

May 12th, 2024

Hon. Paul Calandra
Minister of Municipal Affairs & Housing
17th Floor – 777 Bay Street
Toronto, ON
M7A 2J3

**Re: OPPI Feedback on Proposed 2024 Provincial Planning Statement Draft,
ERO Posting # 019-8462**

Dear Minister Calandra,

On behalf of the Ontario Professional Planners Institute (OPPI), we are submitting our feedback on ERO number 019-8462, “Review of proposed policies for a new provincial planning policy instrument” which represents the Province of Ontario’s second draft of the proposed *Provincial Planning Statement*.

As you know, OPPI is the recognized voice of Ontario’s planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPPs) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions. Our members work across a geographically diverse cross-section of Ontario – from small towns to big cities, from northern Ontario to the Greater Toronto Area.

OPPI is uniquely positioned to provide detailed and insightful feedback on the proposed *Provincial Planning Statement (PPS)*. Our members engage every day with the *Provincial Policy Statement* and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* which are core to our practice. In their current state they are used to support sustainable, equitable, and complete communities. The proposed *Provincial Planning Statement* represents an extremely significant shift in how we undertake planning in Ontario. It is vital that the planning profession and the Ministry of Municipal Affairs and Housing work collaboratively to ensure the best planning outcomes for Ontario. Ultimately, the new *Provincial Planning Statement* should support the application of robust planning principles for the public good, to ensure better outcomes for all.

OPPI supports taking action to improve Ontario’s planning system through thoughtful and intentional changes which deliver better planning outcomes. We have appreciated working with you and your Ministry in the past, and have offered thoughtful, effective and creative ideas and solutions based on OPPI’s vast experience in the planning sector, such as our [Top 10 Housing Supply & Affordability Recommendations](#).

We build upon the comments provided in July 2023 on the previous iteration of the Provincial Planning Statement and understand that time and effort has been put into considering past comments provided in an effort to find an efficient and effective path forward.

For our review of the 2024 draft of the *Provincial Planning Statement*, OPPI convened working groups comprised of members from different professional backgrounds to provide feedback on the changes proposed. Last year, we undertook a similar exercise to provide commentary on the 2023 draft of the *Provincial Planning Statement*. A copy of this submission [can be found here](#).

In last year's submission, OPPI provided detailed feedback on numerous aspects of the 2023 draft *Provincial Planning Statement*. While some of our feedback has been incorporated into the 2024 draft *Provincial Planning Statement*, many of our recommendations to build a more robust and effective policy document have only been partially addressed or have not been incorporated. While OPPI recognizes the government's desire to streamline the planning process, key changes and omissions in the *Provincial Planning Statement* may have the unintended consequences of slowing the construction of new homes and threatens prime agricultural land and environmentally sensitive areas. Additionally, this streamlining works against an efficient system that plans for new critical infrastructure, and builds safe, equitable, and complete communities.

OPPI urges you and your Ministry to consider the comments provided by OPPI, as a trusted stakeholder and voice of the planning process and make further changes to ensure that the planning framework aligns with the desired goals of the ministry and the province. The focus of OPPI's submission for the 2024 draft *Provincial Planning Statement* highlights some of our recommendations from 2023 which were not implemented, and which we deem to be the most important for helping to deliver a better planning system in Ontario. OPPI has attached (as a separate document) a table which summarizes our recommendations from the 2023 draft *Provincial Planning Statement*, and their status of implementation in the 2024 draft *Provincial Planning Statement*.

In the context of numerous planning changes, OPPI recommends the following to help ensure the best planning outcomes for Ontario:

Chief Planner of Ontario

As part of OPPI's *Top 10 Recommendations: Taking Action to Meet Ontario's Housing Challenges*, we recommended establishing the position of Chief Planner of Ontario (CPO) to provide oversight of municipal implementation of provincial land use plans and policies. Ontario's new *Provincial Planning Statement*, along with *Bill 185*, and removing upper-tier municipal planning authority in some municipalities will require additional provincial coordination to ensure sustainable, equitable, and complete communities.

In the current planning context, upper-tier municipal official plans provide critical guidance to lower-tier municipalities for their own official plans. The province, via the Ministry of Municipal Affairs and Housing, currently provides final approval of these upper-tier official plans. With the removal of planning authority from upper-tier municipalities, the province will now be responsible for the approval of more than 80 individual lower-tier municipal

official plans. This additional workload, which will include ensuring sufficient coordination between lower-tier municipalities will fall on to the Province and may require a significant increase in staff to ensure timely approvals of official plans.

