

City Planning

City Hall
100 Queen Street West
12th Floor, East Tower
Toronto, Ontario M5H 2N2

Tel: 416-392-8772
Gregg.Lintern@toronto.ca
www.toronto.ca/planning

June 26, 2023

Provincial Land Use Plans Branch
777 Bay Street, 13th floor
Toronto, ON M5G 2E5
growthplanning@ontario.ca

RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument ([ERO number 019-6813](#))

On behalf of the City of Toronto, we are pleased to submit the City's comments and recommended revisions to the policy changes contained in the proposed Provincial Planning Statement. We understand that the proposed changes by the Province are made with the intended outcome of improving the lives of Ontarians by increasing housing supply. We commend your efforts in this regard. However, housing supply needs to also include leadership on the delivery of affordable housing and ensure that the livability of the Region is maintained or enhanced.

At its meeting of June 14th-15th, 2023, Toronto City Council considered the staff report (Attachments 1 to 4) and adopted the recommendations which address the feedback being requested through the ERO posting. The Decision History (Attachment 5) is enclosed that contains the adopted recommendations, together with the written communications from interested individuals submitted for City Council's consideration (Attachment 6).

The City has concerns with the proposed policy changes and these concerns are articulated in the enclosed Staff Report, in particular the fundamental changes to the growth management framework that has guided development and infrastructure investments across the Greater Golden Horseshoe. The proposed repeal of the Growth Plan would treat the region generally the same as any other part of the Province despite it being home to 70% of Ontarians. Virtually all the foundational policies have been eliminated and the overall policy intent of establishing a regional plan to coordinate planning, resource and infrastructure management efforts has been abandoned.

It is our contention that the wholesale changes contained in the proposed Provincial Planning Statement are not necessary or needed, as they would replace the predictability and comprehensiveness of the current system in favour of a system that encourages one-off decision making and increased land-use speculation.

The City remains committed to working with the Province and other municipal partners to ensure that the housing needs of our communities are met without compromising agricultural lands, employment areas, the health of the natural environment, and the investments in infrastructure made over the past several decades. City staff welcome the opportunity to work with Provincial staff and other municipal partners to assist in refining the proposed policies as there is a potential that they may not, when operationalized, achieve the intended outcomes.

We appreciate the opportunity to provide feedback on the proposed Provincial Planning Statement. Should you have any questions regarding the City's submission or would like to arrange a meeting with City staff, please directly contact [Kerri Voumvakis](#), Director, Strategic Initiatives, Policy & Analysis (416-392-8148) or [Jeffrey Cantos](#), Manager, Official Plan & Legislation (416-397-0244).

Sincerely,



Gregg Lintern, MCIP, RPP
Chief Planner and Executive Director,
City Planning Division

Attachments:

1. Staff Report regarding City Comments on the Proposed Provincial Planning Statement
2. Attachments to the staff report containing detailed comments on the Proposed Provincial Planning Statement
3. City Council Decision with adopted recommendations
4. Copies of Communications provided for City Council consideration



City Comments on the Proposed Provincial Planning Statement

Date: May 17, 2023

To: Planning and Housing Committee

From: Chief Planner and Executive Director, City Planning Division

Wards: All

SUMMARY

The policy led planning system under which municipalities within the Greater Golden Horseshoe (GGH) Area have operated since 2006 has experienced numerous changes over the last 5 years requiring the City to continuously review, examine and adapt our planning policies and practices. On April 6, 2023 as part of Bill 97, the Ministry of Municipal Affairs and Housing introduced a draft Provincial Planning Statement that is intended to replace the current Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe. Some policies of the Growth Plan are intended to be incorporated into the new Provincial Planning Statement and the Growth Plan is proposed to be repealed.

The proposed repeal of the Growth Plan now treats the region generally the same as any other part of the Province despite it being home to 70% of Ontarians. While some Growth Plan policies are found in the proposed Provincial Planning Statement, virtually all the foundational ones have been eliminated and the overall policy intent of establishing a regional plan to lay out and coordinate planning, resource and infrastructure management efforts has been abandoned. Absent a comprehensive and coordinated regional growth management framework, potential unintended consequences may include, loss of agricultural land and associated worsening food insecurity, degradation of the natural heritage system and it's ability to mitigate the impacts of climate change, impacts on water quality, uncoordinated infrastructure planning that increases costs for local and regional governments, uncoordinated and unsustainable development patterns that encourage car dependency, and the loss and removal of employment lands needed to support a diverse economic base.

The direction for regional planning implied in the draft Provincial Planning Statement represents a seminal change in the land use planning system in the GGH that together with recent and potential future governance changes pose risks to the widely recognized benefits of coordinated and integrated land use, resource and infrastructure planning and calls into question progress toward widely understood and desirable

outcomes around climate adaptation, inclusion, economic and financial stability over the next decades. Growing imperatives around housing supply and paying for infrastructure should spark an evolution in regional planning through a focussed collaborative process around making the Growth Plan work better, without jettisoning its fundamental goals around limiting sprawl and long-term land use predictability.

The Province has provided stakeholders 60 days to review the proposed document and comments are due no later than June 5, 2023. Staff will submit the recommendations from Planning and Housing Committee to the provincial ERO posting and will submit additional comments received at City Council's meeting on June 14-16, 2023 as supplementary information to the recommendations contained in this report.

This report outlines staff comments on the proposed Provincial Planning Statement as itemized in Attachment 1. The recommendations contained in this report address concerns raised by City staff intended to inform the Ministry of the City's comments and suggested revisions to the proposed Provincial Planning Statement. Staff from City Planning, Engineering & Construction Services, Economic Development & Culture, the Housing Secretariat, Toronto Water, Parks, Forestry & Recreation, Corporate Finance and Legal Services reviewed and provided comments organized in the following six themes:

1. Regional Planning;
2. Housing;
3. Employment Lands Planning;
4. Environment;
5. Infrastructure; and
6. Implementation

RECOMMENDATIONS

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

1. City Council express it's concern to the Minister of Municipal Affairs on the general direction taken in the proposed Provincial Planning Statement as it represents fundamental changes in how growth planning is carried out in the province and by the City of Toronto.
2. City Council support in principle the provisions in the proposed Provincial Planning Statement that encourage the supply of housing, notwithstanding, that references to "Affordable Housing" and "Housing that is affordable to low- and moderate-income households" have not been carried over.
3. City Council request the Province through ERO 019-6813 and outlined in Attachment 1 to this report, to:
 - a. maintain all policy references to "residential intensification" and "redevelopment" in the current Provincial Policy Statement to provide clarity that

where sufficient land and servicing exists to accommodate forecast population through infill, the need for greenfield development is diminished.

b. require that large and fast-growing municipalities accommodate a minimum of 50% of all residential development within their existing settlement area and that new settlement areas or settlement area expansion lands are planned for a minimum density target of 50 residents and jobs per gross hectare.

c. maintain the density targets of Urban Growth Centres (Growth Plan 2.2.3.2) and policies that directed how Urban Growth Centres will be planned (Growth Plan 2.2.3.1).

d. provide flexibility for municipalities to identify additional higher order transit corridors that deviate from the definition of "higher order transit" in the proposed Provincial Planning Statement.

e. maintain the Growth Plan policies (2.2.4.8 – 2.2.4.10) that support the development of complete communities with a compact built form and affordable housing within MTSAs, on lands adjacent to MTSAs, and along transit corridors.

f. include reference to affordable housing in Provincial Planning Statement Policy 2.4.2.6 given provincial direction to include affordable housing in Protected Major Transit Station Areas through inclusionary zoning.

g. maintain that municipalities may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a 5-year official plan update and only where it has been demonstrated that certain conditions have been met (Provincial Policy Statement 1.1.3.8).

h. lead a provincial-municipal process with large and fast-growing municipalities for the periodic preparation of regional population and employment forecasts. Enable municipalities to continue to be able to adopt higher forecasts.

i. direct municipalities in the Greater Golden Horseshoe to continue using population and employment forecasts of Schedule 3 of the Growth Plan for managing growth to 2051 and ensuring "at least 25 year" supply of land.

j. maintain the current definitions of "affordable" housing and "low and moderate-income households" OR provide explicit direction for municipalities to set their own definition.

k. maintain the requirement for municipalities to establish targets for housing affordable to low- and moderate-income households (Provincial Policy Statement 1.4.3(a)) and for affordable ownership and affordable rental housing (Growth Plan 2.2.6.1(a)(ii))

l. maintain Growth Plan policy 2.2.6.3 that provides direction to municipalities to use available tools to require that multi-unit residential developments incorporate

a mix of unit types to accommodate a diverse range of households sizes and incomes.

m. revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes.

n. amend proposed policy 2.2.1.b.2, related to the conversion of existing commercial and institutional buildings for residential uses, to include a requirement to maintain or replace employment space within the redevelopment or within an off-site location.

o. enact a Regulation to permit the use of zoning with conditions, pursuant to Section 113 of the City of Toronto Act 2006, that would enable a municipality to secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space.

p. enact a Regulation to permit the use of conditional zoning, pursuant to Section 113 of the City of Toronto Act 2006, that would enable the City to require and secure employment space to be provided prior to, or concurrent with any non-employment uses, including residential.

q. revise the *Employment Area* definition to explicitly include film production, cluster of office uses, stand-alone convenience retail and services to serve businesses and workers within *Employment Areas*, and enable municipalities to define components of *Employment Areas* to serve local economies.

r. maintain the current timeframe for when a conversion of employment lands can be considered: only when municipalities are undertaking their 5-year Official Plan review, absent the Municipal Comprehensive Review concept.

s. strengthen land use policy protections for all *Employment Areas* across the Province to ensure that these lands support the economy and are viable over the long-term.

t. require that municipalities determine that sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible or can be made compatible prior to permitting a sensitive land use.

u. retain the existing Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other major facilities.

v. maintain the current Provincial Policy Statement and Growth Plan policies that explicitly support energy efficiency, increased vegetation, and improved air quality.

- w. maintain and expand the geographic scope of the current Provincial Policy Statement and Growth Plan policies related to natural heritage protection, climate action, intensification, and greenhouse-gas reduction.
- x. expand the geographic scope of the Growth Plan's protections for natural heritage systems (4.2.2), water resource systems and watershed planning (4.2.1), and stormwater management (3.2.7) to the entire Province.
- y. maintain the Growth Plan's provincially identified Agricultural System.
- z. Maintain Growth Plan policy 4.2.8.1 requiring municipalities to develop and implement official plan policies and other strategies related to conserving mineral aggregate resources.
 - aa. change the definition of "waste management system" to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province's circular economy ambitions.
 - bb. align the Waste Management policies with the language of the Waste Free Ontario Act and Resource Recovery and Circular Economy Act (RRCEA) and provide guidance on how municipalities are to interpret the Waste Management policies in the Provincial Planning Statement alongside the RRCEA.
 - cc. include policy direction that requires municipalities to coordinate and plan for appropriate and adequate shared waste management infrastructure.
 - dd. include policy direction that ensures the provision of lands for integrated waste management, including recycling and processing facilities, and residual disposal/management.
 - ee. maintain and expand the geographic scope of Growth Plan policy 4.2.1.4 that requires a sub-watershed plan for large-scale development in greenfield areas.
 - ff. maintain policy references to "key hydrologic features, key hydrologic areas and their functions", from the current Provincial Policy Statement (2.2.1(e)) and expand the geographic scope of Growth Plan policy 4.2.1.2.
 - gg. include direction in the proposed Provincial Planning Statement that planning authorities shall protect, improve, or restore the quality and quantity of water.
 - hh. recognize and promote green infrastructure's role in water and stormwater systems.
 - ii. maintain all transportation related policies in the current Provincial Policy Statement and Growth Plan that support reducing vehicle trips.
 - jj. include language regarding planning for a transportation system in way that accounts for factors such as equity, cost, air quality, winter maintenance and resiliency.

kk. modify policies concerning the protection of heritage properties to say, “protected heritage property shall be conserved”, recognizing that the definition of “protected heritage property” includes more than lands with built heritage resources or cultural heritage landscapes.

ll. maintain the existing Land Needs Assessment methodology as Provincial guidance to the large and fast-growing municipalities for assessing land needs as a complement to the Provincial Projections Methodology Guideline available to other municipalities.

mm. include as part of the transition regulation that all planning matters (Official Plan Amendments or Zoning By-law Amendments) that predate the in-effect date of the new Provincial Planning Statement be transitioned under the existing planning framework. These include planning matters that are: (1) deemed complete and in process/under review; (2) city-initiated process underway or nearing completion, or (3) Council-adopted but is under appeal or appeal period nearing.

nn. continue to transition Official Plan Amendment 231 as a matter in process that was approved under the Growth Plan, 2006.

oo. acknowledge the importance of and requirement for undertaking integrated planning across the Province.

pp. provide guidance on expectations with respect to municipal engagement with Indigenous communities on land use planning matters that identify best practices.

qq. clarify the scope of a municipality's obligation to identify potential impacts of decisions on the exercise of Aboriginal or treaty rights and how the Province's role in addressing asserted Aboriginal or treaty rights will be integrated in the municipal decision-making process.

rr. add a new policy that enables municipalities to put in place local policies that address the changing nature of office space and needs to reflect the local context.

4. City Council confirm that film production will continue to be considered a form of manufacturing for the purposes of land use planning and interpretation of official plan policies and zoning standards.

5. City Council forward Attachment 2 to the Minister of Municipal Affairs and Housing and the Minister of Economic Development, Job Creation and Trade from the Film Commissioner and Director, Entertainment Industries related to the impacts the proposed Provincial Planning Statement has on the City's film production Industry.

6. City Council forward a copy of this report to the Premier of Ontario, the Minister of Municipal Affairs and Housing, the Minister of Economic Development, Job Creation and Trade, the Leader of the Official Opposition, all Ontario MPPs, the Association of

Municipalities of Ontario, and all Ontario municipalities for their information and consideration.

FINANCIAL IMPACT

There are no financial impacts arising from adoption of the recommendations in this report.

Financial impacts, if any, arising from the implementation of the policies in the proposed Provincial Planning Statement, if identified will be subject to future reporting process, as required.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in the Financial Impact Section.

DECISION HISTORY

Over the last five years, the policy led planning system under which municipalities have operated since 2006 has experienced numerous changes, requiring the City to constantly review, examine and adapt planning practices and policies to address an ever-evolving Provincial planning policy framework. Many policy and legislative changes are intended to help increase housing supply. However, the frequency and magnitude of the changes have created a level of land use uncertainty that affects the City's ability to effectively and efficiently implement policy changes, while new legislative changes are proposed.

In November 2022, Council considered report CC1.2 Update on Bill 23, *More Homes Built Faster Act, 2022*, and Supplementary Report – City Staff Comments on Proposed Bill 23 – *More Homes, Built Faster Act, 2022*, which highlighted major changes proposed in Bill 23, potential effects on the City of Toronto, and made recommendations for Council adoption and submission to the Province. Among other matters, Council adopted a request to the Province to not proceed with changes that reduce municipal development charges, community benefit charges, or parkland dedication, along with a request to rescind proposed changes to the Greenbelt.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.CC1.2>

Supplementary Report – City Staff Comments on Proposed Bill 23 – *More Homes, Built Faster Act, 2022* noted the proposed changes outlined in Bill 23 included changes to the boundaries of the Greenbelt Plan. Council adopted a request to the Province to rescind the proposed changes to the Greenbelt to protect environmental features sustaining resides of the Greater Toronto and Hamilton Area.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.CC1.2>

In March 2022, Executive Committee considered report EX31.11 on the City's review of the Provincial Housing Affordability Task Force Recommendations. On March 30, 2022, the Province introduced changes to various pieces of legislation to implement

recommendations in the Task Force's report. As a result, Executive Committee referred the item to the City Manager and requested a report to Planning and Housing Committee. <https://secure.toronto.ca/council/agenda-item.do?item=2022.EX31.11>

In May 2022, City Council considered report PH33.11 on Bill 109 *More Homes for Everyone Act*, which received Royal Assent before the stated commenting period expired. Council also adopted additional concerns related to Bill 109. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH33.11>

In October 2019, City Council considered report PH9.1 on proposed revisions to the Provincial Policy Statement (PPS 2019) and their potential effects on municipal land-use planning and the development-approval process. The revised PPS 2019 made edits to support the government's More Homes, More Choice: Ontario's Housing Supply Action Plan and further aligned the PPS 2019 with the Growth Plan 2019 and revised *Heritage Act*. <https://secure.toronto.ca/council/agenda-item.do?item=2019.PH9.1>

At its meeting in July 2019, City Council considered report CC9.7, More Homes, More Choice Act - Budgetary Considerations, which identified budgetary considerations related to the implementation of Bill 108 and the measures City of Toronto Staff were pursuing to work with the Province to ensure appropriate regulations were adopted. The report also communicated reasonable assumptions to program areas for 2020 budget purposes. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.CC9.7>

In May 2019, City Council considered report CC7.3, Proposed Bill 108 *More Homes, More Choice Act, 2019*, and Housing Supply Action Plan - Preliminary City Comments, which highlighted proposed changes to various legislation. The report provided preliminary comments outlining potential effects on municipal land-use planning, the development-approval process, heritage conservation, and funding for community facilities and infrastructure. <https://secure.toronto.ca/council/agenda-item.do?item=2019.CC7.3>

In February 2019, Council considered PH2.4, Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 ("Growth Plan") – Preliminary City Comments, which provided preliminary comments and recommendations on the proposed amendment to the Growth Plan. The proposed amendment would require updates to the City's Official Plan and Zoning By-law through a mandatory Municipal Comprehensive Review, and the recommendations provided sought to ensure the integrity of the Official Plan. Among other matters, Council adopted requests to the Province regarding *Employment Area* conversions and Provincially Significant Employment Zones. <https://secure.toronto.ca/council/agenda-item.do?item=2019.PH2.4>

COMMENTS

The following report section summarizes and consolidates staff comments and recommendations on the proposed Provincial Planning Statement from City Planning, Engineering & Construction Services, Economic Development & Culture, the Housing Secretariat, Toronto Water, Parks, Forestry & Recreation, Corporate Finance, and Legal

Services. Attachment 1 to this report organizes staff comments on each policy matter covered in the proposed Provincial Planning Statement. Given the multi-disciplinary work that each division undertakes, the consolidated comments are organized within the following headings:

1. Regional Planning;
2. Housing;
3. Employment Lands Planning;
4. Environment
5. Infrastructure;
6. Implementation

1. Regional Planning

The proposed Provincial Planning Statement departs from the Growth Plan by removing intensification targets and deleting language in several policies that direct municipalities to prioritize intensification and redevelopment over growing outwards. Since 2006, the Greater Golden Horseshoe (GGH) municipalities shared a common land use goal to minimize sprawl through intensification of areas that have the necessary infrastructure to support growth. The departure from these policy objectives may lead to the inefficient use of public investments in infrastructure such as transit in the absence of regional and coordinated planning. Given that each municipality will be responsible for the implementation of these proposed policies another unintended consequence may be uneven growth and development patterns across the region that may result in increased car dependency.

Intensification

The Province is proposing to repeal the Growth Plan for the GGH, for which municipalities were required to accommodate a minimum percentage of residential development within their existing urban areas. By removing these targets from the proposed Provincial Planning Statement, municipalities in the GGH will no longer be required to ensure that a certain percentage of residential development occurs within their existing urban areas. Some municipalities may elect to maintain their intensification targets, but it is likely that over time some municipalities may abandon or reduce their intensification targets which could result in more urban expansions than if the intensification targets were maintained.

Toronto was not assigned an intensification target in the Growth Plan as the City does not have any greenfield land to expand into so all development that occurs within Toronto is a form of intensification.

Intensification Recommendations

- Request that the Province maintain all policy references to “residential intensification” and “redevelopment” in the current Provincial Policy Statement to provide clarity that where sufficient land and servicing exists to accommodate forecast population through infill, the need for greenfield development is diminished.

- Request that the Province maintain the current intensification policies in the Growth Plan (2.2.2.1 (a)) that require select municipalities to accommodate a minimum of 50% of all residential development within their existing delineated built-up area.

Strategic Growth Areas

The proposed Provincial Planning Statement maintains the Growth Plan’s policy concept of Strategic Growth Areas. These are identified areas within municipalities to be the focus for intensification and higher-density mixed use in a compact built form. Importantly, several policy changes signal a reduced role of Strategic Growth Areas to accommodate population and employment growth. This change may lead to increased development pressures on employment lands which, based on the City’s land needs assessment, need to be retained to accommodate forecasted employment growth. The proposed Provincial Planning Statement carries over most of the Growth Plan’s policies on Major Transit Station Areas (MTSA), including the minimum density targets and the option for municipalities to request an alternative density target. The proposed Provincial Planning Statement does not include any maps that identify specific higher order transit corridors on which MTSA’s are required to be delineated. Instead, the proposed Provincial Planning Statement provides a definition of “higher order transit”. Based on a preliminary analysis, there may be an additional 70 MTSA’s that the city will be required to identify as an MTSA. It is not anticipated that any of the current MTSA’s will be removed as a result of this change.

The ability to identify MTSA’s around “higher order transit”, could potentially expand the number of locations where inclusionary zoning could apply, provided that Council adopts these MTSA’s as Protected Major Transit Station Areas (PMTSA) and assuming the Province approves those that are currently in front of the Minister for approval.

Strategic Growth Areas Recommendations

- Request that the Province maintain the density targets of Urban Growth Centres (Growth Plan 2.2.3.2) and policies that direct how Urban Growth Centres will be planned (Growth Plan 2.2.3.1).
- Request that the Province provide flexibility for municipalities to identify additional higher order transit corridors that deviate from the definition of "higher order transit" in the proposed Provincial Planning Statement.

Request that the Province maintain the Growth Plan policies (2.2.4.8 – 2.2.4.10) that support the development of complete communities with a compact built form and affordable housing within MTSA’s, on lands adjacent to MTSA’s, and along transit corridors

- Request that the Province, at minimum, include reference to affordable housing in Provincial Planning Statement Policy 2.4.2.6 given provincial direction to include affordable housing in Protected Major Transit Station Areas through inclusionary zoning.

Urban Expansions

The proposed Provincial Planning Statement has significantly altered the policies related to settlement area boundary expansions. The policy changes reduce the role of intensification and increase the role of urban expansion to accommodate residential growth. This is accomplished by several proposed policy directions, including: removing the requirement to accommodate significant residential growth through intensification and replacing this with more general direction to encourage intensification; removing the requirement that settlement boundary expansions only be considered during a Municipal Comprehensive Review; and by removing requirements for new greenfield development to achieve a density target of 50 people/jobs per hectare.

While the City does not have the ability to expand its settlement boundary, the upper and lower-tier municipalities surrounding Toronto are likely to be impacted by these policy changes. Over time it can be anticipated that these policies will result in more urban boundary expansions than would otherwise happen if the policies in the current Provincial Policy Statement and Growth Plan were maintained. As result, there is a risk that Toronto could be exposed to greater environmental risks (i.e., flooding) due to the downstream effects of the loss of permeable surfaces, natural spaces and agricultural lands. Further, Toronto may suffer impacts related to the loss of headwater features, infiltration, natural connectivity, and a decrease in ecological functioning across the bioregion.

Other indirect impacts on Toronto relate to reverting to an urban system that is not supported by a regional plan for land use choices that reconcile how scarce resources for infrastructure are managed and implemented. Unintended consequences of MZO for example may mean resources are redirected to an unplanned node of development instead of completing infrastructure where servicing enables more sustainable housing supply and financially sustainable development.

Urban Expansion Recommendations

- Request that the Province maintain that municipalities may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a 5-year official plan update and only where it has been demonstrated that certain conditions have been met (Provincial Policy Statement 1.1.3.8).

