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October 18, 2019

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street
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Toronto, ON
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Re: City of London comments: **ERO Number: 019-0279**; Provincial Policy Statement Review – Proposed Policies

Thank you for the opportunity to comment on the proposed policies and changes to the Provincial Policy Statement (PPS). The City of London strongly supports the efforts of the Province in tackling the pressing issue of housing affordability and supply, as well as the greater focus of the Province on climate change. However, there are a number of significant concerns regarding the proposed policies, particularly those on climate change. The City is significantly concerned that some of the policies could have a negative impact on climate change. A summary of the City's comments follows.

25-year planning horizon and extended minimum time periods for land supply

- Proposed changes with respect to 25-year planning horizon and minimum time periods for land supply are contrary to the goals of compact growth and intensification, as the changes could allow for settlement area boundaries that would increase the supply of low density, auto-dependent development.
- The City would face increased costs to administer the extended time periods and greater financial risks associated with longer-term planning for residential and employment areas.

Market-based range and housing types and settlement area expansion

- New references to single-detached houses and market-based decision-making could challenge municipalities' ability to balance intensification and settlement area expansion with facilitating appropriate housing options based on short-term demand.
- Given increased flexibility on provisions for settlement area expansion, the proliferation of low-density development and fragmented settlement patterns could facilitate sprawl, thereby undermining the cost-effective provision of services and contributing to property tax and development charge increases.

Unclear definition and concept of air rights development

- The City is supportive of a new reference to "air rights development" as part of transit-supportive development and intensification. However, further clarification on the concept of air rights development is required so municipalities could ensure that air rights development would promote transit-supportive development and intensification and would be used to support development that would address climate change.

Climate change

- The addition of policies with respect to climate change is welcomed. However, the focus of these policies is primarily on climate change adaptation, while no policies with respect to climate change mitigation have been proposed. In addition, the proposed removal of the existing provisions with respect to renewable energy and alternative energy (policy 1.8.1) and waste management (policy 1.6.10.1) could challenge municipalities' ability to develop actions to mitigate climate change and address environmental and public health and safety impacts.

Servicing

- Proposed changes throughout policy 1.6.6 could challenge the City's goals to ensure that servicing is carried out in a sustainable and cost-efficient manner, and that growth is supported by a comprehensive infrastructure system.
- The proposed changes could also challenge municipalities' financial capability and ability to deliver reliable water and stormwater services that would be resilient to climate change impacts, such as heavy rainfalls and flooding. In addition, new provisions allowing for partial and private services within settlement areas could hinder municipalities' ability to comprehensively plan and finance development-related services and infrastructure.

Streamlining applications

- Municipalities are already working on streamlining development applications given the shortened timelines under the Planning Act as amended by Bill 108. In addition to the timelines, direction on streamlining through policy 4.7 could result in an increased number of appeals. It is not clear how "priority applications" in policy 4.7 (a) would be defined and what criteria would be established in identifying and selecting such applications, especially in case of applications for both housing and job-related growth.

Increased flexibility to interpret and implement PPS policies

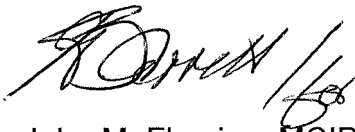
- Municipal official plans and zoning by-laws have been the most important vehicle for PPS policy implementation. However, through amendments to related policies (former policies 4.7, 4.8 and 4.9), municipalities will face challenges to address matters in their local community beyond the minimum standards of the PPS.

“Shall” to “Should”

- Several proposed language changes from “shall” to “should” would challenge the City’s decision-making processes in keeping with its official plan policies, which align with the PPS.
- Along with the proposed changes with respect to the planning horizon, the language changes would undermine the City’s ability to accommodate projected growth and decrease sprawl to the greatest extent possible.

Attached to this letter is the report regarding the proposed draft PPS, received by Municipal Council on October 7, 2019. **Section 3.0: Questions and Answers** of the report covers the City’s responses to the five questions posted by the Environmental Registry of Ontario (ERO). The City supports provincial aims to address housing affordability and supply, as well as climate change, through collaboration with the Province, and is requesting that the Province uses this consultation process to address municipal concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'John M. Fleming', with a stylized flourish at the end.

John M. Fleming, MCIP, RPP
Managing Director, Planning and City Planner

Attachment

- Planning and Environment Committee, Provincial Policy Statement (PPS) 2019 Review