

November 16, 2025

Minister David Piccini
Ministry of Labour, Immigration, Training and Skills Development
400 University Ave, 14th Floor
Toronto, ON M7A 1T7

Re: OPPI Feedback on ERO 025-1159: Amendments to the Planning Act and City of Toronto Act, 2006 / Reducing Red Tape and Burden to Build Training Centres.

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Labour, Immigration, Training and Skills Development (MLITSD)'s request for comments on amendments to the *Planning Act* and the *City of Toronto Act, 2006* to reduce red tape and associated burdens in the construction of training centres.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario in communities of all size.

OPPI is fully supportive of the government's commitment to supporting a competitive and resilient workforce through the Skills Development Fund and exploring ways by which creation of new workforce training facilities could be expedited. Understanding that this is a priority for the government, OPPI respectfully recommends the following:

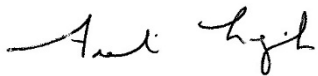
1. Leverage existing provincial planning tools to achieve the same objectives without creating a "cut-out" from Ontario's established, policy-led planning system. Exemptions of this nature may inadvertently lead to a two-tiered system, with potential unintended consequences such as challenges in municipal service delivery for new training facilities and land use compatibility issues.
2. Utilize Minister's Zoning Orders (MZOs), as clarified through the Zoning Order Framework and enhanced through recent legislation, as an alternative mechanism to achieve the same goals as the proposed legislation. This approach maintains opportunities for municipal collaboration and helps avoid the unintended consequences that can arise from *Planning Act* exemptions.
3. Consider revisiting recent amendments to the *Planning Act* and Provincial Planning Statement that currently prohibit public service facilities within designated employment areas. These restrictions extend to government-provided or subsidized "education facilities," which limits the ability to establish standalone workforce training centres near Ontario's employment and manufacturing clusters. For example, a trade school for

mechatronics could not currently be located within a cluster of advanced manufacturing businesses.

4. Build on recent steps introduced through Bill 17, which allow school boards to locate schools on any parcel of urban residential land to facilitate faster school construction. A similar approach could be considered for workforce training facilities, with broadened permissions that include both employment lands and rural areas.

Thank you for the opportunity to provide feedback on the ERO 025-1159. We would be pleased to meet with you to discuss our recommendations, and their utility to the overarching objective to build faster while enhancing community safety. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (416)-483-1873 x2313 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI