

May 15, 2024

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

Re: Ripple Effect of Proposed Changes to Ontario's Land Use Planning Regime

Dear Minister Calandra,

On behalf of the Ontario Professional Planners Institute (OPPI), we are requesting a meeting with you to discuss the significant impact of proposed changes to Ontario's land use planning regime.

As we have discussed, our organization supports the provincial government's goal of building 1.5 million homes by 2031 and efforts to streamline the planning process to help achieve that objective. We support many of the proposed changes in *Bill 185, Cutting Red Tape to Build More Homes Act, 2024* and the proposed Provincial Planning Statement (PPS). Moreover, we were pleased to see our input reflected in the government's proposed 'Use it or Lose it' and Minister's Zoning Order (MZO) frameworks. With that being said, our members are genuinely concerned with the significant shift in how we undertake planning as proposed in some of the legislative and policy changes under Bill 185 and within the new PPS.

Firstly, the move away from regional planning isolates Ontario as the only jurisdiction that is not moving towards more regional and integrated planning across lower-tier boundaries. Infrastructure such as water and wastewater and transportation are not limited to a local municipality. The network of pipes and treatment plants and systems of transportation must be planned from a broader, more regional level. Removing regional planning jeopardizes efficient coordination of essential servicing we need in order to build not only homes but communities where people can live, work, and play in our Province.

Secondly, removing the Growth Plan and moving away from intensification policies will have negative long-term impacts on the growth of the Greater Golden Horseshoe (GGH) region. Without a specific policy framework for the GGH that includes designated growth areas, minimum intensification targets, and stronger policies for settlement area expansions, Ontario will jeopardize two decades of policy direction that has won awards as international best practice in growth management. Unfortunately, we are concerned that this demonstrates a lack of understanding of the complex history of policy, growth and development in Ontario and has the potential to move us backwards to a system that sees suburban, sprawl development occurring province-wide.

Furthermore, these changes could result in unchecked urban expansion, a development pattern that results in higher servicing costs, and negative environmental impact. Additionally, the changes fail to benefit from the tens of billions of dollars being spent on transit in the GGH, and results in higher property taxes for local residents.

Based on our considerable industry experience driving and implementing planning policy we are uniquely a tune to the ripple effects that some of the legislative changes will have on the planning process which are potentially counter to or counterproductive to the Ministry's desired goals and objectives. We bring this perspective to the Ministry from practitioners who have worked (for decades) within provincial, regional, and municipal settings and have experience from all areas of the province. We strongly caution the Ministry away from contradictory legislation and a 'one size fits all' approach and want to provide our input and guidance to revisit and improve (where needed) the planning framework to help establish a system and process that supports and allows municipal staff and the province to achieve our collective overarching goals.

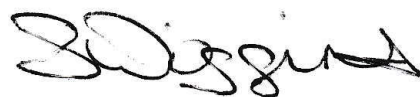
OPPI submitted detailed feedback, through four separate submissions, on the proposed changes through the Environmental Registry of Ontario for your Ministry's consideration. We have already copied you directly on our submission related to the PPS. The OPPI leadership team is seeking an opportunity to brief you on the impact of the concerning proposed changes and our recommendations to address the related challenges.

Please reach out to Susan Wiggins, our Executive Director, to find a suitable time to meet at your earliest convenience. Our ultimate goal is to help you succeed in reaching your housing targets through streamlined, future focussed planning practices in the public interest.

Sincerely,



Claire Basinski, MCIP, RPP, CP3
Chair



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c.c. Hannah Anderson
Andria Leigh, Chair-Elect, OPPI