



Submission to the Province of Ontario, Environmental Registry of Ontario

Date: August 3rd, 2023

Re: Proposed Provincial Planning Statement – ERO posting 019-6813

From: Scarborough Community Renewal Organization, Larry Whatmore, President

Scarborough Community Renewal Organization (SCRO) is providing comments regarding the proposal to consolidate two major planning documents in Ontario: *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (Growth Plan), 2020 and the *Provincial Policy Statement*, 2020. The proposed merged documents will form the basis for the Province to achieve its housing objectives. **Unfortunately, the document fails to set a foundation to achieve the Province’s vision of a complete community that provides employment, community services and all housing types to meet the current and future needs of Ontarians.**

While SCRO recognizes the need to expedite the planning processes, address housing shortages (especially affordable housing) and protect employment lands, we have the following concerns about the proposed Provincial Planning Statement and its ability to achieve the vision of the plan. We have included some suggestions to aid in improving outcomes for the plan.

Key Areas of Concern for SCRO:

1. The Provincial Planning Statement does not define affordable housing and has not brought forward targets for affordable or rental housing. Nor are there any new tools being considered for municipalities to require affordable or rental housing within development plans. The plan misses the mark on the core housing issue – which is affordability not just supply.

SCRO recommends that targets be set for affordable or rental housing and the Province should provide municipalities with tools to require affordable or rental housing.

2. Municipal comprehensive reviews would no longer be required, creating open season on employment conversions, creating uncertainty for employers and reducing future growth opportunities of Ontario businesses to grow within their markets.

SCRO recommends that the Municipal Comprehensive Review needs to remain and be improved with a focus on the protection of Ontario businesses located within employment and business districts using the same timeline as the 5-year Official Plan Review.

3. Employment Area definition changes may result in loss of businesses and impair the future growth of those businesses. The Provincial Planning Statement is recommending the removal of office, institutional and film production industries from Employment Areas which is, in our opinion, short-sighted and will have negative consequences for those businesses and for Ontario as a business location.

SCRO recommends that the Employment Area definition should explicitly include clusters of office uses, film production, institutional uses, and stand-alone convenience retail and services to support businesses and their employees within Employment Areas.

4. Employment targets and business locations are being sacrificed for housing at any cost, anywhere.

SCRO recommends that the Province needs stronger land use policy protections for all Employment Areas across the Province. The policies need to be strengthened to ensure that these lands support the economy and are viable over the long-term. More importantly, we need to give businesses certainty of operations and opportunities to grow in Ontario.

SCRO recommends that, when conversions of employment lands occur, municipalities should be provided with the following :

- conditional zoning that would enable municipalities to secure employment space prior to or concurrent with residential developments that would replace lost jobs as result of the conversion
- permit zoning conditions that would secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space.

SCRO recommends the Province needs to consider securing additional employment lands to meet employment targets of a growing population. You cannot afford housing without a job and not everyone will be working from home.

5. The proposal eliminates the provincial mapped Agricultural System and permits additional residential uses in agricultural areas.

SCRO recommends that the environmental, climate change and local food production impacts need to be considered wholistically for the Greater Golden Horseshoe before decisions on eliminating prime agriculture lands are made.

SCRO believes that the Provincial Planning Statement should advance its goal of complete communities through long term and regional planning that focuses on balancing housing, jobs, and community services such as park land, transit infrastructure and community social amenities.

We thank the Province for the opportunity to provide input into such an important document that will impact the lives of Ontarians

Respectfully

A handwritten signature in black ink, appearing to read 'Larry Whatmore', with a long horizontal line extending from the end of the signature.

**Larry Whatmore
President
Scarborough Community Renewal Organization**

About SCRO:

Scarborough Community Renewal Organization works collaboratively through action and advocacy to connect, promote and renew Scarborough, to create a strong and prosperous Scarborough that thrives within the City of Toronto. www.scro.ca

Scarborough Community Renewal Organization Contacts :

Larry Whatmore, Larry.Whatmore@rogers.com

Brenda Librecz, thecommish60@hotmail.com