Growth Targets

The proposed Provincial Planning Statement removes the population and employment growth forecasts that are included in the Growth Plan. These forecasts allocate population and employment growth that municipalities are required to plan to accommodate by 2051. These allocations are used as the foundation for the land needs assessment that municipalities undertake to determine how to accommodate the allocated population and employment growth. With the removal of the population and employment growth forecasts, municipalities will be required to undertake their own forecasting exercise to inform their land needs assessment.

Without a standardized population and employment growth forecast there is a risk that municipalities in the GGH area will use different methodologies potentially resulting in

divergent forecasts that could have implications for the regional coordination of infrastructure and services, as well as the natural heritage and agricultural systems.

When the City's Development Charges Bylaw is updated, growth projections are required as part of the background study. Lack of a common set of population and employment forecasts may complicate that process. Staff will continue to monitor implementation of the proposed Provincial Planning Statement and any other legislative changes and, as more information is made available, report back on fiscal impacts that have budgetary ramifications.

Growth Targets Recommendation:

- Request that the Province lead a provincial-municipal process with large and fast-growing municipalities for the periodic preparation of regional population and employment forecasts. Enable municipalities to continue to be able to adopt higher forecasts.
- Request that the Province direct municipalities in the Greater Golden Horseshoe to continue using population and employment forecasts of Schedule 3 of the Growth Plan for managing growth to 2051 and ensuring “at least 25 year” supply of land.
- If the Province proceeds with removing population and employment forecasts, the City should engage with all Greater Golden Horseshoe area municipalities to undertake regional forecasting and growth management exercises to ensure balanced regional growth, effective collaboration on transit planning, environmental sustainability and the greater region’s quality of life.

2. Housing

The proposed Provincial Planning Statement stated and intended outcomes are: to generate housing supply; make land available for development; provide infrastructure to support development; and balance housing with resources. While increasing housing supply is an important consideration in addressing the current housing crisis, ensuring a high quality of life that is affordable for current and future Torontonians is equally - if not more - important than simply increasing supply. Increased supply on its own will not address the affordability challenge faced in this Province.

For the Province to achieve its goal of 1.5 million homes in 10 years, servicing and infrastructure sequencing will be critical. Land use planning, infrastructure and community services need to be closely aligned. The Provincial Planning Statement should include the objective of long-term financial planning required to deliver and maintain sustainable infrastructure for years to come. It is imperative that comprehensive municipal infrastructure planning consider the financial, technical, and operational needs of a growing City.

Affordability

The proposed Provincial Planning Statement makes significant and concerning changes to affordable housing policies. “Affordable” housing and “Low- and moderate-income

households” have been removed as defined terms. The removal of these terms is possibly intended to allow the Province to establish unique definitions for the various planning policies and tools that can be used to secure affordable housing, such as through inclusionary zoning, rental replacement, in-kind community benefits charge contributions and community improvement plans.

Land use planning plays an important role in the delivery of affordable housing and this should be acknowledged in the Provincial Planning Statement. The *Planning Act* identifies affordable housing as a provincial interest and clearly outlines that land use planning tools such as inclusionary zoning and the community benefits charge can be used to secure affordable housing.

The proposed Provincial Planning Statement has also removed policies requiring municipalities to set affordable housing targets for ownership and rental housing (Growth Plan), as well as for low- and moderate-income households (Provincial Policy Statement). Targets for affordable ownership and rental housing in the Growth Plan supports the inclusion of these policies in official plans and allow municipalities to utilize both program and land use planning tools, such as inclusionary zoning to meet these targets.

In Ontario, 25% of renter households and 30% of renter households in Toronto are in core housing need compared to 6.4% of owner households in Ontario and 10.8% of owner households in Toronto. This illustrates the importance of setting affordable housing targets for both ownership and rental housing. The City’s HousingTO Action Plan 2020-2030 includes a target of 40,000 affordable rental and supportive homes approvals by 2030.

The specific reference to low and moderate-income households in the definition of affordable housing in the current Provincial Policy Statement provided municipalities with a basis and rationale to develop land use planning policies that better respond to the housing affordability needs of residents as these were tied to household incomes. An income-based approach to defining affordable housing is consistent with a human-rights approach as it better reflects what households can afford, particularly as household incomes are not increasing at the same rate and pace as house prices and rents. The proposed definition of “additional needs housing” does not speak to economic/affordability needs so is not a replacement for this.

Affordability Recommendations

- Request that the Province maintain the current definitions of “affordable” housing and “low- and moderate-income households” OR provide explicit policy direction for municipalities to set their own definition.
- Request that the Province maintain the requirement for municipalities to establish targets for housing affordable to low- and moderate-income households (Provincial Policy Statement 1.4.3(a)) and for affordable ownership housing and affordable rental housing (Growth Plan 2.2.6.1(a)(ii)).

Housing Options

The proposed Provincial Planning Statement expands the definition of Housing Options to include references to the missing middle housing and forms of gentle density such as laneway housing, garden suites, rooming houses, low-rise apartments and mid-rise apartments. The definition does not make references to different unit types and, tenures. The provision of a mix of unit types is important to ensure that multi residential developments, which make up a large proportion of residential developments in the city, will support complete communities with options for small households as well as larger households such as families with children and inter-generational families.

The proposed definition also removes the existing reference to affordable housing, despite including other income-based forms of housing such as supportive, community and transitional housing. The lack of reference to affordable housing removes direction and rationale for municipalities to define and highlight the importance of this housing option in municipal official plans and policy documents.

Affordable housing is a critical component of the housing continuum and has a clear and established link to land use planning under the *Planning Act*. Regardless of whether “affordable” is defined in the Provincial Planning Statement, affordable housing must be included in the definition of “housing options”.

Housing Options Recommendations

- Request that the Province maintain Growth Plan policy 2.2.6.3 that provides direction to municipalities to use available tools to require that multi-unit residential developments incorporate a mix of unit types to accommodate a diverse range of household sizes and incomes.
- Request that the Province revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes, i.e., “Housing options means a range of housing types, tenures, unit types, and affordability levels, such as, but not limited to...affordable housing, purpose-built rental housing...”.

Conversion of Office and Institutional Buildings to Residential

The proposed Provincial Planning Statement includes a new policy that would require municipalities to permit and facilitate the conversion of existing commercial and institutional buildings for residential use. In 2022, Toronto’s office sector employed approximately 750,000 people, which represents a 17% increase over the last 10 years.

As a major contributor in the city, regional, and provincial economy, Toronto’s office sector should be protected from speculative markets that would seek to convert this space to residential uses. Providing policy protections helps to ensure the long-term viability of the office sector’s success.

Conversion of Office and Institutional Buildings to Residential Recommendations

- Request that the Province amend proposed policy 2.2.1.b.2, related to the conversion of existing commercial and institutional buildings for residential uses, to include a requirement to maintain or replace employment space within the redevelopment or within an off-site location.
- Request that the Province add a new policy that enables municipalities to put in place local policies that address the changing nature of office space and needs to reflect the local context to ensure the integrity of these areas
- Request that the Province enact a Regulation to permit the use of zoning with conditions, pursuant to Section 113 of the City of Toronto Act 2006, that would enable a municipality to secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space.

3. Employment Lands Planning

Lands designated in the Official Plan as *Core Employment Areas* and *General Employment Areas* account for approximately 13% of the City's land base but accommodates almost 25% of all the jobs across the city. These lands are a finite land resource that may also provide low barrier entry jobs that help to diversify the City's economic base, enabling the City to weather economic downturns, as we are not dependent on a single industry for a source of local jobs. The Growth Plan and Provincial Policy Statement provide land use policy protections for these lands, most of which are not proposed to carry over into the Provincial Planning Statement.

Definition of Employment Area

The proposed Provincial Planning Statement includes a new definition of *Employment Areas* to match the *Planning Act* definition change proposed in Bill 97. The new definition for *Employment Areas* scopes the protected land uses by excluding institutional and commercial uses (i.e., retail and office not associated with the manufacturing, research and development, warehousing, and goods movement).

The new definition may result in the loss of stand-alone convenience retail and services (i.e., banks, gas stations, printing services, office supply retailing, restaurants, etc.) that businesses within *Employment Areas* use for their operations and that are also intended to serve workers. Upon preliminary analysis, the new definition may potentially put at risk the City's *General Employment Areas*, which accounts for approximately 25% of all employment lands and 150,000 jobs. These figures include the existing office parks located across the city, whose land would be subject to removals through an official plan amendment application and whose current building stock would be subject to conversion for residential purposes.

Attachment 2 to this report outlines concerns from the City's Film Commissioner & Director, Entertainment Industries related to the impacts on the film production industry. The proposed definition for *Employment Areas* should explicitly include film production

so that this important industry and economic driver can be protected from encroachment from residential and other sensitive land uses.

Definition of Employment Area Recommendations

- Request that the Province revise the *Employment Area* definition to explicitly include film production, cluster of office uses, and stand-alone convenience retail and services to serve businesses and workers within *Employment Areas* and enable municipalities to define components of *Employment Areas* to serve local economies.

Expansion of Uses in Non-Employment Areas

The proposed Provincial Planning Statement includes new policies intended to facilitate the expansion of employment uses in areas outside of *Employment Areas*. One new policy encourages industrial, manufacturing and small-scale warehousing uses in strategic growth areas and other *Mixed Use Areas* where frequent transit is available, provided that these uses would not cause adverse effects on sensitive land uses.

It is anticipated that this policy change will have minimal impact on the growth of employment uses in these areas, as these uses are already generally permitted on lands designated *Mixed Use Areas* and are rare due to the high land and development costs associated with these locations and the business/operational risks with locating employment uses next to sensitive land uses.

The proposed Provincial Planning Statement includes a new policy that requires municipalities to permit residential, employment, public service facilities and other institutional uses on lands for employment outside of *Employment Areas*. Should this policy come into effect, the City will need to explicitly permit these types of uses in all lands that allow for any type of employment uses (i.e., *Mixed Use Areas*, *Neighbourhoods*, *Apartment Neighbourhoods*, *Regeneration Areas*, and *Institutional Areas*).

Expansion of Uses in Non-Employment Areas Recommendations

- Request that the Province enact a Regulation to permit the use of conditional zoning, pursuant to Section 113 of the City of Toronto Act 2006, that would enable the City to require and secure employment space to be provided prior to, or current with any non-employment uses, including residential.

Conversion/Removal of Employment Areas

The proposed Provincial Planning Statement makes significant changes to the policy direction municipalities must follow when determining whether a conversion or removal of lands within an *Employment Area* will be permitted.

Since 2006, the City has benefited from a more stable land use system especially given the high land values and speculative nature of the real estate market. Through two managed conversion cycles, the City has limited the impact by creating a balance between the need to facilitate housing supply, while ensuring that operating business

have a level of land use certainty to make long term financial investments within the City's Employment Areas.

The new policy direction allows for conversions or removals of *Employment Areas* to be considered at any point in time, instead of only during a Municipal Comprehensive Review (MCR). Limiting conversions/removals only during a MCR is critical to providing land use certainty, ensuring careful and comprehensive consideration of these requests and ensuring long-term stability and availability of employment lands. As a result of this change municipalities are likely to face ongoing, site-by-site requests, which does not allow for comprehensive analysis and planning considerations. In addition, this will likely lead to increased land use uncertainty for business operations and growth, increased land speculation, and significantly impact the integrity of large *Employment Areas*.

Municipalities are still required to assess and update *Employment Areas* when updating their official plan to ensure that this designation is appropriate to their planned function. Importantly, the proposed Provincial Planning Statement explicitly allows municipalities to make sufficient land available to accommodate projected *Employment Area* needs beyond a 25-year time horizon. This policy change may allow the City to take a longer-term view of Toronto's *Employment Areas* to ensure that these lands are protected from uses that could adversely affect their overall viability.

The need to protect Toronto's remaining *Employment Areas* was recently highlighted in the Our Plan Toronto: Lands Needs Assessment. The report, which studied the quantity of land required to accommodate forecasted population, household and employment growth to 2051, found there is more than sufficient potential housing in areas designated in the Official Plan for residential development. Further, it found that to accommodate the forecasted employment growth the City will need to retain all of lands designated as *Employment Areas*. <https://secure.toronto.ca/council/agenda-item.do?item=2023.PH3.7>

The proposed Provincial Planning Statement has also removed the requirement for municipalities to set density targets for *Employment Areas*. The City set a minimum density target of 50 jobs per gross hectare for all *Employment Areas*, which is an increase of 5 jobs per gross hectare from current levels. This density target was set in recognition that considerable investment in physical space may not always result in substantially more jobs, but such investment is needed to expand Toronto's economic base, support strategic economic cluster and facilitate all the spinoffs of economic development. The removal of the density target has implications for the conversion/removal of *Employment Areas* in so far as achieving the density target is no longer a required consideration for deciding to convert or remove land from *Employment Areas*.

Conversions of *Employment Areas* to residential also has the potential to consume more servicing capacity from existing infrastructure than contemplated which could necessitate additional infrastructure, as residential users consume water (or services) at a higher rate than employment uses (e.g., offices).

Conversion/Removal of Employment Areas Recommendations

- Request that the Province maintain the current timeframe for when a conversion of employment lands can be considered: only when municipalities are undertaking their 5-year Official Plan review, absent the Municipal Comprehensive Review concept.

Provincially Significant Employment Zones

In 2019, the Province established 31 (11 of which are fully or partially in Toronto) Provincially Significant Employment Zones (PSEZ) across the Greater Golden Horseshoe for the purpose of long-term planning for economic development. The proposed Provincial Planning Statement has removed all policies related to the PSEZ, however, the Province has signalled their intent to provide conversion protections for significant *Employment Areas* through alternative land use tools such as Minister Zoning Orders.

The Province has stated that they would only consider providing these protections to lands that are consistent with the proposed definition of “areas of employment” in Bill 97 and that are of the highest priority, such as sites of heavy industry and other uses that cannot be located near sensitive uses.

The Province cites two Toronto examples of major facilities operating within the City that provide essential goods and services, they are the Ontario Food Terminal and Sanofi Canada’s biopharmaceutical facility. These two examples cited by the Ministry are provincially significant. However, the City has received requests to convert nearby lands from *Employment Areas* to permit residential uses. The proposed protection of PSEZs do not include the necessary protections for nearby *Employment Areas* from encroachment of residential uses. The proposed PPS policies related to employment and land use compatibility would require municipalities to permit residential uses on lands that no longer meet the *Planning Act* definition of “areas of employment”, Attachment 3 of this report outlines nearby proposed *Employment Area* conversion requests currently under review and are to be considered by Committee and Council, and subsequently subject to Ministerial approval.

In 2022, Toronto’s *Employment Areas* were home to over 21,600 establishments employing almost 400,000 people. These businesses currently operate across the city and provide essential goods and services that require land use policy protections.

Provincially Significant Employment Zones Recommendations

- Request that the Province strengthen land use policy protections for all *Employment Areas* across the Province to ensure that these lands support the economy and are viable over the long-term.

Land Use Compatibility

The proposed Provincial Planning Statement includes similar policies regarding land use compatibility that are included in the Provincial Policy Statement. The objective of these policies remains to avoid, minimize and/or mitigate adverse effects on major facilities and sensitive land uses.

There appears to be a policy conflict between the proposed land use compatibility policies and the employment policies. The *Employment Area* policies in the proposed Provincial Planning Statement would allow for sensitive land uses (i.e., residential) in all lands for employment outside of *Employment Areas*, regardless of whether or not adverse effects can be minimized and mitigated as required by the land use compatibility policies. The determination of compatibility should occur before the permission for sensitive land uses are put in place.

The land use compatibility policies in the proposed Provincial Planning Statement do not identify major retail and major offices as uses that could have adverse effects on existing or planned industrial, manufacturing or other major facilities. This exclusion will eliminate considerations of the adverse effects of these uses, which often have high public access needs (high traffic, potential pedestrian traffic, etc.). For example, the Film industry that employs thousands of people require separation distances from impactful industries that generate noise and vibration. The proposed policies abandon a municipality's ability to take a nuanced and contextual approach to protecting existing and future industries and takes a narrow view of the type of employment that occurs within areas of employment.

The land use compatibility policies have also removed some of the detailed considerations that municipalities should make when reviewing development applications with adverse impacts on *Employment Areas*, such as identifying alternative locations for the proposed sensitive land use. The criteria around identifying alternative locations has helped the City with evaluating whether there is a real 'need' for the conversion, with evidence that there are no other available locations.

The City's ability to maintain a sufficient buffer around *Core Employment Areas*, which is necessary to buffer or prevent adverse impacts, will be greatly reduced as *General Employment Areas* may no longer meet the *Employment Area* definition and potentially have sensitive land uses such as residential and institutional uses locate within them.

Land Use Compatibility Recommendations

- Request that the Province require that municipalities determine that sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible or can be made compatible prior to permitting a sensitive land use.
- Request that the Province retain the existing Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other major facilities.

4. Environment

The proposed Provincial Planning Statement introduces policy changes that are likely to have negative impacts on the natural heritage systems. These includes changes to the policy that directs municipalities to support the achievement of complete communities.

Natural Heritage

The proposed Provincial Planning Statement was released without Natural Heritage policies, as such the City is unable to assess those policies at this time. However, changes to the proposed vision and policies in other sections may impact natural heritage in the Province. In particular, the removal of infill development as an explicit priority over settlement area expansions will lead to a loss in permeable lands, natural spaces and productive agricultural land. This will negatively impact Toronto as a downstream community where outward growth may occur. Increased settlement area expansions will result in a loss of headwater features, stormwater infiltration, natural connectivity and ecological function throughout the region.

The removal of key environmental themes (e.g., biodiversity) from the vision statement is concerning as land use change and habitat loss are major drivers of biodiversity loss and species decline. Climate change impacts were also eliminated in many sections of the proposed Provincial Planning Statement. Natural heritage protection and positive environmental outcomes should be woven throughout the proposed Provincial Planning Statement in order to address the dual crisis of biodiversity decline and climate change through land use planning decisions.

Climate Change

The proposed Provincial Planning Statement has weakened the climate change adaptation and green house gas emissions reduction-related policies in contrast to what is included in the current Provincial Policy Statement and Growth Plan. In particular, the climate change related policies have partially removed the role of changing land use and development patterns to support energy conservation, improve air quality, reduce greenhouse gas emissions and prepare for the impacts of a changing climate. This is particularly concerning as we see the negative impacts on communities arising from climate change.

Climate Change Recommendations

- Request that the Province maintain the current Provincial Policy Statement and Growth Plan policies that explicitly support energy efficiency, increased vegetation, and improved air quality, including:
 - Current Provincial Policy Statement policy 1.8.1(f), supporting building design which maximizes energy efficiency;
 - Current Provincial Policy Statement policy 1.8.1(g), supporting maximizing vegetation within settlement areas; and
 - Current Provincial Policy Statement policy 1.8.1(d) and Growth Plan policy 4.2.10.1(b), supporting shortened commutes, decreased traffic congestion, and reduced dependence on the automobile;
- Request that the Province maintain and expand the geographic scope of current the Provincial Policy Statement and Growth Plan policies related to natural heritage protection, climate action, intensification, and greenhouse-gas reduction, including:

- Growth Plan policy 4.2.10(a), setting intensification targets and linking intensification and density to climate change;
 - Growth Plan policies 4.2.10.1(c) and 4.2.10.2(b), requiring strategies to address and assess infrastructure risks and vulnerabilities related to climate change;
 - Growth Plan policy 4.2.10.2(b), encouraging the development of GHG inventories; and
 - Growth Plan policy 4.2.10.2(c), encouraging the establishment of GHG reduction targets.
- Request that the Province expand the geographic scope of the Growth Plan's protections for natural heritage systems (4.2.2), water resource systems and watershed planning (4.2.1), and stormwater management (3.2.7).

Greenbelt

The Province has signalled their intent to ensure that policies in the Greenbelt Plan remain unchanged. To address instances where Greenbelt Plan policies refer to the Provincial Policy Statement or Growth Plan policies, the Province is contemplating amendments to the Greenbelt Plan that would indicate that the previous policies of the Growth Plan and Provincial Policy Statement would continue to apply.

The proposed Provincial Planning Statement would remove the Agricultural System in the Greater Golden Horseshoe. The Agricultural System provided for the identification and protection of agricultural lands in the Greater Golden Horseshoe area, including the Greenbelt. The Agricultural System includes a continuous land base comprised of prime agricultural areas, including speciality crop areas, and rural lands, as well as a the agri-good network. The Agricultural System created consistency for application of agricultural policies across the Region.

Greenbelt Recommendations

- Request that the Province maintain the Growth Plan's provincially identified Agricultural System.

Mineral Aggregate Resources

The proposed Provincial Planning Statement has removed policies in the Growth Plan that require municipalities to implement Official Plan policies and strategies to conserve mineral aggregate resources by recovering and recycling aggregate material. This direction has helped to encourage a market for secondary aggregate materials, which aligns with the City's circular economy goals.

Mineral Aggregate Resources Recommendations

- Request that the Province maintain Growth Plan policy 4.2.8.1 requiring municipalities to develop and implement official plan policies and other strategies related to conserving mineral aggregate resources

Waste Management

The proposed Provincial Planning Statement omits a more thorough explanation of what is meant by integrated waste management. This risks a narrow interpretation of the term that is more focused on downstream waste management strategies. This is contrary to and not supportive of Toronto's aspiration to move towards a more circular economy.

The proposed removal of Growth Plan policies to consider waste management initiatives within the context of long-term regional planning, and in collaboration with neighbouring municipalities, risks a loss of efficiency and effectiveness in Ontario's planning context for sustainable waste management.

The proposed Provincial Planning Statement also includes changes that appear to be inconsistent with the Provincial interests expressed in the Resource Recovery and Circular Economy Act (RRCEA), including fostering the continued growth and development of the circular economy, and increasing the reuse and recycling of waste across all sectors of the economy. In particular, the lack of definition for integrated waste management system means that the proposed Provincial Planning Statement is devoid of reference to resource recovery, which could be interpreted as allowing planners to put disposal (e.g., landfilling) on par with any efforts toward resource recovery. This is inconsistent with the objectives of most municipalities in Ontario and a departure from the RRCEA.

Waste Management Recommendations

- Request that the Province change the definition of "waste management system" to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province's circular economy ambitions.
- Request that the Province align the Waste Management policies with the language of the Waste Free Ontario Act and Resource Recovery and Circular Economy Act (RRCEA) and provide guidance on how municipalities are to interpret the Waste Management policies in the Provincial Planning Statement alongside the RRCEA.
- Request that the Province include policy direction that requires municipalities to coordinate and plan for appropriate and adequate shared waste management infrastructure
- Request that the Province include policy direction that ensures the provision of lands for integrated waste management, including recycling and processing facilities, and residual disposal/management.

Water

The proposed Provincial Planning Statement has removed the requirement for municipalities to use a sub-watershed plan to inform the planning of large-scale development in greenfield areas. The removal of the requirement could have negative downstream impacts.

The proposed Provincial Policy Statement also proposes to remove the Provincial Policy Statement policy direction that planning authorities should evaluate and prepare for the impacts of a changing climate on water resource systems at the watershed level, including direction to increase the extent of vegetative and pervious surfaces as a stormwater management practice.

Watershed, Hydrology, and Stormwater Management Recommendations:

- Request that the Province maintain and expand the geographic scope of Growth Plan policy 4.2.1.4 that requires a sub-watershed plan for large-scale development in greenfield areas.
- Request that the Province maintain policy references to "key hydrologic features, key hydrologic areas and their functions", from the current Provincial Policy Statement (2.2.1(e)) and expand the geographic scope of Growth Plan policy 4.2.1.2.
- Request that the Province include direction in the proposed Provincial Planning Statement that planning authorities shall protect, improve, or restore the quality and quantity of water by:
 - evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level; and
 - ensuring stormwater management practices minimize stormwater volumes and contaminant loads and maintain or increase the extent of vegetative and pervious surfaces.
- Request that the Province recognize and promote green infrastructure's role in water and stormwater systems.