The creation of a Chief Planner of Ontario would help to ensure that official plan conformity and approval occurs in a timely manner. Additionally, this office of the legislature can help to coordinate the planning of homes and infrastructure to ensure that the provincial interest is maintained, to deliver more homes and complete communities in an orderly and efficient manner.

Support for Regional-Scale Planning for Developing Infrastructure

OPPI strongly supports the significant role of regional-scale planning in coordinating growth planning and infrastructure, building complete communities, and protecting agricultural, natural heritage, and water systems. The GGH is the fastest growing and one of the three largest city-regions in North America with a population of over 9 million and another 5 million people expected over the next 30 years. OPPI is concerned that two decades worth of award-winning growth management policies are being eliminated in the country's fastest growing region without sufficient data and evidence to remove these policies. As other provinces have embraced regional planning, Ontario is the only jurisdiction moving in the opposite direction.

The effect of removing the *Growth Plan* combined with removing planning authority from upper-tier municipalities in the Greater Golden Horseshoe carries significant long-term risks, many of which are associated with unchecked urban expansion. These include loss of natural heritage features and systems, including the loss of habitats and biodiversity; negative impacts to quantity and quality of water resources and systems, including watershed health; increased susceptibility to climate change events, including increased flooding, and impacts on public health and safety; extensive farmland loss in a region with nearly half of the province's best Class 1 farmland; and increased traffic congestion and reduced air quality.

Removing the lack of coordination between infrastructure, finance and land use may in fact have the negative result of slowing down housing construction (which is counter to the stated goal of this government) as lower-tier municipalities are forced to put new processes in place to adapt to the new regime and build planning capacity.

Specific Policy for Greater Golden Horseshoe Region

OPPI strongly recommends that the PPS include specific policy direction for the Greater Golden Horseshoe Region (GGH), which could be focused on fast growing municipalities, to help address the risks and policy gaps identified above. This could take the form of a specific chapter in the *Provincial Planning Statement*. While OPPI supports streamlining policies, the proposed *Provincial Planning Statement* has the effect of weakening the overall policy framework for the GGH.

OPPI suggest that this new section should provide stronger policy directions from the in-effect Growth Plan, including:

- Minimum intensification and designated growth area (DGA) targets
- Stronger policy framework for settlement area expansions
- Stronger protections for natural heritage, water, and agricultural systems
- Climate change mitigation and adaptation
- Integration of land use policies with infrastructure and financial planning and asset management (particularly in areas where upper tier planning authority is being removed)

Indigenous Perspectives

OPPI unequivocally supports incorporating Indigenous perspectives in the new *Provincial Planning Statement* and supports the rights and roles of Indigenous Nations. Further recognition should be given to Indigenous rights, Indigenous Knowledge, and more references to impacts of development on the land and water, with a focus on traditional practices and the role of Indigenous Nations and people as the protectors of the earth. The *Provincial Planning Statement* states that Indigenous perspectives should be “considered”, but that terminology is broad and undefined.

Furthermore, articles outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) should be recognized, including the Duty to Consult and Accommodate, and the principles of free, prior, informed consent. Ontario must review the *Truth & Reconciliation Commission’s 94 Calls to Action* and incorporate key elements into the *Provincial Planning Statement*. The Province of Ontario should ensure that additional consultation is undertaken with Indigenous Nations before the 2024 draft *Provincial Planning Statement* is finalized.

OPPI and its members have spent considerable time and effort reviewing both the 2023 and 2024 drafts of the *Provincial Planning Statement* and are committed to working with your government to ensure that our planning system can deliver the best outcomes for Ontarians and Ontario.

OPPI acknowledges that the 2024 draft *Provincial Planning Statement* is being introduced alongside numerous other planning changes, including *Bill 185, Cutting Red Tape to Build More Homes Act, 2024*, and the removal of upper-tier planning authority. These changes follow several years of significant policy and legislative changes to planning in Ontario. Municipalities across the province have spent significant time and resources to conform to the currently in-effect *Growth Plan* and *Provincial Policy Statement*.

With any legislative changes planners will be tasked with taking considerable time and effort to understand, adopt and confirm – a process that may further delay housing targets. These constant changes are not conducive to stability within Ontario’s planning system. OPPI also requests an extended transition period between when the *Provincial Planning Statement* is finalized to when it comes into effect, to allow planners time to familiarize themselves with the changes, and so the local planning processes can be updated.

