



Regional Planning Commissioners of Ontario

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Hon. Doug Ford, Premier of Ontario
Hon. Steve Clark, Minister of Municipal Affairs and Housing
Legislative Building
1 Queen's Park
Toronto, Ontario
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Re: Response to Proposed Provincial Planning Statement (ERO Posting Number 019-6813).

Dear Premier Ford and Minister Clark:

On behalf of the Regional Planning Commissioners of Ontario (RPCO), please accept this submission to the above-noted ERO Posting.

The Regional Planning Commissioners of Ontario (RPCO) is an organization made up of senior planning practitioners from Ontario's large single-tier Cities and upper-tier Regions. Members of RPCO provide planning services and planning advice to municipal Councils representing approximately 80% of Ontario's population. RPCO members are fully engaged on a daily basis in matters which are urban and rural; northern and southern; small town and big city. The universal importance of having a healthy development industry to support community vitality across Ontario is well understood and supported. We acknowledge and share your objective of building more homes faster and a policy-led system of land use planning in Ontario. RPCO's web site is rpco.ca, and has a variety of information and analysis that you may also find helpful.

This submission highlights common themes we have heard, and that we see as having direct and material bearing on the prosperity of Ontario communities. Our member municipalities will also be making their own submissions that are more detailed and specific to their communities. Given the Province's significant community diversity, we expect that the comments you receive will also be diverse.

We offer the following themes as the basis of our comments:

- 1. The Provincial Planning Statement (PPS) is important to a policy-led system for land use planning, founded on good planning, and integrated with other planning policy documents.** Broad long-standing goals to promote compact growth, protect agricultural land and natural heritage, create transit-supportive development, realize complete communities, protect heritage, and closely co-ordinate infrastructure and financial planning, seem to be lacking in the draft PPS. Growth forecasts and municipal comprehensive reviews are proposed to be removed. The implementation relationships between the PPS and other Provincial actions (e.g. Environmental Assessment streamlining, funding the municipal infrastructure deficit) is unclear. The proposed PPS, while intended to provide flexibility at the local level, does not provide strong policy support for circumstances like ongoing urban transformation to transit supportive communities, necessary to accommodate our growing population.
- 2. Municipalities have significant concerns about misalignment between municipal growth planning, infrastructure planning and financial planning.** Municipalities have recently completed Official Plan updates following the Provincial Land Needs Assessment methodology. Collectively, this has produced an adequate supply of urban expansion for the next 30 years. With the ability for further expansion of settlement boundaries and creation of additional settlement areas under the proposed PPS, infrastructure and capital infrastructure planning completed through Municipal Comprehensive Reviews will need to be redesigned. The process will take time and financial resources to achieve. Orderly growth patterns used to establish multi-year capital programs (with the requisite financing) will be compromised. If servicing costs are prohibitive, such newly developable lands may either sit idle or be developed for higher-priced housing that is not within the reach of average home buyers and tenants in Ontario.
- 3. Fragmentation of agricultural and other rural lands can have far-reaching impacts.** The most recent Pandemic highlighted the fragility of our domestic food (and other commodity) supply chains, and the need to protect local agricultural resources. Allowing housing development on agricultural lands fragments and diminishes these invaluable resources.
- 4. The natural environment provides for multi-purpose "green infrastructure" and should not be treated as a development impediment.** Municipalities await the release of Natural Heritage policies before they can comment further. Once released, we look forward to a meaningful dialogue before such policies are finalized. Overarching global concerns, like climate change, need be considered and addressed.

5. **Strong Provincial policy is required to address the many different housing affordability needs across Ontario.** With a predominant focus on increasing housing supply, associated levers to make housing affordable to a range of needs for Ontarians is missing. The definitions for “affordable housing” and “low and moderate income households” should be maintained to encourage continued progress toward targets for affordable or rental housing creation.
6. **The Greater Toronto and Hamilton Area (GTHA) and adjacent densely urban municipalities are distinctly more complex than other Ontario municipalities and need deeper planning policy direction.** The removal of mandatory density and intensification targets other than density targets in Strategic Growth Areas and Major Transit Station Areas removes long standing tools that assist GTHA municipalities to shape “big growth”. We would ask you to also carefully review the comprehensive submission made by the City of Toronto that identifies the many policy deletions that will compromise high density planning in and around Canada’s largest city.
7. **We see many unintended consequences if the draft PPS is adopted in its current form.** The establishment of geographically scattered private communal water and sewage treatment systems alone creates the risk of widespread failure and the need for major municipal investment to ensure safe water supply and sewage services. Through both the *Safe Drinking Water Act* and MOE Guideline D-5-2, the Province has put the onus on municipalities to ensure these systems remain operable and safe. Another example is the removal of policies supporting the use of Rural lands for recreational, tourism and other opportunities. Such areas include waterfront businesses, which deliver significant employment and other economic benefits to many municipalities, and to Ontario as a whole.
8. **Erosion of employment lands may be at risk under the proposed PPS.** A mix of employment and residential uses is encouraged in mixed use urban intensification areas. The conversion of employment lands for housing development is considerably easier, putting employment land inventories at greater risk, and creating incompatible land use circumstances. The real estate value proposition for office is very different than residential. Existing office developments removed from the definition of employment areas will not be able to compete with residential property valuation and will be lost in key employment and business park areas. Within the Greater Golden Horseshoe, the removal of minimum intensification targets and density targets that are currently in *Places to Grow* may make it harder to obtain approvals for infill projects facing public opposition. The prohibition of commercial uses not associated with primary employment and institutional uses is expected to cause problems as well. Finally, it appears that film production uses may not be properly anchored in the draft PPS, placing this important provincial economic sector at risk.
9. **A return to “good planning” collaboration at the earliest stages between municipalities and the Province is encouraged to arrive at a better PPS.** Our interactions with Provincial staff have been predominantly process-based, or suggestions that we itemize our substantive concerns in our written submissions. We would appreciate a shift in focus toward “good planning” outcomes well in advance of any final decisions being made by the

Province, including a careful review of the forthcoming Natural Heritage policies (for which RPCO will also be making a submission).

We trust these comments are helpful, and we invite you to call on RPCO as a resource to help address our mutual planning challenges as you continue your deliberations. Please do not hesitate to contact me if you require anything additionally.

Sincerely,



Thom Hunt, Chair
Regional Planning Commissioners of Ontario

cc.
Association of Municipalities of Ontario
RPCO Members