5. Infrastructure

As the City continues to grow and increase housing supply, it is integral to ensure that the needed infrastructure accompanies population and job growth to serve the needs of residents and workers. These components form part of a complete community and are important to achieving a high quality of life for current and future Torontonians.

The City's 2023 10-year Capital Budget and Plan includes \$9.5 billion to support vital growth-related infrastructure including roads, transit, water and wastewater systems, as well a community services such as parks and recreation, childcare, libraries, and protective services such as fire, ambulance and police.

An additional \$29.8 billion of expenditures beyond those included in the capital plan have been identified for priority projects below the line / as capital needs constraints that are needed to help build complete communities across the City. These projects remain reliant on senior government funding commitments and are subject to the City's fiscal capacity considerations. Included in the \$29.8 billion estimate is approximately \$2.2 billion to advance the City's affordable housing initiatives.

Long term and capital infrastructure plans play a strong role in identifying areas that are serviced, and those next in line for development. The 2022 Development Charges Background Study identified net City growth-related costs to 2041 of \$22.7 billion, with total costs, including expenditures by other levels of government, of \$67 billion, to support the forecast growth of 138,4000 dwelling units over 10 years (versus the Provincial target of 285,000 over 10 years for Toronto) and 235,000 units to 2041. The City's 2023 10-year Capital Budget and Plan includes \$9.5 billion to support growth-related infrastructure primarily for roads, transit, and water and wastewater systems.

Phasing and sequencing of infrastructure allows for orderly implementation of servicing to planned and identified strategic areas. It is not financially feasible, sustainable or efficient to build disconnected (or interim) infrastructure to all corners of a municipality. Long term plans identify the quantum of infrastructure required to address growth to 2041, and capital plans identify needs for the next 10 years. Together these plans identify where, how and when servicing capacity should be delivered to enable housing to come online more quickly and cost effectively to support Provincial goals.

Schools

The proposed Provincial Planning Statement has established schools as an element of a “complete community” and has specifically directed municipalities to collaborate with school boards to facilitate early and integrated planning for schools and associated childcare facilities to meet current and future needs. The proposed Provincial Planning Statement also acknowledges and encourages the use of non-traditional school locations where appropriate for the community. Schools located into high-rise developments are specifically mentioned as a form of innovative design that can be considered and encouraged for strategic growth areas and other areas with a compact built form.

City Staff are supportive of these new policies and will continue to work collaboratively with school boards to ensure schools are planned for as part of large development sites.

Transportation

The proposed Provincial Planning Statement removes or changes several policies that support an efficient and sustainable public transit system, including: removing a policy that encourages municipalities to ensure development patterns help to minimize the length and number of vehicle trips; changing a policy so that compact and transit-supportive design should only be considered "where locally appropriate"; and changing a policy to weaken direction on reducing dependence on the automobile for mobility purposes.

Transportation Recommendations

- Request that the Province maintain all transportation related policies in the current Provincial Policy Statement and Growth Plan that support reducing vehicle trips.

- Request that the Province include language regarding planning for a transportation system in way that accounts for factors such as equity, cost, air quality, winter maintenance and resiliency.

Heritage

Generally, the proposed Provincial Planning Statement does not make significant changes to archaeology policies. There is possible policy duplication, however, with respect to protected heritage properties. The proposed Provincial Planning Statement expands the definition of "Protected Heritage Property" to include "property with known archaeological resources in accordance with Part VI of the Ontario Heritage Act." Therefore, this policy now applies to properties where archaeological resources have been identified. This creates some duplication with policy 4.6.2, which also requires conservation of archaeological resources. Duplication of requirements to conserve archaeological resources is not necessarily negative but may create situations in which the policy direction is unclear.

City staff support the addition of "early" to proposed Provincial Planning Statement policy 4.6.5, providing direction for planning authorities to engage early with Indigenous communities on matters related to archaeological resources, built heritage resources, and cultural heritage landscapes.

Heritage Recommendation:

- Request that the Province modify policies concerning the protection of heritage properties to read "protected heritage property shall be conserved", recognizing that the definition of "protected heritage property" includes more than lands with built heritage resources or cultural heritage landscapes.

6. Implementation

As with previous Provincial Policy Statements, the City is required to ensure its land use policies and land use decisions are consistent with the policies in the proposed Provincial Planning Statement. These decisions come in the form of updates or amendments to the Official Plan to approving a development application any site. Once the Province brings into effect the proposed Provincial Planning Statement, City staff will be required to initiate the policy review process to determine what policies need to be amended to be made consistent with the Provincial Planning Statement.

Municipal Comprehensive Review (MCR)

The proposed Provincial Planning Statement has removed the concept of and requirement to undertake a MCR which is part of the current Provincial Policy Statement and Growth Plan. A MCR require that municipalities comprehensively apply the policies of the Provincial Policy Statement or Growth Plan when updating an Official Plan or developing a new one. While municipalities will still be required to update their Official Plan every five years (or every ten years after a new official plan) to ensure conformity with provincial land use plans and consistency with policy statements, the concept of MCRs has utility in so far as it provides timeframes for when certain planning matters

are to be addressed. This has not only helped to provide more predictability and consistency regarding when municipalities would undertake certain planning exercises, but more importantly it has helped to ensure certain planning matters are undertaken holistically for better planning outcomes.

For example, the consideration of *Employment Area* conversions and Settlement Area Boundary Expansions are currently only permitted when municipalities are undertaking an MCR. As municipalities are required to undertake other long-term planning exercises during an MCR, such as a land needs assessment, municipalities have timely and comprehensive data to determine whether (or to what extent) a settlement area boundary expansion or *Employment Area* conversion is needed to accommodate future population and employment growth.

Land Needs Assessments

The proposed Provincial Planning Statement significantly changes the processes that municipalities in the Greater Golden Horseshoe follow to plan for population and employment growth by removing the need to undertake a land needs assessment in accordance with the method established by the Minister of Municipal Affairs and Housing.

Instead, municipalities will be responsible for developing their own method to plan for population and employment growth. In the absence of regional coordination with GGH municipalities, it is likely that municipalities will adopt different methods which will complicate efforts to align and coordinate service and infrastructure delivery across the region.

Land Needs Assessment Recommendations

- Request that the Province maintain the existing Land Needs Assessment methodology as Provincial guidance to the large and fast-growing municipalities for assessing land needs as a complement to the Provincial Projections Methodology Guideline available to other municipalities.

Time Horizon

The proposed Provincial Planning Statement makes changes to the time horizon that municipalities must use when planning for sufficient land availability to accommodate an appropriate range and mix of land uses to meet projected population and employment growth.

The proposed Provincial Planning Statement changes the time horizon from the 2051-time horizon in the Growth Plan to “at least 25 years”. The policy further clarifies that municipalities may apply a time horizon beyond 25 years when planning for infrastructure, public service facilities, strategic growth area, and *Employment Areas*.

Minister Zoning Orders

The proposed Provincial Planning Statement includes a new policy that states that when a Minister Zoning Order has been issued the resulting development potential will be in addition to projected needs over the planning horizon and that municipalities are required to incorporate the additional growth when updating their official plan and infrastructure plans.

This new policy may lead municipalities to set aside more land than is needed for population growth, which may result in planning for too little land for employment growth. Further, should Minister Zoning Orders be issued without consulting the affected municipality, there is a greater risk of infrastructure planning misalignment.

Conformity with the Provincial Planning Statement

Should the proposed Provincial Planning Statement come into effect, updates to the Official Plan will be required to bring it into conformity. It should be noted that this upcoming policy review would be occurring close to when the current MCR will be completed. The five-year period of land use policy certainty will not exist.

The proposed Provincial Planning Statement has maintained the policy from the current Provincial Policy Statement and Growth Plan that states that all decisions on planning matters must be consistent with this Policy Statement once it comes into effect, even if a municipality's Official Plan and Zoning By-Laws have not yet been updated to be consistent with it. It is anticipated that the City will need to undertake substantial work to update the Official Plan and Zoning By-Laws to be consistent with the policies in the proposed Provincial Planning Statement. Before such work is completed, there is a risk that planning decisions may be made that do not conform to the City's in effect Official Plan policies.

Transitional Matters

The Province has requested that municipalities identify planning matters that should be transitioned under the current planning framework. The City has many planning initiatives underway, waiting for approval, or waiting for an Ontario Land Tribunal hearing or decision that would be impacted by the change in policies in the proposed Provincial Planning Statement.

Should some or all of these planning matters not be transitioned it is likely that substantive changes will be required to conform to the new policies which will further delay the implementation of these initiatives, many of which aim to increase housing supply in Toronto.

Toronto's previous Municipal Comprehensive Review resulted in Official Plan Amendment 231 (OPA 231), which Council adopted in 2013 and the Minister approved in 2014, and subsequently received 178 appeals to the Ontario Land Tribunal (OLT) in 2015. To date, approximately 80 site specific appeals remain. OPA 231 was approved under the previous Growth Plan, 2006. Including OPA 231 in the proposed transition regulation would have the effect of streamlining the current proceedings before the OLT.

Transitional Matters Recommendations

- Request that the Province include as part of the transition regulation that all planning matters (Official Plan Amendments or Zoning By-law Amendments) that predate the in-effect date of the new Provincial Planning Statement be transitioned under the existing planning framework. These include planning matters that are: (1) deemed complete and in process/ under review; (2) city-initiated process underway or nearing completion, or (3) Council-adopted but is under appeal or appeal period nearing.
- Request that the Province to continue to transition Official Plan Amendment 231 under an authority proposed in the Helping Homebuyers, Protecting Tenants Act, 2023, as a matter in process that was approved under the Growth Plan, 2006, but is currently under appeal at the Ontario Land Tribunal.

Coordination

The proposed Provincial Planning Statement has weakened policy direction that currently requires municipalities to undertake integrated planning. This change could create ambiguity and inconsistencies among municipalities with respect to the degree to which they undertake integrate and coordinated planning. As a first principle, integrated and coordinated planning forms the foundation of good planning by accounting for the complex and multifaceted nature of building complete communities.

Coordination Recommendations

- Request that the Province acknowledge the importance of and requirement for undertaking integrated planning across the Province.

Indigenous Engagement

The proposed Provincial Planning Statement has strengthened policy direction regarding engaging with and coordinating land use planning matters with Indigenous communities. Proposed policies include direction that municipalities engage and coordinate early with Indigenous communities to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. At this point, it is unclear what process municipalities are expected to follow if an Aboriginal or treaty right is asserted. This is likely to give rise to additional responsibilities on the part of the Province and it is unclear how the role of the Province will be integrated with the overall land use planning decision making process.

As part of many City-initiated projects, City staff meaningfully engage with Indigenous communities, including the City's Aboriginal Affairs Advisory Committee, Treaty Rights Holders and Urban Indigenous organizations operating in Toronto.

Indigenous Engagement Recommendation

- Request that the Province provide guidance on expectations with respect to municipal engagement with Indigenous communities on land use planning matters that identify best practices.
- Request that the Province clarify the scope of a municipality's obligation to identify potential impacts of decisions on the exercise of Aboriginal or treaty rights and how the Province's role in addressing asserted Aboriginal or treaty rights will be integrated in the municipal decision-making process.

Next Steps

The Province introduced the proposed Provincial Planning Statement on April 6, 2023 with a 60-day commenting period. Upon Planning and Housing Committee's consideration of this report, its recommendations, and Attachment 1, staff will forward them as a package to the Ministry of Municipal Affairs and Housing in advance of the June 5, 2023 commenting period closure. Additional comments received at City Council's meeting on June 14-16, 2023 will be forwarded to the Ministry as supplementary information to the recommendations contained in this report.

To ensure that the City's comments are brought to the attention of other Ministries, this report recommends that the City Clerk forward a copy of this report to the Premier, the Minister of Municipal Affairs and Housing, the Minister of Economic Development, Job Creation and Trade, the Leader of the Official Opposition, all Ontario MPPs, the Association of Municipalities of Ontario, and all Ontario municipalities for their consideration.

Conclusion

As noted throughout this report, the draft Provincial Planning Statement represents a seminal change in direction for regional planning in Ontario and within the Greater Golden Horseshoe area. The nature of the changes proposed replace predictability and integrated land use, infrastructure and resource management planning with retrograde policy directions that favour flexibility for one-off decision making and land use speculation instead of a systems approach.

Wholesale changes to the regional planning system are not needed, as proposed in the draft Provincial Planning Statement. The City is open and willing to work with the Province and other municipal partners to refine the regional planning framework and continue to amend municipal policies and practices to facilitate the development of more housing quickly and sustainably as demonstrated over the last several years in approving over 28,000 units per year on average. Importantly as well, City staff welcome the opportunity to work with Provincial staff to assist in refining the policies and providing lived examples of how the proposed policies will potentially be operationalized and which may ultimately not achieve the intended outcomes without further refinement to the policies as contemplated in the proposed Policy Statement.

CONTACT

Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City Planning Division,
Tel: 416-392-8148, Kerri.Voumvakis@toronto.ca

Jeffrey Cantos, Manager, Official Plan & Legislation, City Planning Division, Tel: 416-
397-0244. Jeffrey.Cantos@toronto.ca

Kyle Pakeman, Project Coordinator, Official Plan & Legislation, City Planning Division,
Tel: 416-392-6477, Kyle.Pakeman@toronto.ca

SIGNATURE

Gregg Lintern, MCIP, RPP
Chief Planner and Executive Director
City Planning Division

ATTACHMENTS

Attachment 1: City of Toronto Staff Comments on the Proposed Provincial Planning
Statement

Attachment 2: Provincial Planning Statement 2023: Impact on Film Production Industry

Attachment 3: Two Examples of *Employment Area* Conversions Requiring Elevated
Levels of Protection from Conversion to Non-Employment Uses

Attachment 2: City of Toronto Staff Detailed Comments on the Proposed Provincial Planning Statement

Proposed PPS Policy #	Potential Impact	Recommendation (New Text) <i>(Deleted Text)</i>
2.1	Planning for People and Homes	
<p>2.1.1</p> <p>Policy related to planning for projected growth.</p>	<p>New policy that states that when a Minister's Zoning Order (MZO) has been issued, the resulting development potential will be in addition to projected needs over the planning horizon and that municipalities are required to incorporate the additional growth when updating their official plan and infrastructure plans. This new policy may lead municipalities to set aside more land than is needed for population growth, which may result in planning for too little land for employment growth.</p> <p>Removes need to undertake a land needs assessment in accordance with the method established by the Minister of Municipal Affairs and Housing. In the absence of regional coordination with GGH municipalities, it is likely that municipalities will adopt different methods which will complicate efforts to align and coordinate service and infrastructure delivery across the region.</p> <p>Removes the population and employment growth</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain the existing Land Needs Assessment methodology as Provincial guidance to the large and fast-growing municipalities for assessing land needs as a complement to the Provincial Projections Methodology Guideline available to other municipalities.</p> <p>The Province lead a provincial-municipal process with large and fast-growing municipalities for the periodic preparation of regional population and employment forecasts. Enable municipalities to continue to be able to adopt higher forecasts.</p> <p>Direct municipalities in the Greater Golden Horseshoe to continue using population and employment forecasts of Schedule 3 of the Growth Plan for managing growth to 2051 and ensuring “at least 25 year” supply of land.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	forecasts that are included in the Growth Plan. Without a standardized population and employment growth forecast there is a risk that municipalities in the GGH area will use different methodologies that will result in divergent forecasts that could have implications for the regional coordination of infrastructure and services, as well as the natural heritage and agricultural system.	
<p>2.1.2</p> <p>Policy related to the amount of land that needs to be designated and fully serviced for growth.</p>	Removes references to “residential intensification and redevelopment” and introduces ambiguity as to whether “lands which are designated and available for residential development” include underutilized infill sites that have the potential to accommodate significant portions of forecasted growth.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain references to “residential intensification and redevelopment” to provide clarity that where sufficient land and servicing exists to accommodate forecast population through infill development.</p> <p>Clarify that municipalities are not themselves expected to provide land with servicing capacity but can leverage policy / legislative tools to make servicing infrastructure available by others (e.g., developers).</p>
<p>2.1.4</p> <p>Policy related to achieving the goal of building a complete community.</p>	Removing references to climate change, green infrastructure, compact built form, transit supportive development, and affordable housing may hinder a planning authority’s ability to ensure	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Maintain references to climate change, green infrastructure, compact built form, transit</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>these matters are considered when planning for complete communities. Removes references to the “convenient access to” amenities and services (i.e., public service facilities, local stores, etc.). Convenient access to a wide range of amenities and services is a core principle of a complete community.</p> <p>Changing the policy from “will support” to “should support” may allow for outcomes that counter the goal of achieving complete communities lowering the bar for the development of complete communities.</p>	<p>supportive development, affordable housing, safety, and convenient access to a range of amenities and services.</p> <p>Maintain the policy language of “will/shall support”.</p>
2.2	Housing	
<p>2.2.1</p> <p>Policy related to how municipalities must accommodate a range and mix of housing options.</p>	<p>Removing the requirement for municipally established affordable housing targets will weaken the delivery of affordable housing and compromises the policy rationale for including affordable housing targets in housing strategies, such as Toronto’s HousingTO Action Plan.</p> <p>Permitting and facilitating the conversion of existing commercial and institutional buildings for residential use may make it harder to plan for complete communities, as it may result in the loss of retail,</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Amend proposed policy 2.2.1.b.2, related to the conversion of existing commercial and institutional buildings for residential uses, to enable municipalities to include a requirement to maintain or replace employment space within the redevelopment or within an off-site location.</p> <p>Enact a Regulation to permit the use of zoning with conditions, pursuant to Section 113 of the City of Toronto Act 2006, that</p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> <i>(Deleted Text)</i>
	<p>office, and institutional uses without replacement of these amenities. These uses are needed to support future population growth.</p> <p>Conversion of existing commercial buildings for residential use can cause long-term economic implications for job growth and erode <i>Employment Areas</i> and the property tax base, especially those primarily comprised of office uses.</p> <p>Removing the direction for the “development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available” may restrict the policy rationale in securing development-related funding for growth-related projects such as new community recreation centres or new parkland.</p> <p>Removing the reference to municipalities requiring that multi-unit developments incorporate a mix of unit sizes to accommodate a diverse range of housing incomes may limit the development of complete communities with options for larger households including families with children, particularly in large and growing municipalities where multi-</p>	<p>would enable a municipality to secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space.</p> <p>Add a new policy that enables municipalities to put in place local policies that address the changing nature of office space and needs to reflect the local context.</p> <p>Maintain policy requirement for municipalities to set targets for housing that is affordable to households with low and moderate incomes: PPS Policy 2.2.1(a) Growth Plan Policy 2.2.6.1(a)(ii).</p> <p>Maintain policy direction for municipalities to direct new housing towards locations where appropriate levels of infrastructure and public service facilities are or planned for (PPS 2.2.1(c)).</p> <p>Maintain Growth Plan policy 2.2.6.3 that provides direction to municipalities to use available tools to require that multi-unit residential developments incorporate a mix of unit types to accommodate a diverse range of households sizes and incomes.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	unit developments make up a large proportion of residential developments.	
2.3	Settlement Areas and Settlement Area Boundary Expansions	
<p>2.3.1</p> <p>Policy related to growth being focused in settlement areas and strategic growth areas.</p>	<p>Policy direction for Strategic Growth Areas omits reference to general intensification of areas outside of Strategic Growth Areas, limiting opportunities to encourage the development of housing in areas that can accommodate new housing options.</p> <p>Policies should require the coordination of development with the delivery of infrastructure to ensure municipalities can proactively and strategically plan infrastructure in a financially responsible manner.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Add a policy that encourages the development of missing middle type housing in areas outside of Strategic Growth Areas.</p>
<p>2.3.2</p> <p>Policy related to how land-use patterns should be coordinated within settlement areas.</p>	<p>Changing policy 2.3.2 (which provides direction regarding land use patterns within settlement areas) from “shall” to “should” significantly weakens the policy and reduces the prospect of the policy having a meaningful direction, including ensuring that land use patterns are based on densities and a mix of land uses which use land resources efficiently, optimize existing hard and</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain policies that direct municipalities to avoid uneconomical expansion of infrastructure. (PPS 1.1.3.2 (b))</p> <p>Maintain policies that direct municipalities to account for climate change planning and mitigation, air quality and energy efficiency. (PPS 1.1.3.2 (c) & (d))</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>soft infrastructure, support active transportation, and support public transit systems.</p> <p>Removing policies that tie land use decisions to minimizing the negative impacts of air quality and climate change, and encouraging energy efficiency, weakens the policy rationale for the City's environmental policies such as TransformTO.</p>	
<p>2.3.3</p> <p>Policy related to directions on supporting intensification and redevelopment.</p>	<p>Policy change to remove the requirement to prioritize infill and intensification will potentially result in less efficient land use patterns leading to a loss in permeable lands, natural spaces, and agricultural lands. This will impact Toronto as a community downstream (i.e., greater risk of flooding).</p>	<p>Do Not Support</p> <p>If approved, recommend revisions:</p> <p>Require that large and fast-growing municipalities accommodate the majority 50% of residential development within their current settlement area.</p>
<p>2.3.4</p> <p>Policy related to when to allow new or expanded settlement area boundaries.</p>	<p>Policy changes reduce the role of intensification and increase the opportunity for urban expansion to accommodate residential growth. While Toronto does not have the ability to expand its settlement boundary, the upper-tier and lower-tier municipalities surrounding Toronto are likely to be impacted by these policy changes.</p> <p>Over time it can be anticipated that these</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain that municipalities may identify a settlement area or allow the expansions of a settlement area boundary only at the time of a 5 year official plan update and only where it has been demonstrated that certain conditions have been met (PPS 1.1.3.8)</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>policies will result in more urban boundary expansions than would otherwise happen if the policies in the current Provincial Policy Statement and Growth Plan were maintained. As result, there is a risk that Toronto could be exposed to greater environmental risks (i.e., flooding) due to the downstream effects of the loss of permeable surfaces, natural spaces and agricultural lands.</p>	
<p>2.3.5 Policy related to establishing density targets for new or expanded settlement areas.</p>	<p>The policy change removes the requirement for select municipalities to set density targets for greenfield development. While Toronto does not have land available for greenfield development the upper-tier and lower-tier municipalities surrounding Toronto are likely to be impacted by these policy changes.</p> <p>Over time it can be anticipated that these policies will result in more greenfield development than would otherwise happen if the policies in the current Provincial Policy Statement and Growth Plan were maintained. As result, there is a risk that Toronto could be exposed to greater environmental risks (i.e., flooding) due to the downstream effects of</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Direct that large and fast-growing municipalities must achieve a minimum density target of 50 residents and jobs combined per hectare for new settlement areas or settlement area expansion lands.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	the loss of permeable surfaces, natural spaces and agricultural lands.	
2.4	Strategic Growth Areas	
2.4.1.1 Policy related to the planning of strategic growth areas.	Would maintain Strategic Growth Areas as an important element of a municipality’s urban structure that are planned to accommodate significant population and job growth.	Support in Principle
2.4.1.2 Policy related to modifying the size and location of Urban Growth Centres.	Removing the Growth Plan policy that set density targets and provide direction for how municipalities will plan their Urban Growth Centres (UGC’s) may diminish their ability to: (1) serve as centres for investments in regional public service facilities, as well as commercial, recreational, cultural, and entertainment uses, (2) accommodate and support the transit network at a regional scale, (3) serve as a high-density major employment centres that will attract provincially, nationally, or internationally significant employment uses, and (4) accommodate significant population and employment growth.	Do Not Support If approved, recommended revisions: Maintain the current or comparable policies for UGCs, including density targets (Growth Plan 2.2.3.1 and 2.2.3.2). The policy should contain language that emphasizes the importance of maintaining UGCs as a focal point for significant population and employment growth and that any changes to the size and location of UGCs should not diminish this objective.
2.4.2.1 Policy related to identifying and delineating Major	Existing Major Transit Station Areas (MTSA) are unlikely to be affected by the MTSA policy change. The City may need to include 70 new MTSA’s	Support in Principle If approved, recommended revisions: Provide flexibility for municipalities to identify

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Transit Station Areas.	based on the definition of "higher order transit" corridors.	additional higher order transit corridors that deviate from the definition of "higher order transit".
2.4.2.2 Policy related to density targets for the types of Major Transit Station Areas.	No change to density targets for MTSAs.	Support
2.4.2.3 Policy related to requests for alternative targets for Major Transit Station Areas.	Municipalities are still allowed to request a lower density target where it has been demonstrated as necessary based on the two conditions being met.	Support
2.4.2.5 Policy related to identifying Major Transit Station Areas that are not on a higher order transit corridor.	Provides the flexibility for municipalities to identify MTSAs along transit corridors that do not meet the definition of higher order transit.	Support
2.4.2.6 Policy related to how Major Transit Station Areas should be planned and designed.	Policy direction with respect to planning for MTSAs is weakened, which could reduce their transit supportiveness and negatively impact the building of complete communities in areas adjacent to MTSAs and along higher order transit corridors. Further, policy changes may result in developments that have land uses and built forms that could adversely impact	Do Not Support If approved, recommended revisions: Maintain the Growth Plan policies that support the development of complete communities with a compact built form and affordable housing within MTSAs, on lands adjacent to MTSAs, and along transit corridors (Growth Plan 2.2.4.8 - 2.2.4.10).