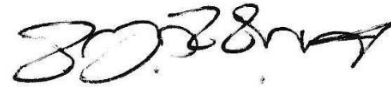
We would be happy to further discuss our input on the *Provincial Planning Statement* with you and provide any additional thoughts and clarity on our submission.

If you would like to discuss our submission further, please do not hesitate to reach out to OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Claire Basinski, MCIP, RPP, CP3
President



Susan Wiggins, CAE, Hon IDC
Executive Director

Chapter 1: Introduction

Overview

Chapter 1 of the *Provincial Planning Statement* plays an important role in describing the document, its intent, and how it is to be used to guide planning matters in the Province of Ontario. While it is clear that the new *Provincial Planning Statement* is intended to streamline planning documents into one guiding document, it is important that essential details are not lost, and that enough clarity is provided for the document to be effective.

It is also imperative that the *Provincial Planning Statement* provides reference, where appropriate, to other planning documents which professional planners may rely on. These factors are especially important to consider in Chapter 1, which provides an overview of the *Provincial Planning Statement* and its intended use.

Based on OPPI's review of the *Provincial Planning Statement*, the following changes are recommended to further improve this chapter and add additional clarity.

Top Recommendations

Document Nomenclature

While the new document which will succeed the *Provincial Policy Statement* and the *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* is now referred to as the *Provincial Planning Statement*, the 1st paragraph also defines the document as the "Policy Statement." The two terms are then used interchangeably throughout the document.

The new statement should be consistent in nomenclature as either the *Provincial Planning Statement* or the *Policy Statement*. It may be simpler to refer to the new document as the *Provincial Planning Statement*. The Legislative Authority Section then formally ties this document to Section 3 of the Planning Act as a Policy Statement under the Planning Act.

Locally-Generated Policies

The fourth paragraph of the preamble references "locally-generated policies", which remains undefined. While the following sentence references municipal official plans, which is an example of a locally-generated policy, further definition of this term should be provided to ensure clarity. The previous 2020 *Provincial Policy Statement* focuses on official plans, and the application of the term "locally-generated policies" could be too broad and open to a wide range of interpretation.

Cross-Boundary Matters

The fifth paragraph of the preamble outlines that official plans should be used to coordinate cross-boundary matters. To further enhance this section, reference should also be made to cross-jurisdictional matters within municipal boundaries. For example, airports, marine facilities, rail yards, transit and provincial highways are all cross-jurisdictional matters that a municipal official plan needs to take into consideration that do not necessarily cross a municipal boundary.

Considering Industry, Jobs, and Employment

In the sixth paragraph of the preamble, OPPI agrees that “zoning and development permit by-laws should be forward looking and facilitate a range and mix of housing”. However, that statement ignores other community building elements such as employment uses, and institutional and commercial development.

Zoning by-laws need to be forward looking to facilitate opportunities for these businesses to invest in their communities; particularly in the case of industry where sensitive uses in proximity to industry, without appropriate mitigation, can create challenges for the industry. The zoning for sensitive uses in the vicinity of industries need to recognize the importance of industrial areas, and the jobs they provide to facilitate complete communities as part of this forward looking approach.

Provincial Guidance

In the Provincial Guidance section of Chapter 1, there should be additional clarification that past provincial guidance continues to apply unless formally stated by the province. While a minor suggestion, it helps to provide additional clarity to the *Provincial Planning Statement*.

Relationship with Provincial Plans

In the *Provincial Planning Statement*, one area that does not appear to be formally addressed is *Section 14(4) of the Places to Grow Act* which specifically addresses conflicts between a direction in a *Growth Plan for the Greater Golden Horseshoe* and other plans such as the *Provincial Policy Statement*, *Oak Ridges Moraine Conservation Plan*, *Greenbelt Plan*. Section 14(4) states that wherever there is a conflict, the policy direction that more protection to the natural environment or human health prevails. With the proposed revocation of the *Growth Plan for the Greater Golden Horseshoe*, further clarity regarding potential conflicts is needed.

Vision

In the fourth paragraph of the “vision” section, there does not appear to be a discussion on goods movement as a part of being “investment ready”, despite other documents such as the Ministry of Transportation’s *Connecting the GGH: A Transportation Plan for the Greater Golden Horseshoe* being an example of a roadmap to support the movement of people and goods. References to these documents should be included in the *Provincial Planning Statement* to ensure robust consideration of these other important documents.

