

**Federation of Urban Neighbourhoods (Ontario)**  
**Submission to the Environmental Registry of Ontario**  
**ERO number 019-8462**

**Provincial Planning Statement, 2024**  
**May 10, 2024**

The *Federation of Urban Neighbourhoods* (“FUN”) is an umbrella organization representing residents’ associations in urban centres across Ontario which are engaged in planning and development issues. FUN advocates for legislation and policies that not only protect but also empower all residents.

On April 10th, the Province released a revised Provincial Planning Statement, 2024 and a new Minister Zoning Order (MZO) framework. The Provincial Planning Statement, if adopted, will replace the existing Provincial Policy Statement, 2020 (the “PPS”) and include some policies from A Place to Grow, Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”). The Growth Plan is proposed to be repealed. The Province also introduced Bill 185 which affects 17 Acts, including the Planning Act, City of Toronto Act, Development Charges Act and others. Bill 185 has reached second reading and has been referred to the Province’s Standing Committee on Finance and Economic Affairs and FUN will be speaking to the Committee on March 15, 2024.

FUN notes that the proposed changes to the PPS focus on increasing housing supply, choices, and affordability based on the following assumptions:

- that increased residential land supply lowers land cost and increases housing affordability (if developers pass along the savings);
- that the undefined determination of ‘market demand’ will be one of the key approval criteria and will not lengthen the approval processes;
- that permitting lower servicing standards and easier settlement boundary expansions will not create more sprawl; and,
- that housing option policies will not be misused to direct growth to where it is not needed.

While FUN supports the stated goals of encouraging an increased mix and supply of housing, protecting of the environment, creating jobs and a strong economy, reducing barriers and costs for development, and providing greater predictability, we note that many of the proposed policies pay only lip service to these goals. Several proposed policies undermine the government’s professed commitment to orderly growth management, for example policies such as:

- loosening environmental standards;

- further facilitating sprawl by increasing the opportunities for settlement boundary changes;
- lowering the protection of employment lands by allowing conversions outside of the municipal review process;
- reducing predictability and certainty by constantly changing provincial planning legislation, policies, and plans in rapid succession; and
- the central and critical issue of climate change is neglected.

Our concerns are summarized as follows:

<b>Issue</b>	<b>Impact</b>
<p><b>1. Intensification Targets</b></p> <p>No intensification targets mandating certain amounts of growth to be directed to existing built-up areas (encouraged only)</p>	<p>Allows more low-density sprawl to be directed to farmland therefore reducing housing output, wasting existing infrastructure capacity and destroying farmland.</p>
<p><b>2. Settlement Areas</b></p> <p>Settlement expansion allowed at any time and no requirement for comprehensive review</p>	<p>This makes the urban boundaries meaningless and removes/minimizes the need to comprehensively consider whether the conversion of farmland to accommodate future growth is necessary.</p>
<p><b>3. Residential subdivisions</b></p> <p>Residential subdivisions allowed on rural lands throughout Greater Golden Horseshoe</p>	<p>Reverses prior prohibition and will result in scattered residential development in the countryside unattached to any existing community, jobs, services, community facilities and sewer/water services creating more conflicts for agriculture and 100% car dependency</p>
<p><b>4. Development on buffer land</b></p> <p>Requires municipalities to permit sensitive lands uses (i.e., residential in lands intended to serve as a buffer to prevent adverse impacts).</p>	<p>Increase the risk of land use incompatibility causing adverse effects on both sensitive land uses and businesses in employment areas</p>

<b>Issue</b>	<b>Impact</b>
<p><b>5. Greenfield density targets</b></p> <p>No greenfield density targets mandating efficient development (encouraged only) –and only in 29 large and fastest growing municipalities</p>	<p>Will result in inefficient use and thus increased conversion of farmland – at densities which will not support transit or active transportation or types of housing forms people need/can afford. Will also reduce the number of homes built.</p>
<p><b>6. Rural Servicing Permissions</b></p> <p>More flexible permissions to allow private and partial sewer and water services in rural areas</p>	<p>Is intended to facilitate scattered rural subdivisions in the countryside</p>
<p><b>7. Residences on Farms</b></p> <p>Two additional residences allowed on every farm</p>	<p>Creates potential for new non-farm residences on every farm and is unnecessary as existing policy already allows residences for farm help</p>
<p><b>8. Mapping System for Protection</b></p> <p>Does not include the Agricultural and Natural Heritage System maps for the Greater Golden Horseshoe</p>	<p>Abandons these systems will result in further loss and degradation of the Region’s water, farmland and natural areas</p>
<p><b>9. Eliminating Municipal Comprehensive Reviews</b></p> <p>Removes the need for a municipality to undertake a Municipal Comprehensive Review (MCR).</p>	<p>Employment Area conversion requests and Settlement Area boundary expansions could occur anytime.</p>

Based on the issues and impacts, **we strongly oppose the legislation.**

**Geoff Kettel**  
**President**