Proposed PPS Policy #	Potential Impact	Recommendation (New Text) <i>(Deleted Text)</i>
	the achievement of transit-support densities.	Include reference to affordable housing given direction to include affordable housing in Protect Transit Station Areas through Inclusionary Zoning.
2.8	Employment	
<p>2.8.1.1</p> <p>Policy related to promoting economic development and competitiveness.</p>	<p>Policy change may allow for a broader mix of employment uses within mixed use areas and a broader mix of non-employment uses within <i>Employment Areas</i>. The policy change may undermine planning for economic development by removing the requirement to consider infrastructure availability.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Revise to include all the considerations listed in PPS 1.3.1. and 1.7.1., as well as Growth Plan Policy 2.2.5.1, in particular: PPS 1.3.1.e PPS 1.7.1.c PPS 1.7.1.g PPS 1.7.1.h Growth Plan 2.2.5.1.b.</p>
<p>2.8.1.2</p> <p>Policy related to the location of employment uses next to sensitive land uses.</p>	<p>Policy change may result in more industrial, manufacturing, and small-scale warehousing uses (that meets the no adverse effects test) to locate adjacent to sensitive land uses in strategic growth areas and mixed-use areas with frequent transit.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of Employment Areas, by prohibiting residential uses in appropriate locations.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> (Deleted Text)
<p>2.8.1.3</p> <p>Policy related to how lands for employment outside of employment lands will be used.</p>	<p>Policy change is likely to result in the encroachment of residential, commercial, institutional, and public service facilities uses on lands for employment outside of <i>Employment Areas</i>, such as office parks and those lands that are no longer deemed <i>Employment Areas</i>. This may result in a net loss of jobs as employment uses are converted to residential uses and limit the City's ability to provide a buffer around <i>Core Employment Areas</i> to allow for a transition of uses.</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: On lands for employment outside of Employment Areas, and taking into account the transition of uses to prevent adverse effects, a diverse mix of land uses, including residential, employment, public service facilities and other institutional uses shall be planned for to support the achievement of complete communities.</p> <p>On lands for employment outside of Employment Areas, uses that would have adverse effects if located in proximity to Employment Areas or major facilities shall be prohibited.</p>
<p>2.8.1.4</p> <p>Policy providing explicit direction that Official Plan and Zoning By-Laws cannot be more restrictive than policy 2.8.1.3 (above).</p>	<p>Policy change removes the flexibility of municipalities to set OP and other policies that are more restrictive than 2.8.1.3.</p> <p>With the potential loss of the <i>Employment Area</i> land base and prospects for conversions to happen incrementally, there will be growing dependency on Mixed Use Areas (MUAs) to provide future jobs for residents.</p> <p>There are strong economic pressures to limit the amount of employment space provided in MUAs as</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 2.8.1.3 except for purposes of public health and safety or where a development would have adverse effects if located in proximity to an Employment Area or major facility.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> <i>(Deleted Text)</i>
	residential is far more lucrative. Given the land consumptive nature of traditional employment uses the amount of intensification that will be able to happen on <i>Employment Area</i> lands will be limited, making it more necessary for municipalities to have a mechanism to ensure certain employment space minimums are met in mixed use development.	
2.8.1.5 Policy related to location of major office and institutional developments.	Policy change may lead some major offices and major institutional developments to occur outside of strategic growth areas.	Support in Principle
2.8.2.2 Policy related to protection of <i>Employment Areas</i> .	<p>Policy change includes new limitations on what can be located within <i>Employment Areas</i>: public service facilities, other institutional uses, commercial uses, and retail/office uses not associated with the primary employment use.</p> <p>Excluding standalone office uses and major office uses excludes office parks from being designated <i>Employment Areas</i>. This exposes some <i>Core</i> and <i>General Employment Areas</i> to encroachment from sensitive uses. Will likely result in the</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Change policy (e) to read: including an appropriate transition to adjacent non-<i>Employment Areas</i> to ensure land use compatibility <u>and to maintain the long-term operational and economic viability of the planned uses and function of these areas.</u></p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> (Deleted Text)
	<p>destabilization of Areas of Employment.</p> <p>Prohibiting commercial uses, public service facilities and other institutional uses in <i>Employment Areas</i> will reduce the number of places these uses can locate in Toronto. These uses would need to compete against residential uses in a highly land speculative market.</p> <p>Comprehensive planning and protection of employment lands for a variety of sectors on a city-wide scale aligned with municipal investment in water and wastewater infrastructure, transit, and economic development initiatives is key in supporting job growth and attracting and retaining businesses to the City's employment lands.</p>	
<p>2.8.2.3</p> <p>Policy related to updating Official Plans to appropriately identify <i>Employment Areas</i>.</p>	<p>This policy makes no reference to the timing of when planning authorities should assess and update <i>Employment Areas</i> identified in official plans. By removing this critical timing policy, municipalities may face pressure to reconsider these designations repeatedly and at site-by-site requests, which leads to poor planning outcomes,</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: At the time of the official plan review or update, Planning authorities shall assess and update Employment Areas identified in official plans to ensure that this designation is appropriate to the planned function of Employment Areas.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	and land use uncertainty for landowners and business operators in <i>Employment Areas</i> .	
<p>2.8.2.4</p> <p>Policy related to conditions when municipalities may grant the removal of lands from <i>Employment Areas</i>.</p>	<p>Policy eliminates the role of a comprehensive review when considering conversions of <i>Employment Areas</i>, a critical method of providing land use certainty, ensuring careful and comprehensive consideration of these requests and ensuring long-term stability and availability of employment lands. Municipalities will face ongoing, site-by-site requests, which does not allow for comprehensive analysis and planning considerations. In addition, this will lead to increased land use uncertainty for business operations and growth, increased land speculation (since essentially all lands could be proposed for conversion) and significantly impact the integrity of large <i>Employment Areas</i>.</p> <p>Private requests to remove lands from <i>Employment Areas</i> would be subject to Bill 23's 180-day review timeline. This timeline will be challenging to meet as the issues that need to be addressed are complex and require detailed study</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: Planning authorities may remove lands from <i>Employment Areas</i> at the time of the official plan review or update only where it has been demonstrated that:</p>

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	(e.g., land use compatibility study).	
2.9	Energy Conservation, Air Quality and Climate Change	
2.9.1 Policy related to reducing greenhouse gas emissions and preparing for the impacts of climate change.	Policy weakens direction regarding adequately addressing climate change adaptation and green houses gas emissions goals. Changes reduce the role of land use and development patterns to support energy conservation, improve air quality, reduce greenhouse gas emissions, and prepare for the impacts of a changing climate.	Do Not Support If approved, recommended revisions: Maintain the current Provincial Policy Statement and Growth Plan policies: PPS policy 1.8.1 (d), (f), and (g) Growth Plan policy 4.2.10.1 (a), (b) and (c) Growth Plan policy 4.2.10.2 (b) and (c)
3.1	General Policies for Infrastructure and Public Service Facilities	
3.1.1 Policy providing general direction on planning infrastructure and public service facilities.	The proposed language does not address infrastructure resilience, climate change considerations, and infrastructure capacity when planning for infrastructure and public service facilities. There is less guidance for municipalities. The removal of more detailed Growth Plan policies speaking to coordinated investment in infrastructure and public service facilities, and the removal of language speaking to climate change considerations in planning these elements may require a re-evaluation of	Partially Support If approved, recommended revisions: Retain the policies from the Growth Plan (3.2.1.2 (b) – (d)). Provide sufficient infrastructure capacity in strategic growth areas; identify the full life cycle costs of infrastructure and developing options to pay for these costs over the long-term; and consider the impacts of a changing climate. Provide additional policy direction on how municipalities are expected to “leverage the capacity of development proponents”.

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>the municipal policy framework protecting parklands and may compromise the ability to secure growth-related infrastructure and facilities as a condition of development.</p> <p>The proposed policy also removes reference to the Province supporting planning for infrastructure and public service facilities.</p> <p>Requirements to ensure viability of infrastructure over its lifecycle in 3.1(1)a is critical and needs to remain clearly called out.</p>	
<p>3.1.2</p> <p>Policy related to prioritizing infrastructure and public service facilities in strategic growth areas.</p>	<p>Deleted PPS Policy 1.6.2 which directed municipalities to promote green infrastructure to complement infrastructure.</p> <p>Infrastructure takes time to plan and build, it is recommended that the PPS direct proponents to develop in areas with servicing or servicing is planned, whenever possible, as outlined in the municipality’s long term servicing plans and capital plans. Private servicing should be a last resort, subject to adequate tests with adequate measures to address potential liability.</p>	<p>Support in Principle</p> <p>If approved, recommended revisions:</p> <p>Maintain policy reference to green infrastructure.</p> <p>Introduce new language that emphasises the important of ongoing state-of-good repair for infrastructure.</p>
<p>3.1.4</p>	<p>The proposed changes in various sections of the proposed PPS (1.1.1 (c),</p>	<p>Do Not Support</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
Policy providing direction on locating new infrastructure and public service facilities to support emergency management services.	1.1.3.4, 1.4.3 (f), and Vision) clarifying that safety only needs to be "mitigated" may result in the design of development-provided infrastructure not requiring adherence to public safety, except to provide emergency vehicle access.	<p>If approved, recommended revisions:</p> <p>Amend 3.1.4 to ensure the protection of public health and safety as its own requirement, irrespective of Section 3 which only addresses hazards.</p> <p>Change policy to read: 3.1.4 Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services; and to ensure the protection of public health and safety <i>in accordance with the policies in Section 3.0: Protecting Public Health and Safety.</i></p>
3.2	Transportation Systems	
3.2.1 Policy providing general principles for transportation systems.	Policy changes may limit opportunities to coordinate land use and transportation planning, reduce reliance on automobile or reduce emission of greenhouse gases and plan for multi-modal transportation.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Maintain Growth Plan policies 3.2.2.1 and 3.2.2.2</p>
3.2.2 Policy related to general direction on transportation system efficiency.	Changed policy so Transportation Demand Management (TDM) is only required 'where feasible'. Growth Plan TDM goals have been removed.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Maintain Growth Plan policy 3.2.2.4.</p>
3.2.3 Policy related to connectivity between	Removes prioritization of non-auto modes, as well as integration with land-use planning.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text) (Deleted Text)</i>
transportation systems/modes.	Removes requiring efficient land use patterns, density, and mix of uses along with the objective of minimizing trip lengths and vehicle trips.	Maintain Provincial Policy Statement policy 1.6.7.4 and 3.2.4. Maintain Growth Plan policy 3.2.3.3.
3.3	Transportation and Infrastructure Corridors	
3.3.2 Policy related to protecting major goods movement facilities and corridors.	Minor changes. Removes reference to coordination with municipalities in Growth Plan.	Support in Principle
3.3.3 Policy related to development in and adjacent to planned corridors.	Minor changes. Prioritizes corridor protection over the land use designations along transportation corridors. Gives stronger policy support for City to refuse applications that may not be compatible with planned corridors.	Support in Principle
3.3.4 Policy related to abandoned corridors.	Minor changes. Preserves and reuses abandoned corridors. Supports the future use of currently abandoned corridors to potentially improve the transportation system.	Support in Principle
3.3.5 Policy related to co-locating linear infrastructure.	Removes policy direction for how municipalities are to plan for linear infrastructure and corridors.	Support in Principle If approved, recommended revisions: Maintain Growth Plan policy 3.2.5.1 (d).

Proposed PPS Policy #	Potential Impact	Recommendation (New Text) (<i>Deleted Text</i>)
3.5	Land Use Compatibility	
<p>3.5.1</p> <p>Policy related to planning major facilities and sensitive land uses.</p>	<p>Appears to be a policy conflict with the employment policies. The <i>Employment Area</i> policies in the proposed Provincial Planning Statement would allow for sensitive land uses (i.e., residential) in all lands for employment outside of <i>Employment Areas</i>, regardless of whether or not adverse effects can be minimized and mitigated as required by the land use compatibility policies. The determination of compatibility should occur before the permission for sensitive land uses are put in place.</p>	<p>Do Not Support (More Information Needed)</p> <p>If approved, recommend revisions:</p> <p>Require that municipalities determine that sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible or can be made compatible prior to permitting the sensitive land use.</p>
<p>3.5.2</p> <p>Policy related to protecting industrial, manufacturing, or other major facilities from sensitive land uses.</p>	<p>Policies do not identify major retail and major offices as uses that could have adverse effects on existing or planned industrial, manufacturing or other major facilities. This exclusion will eliminate considerations of the adverse effects of these uses, which often have high public access needs (high traffic, potential pedestrian traffic, etc.).</p>	<p>Maintain the Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other major facilities.</p>
3.6	Sewage, Water, and Stormwater	
<p>3.6.1</p> <p>Policy related to planning for sewage and water services.</p>	<p>Policy no longer addresses comprehensive water or wastewater master planning and adapting/revising municipal</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>stormwater infrastructure to address climate change. Sewage, water and stormwater should be managed with climate change impacts in mind.</p>	<p>Maintain PPS policy 1.6.6.1 (b) 2.</p> <p>Maintain Growth Plan policy 3.2.6.2.1, 3.2.6.2 (a) and (c).</p>
<p>3.6.2</p> <p>Policy related to identifying preferred sewage and water services for settlement areas.</p>	<p>Policy removes direction to optimize municipal sewage and water services through intensification and redevelopment.</p> <p>Unclear what “centralized servicing systems” and “decentralized servicing systems” are.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. <u>Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</u> For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.</p> <p>Clarify in the definition section what “centralized servicing systems” and “decentralized servicing systems” are.</p>
<p>3.6.7</p> <p>Policy related to allowing lot creation where there is sufficient sewage and water system capacity.</p>	<p>Policy removes consideration of sufficient reserve sewage system capacity by reviewing capacity for hauled sewage from private communal sewage services and individual on-site sewage</p>	<p>Support in Principle</p> <p>If approved, recommended revisions:</p> <p>Change policy to read: Planning authorities may allow lot creation only if where there is</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	services when deciding whether to approve lot creation.	confirmation of sufficient reserve sewage system capacity and reserve water system capacity. <u>The determination of sufficient reserve sewage system capacity shall include treatment capacity for hauled sewage from private communal sewage services and individual on-site sewage services.</u>
3.6.8 Policy related to planning for stormwater management.	Policy no longer addresses adapting/revising municipal stormwater infrastructure to address climate change and removes direction for stormwater management planning to inform proposals for large-scale developments.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Maintain Growth Plan policy 3.2.7.2.</p> <p>Change policy (c) to read: minimize erosion and changes in water balance, <u>and prepare for the impacts of changing climate through the effective management of stormwater,</u> including through the use of green infrastructure;</p>
3.7	Waste Management	
3.7.1 Policy related to planning and providing for a waste management system.	The proposed Provincial Planning Statement omits a more thorough explanation of what is meant by integrated waste management. This risks a narrow interpretation of the term that is more focussed on downstream waste management strategies. This is contrary and not supportive of Toronto’s aspiration to move towards a more circular economy, and it’s proposed circular economy goals to:	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Change the definition of "waste management system" to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province’s circular economy ambitions.</p> <p>Align the Waste Management policies with the language of the</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<ul style="list-style-type: none"> • Reduce overall material consumption • Sustain a robust ecosystem of reuse, repair, donation • Minimize waste generation • Stimulate a thriving market for secondary materials <p>Additionally, this change is seemingly inconsistent with the Provincial Interest expressed in the Resource Recovery and Circular Economy Act, including fostering the continued growth and development of the circular economy, and increasing the reuse and recycling of waste across all sectors of the economy. In particular, the lack of definition for integrated waste management system means that the proposed policy statement is devoid of reference to resource recovery, which could be interpreted as allowing planners to put disposal (e.g., landfilling) on par with any efforts toward resource recovery. This is inconsistent with the objectives of most municipalities in Ontario and a departure from the RRCEA.</p> <p>Removal of the Growth Plan policies to consider waste management initiatives within the context</p>	<p>Waste Free Ontario Act and Resource Recovery and Circulate Economy Act (RRCEA) and provide guidance on how municipalities are to interpret the Waste Management policies in the Provincial Planning Statement alongside the RRCEA.</p> <p>Include policy direction that requires municipalities to coordinate and plan for appropriate and adequate shared waste management infrastructure.</p> <p>Include policy direction that ensures the provision of lands for integrated waste management, including recycling and processing facilities, and residual disposal/management.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	of long-term regional planning, and in collaboration with neighbouring municipalities, risks a loss of efficiency and effectiveness in Ontario's planning context for sustainable waste management.	
3.8	Energy Supply	
3.8.1 Policy related to planning for energy systems.	Removed policy direction for the energy conversation for existing buildings and planned developments.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain Growth Plan policy 4.2.9.1 (b).</p> <p>Add new policy 3.8.2: Planning for energy distribution shall: a) prepare for the impact of a changing climate; and b) accommodate climate-focused behaviour changes that will increase electricity demand, such as EV adoption or electric HVAC systems.</p>
3.9	Public Spaces, Recreation, Parks, Trails, and Open Space	
3.9.1 Policy related to planning and providing for public spaces, recreation, parks, trails, and open space.	<p>The removal of the more detailed Growth Plan policies (2.2.1.4(d), 3.2.2.3, 4.2.5.1, and 4.2.5.2) may require a re-evaluation of existing municipal policies which utilize these policies as a foundation.</p> <p>This policy introduces the idea that public spaces should be inclusive but de-</p>	<p>Partially Support</p> <p>If approved, recommended revision:</p> <p>Maintain Growth Plan policy 2.2.1.4 (d) (iii) an (iv).</p> <p>Change policy (b) to read: planning and providing for the needs of persons of all ages and abilities in the equitable</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>emphasizes the need for them to be equitably distributed geographically across a municipality.</p> <p>Narrowing the meaning of healthy, active and inclusive communities by omitting mention of access to healthy, local, and affordable food options does not support Toronto’s proposed circular economy goal of promoting healthy and culturally appropriate food for all, sourced as locally as possible.</p>	<p>distribution of a full range of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources.</p>
4.1	<p>Natural Heritage The natural heritage policies and related definitions remain under consideration by the government.</p>	
4.2	<p>Water</p>	
<p>4.2.1</p> <p>Policy related to protecting or improving the quality and quantity of water.</p>	<p>Removed policy direction that planning authorities should evaluate and prepare for the impacts of a changing climate to water resource systems at the watershed level.</p> <p>Removed policy direction to increase the extent of vegetative and pervious surfaces as a stormwater management practice.</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain policy references to “key hydrologic features, key hydrologic areas and their functions” from PPS 2.2.1 (e).</p> <p>Maintain PPS policy 2.2.1 (c) and (i).</p> <p>Maintain Growth Plan policy 4.2.1.2.</p>
<p>4.2.3</p> <p>Policy related to undertaking watershed planning.</p>	<p>Removed requirement that sub watershed planning is to be utilized to inform planning for large-scale development in greenfield areas for Growth Plan</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text) (Deleted Text)</i>
	municipalities in order to understand the local and downstream impacts of new development.	Maintain Growth Plan policy 4.2.1.4.
4.3.1	General Policies for Agriculture	
4.3.1.1 Policy related to encouraging support for agricultural system.	Removed Provincially identified Agricultural System and associated policies. The Provincially identified Agricultural System created consistency for application of the Growth Plan policies across the Region.	Do Not Support If approved, recommended revisions: Maintain the Provincially identified Agricultural System.
4.3.3	Lot Creation and Lot Adjustments	
4.3.3.1 Policy related to permitting residential lot creation in prime agricultural areas.	Policy changed to permit new residential lot creation on prime agricultural land. This was previously explicitly discouraged in the current Provincial Policy Statement.	Do Not Support If approved, recommended revisions: Maintain prohibition on new residential lots.
4.5	Mineral Aggregate Resources	
4.5.1.1 Policy related to the long-term protection and use of mineral aggregate resources.	Removed policies in the Growth Plan that require municipalities to implement Official Plan policies and strategies to conserve mineral aggregate resources by recovering and recycling aggregate material. This direction has helped to encourage a market for secondary aggregate materials, which aligns with the City's circular economy goals.	Partially Support If approved, recommended revisions: Maintain Growth Plan policy 4.2.8.1 requiring municipalities to develop and implement official plan policies and other strategies related to conserving mineral aggregate resources.