In the seventh paragraph, there is discussion regarding “housing being built in the right place”. While this is referenced regarding supporting the agricultural sector, it also supports industries and industrial areas throughout the entire province. Another important aspect to consider is building homes away from the adverse effects of industry. Both elements should be included in this paragraph.

In the eighth paragraph, further commentary should be provided on risks from industry, such as odour and emissions. Risks to public health and safety come from more than just natural hazards or other human-made hazards. It is important to discuss these items when considering planning complete communities.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

Overview

Orderly planning for future growth, where it will occur, and how to accommodate this growth is an essential part of planning for liveable and sustainable communities. To accomplish these goals, municipalities and planners must have a stable planning environment and predictability, where future growth can be anticipated. Several of the changes contemplated in the *Provincial Planning Statement* and other recently-introduced legislation threaten this predictability and represent planning on an ad-hoc basis.

Of particular concern is the proposed loosening of requirements for settlement area boundary expansions (SABEs) and new settlement areas, which will have numerous negative impacts on planning for growth. By making it easier for SABEs to occur, it becomes harder for municipalities to grow in an orderly manner, provide the required infrastructure and services, and represents a more costly manner of growing. Additionally, these changes will create more pressure on agricultural lands and natural heritage and water systems, increase opportunities for conflicts with farming operations, and represents a return to growth via sprawl.

Also of concern is the protection of employment areas. The *Definitions* section of the *Provincial Planning Statement* altered the definition of employment areas to remove “institutional and commercial, including retail and office not associated with the primary employment use listed above”. These permitted uses must be retained for employment areas. If removed it severely limits how municipalities can plan to protect these areas over time. This risk is especially amplified with the removal of the municipal comprehensive review process, which is vital for long-term employment planning.

If the government decides to proceed in these directions, we urge you to consider the following changes which can help to mitigate the impacts of outward growth, rather than growth via densification and infill, and to ensure that planning authorities are properly prepared to plan for and accommodate this growth.

Top Recommendations for Implementation

Ministry of Finance Growth Projections

OPPI requests that the Province of Ontario provide further clarity on the provision to allow for municipalities to have flexibility to adjust the Ministry of Finance growth projections to their own local contexts. OPPI would be pleased to be included in future discussions on this provision.

Minister's Zoning Orders

The proposed *Provincial Planning Statement* draft contemplates adding growth that occurs via a Minister's Zoning Order (MZO) in addition to a municipality's defined "need". Growth that occurs via MZOs is not targeted to a specific growth horizon and is difficult to plan and accommodate for. OPPI recommends amending policy 2.1.3 to either: "In addition to the projected needs in the planning horizon" or "Planned to the appropriate build out period for the planning horizon".

Settlement Areas and Settlement Area Boundary Expansions

A municipality's control of its settlement area is an important consideration when planning for orderly growth and accommodating that growth via new supporting infrastructure. The *Provincial Planning Statement* and accompanying legislative changes contemplate loosening municipal control over settlement area boundary expansions (SABEs), by allowing private proponents to appeal decisions on SABEs.

This potential new direction in the *Provincial Planning Statement* will have numerous negative implications for growth, including an increased workload for the Ontario Land Tribunal (OLT), and a weaker planning document for municipal planners to use at Ontario Land Tribunal hearings to defend existing municipal plans for growth and existing settlement area boundaries. To mitigate these impacts of new settlement area boundary expansions, OPPI recommends:

- That intensification targets are included for new SABEs, with targets of at least 50% in accordance with the current *Growth Plan*.
- Designated growth area (DGA) targets of at least 50 people or jobs per hectare.
- That a proponent of a SABE must demonstrate that new growth cannot reasonably be accommodated within the existing settlement areas.
- That the Province of Ontario, via the Minister of Municipal Affairs and Housing, is the final approval authority for private proponent-driven SABEs, and the new SABEs are considered from the perspective of provincial interest.
- In section 2.3.2.1, the term "shall consider" is used. This framing is vague and does not necessarily direct for the protection of important factors outlined in the subsections (a-g) such as prime agricultural areas and specialty crop areas.
- In the interest of protecting Ontario's agriculture industry and agriculture lands, section 2.3.2.1 c) should be amended to: "whether the applicable lands do not comprise of specialty crop areas".
- In section 2.3.1.4, the *Provincial Planning Statement* encourages planning authorities to implement intensification targets based on "local conditions". This term is vague and may be difficult for planners to effectively interpret.
- In section 2.3.1.5 a new density target of 50 people and jobs per hectare was established for large and fast-growing municipalities in designated growth areas. This target is generally

considered low for municipalities located within the Greater Toronto Hamilton Area. The word “minimum” should be added to this section to ensure that land is being used efficiently and to discourage the establishment of estate lot developments.

