

MPP Stephen Lecce
Minister of Energy and Mines
77 Grenville Street, 10th Floor
Toronto, ON M7A 2C1

September 12, 2026

RE: ERO 026-0853, Economic and Strategic Assessment Framework for New Data Centres

Dear Minister Lecce,

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to offer feedback on the Ministry's assessment framework for new data centres in Ontario.

About OPPI and Ontario's Professional Planners

OPPI is the recognized voice of the planning profession in Ontario. With more than 6,200 members, OPPI serves as both the Professional Institute and Regulator of Registered Professional Planners (RPPs) 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 sizes on matters pertaining to land use.

OPPI's Position

OPPI recognizes the Province's interest in attracting data centre investment to Ontario and supports efforts to establish a clear and coordinated framework for evaluating these investments. We offer the following considerations to inform the development a provincial "Playbook":

Vital planning considerations

There are many vital planning considerations that should be taken into account, including:

- *Energy, infrastructure, and resource planning*
Large facilities can have substantial electricity, water, wastewater, and transportation requirements, and these demands should be considered alongside the needs of existing and future communities. Energy reliability and available generation capacity, water supply and environmental impacts, and the potential requirements for backup systems are all relevant considerations in assessing the appropriate scale and location of development. The Province should also consider how provincial, federal, electricity-sector, and municipal processes can be coordinated to provide clarity and avoid unnecessary duplication.

- *Planning for different scales*
Different facilities may have very different implications depending on their intended use, scale, location, and servicing requirements. As the Province continues to develop guidance for data centre development, consideration of scale should be an important component of the assessment of land use and infrastructure implications, rather than treating data centres as a single category. Considerations of scale (e.g. square footage; wattage) should be revisited on a regular basis, to keep up in changes in technology, energy efficiency, etc.
- *Effective local planning frameworks*
A Provincial Framework would be a valuable tool to help guide municipalities in local decision-making, informed by local contexts and local priorities. Municipalities should retain appropriate tools to determine where data centres are suitable within their communities, having regard to Official Plans, Zoning By-laws, servicing, land use compatibility, environmental considerations, and other applicable planning requirements. The planning system is well equipped to consider matters such as infrastructure capacity, noise, transportation, employment lands, environmental impacts, and the appropriate location and scale of development.

Community considerations

Data centres are a sensitive and emotionally-evocative topic for many Ontarians. There have been many reports of the potential negative impacts of data centres, and communities who have experienced challenges related to energy, water, noise, etc.

Good land use planning must consider each community's priorities, needs, and economic goals, whether that land is used for housing, agricultural, commercial activity, tourism, or greenspace. In that light, we encourage the Province to keep the following in mind:

- *Local community consultation*
Local residents have an important stake in land use – they are the ones who may need to live, work, and/or grow around a data centre. A Provincial framework should reinforce that community consultation must be a key component in this regard.
- *Indigenous consultation*
Similarly, the Provincial framework should reaffirm the duty to consult with Indigenous communities regarding data centres.
- *Community benefits*
Like with any land use, local planning frameworks should be utilized to evaluate and secure meaningful community benefits. The stated Pillar #3 suggests that local labour participation, training, and apprenticeships might be considered here. The Province may

want to distinguish short-term from long-term community benefits, and prioritize long-term benefits. Data centre facilities can support one-time investment, one-time construction employment, etc., while their long-term employment characteristics may differ from other forms of industrial development

Bigger questions

OPPI recognizes that data centre investment can contribute to local and regional economic activity, infrastructure, employment, and other community outcomes, although the nature and extent of these benefits will vary depending on the scale and characteristics of individual facilities.

Questions relating to employment displacement, technology policy, or the broader societal effects of artificial intelligence likely warrant consideration through other public policy processes but should not be treated as land use planning tests.

Professional planners are your asset here

Planning professionals will be essential to the successful implementation of the Provincial framework. In Ontario, they have already helped navigate a series of new large-footprint land uses, including the rise of big-box stores; e-commerce warehouses; and renewable energy facilities like wind turbine “farms”.

Ontario has thousands of professional planners who understand local planning contexts, infrastructure and servicing needs, environmental considerations, regulatory frameworks, and community priorities. They are well positioned to help all parties understand how data centre proposals interact with broader community objectives, infrastructure, local priorities, and provincial policy. Their involvement can help identify potential issues early, coordinate competing considerations, facilitate informed public dialogue, and support efficient implementation of provincial objectives.

OPPI can be your partner

OPPI would welcome the opportunity to work closely with the Province on the development of practical guidance that flows out of the planned provincial Playbook.

We would like to propose the development of a Practice Guide for Planning Data Centres, which could be created collaboratively with OPPI, the Province, peer associations, and subject matter experts. OPPI also has experience working with a range of partners on education roll-outs, including with the Association of Municipalities of Ontario (AMO).

We hope you can consider connecting with us to discuss our feedback and our offer to support your work on this issue. Please do not hesitate to reach out to our CEO at d.carey@ontarioplanners.ca or 416 483 1873.

With warm thanks,



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



David Carey
Chief Executive Officer, OPPI