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
4.6	Cultural Heritage and Archaeology	
<p>4.6.1</p> <p>Policy related to conserving protected heritage properties.</p>	<p>Policy removes “significant” as it relates to cultural heritage and archaeology, resources that have been determined to have cultural heritage value or interest. Narrowed the scope of properties to protected properties (revised definition) instead of significant properties (those included on a municipal register).</p> <p>Expands the PPS definition of “Protected heritage property” to include “property with known archaeological resources in accordance with Part VI of the Ontario Heritage Act.” Therefore, this policy now applies to properties where archaeological resources have been identified.</p>	<p>Partially Support</p> <p>If approved, recommendation revisions:</p> <p>Change policy to read: Protected heritage property, <i>which may contain built heritage resources or cultural heritage landscapes</i>, shall be conserved.</p> <p>Alternatively, clarify that this policy applies to archaeological resources as well.</p>
<p>4.6.3</p> <p>Policy related to conserving protected heritage properties.</p>	<p>Providing further general direction that planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property is conserved.</p> <p>Scoping the City’s ability to expand protection by deleting the term “or as otherwise defined in the municipal official plan.”</p>	<p>Partially Support</p> <p>If approved, recommendation revisions:</p> <p>Clarify that “heritage attributes” referenced in this policy includes properties with known archaeological resources that may not otherwise be designated under the Ontario Heritage Act.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>In the absence of a designation by-law/Heritage Conservation District Plan etc. that clearly notes archaeological resources as heritage attributes of the property, it is possible to overlook that this policy applies to lands with known archaeological resources as per the new definition of “protected heritage property”.</p>	
<p>4.6.4 Policy related to developing an archaeological management plan and strategies to identify heritage properties.</p>	<p>Adds language that planning authorities “are encouraged to develop” and “implement” proactive strategies for identifying properties for evaluation under the Ontario Heritage Act.</p>	<p>Support in principle</p> <p>If approved, recommended revisions:</p> <p>clarification on what is meant by “proactive strategies” for identifying properties for evaluation under the Ontario Heritage Act.</p>
<p>4.6.5 Policy related to engaging with Indigenous communities</p>	<p>Provides direction for planning authorities to engage early with Indigenous communities on matters related to archaeological resources, built heritage resources, and cultural heritage landscapes.</p>	<p>Support</p>
<p>5.1</p>	<p>General Policies for Natural and Human-Made Hazards</p>	
<p>5.1.1 Policy related to identifying hazardous lands and sites.</p>	<p>Policy removes reference to the risk associated with a changing climate.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Maintain language to “including the risks that may be associated</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
		with the impacts of a changing climate”.
5.3	Human-Made Hazards	
5.3.2 Policy related to remediating lands.	Removed direction to reuse excess soil on site or locally through development applications. This risks excess soil going towards landfill instead of onsite reuse.	Do Not Support If approved, recommended revisions: Maintain Growth Plan policies 4.2.9.2 and 4.2.9.3
6.1	General Policies for Implementation and Interpretation	
6.1.4 Policy related to Ministerial decisions and government priorities.	Provides more flexibility for the Minister to make land use planning decisions that deviate from the Policy Statement. This creates uncertainty with respect to the planning framework and its implementation.	Do Not Support If approved, recommended revisions: Revise to clarify that MZO, should always be consistent with the PPS and have regard to the matters of provincial interest as spelled out in the Planning Act.
6.2	Coordination	
6.2.1 Policy related to using a coordinated, integrated, and comprehensive approach to planning.	Policy change is proposing to remove a more prescriptive requirement in the Growth Plan that requires planning authorities to undertake "integrated planning". This change could create ambiguity and inconsistencies among planning authorities with respect to the degree to which they undertake integrate and coordinated planning. Integrated and coordinated planning forms the foundation of good planning that accounts for	Do Not Support If approved, recommended revisions: Change policy to read: A coordinated, integrated, and comprehensive approach <i>should</i> <u>shall</u> 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, boards and Service Managers including:

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	<p>the complex and multifaceted nature of building complete communities that have the required soft and hard infrastructure. Integrated and coordinated planning should not be optional. A growth management approach that is integrated with infrastructure planning and financial planning has proven to be successful over the last few decades in using land more efficiently, by encouraging more compact, complete communities reducing sprawl. This was the basis of the Growth Plan that is lost in the proposed Provincial Planning Statement.</p>	
<p>6.2.2 Policy related to planning authority engagement with Indigenous communities.</p>	<p>Policy strengthens direction regarding early engagement and coordination on land use planning matters with Indigenous communities, which includes supporting the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.</p> <p>At this point, it is unclear what process municipalities are expected to follow if an Aboriginal or treaty right is asserted. This is likely to give rise to additional responsibilities on the part of the Province and it is</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Clarify the scope of a municipality's obligation to identify potential impacts of decisions on the exercise of Aboriginal or treaty rights and how the Province's role in addressing asserted Aboriginal or treaty rights will be integrated in the municipal decision-making process.</p> <p>Provide guidance on expectations with respect to municipal engagement with Indigenous communities on land</p>

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
	unclear how the role of the Province will be integrated with the overall land use planning decision making process.	use planning matters that identify best practices.
Definitions		
Housing Option	Removed reference to affordable housing, which weakens direction and the policy rationale for municipalities to define and use municipal official plans and policy documents to address housing affordability challenges.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes.</p> <p>Change definition to read: Housing options: means a range of housing types, tenures, unit types, and affordability levels, such as, but not limited to...affordable housing, purpose-built rental housing....</p>
Affordable (Housing)	<p>Definition removed. This definition provided a basis and rationale for municipalities to develop an income-based definition of affordable housing.</p> <p>Various provincial and federal programs, including ones administered by Service Managers, have different definitions of affordable housing which can create confusion and act as a barrier for housing developers to stack program funding with municipal incentives. Having a common, income-</p>	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain the current definition of “affordable” housing OR provide explicit direction for municipalities to set their own definition.</p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> (Deleted Text)
	based definition of affordable housing would support municipalities in better addressing local needs. A common definition within the PPS will also create more certainty among private and non-profit developers and support stacking of program funding as well as municipal land use planning tools to encourage and support the development of affordable housing.	
Low- and Moderate-Income Households	Definition removed. This definition provided municipalities with a basis and rationale to develop land use planning policies that better respond to the housing affordability needs of residents as these were tied to household incomes.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Maintain the current definition of “low- and moderate-income households” OR provide explicit direction for municipalities to set their own definition.</p>
<i>Employment Areas</i>	Definition has been scoped to exclude institutional and commercial uses, including retail and office not associated with the primary employment use. Changing the definition will destabilize <i>Employment Areas</i> and undermines the City’s ability to achieve employment projections and long-term economic viability.	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <p>Revise the Employment Area definition to explicitly include film production, cluster of office uses, stand-alone convenience retail and services to serve businesses and workers within Employment Areas and enable municipalities to define components of Employment Areas to serve local economies.</p>
Residential Intensification	Definition Removed.	Do Not Support

Proposed PPS Policy #	Potential Impact	Recommendation <i>(New Text)</i> <i>(Deleted Text)</i>
		<p>If approved, recommended revisions:</p> <p>Maintain the current definition of “Residential Intensification”.</p>
Waste Management System	No changes to the definition but opportunity to provide clarification.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Change definition to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province’s circular economy ambitions.</p>
Major Transit Station Area	<p>Definition states that a major transit station area can be the “area including and around a major bus depot in an urban core.” However, “major bus depot” and “urban core” are not defined. The TTC has many bus facilities that are not associated with a higher order transit station. Furthermore, “major bus depot” excludes streetcar facilities.</p>	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Provide additional policy direction on how municipalities are to interpret “major bus depot” and “urban core”.</p>
Multimodal	Definition includes “rail” but is ambiguous as to interpretation.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Revise definition to read:</p> <p>means relating to the availability or use of more than one form of transportation, such as automobiles, walking, cycling, buses, streetcars, subways, rail</p>

Proposed PPS Policy #	Potential Impact	Recommendation <u>(New Text)</u> <i>(Deleted Text)</i>
		(such as commuter and freight), trucks, air, and marine.
Negative Impacts	In regard to policy 3.3.3, definition favours planned corridors over existing corridors. Older segments of the subway system require ongoing upgrades to meet present day AODA and OBC requirements.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Revise definition to read:</p> <p>c) in regard to policy 3.3.3, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs <u>or meet legislative requirements</u>, and cost of implementation <u>or modernization</u> of the corridor</p>
Planned Corridors	Definition favours planned corridors over existing corridors. From a transit perspective, definition appears limited to planned Provincial transit expansion projects and not existing transit infrastructure (subways, LRTs, and other operations within a dedicated transit ROW).	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Revise definition to read:</p> <p>means corridors <u>(including existing higher order transit corridors)</u> or future corridors....</p>
Transit-supportive	Definition does not reference safety or accessibility which are key components of any transit system – especially higher-order transit corridors below-grade. Older segments of the subway system require ongoing upgrades (second exits, elevators, fire ventilation shafts) to meet present day AODA and OBC requirements.	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <p>Revise definition to read:</p> <p>in regard to land use patterns, means development that makes transit viable, optimizes investments in transit infrastructure, and improves the quality of the experience of using transit, <u>including safety</u></p>

Proposed PPS Policy #	Potential Impact	Recommendation (<u>New Text</u>) (<i>Deleted Text</i>)
	<p>To be transit-supportive, development should not preclude the ability of transit agencies to modernize their systems – which is especially challenging for higher-order transit corridors below-grade. Further, upgrades to modernize below-grade corridors need not preclude development above and adjacent to the upgrades – integration is preferred and is a better use of the land.</p>	<p><u>and accessibility</u>. It often refers to compact, mixed-use development that has a high level of employment and residential densities, including: <u>a) air rights development, in proximity to transit stations, corridors and associated elements within the transportation system; and/or b) integration with transit stations or corridors.</u></p>

Patrick Tobin,
General Manager
Economic Development &
Culture

City Hall
100 Queen Street West
8th Floor, East Tower
Toronto, Ontario M5H 2N2

Tel: 416 392-4166
Patrick.Tobin@toronto.ca

Provincial Planning Statement 2023: Impact on Film Production Industry

Impact Analysis

The proposed policies are detrimental to the film production industry and could potentially drive investment out of Ontario.

The film industry makes a direct production spend of **\$2.5 billion annually** in the City of Toronto, and as a major global jurisdiction, draws international production to the region more broadly. The film industry employs **35,000 Torontonians** in largely unionized, remunerative work.

The proposed Provincial Planning Statement and its definition of employment areas is not clear on whether film production is considered as manufacturing, and this question determines whether it scopes in or out of the narrowed definition of employment lands.

If film production is not considered as manufacturing and/or industrial:

- future studio builds will not be able to access employment lands, and would be forced to compete with other uses for land that is potentially more expensive and less suitable;
- Toronto and the region would be seen as challenging for investment, and global developers may choose to invest elsewhere, taking future production spend and job growth with them;
- existing studios could be impacted by new, adjacent developments that are incompatible with studio uses, as film production is a 24 hour industry with fleets of large production vehicles;
- the film industry could lose existing studio stock, as the land will increase in value if it can be sold to developers for other uses, potentially motivating some owners of existing studios to cash out.

If film production is considered manufacturing and/or industrial:

- the new scarcity of employment lands created by the policy would drive up the price of available employment land, thereby potentially pricing studios out of a market already dominated by last mile logistics and the substantially resourced companies in that sector that can afford to pay higher prices for land, while engaging in less employment-intensive industry on that land.

Regardless of whether film production is defined as manufacturing and/or industrial, the proposed Provincial Planning Statement would cause unintentional negative impact to the industry, for the following reasons:

1. Conversion or removal of employment areas destabilizes the film industry

- The ability to request conversions from or removal of employment lands at any time creates uncertainty that disincentivizes investment and potentially lowers the value of existing and future studio stock.
- The global film industry works in 'hubs', which are precincts or large areas, such as the Port Lands, where studios and adjacent industries congregate for greatest efficiency. Reducing the availability of employment lands undermines this model, thereby incenting investment in studio infrastructure and the resulting jobs and production spend to relocate outside Ontario.

2. Proposed PPS policies could weaken the film industry's preferred "clustering"

- Global film production is a highly mobile business that rapidly moves to those jurisdictions that best meet its needs. Across North America and Europe, jurisdictions are competing to attract new studios and the long-term economic impact they bring using a mix of incentives including generous tax credits. Toronto is a leader in this highly competitive environment, but the uncertainty and potential barriers the proposed policies could impose on this industry would negatively impact Ontario's reputation, motivating investment to seek friendlier jurisdictions.
- Production volume may decrease if studio space is pushed substantially away from Toronto. Decisions that global studios and streaming services make regarding where they will produce their shows are driven in part by the preferences of the key creative team (the stars, the director, and their families) who relocate for extended periods of time to the production location. The consistent preference of these key creators is for proximity to downtown Toronto.
- Additionally, for ease of production, studios should be as close as possible to areas where location shoots outside the studio may be needed. Toronto is the most active area for location shoots in the region. For these reasons, film production is more sensitive than other manufacturing industries may be to the location of the studio in terms of the ability to attract business, drive production volume, and create jobs.

3. Compatibility to adjacent land uses is necessary

- The film industry involves long hours, many large production vehicles, backlot activity, and the potential for noise at any time as required by the production. The location of studios needs to be carefully considered to avoid inappropriate areas that would result in complaints and friction challenging to every industry or use involved.

4. Proposed Provincial Planning Statement risks recent investments into the film industry

- As a result of its popularity as a production hub, Toronto has recently benefitted from substantial domestic and international investment in studio space. As examples, Hackman Capital Partners and MBS are investing over \$330 million to build the Basin St. studios, and Pinewood Studios fully acquired the newly expanded complex in the Port Lands. This is in addition to substantial domestic and international studio growth across the city.
- The aggressive growth in studio space, both existing and projected, supports the growth trend in production volume, which in the three years pre-pandemic grew 10% year-over-year, and which continues to grow. These investments are made possible by investment-friendly land use policy. Changes to this policy will have a negative impact on future investment, and possibly even for currently planned investments, encouraging infrastructure growth, production volume, and jobs to grow in more competitive jurisdictions in the U.S. or other Canadian provinces.
- Film production contains an entire value chain that would be affected by a reduction in existing or current studio space. As one example, international VFX and post-production companies such as DNeg, Rodeo VFX, and Picturashop have recently invested in Toronto by establishing a presence here. This is related to the increase in production volume, and related VFX and post-production work, driven by growing studio space.
- The Province has retained the stability of the tax credit, which in many ways is the bedrock of the international production business in Ontario. Post-secondary institutions have also invested heavily in these sectors by training workforce to participate in these industries. These investments have done much over time to grow the industry. The success of Toronto and the region is due in large part to decades of strategic and effective support from all levels of government. This investment may not be fully leveraged if studio space decreases as a result of the proposed policies.

Next Steps:

- The Film Office will ensure the industry is aware of the proposed policy changes, ERO deadline, and means available to express their views to ensure the Province is fully informed regarding the impacts of the proposed policy.

Prepared by: Marguerite Pigott, Film Commissioner & Director, Entertainment Industries

Circulated to: Patrick Tobin, General Manager, Economic Development and Culture, Gregg Lintern, Chief Planner and Executive Director, City Planning Division

Further information: marguerite.pigott@toronto.ca 416-886-1778

Date: May 16, 2023

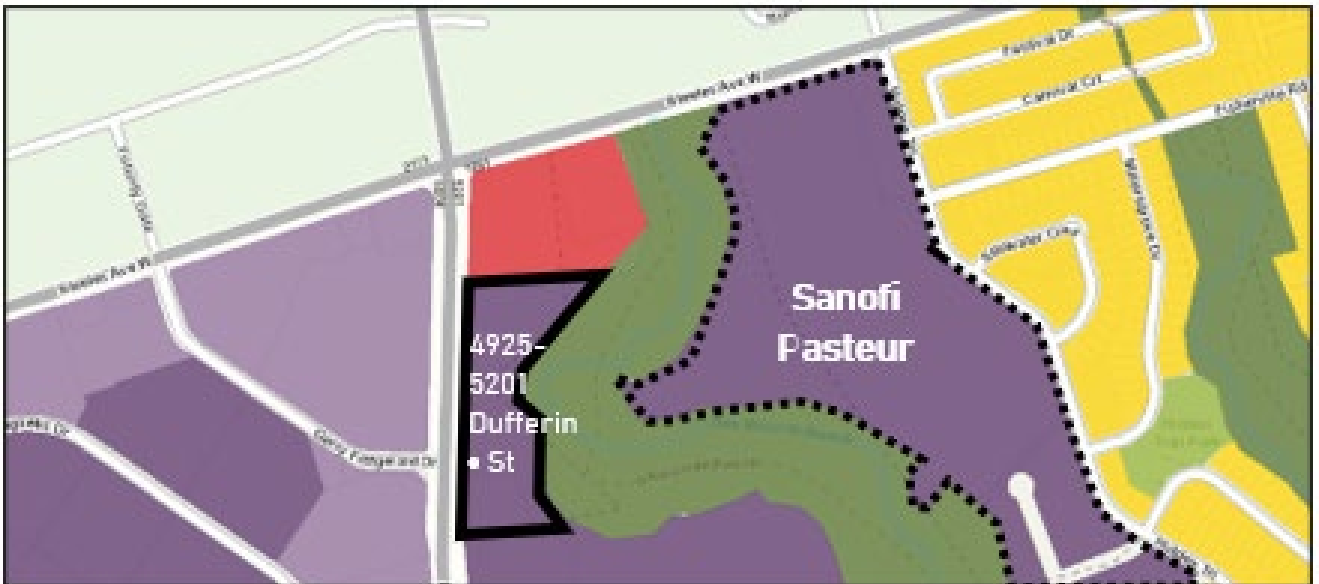
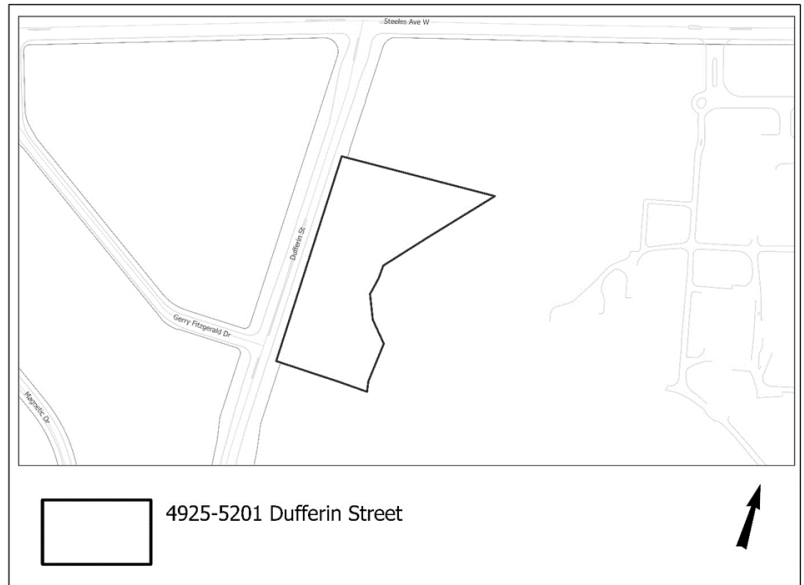
Address: 4925-5201 Dufferin Street

Staff Recommendation to June 1 Planning and Housing Committee: Retain the lands as *Core Employment Areas*

Proposal: to redesignate 4925-5201 Dufferin Street to Mixed Use Areas to permit three residential buildings with commercial and retail uses on the ground floor.

Key Reasons for Recommendation

- The lands are surrounded on three sides by *Employment Areas*, and to the south, and east by *Core Employment Areas*
- Sanofi Pasteur Canada’s biopharmaceutical facility is located 200 metres away, which is within the area of influence of Sanofi Pasteur operations, who have raised concerns about the proposed conversion



Item - 2023.PH4.8

Tracking Status

- City Council adopted this item on June 14, 2023 without amendments.
- This item was considered by Planning and Housing Committee on June 1, 2023 and was adopted with amendments. It will be considered by City Council on June 14, 2023.

City Council consideration on June 14, 2023

PH4.8 - City Comments on the Proposed Provincial Planning Statement

Decision Type: ACTION

Status: Adopted

Wards: All

Caution: Motions and votes are shown below. Any motions or votes should not be considered final until the meeting is complete, and the City Clerk has confirmed the decisions for this meeting.

Committee Recommendations

The Planning and Housing Committee recommends that:

1. City Council express its concern to the Minister of Municipal Affairs on the general direction taken in the proposed Provincial Planning Statement as it represents fundamental changes in how growth planning is carried out in the province and by the City of Toronto.
2. City Council support in principle the provisions in the proposed Provincial Planning Statement that encourage the supply of housing, notwithstanding, that references to "Affordable Housing" and "Housing that is affordable to low- and moderate-income households" have not been carried over.
3. City Council request the Province through ERO 019-6813 and outlined in Attachment 1 to the report (May 17, 2023) from the Chief Planner and Executive Director, to:
 - a. maintain all policy references to "residential intensification" and "redevelopment" in the current Provincial Policy Statement to provide clarity that where sufficient land and servicing exists to accommodate forecast population through infill, the need for greenfield development is diminished.
 - b. require that large and fast-growing municipalities accommodate a minimum of 50 percent of all residential development within their existing settlement area and that new settlement areas or settlement area expansion lands are planned for a minimum density target of 50 residents and jobs per gross hectare.
 - c. maintain the density targets of Urban Growth Centres (Growth Plan 2.2.3.2) and policies that directed how Urban Growth Centres will be planned (Growth Plan 2.2.3.1).
 - d. provide flexibility for municipalities to identify additional higher order transit corridors that deviate from the definition of "higher order transit" in the proposed Provincial Planning Statement.
 - e. maintain the Growth Plan policies (2.2.4.8 – 2.2.4.10) that support the development of complete communities with a compact built form and affordable housing within MTSAs, on lands adjacent to MTSAs, and along transit corridors.

- f. include reference to affordable housing in Provincial Planning Statement Policy 2.4.2.6 given provincial direction to include affordable housing in Protected Major Transit Station Areas through inclusionary zoning.
- g. maintain that municipalities may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a 5-year official plan update and only where it has been demonstrated that certain conditions have been met (Provincial Policy Statement 1.1.3.8).
- h. lead a provincial-municipal process with large and fast-growing municipalities for the periodic preparation of regional population and employment forecasts. Enable municipalities to continue to be able to adopt higher forecasts.
- i. direct municipalities in the Greater Golden Horseshoe to continue using population and employment forecasts of Schedule 3 of the Growth Plan for managing growth to 2051 and ensuring “at least 25 year” supply of land.
- j. maintain the current definitions of “affordable” housing and ‘low and moderate-income households’ OR provide explicit direction for municipalities to set their own definition.
- k. maintain the requirement for municipalities to establish targets for housing affordable to low- and moderate-income households (Provincial Policy Statement 1.4.3(a)) and for affordable ownership and affordable rental housing (Growth Plan 2.2.6.1(a)(ii))
- l. maintain Growth Plan policy 2.2.6.3 that provides direction to municipalities to use available tools to require that multi-unit residential developments incorporate a mix of unit types to accommodate a diverse range of households sizes and incomes.
- m. revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes.
- n. amend proposed policy 2.2.1.b.2, related to the conversion of existing commercial and institutional buildings for residential uses, to include a requirement to maintain or replace employment space within the redevelopment or within an off-site location.
- o. enact a Regulation to permit the use of zoning with conditions, pursuant to Section 113 of the City of Toronto Act 2006, that would enable a municipality to secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space.
- p. enact a Regulation to permit the use of conditional zoning, pursuant to Section 113 of the City of Toronto Act 2006, that would enable the City to require and secure employment space to be provided prior to, or concurrent with any non-employment uses, including residential.
- q. revise the Employment Area definition to explicitly include film production, cluster of office uses, stand-alone convenience retail and services to serve businesses and workers within Employment Areas, and enable municipalities to define components of Employment Areas to serve local economies.
- r. maintain the current timeframe for when a conversion of employment lands can be considered: only when municipalities are undertaking their 5-year Official Plan review, absent the Municipal Comprehensive Review concept.
- s. strengthen land use policy protections for all Employment Areas across the Province to ensure that these lands support the economy and are viable over the long-term.
- t. require that municipalities determine that sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible or can be made compatible prior to permitting a sensitive land use.

u. retain the existing Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other major facilities.

v. maintain the current Provincial Policy Statement and Growth Plan policies that explicitly support energy efficiency, increased vegetation, and improved air quality.

w. maintain and expand the geographic scope of the current Provincial Policy Statement and Growth Plan policies related to natural heritage protection, climate action, intensification, and greenhouse-gas reduction.

x. expand the geographic scope of the Growth Plan's protections for natural heritage systems (4.2.2), water resource systems and watershed planning (4.2.1), and stormwater management (3.2.7) to the entire Province.

y. maintain the Growth Plan's provincially identified Agricultural System.

z. Maintain Growth Plan policy 4.2.8.1 requiring municipalities to develop and implement official plan policies and other strategies related to conserving mineral aggregate resources.

aa. change the definition of "waste management system" to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province's circular economy ambitions.

bb. align the Waste Management policies with the language of the Waste Free Ontario Act and Resource Recovery and Circular Economy Act (RRCEA) and provide guidance on how municipalities are to interpret the Waste Management policies in the Provincial Planning Statement alongside the RRCEA.

cc. include policy direction that requires municipalities to coordinate and plan for appropriate and adequate shared waste management infrastructure.

dd. include policy direction that ensures the provision of lands for integrated waste management, including recycling and processing facilities, and residual disposal/management.

ee. maintain and expand the geographic scope of Growth Plan policy 4.2.1.4 that requires a sub-watershed plan for large-scale development in greenfield areas.

ff. maintain policy references to "key hydrologic features, key hydrologic areas and their functions", from the current Provincial Policy Statement (2.2.1(e)) and expand the geographic scope of Growth Plan policy 4.2.1.2.

gg. include direction in the proposed Provincial Planning Statement that planning authorities shall protect, improve, or restore the quality and quantity of water.

hh. recognize and promote green infrastructure's role in water and stormwater systems.

ii. maintain all transportation related policies in the current Provincial Policy Statement and Growth Plan that support reducing vehicle trips.

jj. include language regarding planning for a transportation system in way that accounts for factors such as equity, cost, air quality, winter maintenance and resiliency.

kk. modify policies concerning the protection of heritage properties to say, "protected heritage property shall be conserved", recognizing that the definition of "protected heritage property" includes more than lands with built heritage resources or cultural heritage landscapes.

ll. maintain the existing Land Needs Assessment methodology as Provincial guidance to the large and fast-growing municipalities for assessing land needs as a complement to the Provincial Projections Methodology Guideline available to other municipalities.

mm. include as part of the transition regulation that all planning matters (Official Plan Amendments or Zoning By-law Amendments) that predate the in-effect date of the new Provincial Planning Statement be transitioned under the existing planning framework. These include planning matters that are: (1) deemed complete and in process/under review; (2) city-initiated process underway or nearing completion, or (3) Council-adopted but is under appeal or appeal period nearing.

nn. continue to transition Official Plan Amendment 231 as a matter in process that was approved under the Growth Plan, 2006.

oo. acknowledge the importance of and requirement for undertaking integrated planning across the Province.

pp. provide guidance on expectations with respect to municipal engagement with Indigenous communities on land use planning matters that identify best practices.

qq. clarify the scope of a municipality's obligation to identify potential impacts of decisions on the exercise of Aboriginal or treaty rights and how the Province's role in addressing asserted Aboriginal or treaty rights will be integrated in the municipal decision-making process.

rr. add a new policy that enables municipalities to put in place local policies that address the changing nature of office space and needs to reflect the local context.

