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2.0	Wise Use and Management of Resources	
2.1	Natural Heritage	
2.1		TRCA recommends that an additional policy be added related to preparing for the impacts of climate change, as well as the importance of green infrastructure for mitigating impacts and building resiliency.
2.1.2	The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.	TRCA recommends the addition of the following words: The diversity and connectivity of natural features in an area, and the long-term ecological and hydrologic functions...
2.1.10	Municipalities may choose to manage wetlands not subject to policy 2.1.4 and 2.1.5, in accordance with guidelines developed by the Province.-	<p>The use of this term is unclear, as guidelines have not yet been developed and/or have not been posted for public consultation. Agencies should have the ability to review and provide input to guidelines before they are implemented via policy. The Natural Heritage Reference Manual should also be updated to support the revised PPS.</p> <p>TRCA may be supportive of this policy if it aligns with our current Compensation Protocol. TRCA understands that this new policy is in reference to a forthcoming provincial guideline on ecological off-setting. We suggest modification to this policy to set it well into the context of the mitigation hierarchy. In this way, approval authorities would be encouraged to protect and enhance locally significant natural heritage features and would only exercise the off-setting option as a last resort, after all avenues for protection of these features have been exhausted. Please see TRCA Living City Policies 7.4.2.1 c) and 7.4.2.1 d) as examples of this approach.</p> <p>Further, TRCA’s Ecosystem Compensation Guideline offers a science-based, practical approach to determining the value of lost features from the landscape. The Guideline uses ecological restoration principles to establish requirements for</p>

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		replacing ecosystem structure and land base back onto the landscape after features have been removed. TRCA staff would be pleased to meet with provincial staff for input to a provincial technical guide that addresses these issues.
2.2	Water	
2.2.1	Planning authorities shall protect, improve or restore the quality and quantity of water by:	
	a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;	TRCA supports this policy and following subsections that acknowledge the watershed as ecologically meaningful scale for integrated and long-term planning. Conserving natural resources improves the landscape to make watersheds more resilient to the variations in precipitation patterns resulting from climate change. As such, natural hazards and natural heritage are intrinsically linked. PPS policies should promote better integration of natural hazard, natural heritage and water resource system policies through watershed and subwatershed planning and infrastructure planning
	b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts;	
	c) evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;	TRCA supports the addition of this policy as it supports planning for climate change at the watershed scale. Guidance will be needed, however, for “how to prepare” for the impacts, including the use of data derived from watershed planning.
	d) implementing necessary restrictions on development and site alteration to: <ol style="list-style-type: none"> 1. protect all municipal drinking water supplies and designated vulnerable areas; and 2. protect, improve or restore vulnerable surface and ground water, sensitive surface water features and sensitive ground water features, and their hydrologic functions; 	TRCA recommends that this policy be amended to include a reference to the <i>Clean Water Act</i> , as well as Source Protection Plan policies.
	e) ensuring stormwater management practices minimize stormwater volumes and contaminant loads and maintain or increase the extent of vegetative and pervious surfaces.	Recommend adding “...through the use of a treatment train approach, including LIDs and new technologies.”
2.5.2	Protection of Long-Term Resource Supply	

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2.5.2.2	Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts. <u>Outside of the Greenbelt Area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions.</u>	TRCA recommends that this policy be deleted in its entirety. This proposed policy is not supported for the following reasons: <ul style="list-style-type: none"> • The policy is unachievable. A proponent cannot demonstrate no negative impacts to significant natural features and their functions when extraction may occur over 30-50 years. • It fails to address the short-term and interim impacts of aggregate operations on natural features and their functions. • It does not consider the cumulative impacts that aggregate operations have on the landscape or natural heritage systems and hydrologic features and their functions.
2.6	Cultural Heritage and Archaeology	
2.6.5	Planning authorities shall <u>engage with Indigenous communities and</u> consider the their interests of Aboriginal communities in conserving <u>when identifying, protecting and managing</u> cultural heritage and archaeological resources.	It is recommended that the Province consider providing guidelines for Planning Authorities on purpose, types and degree of engagement with Indigenous communities. The Ministry of Health report, Relationship with Indigenous Communities Guideline, 2018 is one example.
3.0	Protecting Public Health and Safety	
	<u>(Note: policies in this section related to natural hazards are subject to ongoing review by the Province's Special Advisor on flooding. Further changes may be considered as a result of this review)</u>	TRCA appreciated the opportunity to meet with the Province's Special Advisor on flooding and would be pleased to consult with the Province on any updates to the policies in this section. Please see our correspondence to the Special Advisor, c/of MNR, which outlines TRCA's recommendations related to natural hazards.
3.1	Natural Hazards	
3.1.3	Planning authorities shall consider <u>prepare for</u> the potential impacts of <u>a changing</u> climate change that may increase the risk associated with natural hazards.	TRCA supports the proposed changes to this policy.

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	<p>NOTE: No changes are proposed to current Policies 3.1.1, 3.1.2, 3.1.4 to 3.18. As per above note, changes may be considered as a result of the Province’s Special Advisor’s review and report.</p>	<p>The current policy framework has been extremely effective at reducing risks, especially in new greenfield developments. However, there is a need to recognize historical/existing development in the flood plain (i.e. within the ‘built boundary’) and the challenges related to redevelopment and community revitalization. It is therefore recommended that the current policy framework be updated to recognize the urban context, (i.e. flood vulnerable urban cores and transit lines), and provide guidance for appropriate community revitalization/redevelopment, including encouraging flood mitigation projects and remediation to provide functional protection to existing development, even if it is not possible to remediate the risk to the regulatory level.</p> <p>Technical Guidelines to support policy interpretation and implementation need to be updated to address the following: the urban context/existing development in the one zone approach, minor additions, safe ingress and egress standards, flood proofing standards, risk assessment criteria and standards for one zone, two zone and Special Policy Areas, climate change and current technology and modeling (e.g. two dimensional modelling – to more accurately define flood plain spills)</p> <p>The 2009 Special Policy Area Procedures need to be updated and informed by lessons learned by CAs from comprehensive updates undertaken in the last 10 years. Many SPAs were designated in the late 1980s and early 1990s. Several comprehensive updates undertaken in TRCA’s jurisdiction have been completed in consultation with municipalities, the Province and the public as multi-year projects, providing valuable insights on improvements to processes and outcomes such as: ensuring municipal documents, (Official Plans and Zoning-By-laws), reflect current planning and policy regime; ensuring technical study requirements to accompany applications are known up front to ensure quality submissions</p>

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		<p>in the development process; and updated municipal flood emergency response plans.</p> <p>Conserving natural resources improves the landscape to make watersheds more resilient to the variations in precipitation patterns resulting from climate change. As such, natural hazards and natural heritage are intrinsically linked. PPS policies should promote better integration of natural hazard, natural heritage and water resource system policies through watershed and subwatershed planning and infrastructure planning.</p>
3.2	Human-Made Hazards	
<u>3.2.3</u>	<u>Planning authorities should support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.</u>	TRCA recommends that “ in accordance with provincial guidelines. ” be added at the end of this sentence to reflect the Province’s ‘Excess Soil Best Management Practices Guide’.
	Implementation and Interpretation	
4.1	This Provincial Policy Statement applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after April 30, 2014 <u><DATE></u> .	Please see comments above on Parts I and II, which speak to the subsections 4.0 being moved. TRCA has no objection provided that the weight and intent of the policies have not been diminished by its relocation.
<u>4.7</u>	<u>Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for local development by:</u>	This policy should include the requirements for complete applications that demonstrate consistency with the PPS in order to achieve the Province’s goal to streamline and fast-track priority applications to increase the housing supply.
	a) <u>identifying and fast-tracking priority applications which support housing and job-related growth and development; and</u>	There is no guidance or mechanism to determine what would be considered “priority applications”. Furthermore, comprehensive front ended planning is required in order to facilitate fast tracking.
4.14 <u>4.8</u>	The Province, in consultation with municipalities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies. The Province shall monitor their implementation, including reviewing performance indicators concurrent with any review of this Provincial Policy Statement.	TRCA would be pleased to participate in any future consultations or discussions on natural heritage or hazard-related matters with provincial staff.

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6.0	Definitions	
	<p><u>Impacts of a changing climate:</u> means the potential for present and future consequences and opportunities from changes in weather patterns at local and regional levels including extreme weather events and increased climate variability</p>	<p>TRCA recommends to either provide provincial guidance on how to prepare for the impacts of a changing climate or amending the definition to address specific impacts such as increased flooding and erosion, increased risk to life and property, loss of biodiversity.</p>

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