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## Submission to the Province of Ontario, Environmental Registry of Ontario

**Date:** May 9<sup>th</sup>, 2024

**Re:** Proposed Provincial Planning Statement – ERO posting 019-8462

**From:** Scarborough Community Renewal Organization, Larry Whatmore, President

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Scarborough Community Renewal Organization (SCRO) is providing comments on the updated proposed *Provincial Planning Statement, 2024*, which was posted for comments on April 12, 2024. SCRO provided comments on the previous version issued in 2023; we continue to have similar concerns with this version.

As an all-volunteer organization with a vision of a more vibrant and prosperous Scarborough, SCRO values the Province’s vision of a “complete community” that provides employment, community services and a mix of housing types to meet the current and future needs of Ontarians. However, we believe **the Provincial Planning Statement, 2024 needs stronger protections for employment lands and enabling tools to achieve the complete community outcomes across the Province.**

While SCRO recognizes the need to expedite 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. Municipal comprehensive reviews would no longer be required, creating “open season” on employment land conversions, creating uncertainty for employers and reducing opportunities for Ontario businesses to grow within their markets. This will impede our economic development and the economic vitality of our municipalities.

**SCRO recommends that employment land conversions continue to be linked to Municipal Comprehensive Reviews and that the process 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.**

2. Employment Area definition changes may result in a loss of businesses and impair future growth of those businesses. The Provincial Planning Statement, 2024 is recommending the removal of office, institutional and film production industries from Employment Areas.

This is, in our opinion, short-sighted and will have negative consequences for those businesses and for Ontario generally, 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.**

3. Employment areas and business locations in Scarborough (and Toronto, generally) are being sacrificed for housing at a relentless pace. However, in Toronto, the Chief Planner has noted that housing targets can be achieved without the loss of employment lands. The long-term impact of employment land conversions will harm the economy of Ontario in the long term.

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

**In the updated 2024 version of the Provincial Planning Statement, section 2.8.1.3 proposes employment uses outside of employment areas to support the achievement of complete communities. SCRO supports this change, to provide more options for businesses, especially as it relates to displacement due to redevelopment.**

4. In section 3.5, the draft Statement proposes changes to land use compatibility policies which will make it easier to establish *sensitive land* uses in the vicinity of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment. The proposed statement eliminates the following important requirements to demonstrate compatibility:
  - i. An identified need for the proposed use;
  - ii. That alternative locations have been evaluated;
  - iii. That there are no reasonable alternative locations;
  - iv. That the development avoids adverse effects.

Now the statement reads that adverse effects to the proposed *sensitive land* use are only required to demonstrate potential impacts to industrial, manufacturing, or other major facilities are minimized and mitigated instead of avoided/eliminated.

**SCRO recommends that the 2024 Provincial Planning Statement revert to the original PPS, 2020 requirements for Land Use Compatibility.**

5. The updated Provincial Planning Statement, 2024 now includes affordable housing minimum targets for affordable to low- and moderate-income households. But there are no 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 the Province should provide municipalities with tools to require affordable or rental housing.**

6. The 2024 proposal added the requirement for municipalities to support general intensification (e.g., through redevelopment of plazas and shopping malls for mixed use residential development) and encourage municipalities to establish and implement minimum targets for intensification in built-up areas. SCRO recognizes that this is a trend currently underway across the Province. However, it does come with some negative social impacts during the transition to the new development. Small entrepreneurs/owner operators are displaced with no alternatives within their serving area. The impacts are not just with the small businesses but there is a loss of serves to the existing and future residents. *'Food deserts'* are created whereby residents don't have a grocery store within their neighbourhoods which is challenging for our low income residents and those without vehicles.

**SCRO recommends that the Province provide municipalities with tools to address transition to new developments that would benefit small commercial operators. In addition, 'complete communities' could be achieved by including conditions in the development plan for certain types of services (such as grocery/banks) that are needed within not just the development area but the adjacent communities.**

7. Municipalities will need to collaborate with publicly supported post-secondary institutions on early and integrated planning for student housing and encourage collaboration on development of student housing strategies. **SCRO supports this new addition to the 2024 Provincial Planning Policy.**
8. 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 holistically for the Greater Golden Horseshoe before decisions on eliminating prime agriculture lands are made.**

SCRO believes that the Provincial Planning Statement, 2024 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 for years to come.

Sincerely,

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

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**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](http://www.scro.ca)*

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