4. City Council confirm that film production will continue to be considered a form of manufacturing for the purposes of land use planning and interpretation of official plan policies and zoning standards.

5. City Council forward Attachment 2 to the report (May 17, 2023) from the Chief Planner and Executive Director to the Minister of Municipal Affairs and Housing and the Minister of Economic Development, Job Creation and Trade from the Film Commissioner and Director, Entertainment Industries related to the impacts the proposed Provincial Planning Statement has on the City's film production industry.

6. City Council forward a copy of the report (May 17, 2023) from the Chief Planner and Executive Director to the Premier of Ontario, the Minister of Municipal Affairs and Housing, the Minister of Economic Development, Job Creation and Trade, the Leader of the Official Opposition, all Ontario MPPs, the Association of Municipalities of Ontario, and all Ontario municipalities for their information and consideration.

7. City Council request that the Minister of Municipal Affairs and Housing undertake dedicated consultation with affected industry stakeholders on any changes to policies related to the protection of employment lands in advance of proceeding with the proposed Provincial Planning Statement.

Background Information (Committee)

(May 17, 2023) Report and Attachments 1 and 3 from the Chief Planner and Executive Director, City Planning on City Comments on the Proposed Provincial Planning Statement

<https://www.toronto.ca/legdocs/mmis/2023/ph/bgrd/backgroundfile-236614.pdf>

Attachment 2 - Provincial Planning Statement 2023: Impact on Film Production Industry

<https://www.toronto.ca/legdocs/mmis/2023/ph/bgrd/backgroundfile-236776.pdf>

Communications (Committee)

(May 29, 2023) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs, Federation of North Toronto Residents' Associations (PH.New)

<https://www.toronto.ca/legdocs/mmis/2023/ph/comm/communicationfile-169993.pdf>

(May 31, 2023) Letter from Craig McLuckie, President, Toronto Industry Network (PH.New)

<https://www.toronto.ca/legdocs/mmis/2023/ph/comm/communicationfile-170052.pdf>

(May 31, 2023) Letter from Victoria Harding, Executive Director, DGC Ontario (PH.New)

<https://www.toronto.ca/legdocs/mmis/2023/ph/comm/communicationfile-170104.pdf>

(May 31, 2023) Letter from Issac Tang, Borden Ladner Gervais LLP, on behalf of PT Studios Inc. (PH.New)

<https://www.toronto.ca/legdocs/mmis/2023/ph/comm/communicationfile-170105.pdf>

(May 31, 2023) Letter from Peggy Kyriakidou, President, and Jayson Mosek, Business Agent, NABET 700-M UNIFOR (PH.New)

<https://www.toronto.ca/legdocs/mmis/2023/ph/comm/communicationfile-170106.pdf>

Communications (City Council)

(June 14, 2023) Letter from Les Veszlenyi and Angela Barnes, Co-Chairs of the Mimico Lakeshore Community Network (CC.Supp)

<https://www.toronto.ca/legdocs/mmis/2023/cc/comm/communicationfile-170401.pdf>

(May 31, 2023) Letter from Ian Carmichael and John Caliendo, Co-Chairs, ABC Residents Association (CC.New)

<https://www.toronto.ca/legdocs/mmis/2023/cc/comm/communicationfile-170438.pdf>

Motions (City Council)

Motion to Adopt Item (Carried)

Vote (Adopt Item)


Jun-15-2023 3:50 PM

Result: Carried	Majority Required
Yes: 20	Paul Ainslie, Brad Bradford, Alejandra Bravo, Jon Burnside, Shelley Carroll, Mike Colle, Paula Fletcher, Stephen Holyday, Ausma Malik, Nick Mantas, Josh Matlow, Jennifer McKelvie, Chris Moise, Amber Morley, Jamaal Myers, Frances Nunziata (Chair), Gord Perks, Jaye Robinson, Dianne Saxe, Michael Thompson
No: 1	Anthony Perruzza
Absent: 4	Lily Cheng, Gary Crawford, Vincent Crisanti, James Pasternak

Planning and Housing Committee consideration on June 1, 2023

Source: Toronto City Clerk at www.toronto.ca/council

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Attachment 4 - Copies of Communications provided for City Council consideration

From: [N Corrado](#)
To: [Planning and Housing](#)
Subject: [External Sender] Employment Area Conversion
Date: May 25, 2023 4:23:25 PM

I love the idea of transforming office buildings into apartments. It saves resources, land, and trees, and is carbon neutral. Please make the apartments affordable for everyone, including people on ODSP.

Nicole Corrado



May 29, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

PH4.8 - City Comments on the Proposed Provincial Planning Statement

Dear Chair Brad Bradford and Members, Planning and Housing Committee,

On April 6, 2023, the Ontario Government announced new components of its Housing Supply Action Plan, which seeks to encourage the construction of 1.5 million homes by 2031. Two key elements of the announcement are the introduction of Bill 97, the [Helping Homebuyers, Protecting Tenants Act, 2023](#), which is currently at second reading stage in the Ontario Legislature, and the release of a draft [Provincial Planning Statement, 2023](#) (the “**Statement**”), which is out for public comment until June 5, 2023. The Statement, if it is adopted by the Province, will replace *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (“**Growth Plan**”) and the *Provincial Policy Statement, 2020* (“**PPS, 2020**”).

The [Growth Plan for the Greater Golden Horseshoe](#), prioritized intensification and higher densities to make efficient use of land, supported a mix of housing options, ensured smart use of transit and infrastructure, and protected agricultural and natural areas. Municipalities were expected to align their own official plans with its priorities. Under the new draft Planning Statement, density targets have been watered down or eliminated altogether, and municipalities given flexibility to expand their boundaries. This change is expected to remove the requirement for municipalities to prioritize infill development before expanding urban boundaries to overrun natural lands.

FoNTRA has submitted a report to the Province (attached), in response to the call for comments, which concludes that the proposed Provincial Planning Statement (PPS) and the simultaneous repeal of the Growth Plan should not proceed since these initiatives are not only harmful, but also entirely unnecessary. FoNTRA, respectfully,

urged the Ontario Government to withdraw the proposed Provincial Planning Statement and to maintain the Growth Plan for the Greater Golden Horseshoe.

Our review of City Planning's subject report indicates that its recommendations and FoNTRA's position on the matter are very similar. The major difference is that City Planning wants the foundational elements of the Growth Plan and of the 2020 Provincial Policy Statement (PPS) transferred to the Provincial Planning Statement, while FoNTRA is saying, "save the trouble, and leave the old instruments in place".

In summary, therefore, FoNTRA agrees with City Planning's analysis of the Statement in relation to the current approved documents, but we have proposed a simpler solution.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Attachment: ERO 019-813: Review of Proposed Policies adapted from A Place to Grow and Provincial Policy Statement to form a new Provincial Planning Policy Instrument

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City Planning Division,
Jeffrey Cantos, Manager, Official Plan & Legislation, City Planning Division, -
Kyle Pakeman, Project Coordinator, Official Plan & Legislation, City Planning Division

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.



25 May 2023

VIA E-MAIL: steve.clark@pc.ola.org
growthplanning@ontario.ca

Hon. Steve Clark
Minister of Municipal Affairs and Housing
Provincial Land Use Plans Branch
777 Bay Street, 13th Floor
Toronto Ontario M7A 2J3

ERO Nr. 019-6813:

Review of Proposed Policies adapted from A Place to Grow and Provincial Policy Statement to form a new Provincial Planning Policy Instrument

Dear Minister:

The *Federation of North Toronto Residents' Associations* ("FoNTRA") is an umbrella organization representing over 30 residents' associations in central Toronto engaged in public policy debates on planning and development issues that directly affect our members. Its interventions are guided by pursuing the following goals: 1) rational and stable statutory planning framework; 2) local and regional planning that engages all stakeholders, without ad hoc provincial overrides; 3) intelligent density distribution that fosters complete communities and efficient public transport networks; 4) balancing housing supply with real demand; and, 5) resilient and ecological development patterns with compact communities.

The rationale for this latest legislative initiative has been described as follows: "*Under the Planning Act, planning decisions shall be consistent with policy statements such as the PPS and shall conform with provincial plans like A Place to Grow. Given the importance of the PPS and A Place to Grow in guiding land use planning decisions in Ontario, ensuring that the policy framework is housing-supportive is integral to the implementation of the Housing Supply Action Plan and meeting the target to construct 1.5 million new homes by 2031. In 2022, the government initiated a review on approaches for leveraging the housing supportive policies of both documents, removing barriers and continuing to protect the environment through a streamlined province-wide land use planning policy framework. The government received feedback on the following six themes: Residential land supply; Affordable housing supply and mix; Growth management; Environment and natural resources; Community infrastructure; Streamlined planning framework.*" (emphasis added)¹

FoNTRA appreciates the opportunity to bring to your attention its concerns regarding the proposed Provincial Planning Statement ("PPS") within the 'streamlined' planning system:

1. Ontario's Statutory Planning Framework has been rendered unstable by frequent significant changes and will be further weakened by the new PPS.
2. The Housing Affordability Task Force calls for depoliticizing the planning process while engaging itself in heavy-handed political interference.
3. The new PPS privileges housing supply at the expense of many other valid planning concerns and provincial interests, particularly climate change adaptation.

¹ <https://ero.ontario.ca/notice/019-6813>

4. The new PPS, rather than adapting, simply discards the essential elements of the current Growth Plan and encourages indiscriminate growth anywhere.
5. The new PPS and background studies lack essential information on specific housing needs by type and location for effective policy guidance.
6. The new PPS assumes housing needs identified by the Housing Affordability Task Force based on dubious statistics and without a mandate on affordability.
7. The new PPS relies on housing needs identified by the Housing Affordability Task Force which missed the substantial housing supply inventory.
8. The new PPS lacks policies on community and social housing and equates the housing affordability crisis with a housing supply crisis.

'STREAMLINED' PLANNING FRAMEWORK

COMMENT 1: Ontario's Statutory Planning Framework has been rendered unstable by frequent significant changes and will be further weakened by the new PPS

The planning framework context in which the new PPS must be considered is characterized by a flurry of uncoordinated legislative initiatives that create a perpetual confusion:

DEC 2018	<i>Bill 66: Restoring Ontario's Competitiveness Act</i>
MAY 2019	<i>Bill 108: More Homes More Choice Act</i>
MAY 2019	<i>More Homes, More Choices: Ontario's Housing Supply Action Plan</i>
MAY 2019	<i>Growth Plan for the Greater Golden Horseshoe 2019</i>
AUG 2020	<i>A Place to Grow: Growth Plan for the Greater Golden Horseshoe</i>
FEB 2020	<i>Provincial Policy Statement 2020</i>
APR 2021	<i>Bill 257: Supporting Broadband and Infrastructure Expansion Act 2021</i>
MAR 2022	<i>Bill 109: More Homes for Everyone 2022</i>
DEC 2022	<i>Bill 23: More Homes Built Faster Act, 2022</i>
APR 2023	<i>Bill 97: Helping Homeowners, Protecting Tenants Act, 2023</i>
JUN 2023	<i>New Provincial Planning Statement and repeal of the Growth Plan</i>

To put this 'streamlining' into some historic context: Faced with similar issues in the 1960s and 1970s – lack of affordable housing and a planning system in need of updating – the John Robarts and the Bill Davis governments initiated a successful housing program through the *Ontario Housing Corporation*² (which was later stopped and downloaded without financial compensation by the Mike Harris government in the 1990s). Following the Ontario Economic Council's *Subject to Approval: Review of Municipal Planning in Ontario*³ in 1973, the government set up a *Planning Act Review Committee*, chaired by York University Professor and former Metro Planning Commissioner Eli Comay, which reported in 1977⁴. Its comprehensive and coordinated recommendations were further reviewed by consultants which resulted in a 1979 *White Paper on the Planning Act*⁵ supported by four

² <https://digitalcommons.osgoode.yorku.ca/cgi/viewcontent.cgi?article=2446&context=rso>

³ <https://archive.org/details/subjecttoapproval00bous/page/n15/mode/2up>

⁴ Report on the Planning Act Review Committee, Toronto, 1977

⁵ Government of Ontario, White Paper on the Planning Act, Toronto 1979

detailed *Background Papers* – all made available again in a public consultation process before the Planning Act was amended.

Ontario's Auditor General has noted the following related concerns: *"Our audit concluded that the Ministry of Municipal Affairs and Housing (Ministry) does not have effective procedures and systems in place to ensure that land use planning in the Greater Golden Horseshoe is consistent with good land-use planning practices, the purposes and objectives of the Planning Act, and the Growth Plan for the GGH. Ontario's land-use planning laws and provincial plans are, for the most part, consistent with those established elsewhere in Canada. However, numerous changes to Growth Plan policies have created instability in the planning process. They challenge municipalities' ability to implement provincial policies in their local plans. In addition, the Province's frequent use of MZOs creates inconsistencies and an actual or perceived unfairness concerning how policy is applied. Recently the Province expanded its power to override local authority, legislating increased powers to MZOs and is using them much more frequently. Also, importantly, our audit found that opportunities remain for land-use planning to be better integrated with planning processes for infrastructure and services, such as highways, transit, schools, and hospitals."*⁶

All this hyperactivity without overall comprehensive vision creates a planning chaos, both on a procedural and a substantive level.

COMMENT 2: The Housing Affordability Task Force calls for depoliticizing the planning process while engaging itself in heavy-handed political interference.

The Housing Affordability Task Force believes that "because *local councillors depend on the votes of residents who want to keep the status quo, the planning process has become politicized*" and, therefore, "*municipalities allow far more public consultation than is required.*" Planning in the public sector is an inherently political activity and requires a careful balancing of the roles assigned to the various actors. Shifting all political power to the provincial level, where politicians forming the government, evidently, depend on the financial support of developers, does not depoliticize the process but simply changes the political power landscape – further away from citizens and closer to the development industry.

The Association of Municipalities Ontario (AMO), in its submission regarding Bill 23, rejects many fundamental assertions that drive this current proposal:

*"The assertion that the nationwide housing affordability crisis is the product of Ontario's land use planning and environmental protection framework, and municipalities slow to approve planning applications is objectively false. For decades, Ontario's housing supply in high growth regions has been determined by developers and land speculators managing supply to optimize price, and those who view housing units as solely an investment Previous governments have downloaded costs to municipalities and cut environmental protections to disastrous effect."*⁷

The proper provincial role in local planning and, particularly, the discretionary powers exercised by the Minister have been the subject of extensive deliberations in various planning review exercises. For example, the *Planning Act Review Committee Report*, cited above, notes the following about the Minister's discretionary authority:

"This was perhaps the most appropriate legislative structure in the period when municipal and provincial planning were evolving to their present status. It was also probably the most expeditious way for the province to carry out its supervisory/approval role. We are not certain that this is the case today ... We also believe that when the Minister makes discretionary decisions, he should be required as a general rule to state the reasons for his decisions ... If, for example, the Minister chooses to limit a municipality's planning autonomy in certain respects, the municipality and its residents should know why their autonomy has been circumscribed."

⁶ Office of the Auditor General of Ontario, Value-for-Money Audit: Land Use Planning in the Greater Golden Horseshoe, December 2021

⁷ https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Submissions/SC_HICP-LTR_AP_AMO_Submission_Bill%2023_More_Homes_Built_Faster_Act_20221116.pdf?_zs=9OI6O1&_zl=mbAO2

The Minister's recent unilateral rewriting of Toronto's OPA 405 concerning the Yonge-Eglinton Secondary Plan without any explanation or consideration of the impacts, for example, on the infrastructure is a case in point regarding the provincial mismanagement of the Growth Plan. Concentrating additional growth in the Yonge-Eglinton Centre - the only designated Growth Centre that had already substantially exceeded the growth target – defeats the very purpose of the Growth Plan of balancing growth and intensification to support public transportation across the entire GGH (see chart below):

Figure 13: Number of Residents and Jobs Per Hectare in Urban Growth Centres,¹ 2016

Prepared by the Office of the Auditor General of Ontario

Urban Growth Centre	# of Residents and Jobs per Hectare		Difference between Actual and Target	Actual, as % of Target
	Actual	Target ²		
City of Toronto				
Downtown Toronto	357	400	(43)	89
Etobicoke Centre	166	400	(234)	42
North York Centre	485	400	85	121
Scarborough Centre	163	400	(237)	41
Yonge-Eglinton Centre	575	400	175	144
Downtown Brampton	63	200	(137)	32
Downtown Burlington	114	200	(86)	57
Downtown Hamilton	185	200	(15)	93
Downtown Kitchener	161	200	(39)	81
Downtown Milton	40	200	(160)	20
Downtown Mississauga	179	200	(21)	90
Downtown Oshawa	96	200	(104)	48
Downtown Pickering	57	200	(143)	29
Markham Centre	60	200	(140)	30
Midtown Oakville	31	200	(169)	16
Newmarket Centre	57	200	(143)	29
Richmond Hill-Langstaff Gateway	43	200	(157)	22
Uptown Waterloo	131	200	(69)	66
Vaughan Metropolitan Centre	26	200	(174)	13
Downtown Barrie	51	150	(99)	34
Downtown Brantford	53	150	(97)	35
Downtown Cambridge	70	150	(80)	47
Downtown Guelph	92	150	(58)	61
Downtown Peterborough	99	150	(51)	66
Downtown St. Catharines	93	150	(57)	62

Grey shading indicates targets were not met.

Note: 2016 is the most recent Statistics Canada census data available.

1. Defined as existing or emerging downtown areas identified in Schedule 4 of the Growth Plan.
2. Municipalities are expected to meet the established targets by 2031 or earlier.

The new PPS even incorporates the concept of routine Ministerial Zoning Orders when MZO's were introduced into the Planning Act as a tool of last resort:

“Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.”

COMMENT 3: The new PPS privileges housing supply at the expense of other valid planning concerns and provincial interests, particularly climate change adaptation

Planning is a synoptic activity where a range of issues have to be considered and difficult trade-offs decided. Simply bracketing out certain trendy issues from this often-messy process fundamentally distorts the planning outcomes. Climate change adaptation, for example, is addressed only superficially with these generalized policy directions in the new PPS:

“Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that: a) support the achievement of compact, transit-supportive, and complete communities; b) incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities; c) support energy conservation and efficiency; d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate”⁸

At the 2021 UN Conference on Climate Change in Glasgow, world cities were called upon to double public transportation during this decade to reach 1.5°C target.⁹ This would require in Toronto a more even distribution of densities instead of accommodating most of the growth along the Yonge corridor with the overloaded Line 1 subway (see chart below):

Figure 14: Comparison of Actual and Target Density for Major Transit Station Areas, 2016¹

Prepared by the Office of the Auditor General of Ontario

Major Transit Station Area (MTSA) ²	# of Stations	# of Residents and Jobs per Hectare		Difference between Actual and Target	Actual, as % of Target
		Actual	Target ³		
Subways					
Yonge-University Spadina Subway	32	456	200	256	228
Bloor-Danforth Scarborough Subway Extension	1	107	200	(93)	54
Bloor-Danforth Subway	31	164	200	(36)	82
Toronto-York Spadina Subway Extension	6	29	200	(171)	15
Sheppard Subway	5	182	200	(18)	91
Light Rail Transit (LRT)					
Hamilton LRT	14	94	160	(66)	59
Sheppard East LRT Phase 1	26	78	160	(82)	49
Eglinton LRT Phase 1	25	102	160	(58)	64
Finch West LRT Phase 1	19	73	160	(87)	46
Hurontario LRT	22	109	160	(51)	68
ION LRT Phase 2	7	35	160	(125)	22
Waterloo ION LRT	19	75	160	(85)	47
GO Transit Rail Stations					
GO Barrie	10	185	150	35	123
GO Kitchener	8	263	150	113	175
GO Lakeshore East	10	196	150	46	131
GO Lakeshore West	11	189	150	39	126
GO Stouffville	5	365	150	215	243
Bus Rapid Transit (BRT)					
Mississauga Transitway	11	29	160	(131)	18
VIVA Blue	17	52	160	(108)	33
VIVA Orange	12	46	160	(114)	29
VIVA Purple	20	49	160	(111)	31

Grey shading indicates targets were not met.

1. Most recent Statistics Canada data is from 2016.
2. The Growth Plan that was in effect in 2016 did not require municipalities to plan for a minimum density target in MTSA. The 2017 amendments to the Growth Plan introduced minimum density targets that apply to subways, LRT, BRT and GO Transit Rail Stations.
3. Calculated as the sum of the number of residents and the number of jobs divided by the area covered by the line. Additionally, some municipalities have proposed alternative density targets for some MTSA (subject to Minister's approval) that have not yet been approved.