Employment Areas

As outlined in the *Definitions* section of the *Provincial Planning Statement*, the revised definition of Employment Areas removed “institutional and commercial, including retail and office not associated with the primary employment use listed above”. These permitted land uses should be retained in employment areas. If removed, it has long-term implications for how municipalities plan for and protect these essential areas over time. Municipalities should retain the ability to protect these areas over the long-term.

Major Transit Station Areas

Proposed changes to the *Provincial Planning Statement*, such as the new approach to settlement area boundary expansions (SABEs) and less of an emphasis on provisions to provide affordable housing undermine planning for Major Transit Station Areas (MTSAs). Building homes near frequent rapid transit is in the public interest, and municipalities should have direction in the *Provincial Planning Statement* to encourage this type of sustainable growth.

Chapter 3: Infrastructure and Facilities

Overview

While the intention of the *Provincial Planning Statement* is to act as a streamlined planning document, this streamlining has led to a loss of critical details and provisions in Chapter 3 – Infrastructure and Facilities. For example, despite climate change being the most pressing issue of our time, numerous references from the *Growth Plan* have been removed. Planning for climate resiliency is vital to ensure the safety of residents, as well as ensuring that infrastructure can accommodate the growing risk of extreme weather-related events. Not planning for climate change today means that in the future, our communities and province will not be equipped to deal with this inevitable threat which has the potential to put additional economic pressures on those providing housing and critical community infrastructure in the form of raising housing costs.

Well-planned communities require careful consideration of where various land uses are accommodated, and measures should be taken to reduce the potential for conflicts between these uses. The 2024 draft of the *Provincial Planning Statement* lacks critical provisions that were present in other planning documents such as the needs and alternatives test for land use compatibility. These provisions are critical for supporting the establishment of new communities that are livable and safe. Furthermore, they help to ensure that important industrial areas, which are important provincial economic drivers and provide jobs can continue to function. In cases such as these, the streamlining proposed in the *Provincial Planning Statement* may lead to worse planning outcomes, by removing important elements such as the weakening of land use compatibility provisions.

Other important considerations, such as planning for transit, active transportation, and transportation demand management are examples where the *Provincial Planning Statement's* streamlining results in long-term challenges for planning. If we do not provide guidance on how to plan our infrastructure to properly accommodate for the future, the cost and effort to correct these mistakes in the future will be significant.

Another issue presented by streamlining in the *Provincial Planning Statement*, which coincides with the removal of upper-tier planning authority, is the risk of a lack of coordination of infrastructure planning between municipalities. For Ontarians, municipal boundaries are invisible when going about their daily lives. Residents travel on roads and take transit that crosses municipal boundaries, and the homes that they live in are serviced by infrastructure that transcends these borders as well.

It is vital, especially considering Ontario's rapid growth, that provisions exist to ensure that the planning of critical infrastructure is properly coordinated between municipalities. This must be done to ensure that a comprehensive and macro-approach is taken which addresses the future infrastructure needs of all Ontarians. A lack of coordination of infrastructure planning also presents a risk of slowing home construction, a key goal of the Government of Ontario.

Top Recommendations for Implementation

Major Goods Movement Facilities

The updated *Provincial Planning Statement* does not appear to address major goods movement facilities and transportation hubs as a land use in and of itself. The *Provincial Planning Statement* instead focuses on uses around the facilities and how those land uses should be regulated (i.e., Section 3.3). However, these facilities are important uses that require their own policy recognition in terms of their importance in the urban landscape.

As an example, policies that encourage the continued investment in these facilities to support the broader economy would be useful for their continued operation and success. Specific reference in Section 2.8.1 to these facilities is positive and important. Recognizing that a major goods movement facility is an employment use, even though they may not be located in a designated employment area is essential. This recognition could be implemented in Section 2.8.3 , 3.1 and/or 3.3.

Some municipalities designate major goods movement as a transportation facility while others neglect to designate them at all, and they are not necessarily recognized for the broader function that they serve to the provincial and/or national economy. As such a specific requirement to identify and designate these facilities would serve to help protect their long-term operations and ensure economic prosperity for Ontario.

Land Use Compatibility

OPPI continues to be concerned that the land use compatibility test has been weakened while pressure on industrial lands to be converted to sensitive uses and the pressure to intensify near industrial lands has been increasing to address the housing crisis. Below, OPPI has provided some additional thoughts on how to strengthen this important part of the *Provincial Planning Statement*.

Section 3.5.1: In infill development situations, it is difficult to avoid any potential adverse effects. While this is a reasonable principle, additional guidance could be provided by the province regarding avoidance, specifically in situations where applicants for a project state that avoidance is not possible, without describing why this is the case. In addition, additional guidance regarding which uses are considered a major facility will be helpful.

Section 3.5.2: In the *Provincial Planning Statement*, the needs and alternatives test has been removed, as well as the requirement for assessing impacts to residential and/or sensitive land uses. OPPI recommends that these tests should remain, or that the needs and alternatives test apply to larger municipalities.

Additionally, more consideration should be given to minimizing the impacts of adverse effects on residential and other sensitive uses from industry. Currently, the land use compatibility tests have no formal requirement for examining the impacts from industry on sensitive land use other than the definition of adverse effects.

OPPI recommends that an updated land use compatibility framework should include:

1. Avoid any potential adverse effects between major facilities and sensitive land uses. This should be demonstrated by both municipalities as part of official plan review and zoning review exercises and as part of the development application process.
2. If potential adverse effects can not be avoided, the focus must be on minimizing and mitigating impacts on the industry and on minimizing the adverse effects on sensitive land use.
3. Sensitive land uses would only be permitted once the tests below are thoroughly demonstrated. These tests would include:
 - a. Protect the long-term viability of the existing or planned industrial, manufacturing, or other major facilities that are vulnerable to encroachment.
 - b. Potential impacts to industry are minimized and mitigated in accordance with guidelines.
 - c. Adverse effects on sensitive uses are minimized and mitigated.
 - d. The Needs and Alternatives test from the current 2020 PPS is retained with more guidance provided on its application.

Climate Change

Climate change is the most pressing issue of our time, and not sufficiently planning for climate resiliency will lead to major issues in the near and long term for our communities. References to climate change when planning for infrastructure and public service facilities should be included in sections 3.1; 3.1.2; 3.6.1 b); 3.6.7 and 3.7, including specific reference to green infrastructure,

waste reduction measures etc. Climate change mitigation and adaptation policies are critical to managing the risks of climate change to public health, safety, economy, ecosystems, and infrastructure. Where possible, every opportunity should be found within this section of the new *Provincial Planning Statement* to not only reference but provide guidance on how to address the future of our climate.

Planning for Transit and Active Transportation

Transportation policies which prioritize active transportation and transit use (including transportation demand management) are critical in supporting complete communities and reducing greenhouse gas emissions and should be re-integrated into sections 3.2.1 and 3.2.4. Sections 3.2.2.2 and 3.2.2.4 of the *Growth Plan* should be re-integrated into the 2024 draft *Provincial Planning Statement*. Similar to the climate change references, the removal of planning for transit and active transportation means that municipalities throughout Ontario will be tasked with advocating for changes to sustainable transportation without sufficient support from the provincial government. This may create adverse impacts and a shift away from support for sustainable mobility from those municipalities where the political will to do so does not exist. Without options for sustainable mobility, there will continue to be significant demands on the single occupancy vehicle which will negatively impact our environment as well as requiring considerable investment in municipal infrastructure.

Coordinating Infrastructure Planning

With the removal of planning authority for upper-tier levels of government, there is a significant risk that infrastructure, including both transportation and servicing infrastructure, will not be sufficiently coordinated to support development. There are mounting challenges with connectivity and continuity in the transportation and infrastructure system as people continue to live further away from where they work. Without the support needed for seamless regional integration there will continue be negative impacts on the way in which people move resulting in longer commute times and distances. A policy should be added to address this gap and require coordination between different levels of government.

Chapter 4: Wise Use and Management of Resources

Overview

Since the 2023 draft *Provincial Planning Statement* was published, the Government of Ontario has changed course on numerous agriculture-related changes that were proposed, which had the potential to threaten the viability of farming in Ontario. While OPPI thanks the ministry for their consideration of past comments and concerns. OPPI continues to be concerned about the loss of critical planning tools such as municipal comprehensive reviews, which are essential in protecting agricultural areas. The effects of this removal are compounded by changes contemplated in *Bill 185*, which grants additional appeal rights for proponents of settlement area boundary expansions (SABEs) and the removal of upper-tier planning authority.

Likewise, OPPI has concerns that natural heritage policies have been significantly weakened in the *Provincial Planning Statement*.

Ontario's farmland and natural heritage and water features are critical for ensuring a prosperous and healthy province. Ontario's 2024 draft *Provincial Policy Statement* puts these at risk, and once they are lost, cannot be recovered.

Top Recommendations for Implementation

Agriculture

OPPI would like to thank the Province of Ontario and the Ministry of Municipal Affairs and Housing for listening to the feedback from various stakeholders and OPPI regarding agriculture. The changes in the 2024 version of the draft *Provincial Planning Statement* led to an outcome which is much more positive to ensure Ontario's agricultural community and industry can continue to thrive. Some of the changes which OPPI supports in the 2024 draft of the PPS include:

- The new PPS draft now requires an agricultural systems approach in prime agricultural areas (as outlined in section 4.3.1). This is a positive change that lends priority to agriculture and related uses.
- The lot creation policy included within the draft 2024 PPS reverts back to 2020 lot creation policies (section 4.3.3). This is a major relief for agricultural communities.
- The severance policy, as outlined in section 4.3.3.1 c) is positive. The policy is changed to amend the surplus residence severance criteria to clarify that a detached additional residential unit (ARU) does not qualify as a second surplus residence severance.
- The policies for additional residential units (ARUs) in section 4.3.2 (5) have been more carefully articulated and are now more implementable.
- The use of Agricultural Impact Statements has been entrenched in the PPS (see 2.3.2 and 4.3.5 for example). This should help to ensure that impacts on agriculture are more carefully considered when certain types of development are contemplated in proximity to farms and farmland.
- OPPI notes that battery storage has been added to the on-farm diversified use (OFDU) definition. OPPI agrees with this change, as long as the OFDU size and scale remains and all appropriate justification in the guidelines is utilized, including not affecting neighbouring agricultural uses. A planning justification may be required for these uses.
- Urban agriculture has been defined and supportive policy has been added in section 4.3.6 . OPPI views this as a positive addition that may help build future opportunities for those in the agriculture industry. OPPI suggest adding additional details in terms of how agriculture can be successfully integrated into an urban environment.

The above changes are all viewed as positive amendments and are supported by OPPI for implementation in *Provincial Planning Statement*.

Comprehensive Reviews

OPPI is concerned that any reference to comprehensive reviews have been removed. These comprehensive reviews and the related processes help to minimize impacts on agriculture, ensure that settlement boundary expansions are justified, and recognize the importance of near-urban agriculture. Additionally, the ability to increase density or intensify lands within settlement boundaries equates to a reduction of agricultural land or urban sprawl. These changes combined with the removal of appeal rights for official plan amendments and zoning by-laws in Bill 185, as well as new appeal rights respecting settlement boundary areas in Bill 185, and the removal of upper-tier planning authority, is concerning. OPPI believes that these changes may result in a significantly reduced voice for agricultural interests, especially in those areas most prone to urban expansion.

Many of the changes from an agricultural perspective are major improvements compared to the Draft 2023 *Provincial Planning Statement*. Growth management and related agricultural impacts remain a significant concern that will be worsened by the proposed changes to appeals to the Ontario Land Tribunal and the removal of upper-tier planning authority.

Natural Heritage

OPPI expressed concerns regarding the integration of natural heritage policies from the Growth Plan into the proposed *Provincial Planning Statement*. While these policies and definitions generally align with the Provincial Policy Statement, 2020, this results in a reduced standard of protection for natural heritage features and systems within the Greater Golden Horseshoe, currently established by the Growth Plan. Section 4.1 of the *Provincial Planning Statement* should be strengthened by re-introducing *Growth Plan* policies relating to natural heritage in the GGH which are subject to the highest growth pressures, to provide stronger protections for these critical assets.

Protecting natural heritage systems is essential as they provide critical ecosystem services such as carbon sequestration and climate change resilience, flood control, clean air, wildlife habitat and biodiversity. They also contribute to human health and well-being by providing opportunities for active recreation as well as social, mental, and spiritual benefits.

The proposed *Provincial Planning Statement* changes, combined with the reduced role of conservation authorities and changes to natural heritage features protection through other means (e.g., definition of wetlands through OWES) have a cumulative impact which will contribute to the continued loss of natural heritage features, including wetlands and woodlands.

