**F**EDERATION OF

**U**RBAN

**N**EIGHBOURHOODS

OF **O**NTARIO

www.urbanneighbourhoods.ca

An Umbrella Group of   
Community Associations throughout Ontario

*Communities count.    
Civic matters.*

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Contact email

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October 21, 2019

## RE: ERO 019-0279 – Provincial Policy Statement Review – Proposed Policies

Dear Minister Steve Clark,

The *Federation of Urban Neighbourhoods* (“FUN”) is an umbrella organization representing residents’ associations in urban centres across Ontario who are engaged in planning and development issues. Our comments are as follows:

While FUN supports the stated goals of encouraging an increased mix and supply of housing, protecting of the environment, creating jobs and a strong economy, reducing barriers and costs for development, and providing greater predictability, we note that many of the proposed policies pay only lip service to these goals. Several proposed policies undermine the government’s professed commitment to orderly growth management, for example policies such as:

* loosening environmental standards related to wastewater servicing;
* further facilitating sprawl by increasing the opportunities for settlement boundary changes;
* lowering the protection of employment lands by allowing conversions outside of the municipal review process;
* reducing predictability and certainty by constantly changing provincial planning legislation, policies, and plans in rapid succession; and
* the central and critical issue of climate change is neglected.

FUN notes that the proposed changes to the PPS focus on increasing housing supply, choices, and affordability based on the following assumptions:

* that increased residential land supply lowers land cost and increases housing affordability(if developers pass along the savings);
* that the undefined determination of ‘market demand’ will be one of the key approval criteria and will not lengthen the approval processes;
* that permitting lower servicing standards and easier settlement boundary expansions will not create more sprawl; and,
* that housing option policies will not be misused to direct growth to where it is not needed.

Unfortunately these assumptions are unproven, and frankly are likely false.

FUN represents resident associations in Ontario’s largest cities, some of which have designated Urban Growth Centres under the Growth Plan where the targets of the Growth Plan have not only been met but exceeded. Today, in 2019, the City of Toronto as a whole has already achieved 96% of the residential units needed to meet the provincial population targets of 2041. And yet, the Minister found it necessary to intervene in the municipal planning processes related to the Secondary Plans for these Growth Centres and to also specify minimum density targets for Major Transit Station Areas (MTSAs) in the recently revised Growth Plan that have no realistic relationships to Toronto’s actual growth targets of the same Plan.

FUN appreciates the opportunity to comment on the revised Policies prior to their finalization and looks forward to the government’s response to the public input.

Respectfully submitted,

Geoff Kettel,

President

c.c. Premier Doug Ford

John Fraser, Interim Leader, Liberal Party

Andrea Horwath, Leader, New Democratic Party

Ontario MPPs

Federation of Urban Neighbourhoods

Date