Even before these latest proposals to ‘streamline’ the planning process, the *Ontario Professional Planners Institute*, added its voice to express concerns about the potentially unintended consequences of the many ill-conceived changes:

“We strongly support your policy objective of tackling the housing affordability and supply challenges in the Province of Ontario. However, our membership is very concerned with some provisions in Bill 23, particularly ones that limit meaningful public engagement, impede protections for the environment and negatively impact coordination of infrastructure

⁸ Proposed Provincial Planning Statement, Section 2.9.1

⁹ UN Conference on Climate Change: Press Release of 10 November 2021 by C40 Cities

and growth planning across regions. As planners, our fundamental role is ensuring all those considerations are incorporated in planning decisions in order to appropriately protect the public interest. Good planning is the key to building great communities. It's the informed thinking that is needed to plan successful and livable urban, suburban, and rural communities while balancing short-term and long-term public needs over the next two, 10, or 30 years."¹⁰

The Auditor General, in her recent report on the status of the environment, notes that the government lacks consolidated environmental data to guide policy decisions that impact the environment negatively, including impacts caused by development:

*"A warming climate from increased global greenhouse gas emissions has raised Ontario's surface air temperature, in turn reducing Great Lakes ice cover and increasing the number of weather-related disasters. Although the trend of converting natural land cover for human use is slower than in the centuries following European settlement, remaining wetlands and forests continue to be lost, invasive species are spreading, and more native species continue to be classified as at risk."*¹¹

The new PPS fails to connect housing and density, to transportation, environmental, or climate change issues in a manner that could effectively guide planning processes.

GROWTH PLAN ADAPTATION

COMMENT 4: The new PPS, rather than adapt, simply discards the essential elements of the current Growth Plan and encourages indiscriminate growth anywhere.

In Ontario, historic accidents and coincidences have led to the creation of a curious mix of provincial planning legislation, policies, and plans which create uncoordinated layers of requirements addressing similar or identical issues. The policies and processes arising from the *Planning Act*, *City of Toronto Act*, *Places to Grow Act*, *Heritage Act*, *Greenbelt Act*, *Provincial Policy Statement*, etc., FoNTRA concurs, need to be much better coordinated in order to offer all stakeholders more seamless guidance with coordinated review/approval processes. However, since these policies and plans are constantly updated - and upper-tier and lower-tier Official Plans need to be brought into conformity – a permanent transition period has been created where policies are in an almost constant flux. Unfortunately, the Growth Plan, which had been introduced as a bold regional planning instrument, has more recently been mismanaged if not neglected by the Province. And now, minimum growth targets and restrictions on settlement expansions are to be dropped.

The Auditor General notes the absence of relevant data needed to monitor and guide intensification and housing supply in the Greater Golden Horseshoe:¹²

- *"Since 2015, the Ministry has not measured or publicly reported on the effectiveness of land-use planning in achieving the goals of the Growth Plan.*
- *Many municipalities are falling short of 2006 Growth Plan targets.*
 - *For example, only three of 20 single- and upper-tier municipalities in the GGH met the target to focus 40% of new residential developments per year in already-developed areas from 2015 to 2019.*
- *The Ministry did not have consistent and timely information to accurately measure whether municipalities are meeting certain Growth Plan targets.*
- *Municipalities face challenges implementing the province's Growth Plan policies because of numerous changes to land-use policies (five amendments in nine years) and insufficient guidance from Ministry staff. They are challenged to ensure planning documents are up to date.*
- *Some Minister's Zoning Orders (MZOs) disrupt planning processes and undermine the goals of the Growth Plan.*

¹⁰ OPPI Letter to Minister Clark, 24 November 2022

¹¹ Office of the Auditor General of Ontario, *The State of the Environment in Ontario*, May 2023

¹² https://www.auditor.on.ca/en/content/news/21_summaries/2021_summary_AR_LandUse.pdf

- *For example, 13 of 44 MZOs issued between March 2019 and March 2021 would permit development in areas that may not have existing or planned municipal services such as water and wastewater systems impacting local land-use and fiscal planning processes.*
- *Opportunities exist to better coordinate land-use planning with planning for critical infrastructure, such as highways, transit, schools, and hospitals.*
- *Some municipal planning policy submissions could have benefitted from additional circulation to other ministries for input to ensure the other ministries land-use interests were considered.*
- *Bill 229 amendments to the Conservation Authorities Act and Planning Act will give the Natural Resources Minister authority to issue development permits in flood and erosion-prone areas. Prior to the amendment, conservation authorities had the sole authority.*
- *MZOs are being used to fast track development and bypass normal planning processes that ensure sufficient due diligence through studies and public consultation. From March 2019 to March 2021, 44 MZOs were issued. Prior to this, MZOs were issued about once a year.*
- *There is no formal process that interested parties are required to follow to request an MZO, and there are no established criteria against which the Minister assesses requests for MZOs. Seventeen of the 44 MZOs were issued to the same seven development companies or group of companies.*
- *MZOs have become even more powerful with recent legislative amendments. For example, in 2021, Bill 257 amended the Planning Act to provide that MZOs are not required and are deemed to never have been required to be consistent with the Provincial Policy Statement, which all land-use decisions are required to be consistent with.”*

The most recent MZO¹³ was issued by the Minister on 12 May 2023 in order to double Mississauga’s Lakeview Village development, approved in 2021 for 8,050 residential units, to 16,000 units with unlimited heights and no consideration of infrastructure.

ONTARIO’S HOUSING SUPPLY

COMMENT 5: The new PPS and the background studies lack essential information on specific housing needs by types and locations for effective policy guidance.

Ontario’s housing and household characteristics in 2021 were as follows:¹⁴

• Population	14,223,942
• Total private dwellings	5,929,250
• Total private dwellings occupied by usual residents	5,491,201
• Single-detached house	2,942,990
• Semi-detached house	303,260
• Row house	505,265
• Apartment or flat in duplex	181,030
• Apartment in a building that has fewer than five storeys	548,785
• Apartment in a building that has five or more storeys	984,665
• Other single-attached house	10,220
• Movable dwelling	14,885
• Total private households by size	5,491,201
• 1 Person	1,452,540
• 2 Persons	1,798,040
• 3 Persons	872,480
• 4 Persons	825,445
• 5 or more Persons	542,700
• Average household size	2.6

¹³ <https://www.ontario.ca/laws/regulation/r23091>

¹⁴ <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&Search-Text=Ontario&DGUIDlist=2021A000235&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0>

Remarkably, 3,250,580 or 59% of the total households are 1- and 2-person households, while 2,942,990 or 54% of the total private dwellings are single-detached houses. This suggests that additional sprawl with settlement expansions to build more low-density subdivisions on agricultural land and requiring new highways may not be a high priority, as the PPS implies. No guidance has been provided on strategies to achieve affordable housing and the specific unit-types needed near the centres of large cities where housing prices are escalating much more rapidly than elsewhere in the Province.

COMMENT 6: The new PPS assumes housing needs identified by the Housing Affordability Task Force based on dubious statistics and no mandate on affordability.

After a hasty eight-week study over Christmas 2021 where sloganeering substituted for hard data and professional analysis, the Housing Affordability Task Force proclaimed:

“Today, Ontario is 1.2 million homes – rental or owned – short of the G7 average. With projected population growth, that huge gap is widening, and bridging it will take immediate, bold and purposeful effort. And to support population growth in the next decade, we will need one million more homes ... Shortages of supply in any market have a direct impact on affordability. Scarcity breeds price increases. Simply put, if we want more Ontarians to have housing, we need to build more housing in Ontario. Ontario must build 1.5 million homes over the next 10 years to address the supply shortage”¹⁵

The Housing Affordability Task Force also offered no information on how to produce affordable housing since it had no mandate to study housing affordability:

“Ontario’s Minister of Municipal Affairs and Housing tasked us with recommending ways to accelerate our progress in closing the housing supply gap to improve housing affordability ... Affordable housing (units provided at below-market rates with government support) was not part of our mandate ... We note that government-owned land was also outside our mandate.”¹⁶

Dr. Brian Doucet, Canada Research Chair in Urban Change and Social Inclusion and Associate Professor in the School of Planning, University of Waterloo, points out some fundamental flaws in the statistical evidence underlying the Housing Affordability Task Force’s recommendation and provided by Scotiabank:¹⁷

“The report outlines that 1.5 million new homes are needed over the coming decade. There are two issues with this. The first is whether all these homes are actually necessary to keep pace with growth. The report claims that Ontario is 1.2 million houses short of the G7 average. This is based on data showing that Canada has the lowest number of houses per 1,000 people of any G7 nation. But the number of dwellings per 1,000 people is not a very useful metric, particularly for comparisons between places, because people reside in households. If all 1,000 people live alone, then 1,000 dwellings are required. But if they all reside in households of five, then only 200 dwellings are required. Dividing those 1,000 people by the average household size of the jurisdiction where they live paints a very different picture about housing needs and can help to interpret differences in rates of housing supply between cities, provinces and countries. These differences in average household size mean those same 1,000 people require an average of 507 dwellings in Germany and 441 in Japan. In Canada, because of our larger average household size of 2.47 people, this figure is only 405.

It should also be noted that Ontario’s average household size is significantly larger than the Canadian average — at 2.58 people per household, it is the second-highest in the country after Alberta. Between 2006 and 2016, the number of households in Ontario rose by 614,415. During that same 10-year span, there were 689,625 new occupied dwellings. Some of these replaced existing homes, but most condos, apartments and new developments constituted significant net gains. While we will need to wait for further data from

¹⁵ Report of the Ontario Housing Affordability Task Force, 08 February 2022

¹⁶ Report of the Ontario Housing Affordability Task Force, 08 February 2022

¹⁷ <https://www.scotiabank.com/ca/en/about/economics/economics-publications/post.other-publications.housing.housing-note.housing-note--may-12-2021-.html>

Statistics Canada on the actual number of households in 2021, Ontario's population grew by an average of 155,090 per year between 2016 and 2021. If the average household size remains similar, this is roughly 60,000 new households per year, well short of the 150,000 annual new dwellings the report calls for. It is also lower than the average of 79,085 housing starts per year between 2016 and 2021."¹⁸

Data does also not support the popular narrative propagated by the Housing Affordability Task Force that lack of supply is the cause of the affordability crisis, as noted by Dr. George Fallis, Professor emeritus of Economics and Urban Studies, York University:

"The task force had a very short timeline and could not do any original research. It accepted the dominant narrative that these huge price increases were because Ontario has not built enough houses to accommodate its growing population. Lack of supply is the cause, and the solution is to build more houses. This analysis is consistent with our economic intuition: Demand is growing and prices are rising, so the explanation must be that supply is not keeping up. Unfortunately, the data does not support this narrative. The 2021 Census reported that from 2011 to 2021, Ontario's population grew by 10.7 per cent and the number of occupied dwellings grew by 12.5 per cent. The same has been true for the past 30 years. From the late 1960s to the early 1980s, dwellings grew much faster than population, but the fact remains that new construction is still outpacing population growth. Many of the new units are high-rise condos, whereas many buyers want ground-related units. The problem is not so much the number of units being built as the type of unit. Because the excess of new building over population growth has declined, it is true that an increase in supply would moderate the price increases. But the lack of supply is not the sole explanation of price increases. As cities grow, as in Ontario, the price of housing rises – even with no constraint on supply. This is because dwelling units nearer the centre become relatively more attractive as the city spreads out. This is why housing is more expensive in larger cities."¹⁹

COMMENT 7: The new PPS relies on housing needs identified by the Housing Affordability Task Force which missed the substantial housing supply inventory.

The Regional Planning Commissioners of Ontario (RPCO) – an organization formed by 21 of Ontario's largest cities, regions, and counties - note that most of the housing units, supposedly, needed by 2031 are already in the development pipeline:

"In year two of the Province's ten-year goal to build 1.5 million homes, the Regional Planning Commissioners of Ontario (RPCO) has undertaken a housing supply inventory, which already constitutes 85% of the Provincial 2032 goal. Some proposed units will require infrastructure, but these numbers are intended to provide an indication of the status of units already approved and in the formal approval process. Municipalities representing the remaining 30% of Ontario's population would also have approved and proposed housing unit inventories. If they were included, the approved and proposed supply of housing units in the development approval process could exceed the 1.5 million Provincial target. Collaboration with all stakeholders on the importance of building a mix of unit types to achieve better housing affordability for Ontarians is critical. Addressing supply alone will not fix the problem.

The housing supply inventory is summarized as follows, and is presented in housing units prior to Provincial Bill 23:

<i>Development Ready (Registered and Draft Approved)</i>	<i>331,632</i>
<i>Under Application or Proposed</i>	<i>731,129</i>
<i>Ministerial Zoning Order</i>	<i>64,199</i>
<i>As-of-right units (proxy)</i>	<i>150,000</i>
<i>Total housing unit inventory now (year 2 of 10)</i>	<i>1,276,960</i>
<i>Provincial Target by end 2031 (year 10)</i>	<i>1,500,000"²⁰</i>

¹⁸ Brian Doucet, 'Ontario's 'affordable housing' task force report does not address the real problems', THE CONVERSATION, 10 February 2022

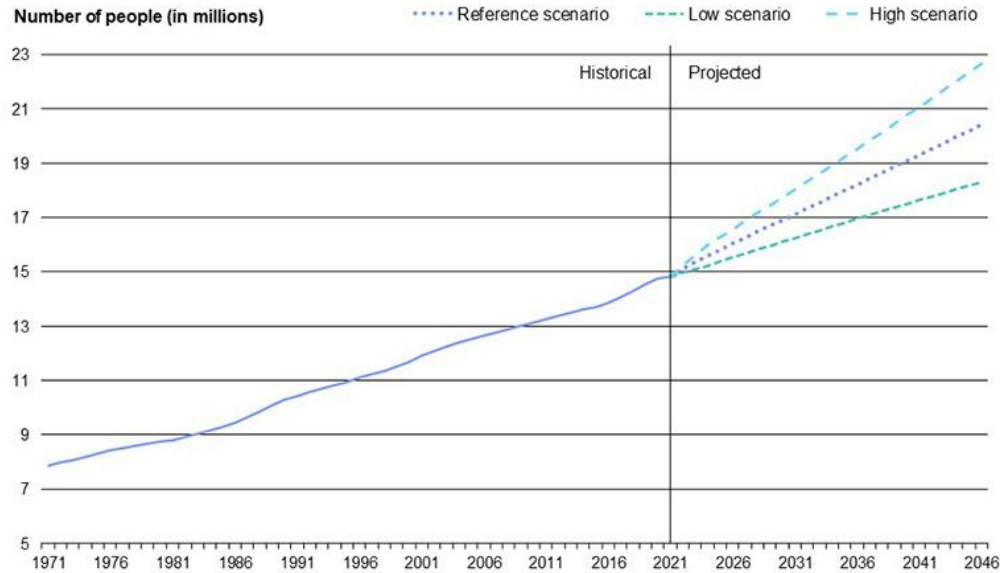
¹⁹ George Fallis, A shortage of homes isn't the main reason house prices keep rising, Globe and Mail, 14 March 2022

²⁰ Regional Planning Commissioners of Ontario, News Release: 'Regional Planning Commissioners of Ontario issue inventory of Ontario's unbuilt housing supply', Windsor, 07 March 2023

The population projections underlying the 2020 *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*²¹ estimate the 2021 population at 10,246,000 and the 2031 population at 11,788,000. Given an average household size of 2.6, this projected population growth of 1,542,000 would require 593,077 new housing units for the Greater Golden Horseshoe. Are we to believe that an additional 1,000,000 housing units are required between 2021 and 2031 to accommodate the growth in Ontario's communities outside of the Greater Golden Horseshoe?

The Province's own population projections²² for all of Ontario show a population growth of about 2,000,000 from 15,000,000 in 2021 to 17,000,000 in 2031. Given Ontario's average household size of 2.6, this would require an additional 769,231 housing units – or about half of the 1.5 million figure underlying the Province's growth policies.

Chart 1: Ontario population, 1971 to 2046



Sources: Statistics Canada for 1971–2021, and Ontario Ministry of Finance projections.

COMMENT 8: The new PPS contains no policies on community and social housing and equates the housing affordability crisis with a housing supply crisis.

The changes to the planning framework are largely driven by the government's false assertion: *"We inherited a confusing and broken housing development system that's impossible for people and home builders to navigate and this has led to a housing shortage and skyrocketing housing prices and rents We cannot fix the housing shortage on our own, but we can cut red tape to make it easier to build new housing for people to rent or own."*²³

Toronto, for example, continues to have a serious housing affordability crisis despite a very robust development pipeline, as recently reported by Toronto' Chief Planner:

"In total, 717,327 residential units and 14,484,961 million square metres of non-residential gross floor area (GFA) were proposed by projects with development activity between January 1, 2017 and June 30, 2022. Of this, 103,638 residential units and 3,087,319 square metres of non-residential GFA have been built. There were 203,793 residential units approved but not yet built, and an additional 409,896 units in projects still under review. Similarly, there was 5,483,875 square metres of non-residential GFA approved and not yet built, and a further 5,913,767 square metres in projects under review. In total, there are

²¹ Hemson Consulting Ltd., Greater Golden Horseshoe: Growth Forecasts to 2051, Technical Report, Toronto, 26 August 2020

²² <https://www.ontario.ca/page/ontario-population-projections>

²³ Government of Ontario, Housing Supply Action Plan, 2019

613,689 residential units and 11,397,642 m2 of non-residential GFA in projects that are either under review or active, indicating a continuation of strong development activity in Toronto in the coming years. If all of these residential units were realized over time, they would increase the total number of dwellings in the city by over one half.”²⁴

Ontario’s average rental rates of purpose-built and condo rental apartments have risen over the last year alone by 17.1% (see chart below).²⁵ The new PPS, however, contains no policies designed to actually create affordable housing.

Average Listed Rent by Province and Unit Type for Apt. and Condo Listings: April, 2023										
PROV.	TOTAL	0B	Average Rent			TOTAL	0B	% Change Y/Y		
			1B	2B	3B			1B	2B	3B
AB	\$1,461	\$981	\$1,307	\$1,628	\$1,668	13.4%	0.6%	13.0%	14.8%	7.3%
BC	\$2,541	\$1,904	\$2,168	\$2,857	\$3,342	13.2%	8.4%	11.0%	13.0%	6.4%
MB	\$1,463	\$1,066	\$1,310	\$1,588	\$1,914	12.6%	13.8%	14.6%	12.5%	5.6%
NS	\$2,167	\$1,723	\$2,029	\$2,368	\$2,586	20.8%	14.1%	22.7%	21.0%	33.6%
ON	\$2,401	\$1,802	\$2,180	\$2,649	\$2,954	17.1%	19.0%	16.9%	15.8%	13.6%
QC	\$1,839	\$1,329	\$1,589	\$2,035	\$2,340	12.2%	2.8%	9.8%	9.9%	6.0%
SK	\$1,097	\$856	\$1,034	\$1,173	\$1,351	8.0%	13.3%	8.7%	7.7%	7.0%
CA	\$1,937	\$1,395	\$1,749	\$2,127	\$2,402	10.9%	4.9%	10.1%	10.7%	6.8%

Source: Urbanation Inc. rentals.ca network data

According to the government, social and affordable housing have been developed in the province in the past, as follows:

“Social housing was developed through federal or provincial government programs from the 1950s through 1995. Over 250,000 households live in social housing. About 185,000 pay a geared-to-income rent and the rest pay a moderate market rent.

Affordable housing programs since 2002 have led to the construction of about 21,800 rental units with rents maintained at or below 80% of Average Market Rent for at least 20 years. These units were built in both the community and market sector “²⁶

OVERALL CONCLUSIONS

In conclusion, FoNTRA believes that the proposed Provincial Planning Statement (PPS) and the simultaneous repeal of the Growth Plan for the Golden Horseshoe should not proceed since these initiatives are not only harmful but also entirely unnecessary:

1. The Ministry does not have effective procedures and systems in place to ensure that land use planning in the Greater Golden Horseshoe is consistent with good land-use planning practices, and opportunities remain for land-use planning to be better integrated with planning processes for infrastructure and services, such as highways, transit, schools, and hospitals, according to the Auditor General of Ontario.
2. The assertion that the housing affordability crisis is the product of Ontario’s land use planning and environmental protection framework, and municipalities slow to approve planning applications is objectively false, according to the Association of Municipalities Ontario (AMO).

²⁴ Toronto Chief Planner and Executive Director, City Planning, Development Pipeline 2022, 13 February 2022

²⁵ <https://rentals.ca/national-rent-report>

²⁶ <https://www.ontario.ca/page/community-housing-renewal-strategy>

3. Data does not support the popular narrative that a lack of supply is the cause of the affordability crisis, and the solution is to build more houses, according to Professor Fallis of York University.
4. The housing supply inventory contains currently – in year 2 of the province’s 10-year horizon - 1,276,960 units in 21 municipalities that represent 70% of the province’s population, according to the Regional Planning Commissioners of Ontario (RPCO).
5. No valid statistical analysis supporting the call for 1.5 million new housing units by 2031 has been made public, according to Professor Doucet of the University of Waterloo.
6. Recent changes to the statutory planning framework limit meaningful public engagement, impede protections for the environment, and negatively impact coordination of infrastructure and growth planning across regions, according to the Ontario Professional Planners Institute.
7. The new PPS eliminates density targets and removes restrictions on the expansion of municipal settlement boundaries, effectively, encouraging low-density sprawl on natural and agricultural land with car-reliant subdivisions – all moves directly counterproductive to intelligent climate change adaptation.
8. The exclusive focus on housing supply anywhere overlooks the basic requirement of the *Planning Act* that the Minister, in exercising his or her authority, shall have regard to all 20 provincial interests listed in the legislation, not just “*the adequate provision of a full range of housing, including affordable housing.*”

FoNTRA, respectfully, urges the government to withdraw the proposed Provincial Planning Statement and to maintain the Growth Plan for the Greater Golden Horseshoe.

Sincerely yours,

Federation of North Toronto Residents’ Associations

Cathie Macdonald
 Co-Chair FoNTRA
 57 Duggan Avenue
 Toronto Ontario M4V 1Y1
cathie.macdonald@sympatico.ca

Geoff Kettel
 Co-Chair FoNTRA
 129 Hanna Road
 Toronto Ontario M4G 3N6
gkettel@gmail.com

Copies:

Hon. Doug Ford, Premier of Ontario
 John Fraser, Interim Leader, Liberal Party
 Mike Schreiner, Leader, Green Party
 Marit Stiles, Leader, New Democratic Party
 Jill Andrew, MPP, Toronto-St. Paul’s
 Jessica Bell, MPP, University-Rosedale
 Stephanie Bowman, MPP, Don Valley West
 Robin Martin, MPP, Eglinton-Lawrence
 Adil Shamji, MPP, Don Valley East
 Acting Mayor Jennifer McKelvie and Members of Toronto City Council
 Gregg Lintern, Chief Planner and Executive Director, City of Toronto
 FoNTRA Members and Others

The Federation of North Toronto Residents’ Associations (FoNTRA) is a non-profit, volunteer organization comprised of more than 30 member organizations. Its members, all residents’ associations, include at least 170,000 Toronto residents within their boundaries. The residents’ associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.



65 Heward Ave. Building A, Suite A201
Toronto, Ontario, Canada M4M 2T5
Tel (416) 925-8200
Fax (416) 925-8400
www.dgcontario.ca

May 31, 2023

Planning and Housing Committee
City of Toronto
c/o Electronic Submission at www.toronto.ca

RE: ENDORSEMENT OF RECOMMENDATIONS RE PROPOSED CHANGES TO PROVINCIAL PLANNING STATEMENT 2023

Dear Members of the City of Toronto Planning and Housing Committee,

The Directors Guild of Canada – Ontario (“DGC Ontario”) is a provincial labour organization representing key creative and operational specialists in the film and television production industry. We represent Directors, Assistant Directors, Production Managers, Location Managers, Production Designers and Art Directors, Production Accountants, Picture & Sound Editors, Post Production Supervisors, and all their respective departmental assistants.

In 2014, DGC Ontario Membership stood at 1,560. It now sits at 3,717, including Full Members, Associate Members and Apprentices, representing an overall growth rate of 138% in just under one decade. This growth rate is attributable to the reputation of Toronto as a centre of excellence in the film industry, and is the result of years of work establishing the skills and reputation of our workforce, now recognized globally. Production numbers have increased, the scale, scope, quality and recognition of our shows has increased, the number of people employed per show has increased, and our workforce is creating globally successful productions, receiving Oscar, Emmy and BAFTA award wins and nominations, along with countless other craft award wins and nominations. In 2022 alone, DGC Ontario hosted over 158 professional development and training courses with over 3,500 participants, not including our outreach and training courses for non-Members, which are programs we develop constantly in response to requests from various levels of government to ensure sustained growth to meet workforce demands in our sector.

.../2

Premier Doug Ford has said repeatedly that he would like to see the film and television industry in Ontario reach \$5B in budget expenditures, and this cannot be achieved without Toronto as the major player. Given the important role Ontario's provincial tax credit program has played in building our worth in the global film and television production industry, it would be a shame to lose any traction in that positioning. Loss or limitation of employment lands for studio and related workspaces to other types of development will hurt our industry and will create far less certainty that Toronto can remain a leading destination for producers. If the industry has to diversify its geographical base and move to other jurisdictions due to loss of studio lands and the related requisite workforce, this could result in substantial economic loss to the City, and subsequently the return on investment to the Province.

Many of our Members choose to live and work in Toronto's downtown and in the Kipling cluster. According to our data, as of this week, we have 2,568 Members and Apprentices out of 3,717 living in the City of Toronto, which represents 69.1% of our total Membership across Ontario. Access to work for those workers is important. As we have seen many of Toronto's former converted warehouse and factory studios disappear, private investors have stepped up to the plate to create purpose-built studios to meet the industry's needs to accommodate the demand for content creation here. **We are manufacturers of entertainment, and we need to retain as much factory floor as possible, both in studio space and location access. As such, DGC Ontario strongly supports the recommendations contained in the Report from the Chief Planner and Executive Director, City Planning regarding the proposed changes to the Provincial Planning Statement 2023.**

Prior to the pandemic, DGC Ontario secured new premises at 65 Heward Avenue, moving from our previous downtown location into the "studio district"/employment lands on Eastern Avenue in order to achieve closer proximity to the studio workplaces of our Membership. We created a convenient "Members Hub" for meetings and other gatherings, which also functions as a communal workspace for Members working independently. This space alone represents approximately 1/3 of our square footage. Since moving in, we have faced uncertainty due to rezoning applications on a property we invested in heavily after securing a 15-year lease, which is extendable to 20, then 25, years. Conversion of the employment lands on which we are situated for convenience and ease of access to and for our Membership could completely negate our purpose in moving to this cluster, along with the significant financial investment we made to gain that proximity.

Our industry has also heeded the calls to address climate change and to diversify our workforce to better represent the multiculturalism for which we are renowned. DGC Ontario has undertaken to support these goals wholeheartedly, establishing both a Diversity & Inclusion Committee and a Sustainability Committee to work with industry partners, our national organization, and with our local fellow unions and guilds. If employment lands downtown that have traditionally been occupied by film production and related businesses are lost from centralized and accessible locations, this will result in

more cars on the road as our workforce is forced out into the extremities of Mississauga, Pickering and Markham to access their workplaces. Additionally, we have worked hard to create more opportunity for future film workers from underrepresented communities in Toronto, and need to acknowledge that for many young people from these communities, accessibility to their workplaces is key. How do they get to the outer limits of the GTA and back every day after putting in a long day (up to 16 hours sometimes) when transit may or may not be running? This creates an absolute barrier to work access for youth and other workers from underrepresented communities, and limits opportunities for remunerative employment in the film industry.

Our workforce wants to live and work here. We want to work sustainably. We want to diversify our workforce and reflect the pride we feel in our multiculturalism. We want to continue our contribution to the cultural fabric of this city, but to do so, we need your support. We often hear that our business is valued as one of the largest local economic drivers, and the skilled workforce here has made Toronto a juggernaut in the film and television industry. To maintain that status, we need active support from the City and the Province, so with great respect, we ask that you support the recommendations contained in the Report from the Chief Planner and Executive Director, City Planning regarding the proposed changes to employment lands in the Provincial Planning Statement 2023.

Sincerely,



Victoria Harding
Executive Director
DGC Ontario

cc Annie Bradley, Chair, DGC Ontario

Isaac Tang
T 416.367.6143
F 416.367.6749
ITang@blg.com

Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada M5H 4E3
T 416.367.6000
F 416.367.6749
blg.com



Brett Davis
T 416.367.6632
F 416.367.6749
BDavis@blg.com

File No. 038577.000001

May 31, 2023

Delivered by Email (phc@toronto.ca)

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins, Committee Administrator

Dear Chair Bradford and Members of Planning and Housing Committee:

Re: Item PH4.8 – City Comments on the Proposed Provincial Planning Statement – Submissions by Pinewood Toronto Studios

We are legal counsel to PT Studios Inc. (o/a Pinewood Toronto Studios) (“**Pinewood**”), the long-term lessee of the properties municipally known as 101 and 225 Commissioners Street and 1-17 Basin Street, in the City of Toronto (the “**Subject Property**” or “**Site**”). Pinewood has been an anchor tenant of the Port Lands for many years, and has long-term plans to redevelop the Subject Property in accordance with the Central Waterfront Secondary Plan, as amended by modifications supported by the City of Toronto (“**City**”).

Pinewood recognizes that the City intends to submit a recommendation to the Minister of Municipal Affairs and Housing (“**Minister**”) on the Proposed Provincial Planning Statement (“**PPS**”). Pinewood shares several of the concerns of the City’s Chief Planner and Executive Director and the concerns of the City’s Film Commissioner and Director in relation to the new Employment Area policies of the PPS and how they affect the viability of the film production industry.

Comments on the PPS

Film production is an important and fast-growing industry in Ontario. In 2022, the film industry contributed roughly \$3.15 billion to the economy while helping to create more than 45,000 jobs.¹ While Pinewood supports updating the PPS to reflect current provincial priorities, it is particularly

¹ Sara Jabakhanji, “Ontario reaches record-high levels of film, TV production in 2022”, *CBC* (March 25, 2023), online: <https://www.cbc.ca/news/canada/toronto/ontario-film-tv-production-levels-record-high-1.6788133>.

concerned that the Employment Area policies are overly restrictive and will lead to the decline of the film industry in Ontario.

Pinewood's concerns stem from the more restrictive definition of Employment Areas in the PPS. Film studios are a specialized industry and benefit from a number of key land use considerations including: the ability to cluster with other film studios and media-related uses, proximity to major population centers to access a large employee pool and diversity of filming locations, and the ability to maintain and secure expansions to large studio properties without competing with lands that may be subject to other development pressures.

The revised PPS risks making the film industry in Ontario less competitive by creating an environment where film studios must compete with other more lucrative land uses for sites. Pinewood's concerns are largely echoed in the Impact Analysis on the PPS conducted by the City's Film Commissioner. The Impact Analysis acknowledges that the revision to Employment Areas in the PPS may jeopardize the future success of the film industry in Ontario. The film industry is highly global in nature and can choose to relocate their film productions to other jurisdictions that are supportive of the land use considerations that make a studio facility and location viable and attractive. In addition, in order to be considered viable and attractive in the global market for film production locations, film studio operators seek to locate their operations and facilities in jurisdictions that best meet, and are supportive of, their land use planning needs.

Pinewood's concerns are also nuanced given that the Subject Property is located within the Port Lands, an area in Toronto that is planned for significant urban renewal in the coming years. The Don River naturalization and flood protection project entails major infrastructure investment that will support a thriving, mixed-use environment where industries, homes, shops, and services will all co-exist. The Subject Property itself comprises a large portion of the Production, Interactive, and Creative (PIC) Core district, as identified by the Port Lands Planning Framework and Central Waterfront Secondary Plan. This area is intended to grow as a modern, urban district with a mix of film, television, digital media production, creative and supportive uses, some of which are not recognized by the proposed treatment of Employment Areas in the revised PPS.

In addition, there are a number of sensitive uses permitted on the Subject Property and within its immediate context. These include a daycare and post-secondary school on the Subject Property as well as residential uses directly north of the Site. Compatibility and mitigation studies were completed during the planning process for these lands, through which it was determined that Pinewood's operations do not have impacts on these uses and are in fact compatible with them. This makes them somewhat unique from other Employment Areas.

Requested Recommendation

Pinewood supports the City of Toronto proposal that the Minister consider revising the definition of Employment Area in the PPS to explicitly include film production, stand-alone and associated office, convenience retail and service uses. This would allow the film industry to access employment lands and benefit from their inherent protections. It would also facilitate the clustering of studios and their placement near major population centers and filming locations. Furthermore, allowing film studios to be located on employment lands would help alleviate development pressures to convert the lands to more expensive uses.

Pinewood similarly supports the City of Toronto's position that commercial uses, public service facilities and other institutional uses should also be permitted within Employment Areas. These uses are supportive of film production and media-related uses and can help bolster the competitiveness and success of Ontario's film industry, where appropriate.

Pinewood will be making their own independent submission regarding the proposed changes to the PPS, which will be consistent with the contents of this letter. Our client would be happy to further discuss this submission with City Staff and the City's Film Commissioner in the coming days.

Yours very truly,

BORDEN LADNER GERVAIS LLP



Isaac Tang

Cc: Client

Marguerite Pigott, Film Commissioner & Director, Entertainment Industries
Patrick Tobin, General Manager, Economic Development and Culture,
Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Geoff Grant, General Manager, Pinewood Toronto Studios
Sarah Farrell, General Counsel, Pinewood Toronto Studios



unifor
NABET 700-M

Ontario Film, Television & New Media Technicians

NABET 700-M UNIFOR
100 Lombard Street, Suite 303
Toronto, ON M5C 1M3
www.nabet700.com

T: 416-536-4827
TF: 1-888-428-0362
F: 416-536-0859
E: info@nabet700.com

May 31, 2023

City of Toronto
Planning and Housing Committee
100 Queen Street West
Toronto, ON
M5H 2N2

Sent via email: phc@toronto.ca

RE: Toronto Agenda Item 2023.PH4.8

Dear Chair and Committee Members,

We are writing today on behalf of NABET 700-M UNIFOR.

NABET 700-M UNIFOR represents nearly 3,000 film, television and digital media Technicians in the Province of Ontario, 67% of whom call the City of Toronto home. Our Technicians work behind the scenes in the departments of Lighting, Grip, Hair, Makeup, Costume, Sets, Props, Construction, Paint, Special Effects, Transportation and Sound. An example of the amazing productions that our Technicians work on which are seen, and celebrated at home as well as around the world, include the series *Run the Burbs*, *Shelved*, *Sort Of*, *Murdoch Mysteries*, *Robyn Hood*, *I Woke Up a Vampire*, *Popularity Papers*, *Ruby and the Well* and *Children Ruin Everything* and feature films such as *Brother*, *The Swearing Jar*, *Humane* and *The Invisibles*; just to name a few.

Specifically, we are writing in regard to the above-noted agenda item and the upcoming Planning and Housing Committee meeting on June 1, 2023 and to advise that NABET 700-M UNIFOR endorses the comments put forward by the Chief Planner and Executive Director, City Planning in their May 17, 2023 submission to this Committee.

Even more specifically, we share the concerns put forward in the *"Impact on Film Production Industry"* analysis provided as part of the larger submission mentioned above.

The film and television industry, the new manufacturing, in Ontario is a \$3.15 billion dollar industry, with \$2.5 billion of that activity happening right here in the City of Toronto. The Province of Ontario has a stated goal of growing the sector to \$5 billion – a goal we can meet – however, we feel that the impact to film and television production through the proposed Provincial Planning Statement 2023 will impede our ability to achieve this goal.

Film and TV is a business that thrives on predictability and stability. The potential for upheaval that the removal of the five-year cycle for reviewing conversion requests creates could be problematic for our sector. Productions looking to locate to Ontario, and specifically Toronto, need to know if they are going to make a long-term investment with their production and commit to the jurisdiction for what we hope will be multiple years that they will not be in danger of having to incur costs of uprooting their production and moving to another part of the City or even Province should conversion be allowed at any time.

Film and TV is a business that has unique needs and work habits. To address this fact, our sector is one that often clusters in certain areas of the City. This can be found in areas such as the Port Lands and Etobicoke South, just to name two, where you will find film and television studios, equipment suppliers, production offices and other ancillary businesses that support the business of film and television. As we are mindful of our sector's impact on neighbours; we work odd hours, can produce noise in relation to the requirements of a production and we require some level of anonymity and privacy, this "clustering" makes it more efficient for our sector to do business. This is why it is important to have film production included in the definition of Employment Areas.

Film and TV is a business that provides year-round work opportunities and high paying jobs for the crews they employ. In order to keep up with the demands for skilled and qualified crew, NABET 700-M UNIFOR has grown the number of full Members and Permittees, those working towards membership, by approximately 20% over the last three years. As a Union, we are always looking at ways to add to the diversity of our membership. In part due to our partnerships with the City of Toronto and the Province of Ontario, NABET 700-M UNIFOR has been able to provide training and on-the-job, paid placements for individuals from underrepresented communities to learn the craft and become part of this sector. Many of these new entrants into our sector live, and want to work, in the City where they either grew up, or recently came to, to start a career.

Any measures that allow for the fracturing and fragmenting of the sector will only have an adverse effect on the positive steps that we as an industry have taken together to get us to this point in our success.

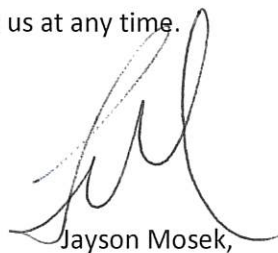
We appreciate the opportunity to provide this submission for consideration by the Committee.

Should you have any questions, feel free to contact us at any time.

Yours very truly,



Peggy Kyriakidou,
President
NABET 700-M UNIFOR



Jayson Mosek,
Business Agent
NABET 700-M UNIFOR



May 31, 2023

Re: PH4.8 - City Comments on the Proposed Provincial Planning Statement

Dear Members of the Planning and Housing Committee

ABC Residents Association (“ABCRA”) is an incorporated volunteer body that has been in existence since 1957. ABCRA represents the interests of residents who live in the area between Yonge Street and Avenue Road and Bloor Street to the CPR tracks.

ABCRA appreciates the opportunity to bring to your attention its concerns regarding the proposed Provincial Planning Statement (“PPS”) within the ‘streamlined’ planning system, and wants to indicate our support for the Overall Conclusions raised by The Federation of North Toronto Residents’ Associations (“FoNTRA’) letter dated May 25, 2023 and reproduced below.

1. The Ministry does not have effective procedures and systems in place to ensure that land use planning in the Greater Golden Horseshoe is consistent with good land - use planning practices , and opportunities remain for land - use planning to be better integrated with planning processes for infrastructure and services, such as highways, transit, schools, and hospitals, according to the Auditor General of Ontario.
2. The assertion that the housing affordability crisis is the product of Ontario’s land use planning and environmental protection framework, and municipalities slow to approve planning applications is objectively false, according to the Association of Municipalities Ontario (AMO).
3. Data does not support the popular narrative that a lack of supply is the cause of the affordability crisis, and the solution is to build more houses, according to Professor Fallis of York University.
4. The housing supply inventory contains currently – in year 2 of the province’s 10 - year horizon - 1,276,960 units in 21 municipalities that represent 70% of the province’s population, according to the Regional Planning Commissioners of Ontario (RPCO).
5. No valid statistical analysis supporting the call for 1.5 million new housing units by 2031 has been made public, according to Professor Doucet of the University of Waterloo.
6. Recent changes to the statutory planning framework limit meaningful public engagement, impede protections for the environment, and negatively impact coordination of infrastructure and growth planning across regions, according to the Ontario Professional Planners Institute.
7. The new PPS eliminates density targets and removes restrictions on the expansion of municipal settlement boundaries, effectively, encouraging low - density sprawl on natural and agricultural land with car - reliant subdivisions – all moves directly counterproductive to intelligent climate change adaptation.



8. The exclusive focus on housing supply anywhere overlooks the basic requirement of the Planning Act that the Minister, in exercising his or her authority, shall have regard to all 20 provincial interests listed in the legislation, not just “the adequate provision of a full range of housing, including affordable housing.”

ABCRA has submitted a letter of support of FoNTRA's position to the Province in response to the call for comments, which concludes that the proposed Provincial Planning Statement (PPS) and the simultaneous repeal of the Growth Plan should not proceed since these initiatives are not only harmful, but also entirely unnecessary. FoNTRA, respectfully, urged the Ontario Government to withdraw the proposed Provincial Planning Statement and to maintain the Growth Plan for the Greater Golden Horseshoe

Our review of City Planning's subject report indicates that its recommendations and FoNTRA's position on the matter are very similar. The major difference is that City Planning wants the foundational elements of the Growth Plan and of the 2020 Provincial Policy Statement (PPS) transferred to the Provincial Planning Statement, while FoNTRA is saying, “save the trouble, and leave the old instruments in place”.

In summary, therefore, ABCRA agrees with FoNTRA and City Planning's analysis of the Statement in relation to the current approved documents and supports the solution FoNTRA has outlined in their letter to Minister Clark.

Yours truly,

The ABC Residents Association,
Ian Carmichael and John Caliendo,
Co-Chairs
abcra@abc.ca

CC. Councillor Dianne Saxe



Toronto Industry Network C/O Paul Scrivener and Associates
Phone & Fax: (416) 444-8060
Email: paul@scrivener-associates.net

Toronto Industry Network

June 1, 2023

EMAILED

Councillor Brad Bradford and Members of the
Planning and Housing Committee,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2

Attention: Ms. Nancy Martins

Dear Councillor Bradford and Committee Members:

Re: PH4.8 - City Comments on the Proposed Provincial Planning Statement

The Toronto Industry Network (TIN) respectfully asks that you recommend to Council that the points covered in the staff comments on the proposed changes to the consolidated Provincial Policy Statement (PPS) be sent to the ERO as well as the circulation list outlined in the report. However, we believe that City representatives need to meet directly with their counterparts at the province to indicate the City's concerns.

TIN is very worried that if brought into force, the new PPS will significantly lessen the protections afforded currently to our manufacturing community. The uncertainty this will cause may make some companies less confident in re-investing in our City.

TIN requests that the communication from the City to the province specifically request that a pause in the implementation of the new PPS occur so that proper consultation can happen with affected stakeholders. A motion might read:

THAT given the potentially negative impact of the proposed PPS may have on Toronto's manufacturers, the Minister of Municipal; Affairs and Housing be requested to pause implementation of the PPS until improved protections of employment lands can be discussed with affected stakeholders.

I thank you for your attention.

Sincerely,

Craig McLuckie,
President

June 14, 2023,

Sylwia Przewdziecki
Toronto City Hall
Email: councilmeeting@toronto.ca

Item - 2023.PH4.8 - City Comments on the Proposed Provincial Planning Statement (PPS)

Dear City Council,

The Mimico Lakeshore Community Network (MLCN), represents a number of community groups as well as engaged individuals. We have been following with great dismay the proposed changes to the Provincial Planning Statement (PPS) which is part of the changes of Bill 97, Helping Homeowners, Protecting Tenants Act 2023, which is part of the provincial government's efforts to address the housing affordability crisis by increasing the housing supply, But it falls short of its goal because of the removal or alterations of certain definitions such as "Affordable Housing", "Low and Moderate Income Households", "Employment Areas" and "Provincially Significant Employment Zones" from the proposed Provincial Planning Statement. Those definitions are keys to living in a complete and affordable community, where potential employment is close to where one lives. 30% of renter households in Toronto are in core housing needs and the City's HousingTO Action Plan 2020-2030 needs to build 40,000 affordable rental and supportive homes by 2030.

The province through PPS 2023 wants to define affordable prices or rents at 80% of the average resale purchase price or market rent, rather than average income. Toronto's annual rent growth sits at just over 21 per cent – reaching an average of \$2,822 last month. Current Toronto MLS stats indicate an average house price of \$1,204,166. 80% of the \$2,822 rental average is \$2,257, while 80% of the \$1,200,166 average house price comes in at \$963,332, both well above what most people can afford. Because of the cost of housing and living in Toronto, there has been an exodus of 50,000 people leaving the city for other provinces which has created a labour shortage in Toronto. The elimination of the "affordable housing" and "low and moderate income households" definitions helps realize the possibility that only high-income earners are can afford to live in Toronto.

In Ontario's 2020 Provincial Policy Statement, affordable is defined as the least expensive of the income-based and market cost-based definitions. MLCN agrees with the city recommendation that the Province maintain the 2020 definitions of "Affordable Housing", & "Low and Moderate Income Households" which is 30 per cent or less of total household income. A household with annual income (before tax) of \$29,401 to \$52,500, can afford up to \$1,313 per month for housing. A Medium Income Household with an annual income of \$52,501 to \$83,900 can afford up to \$2,098 per month for housing. MLCN also believes that there should be provisions for municipalities to define climate change adaptation and green house gas emissions goals for new development.

Last year Toronto's Employment Areas employed almost 400,000 people, which is projected to rise to 500,000. The PPS's new definition of "Employment Areas" changes the protected land uses to exclude institutional and commercial uses, which means that sites that are currently designated as an "Area of Employment" in the official plan with an office building or a hospital will no longer be identified as "employment" This change in the "Area of Employment" definition comes despite the Land Needs Assessment finding that there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate 2051 population forecasts.

The definition change in "Employment Areas" impacts the film industry dramatically. The film industry spends \$2.5 billion annually in Toronto, and uses 35,000 local employees. Proposed policies could potentially drive film investment out of Ontario. MLCN agrees with the city that the Province revise the "Employment Areas" definition to include film production, clusters of office uses, and stand-alone convenience retail and services to serve businesses and workers within Employment Areas.

The PPS also makes significant changes that municipalities must follow when determining whether a conversion or removal of lands within an Employment Area will be permitted. The new policy allows for

conversions or removals of Employment Areas to be considered at any point in time, instead of only during a Municipal Comprehensive Review (MCR) every five years. An ongoing, site-by-site request, does not allow for comprehensive analysis and planning. MLCN agrees with the City's suggestion that the Province maintain the current time frame for conversion of employment lands when municipalities are reviewing their 5-year Official Plan.

The new PPS has eliminated the definition "Provincially Significant Employment Zones" (PSEZ). The Province will instead provide conversion protections for former Provincially Significant Employment Zones only through a Minister's Zoning Orders (MZOs), if those lands meet the proposed definition of "areas of employment" in Bill 97. The Ontario Food Terminal, which was labelled as a PSEZ in 2019 is not only the second largest fresh food distribution facility in North America, but is also a major employer in the Mimico area that employs 5,000 employees directly at the terminal and also supports 170,000 people who have direct or indirect employment affiliated with the terminal. PSEZs did not include protections from encroachment of residential uses. Proposed PPS policies related to employment and land use compatibility would require municipalities to permit residential uses on lands that no longer meet the Planning Act definition of "areas of employment". The city, along with MLCN request that the Province allow municipalities to determine whether sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible.

While Mimico Lakeshore Community Network applauds the province's efforts at solving the housing affordability crisis, the removal or modifications to definitions for "Affordable Housing", "Low and Moderate Income Households", "Employment Areas" and "Provincially Significant Employment Zones" is counterproductive to reaching that housing affordability goal.

Sincerely,

Les Veszlenyi and Angela Barnes, Co-Chairs of the Mimico Lakeshore Community Network