Once natural features have been removed, it costs significant time and money to bring them back and recognize their benefits (e.g., wetlands restoration in the Toronto Port Lands). These policies have the impact of reducing two decades of natural heritage systems protection in the Greater Golden Horseshoe.

Chapter 5: Protecting Public Health and Safety

No major amendments were made between the 2023 draft *Provincial Planning Statement* and the 2024 draft *Provincial Planning Statement*. OPPI does however support the added reference to collaborating with conservation authorities to identify hazardous lands and hazardous sites and to manage development in these areas.

Chapter 6: Implementation and Interpretation

Overview

Municipalities play a critical role in the planning process, by planning for healthy, safe, and complete communities, and by implementing provincial policies such as those outlined in the *Provincial Planning Statement*. It is critical that the 2024 draft of the *Provincial Planning Statement* reflects this reality and acts as a clear and strong tool which can be used to guide growth.

OPPI is concerned that it is unclear how the new *Provincial Planning Statement* will be implemented, when current municipal official plans which conform the *Growth Plan* have a much higher standard. It is important to have greater clarity on how the Government of Ontario will address this.

Numerous items in Chapter 6 of the *Provincial Planning Statement* lack clarity. This ambiguity makes the policy difficult for planners to implement and plan. OPPI recommends that the province provide additional clarity on the below items, to help ensure a stronger *Provincial Planning Statement*.

Top Recommendations for Implementation

Importance of Official Plans

OPPI recommends adding a new policy in section 6.1 similar to *Provincial Policy Statement* 4.6 to ensure clarity that the official plan of a municipality is recognized as the most important tool for implementing the *Provincial Planning Statement*. This is important as official plans are the overarching document and a key tool to implement the key planning principles outlined in the *Provincial Planning Statement*, which should integrate with infrastructure and asset management planning.

Ministerial Decision-making

It is unclear how to interpret policy 6.1.4, given that the *Planning Act* requires that decisions, including by the Minister, must be consistent with the *Provincial Planning Statement*. Minister's Zoning Orders (MZOs) are exempt from this clause under the Act. Inclusion of this policy makes it unclear how the Minister would comply with the *Planning Act*. This would be precedent setting and we therefore caution the Ministry in making this change. Consider the many impacts and provide guidance on how to navigate this new approach.

Upper Tier Growth Management

Proposed policy 6.2.9 outlines that upper-tier municipalities would be responsible for where growth occurs and is focused. Additional clarity is needed on if this includes settlement area boundary expansions.

This lack of clarity on settlement area boundary expansions could result in confusion in implementation. In addition, it is not clear how/where upper tier planning authority is being removed, and how lower tiers will coordinate with upper tiers regarding infrastructure. OPPI recommends that a policy be added to this effect. This also relates to the removal of appeal rights for refusal of settlement area expansions.

Definitions:

Employment Areas

The *Provincial Planning Statement's* definition of employment areas states “uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above”. OPPI believes that the exclusion of these uses may lead to the degradation of important employment uses, and that this exemption should not be maintained.

Appendix: List of Submitted OPPI Changes

Appendix : 2023 PPS vs 2024 PPS OPPI Comparison + Comment Acceptance

ATTACHED AS SEPARATE PDF DOCUMENT

Working Together

OPPI appreciates the opportunity to provide feedback on the *Provincial Planning Statement*.

As the Professional Institute and regulator of Registered Professional Planners (RPPs) throughout all of Ontario we uniquely understand the planning process and pressures that planners (at all levels and through a wide range of practices) face. This response has been developed with thoughtful input from our members, who have seen and experienced the evolution of the planning profession over numerous decades.

We have important perspectives on how planning is put into action. We have reflected on the multitude of impacts – both positive and negative – that could occur should the proposed policies be put into affect and have crafted our comments thoughtfully knowing the province’s goals, objectives, and targets.

We strongly urge the Province of Ontario to thoughtfully consider and address our above feedback and continue to engage with OPPI on matters that have a significant and direct impact on the way in which Professional Planners practice planning throughout all areas of Ontario. We are concerned with some of the changes but see this as an opportunity to work together to “get it right”.

We offer our knowledge, and experience as a means of developing the most effective, efficient, and impactful legislative framework and would be happy to provide additional clarification around any of the items noted if there are questions or concerns raised by the ministry.