

**Leaside Property Owners Association Incorporated**

1601 Bayview Avenue, P.O. Box 43582

Toronto ON M4G 3B0

October 21, 2019

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, Floor 17  
Toronto, ON M5G 2E5

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

Dear Minister Steve Clark,

The Leaside Property Owners' Association represents a diverse community of owners and renters in an established neighbourhood of Toronto. Over the next few years major development is being proposed driven by the Eglinton Crosstown LRT project. We are well aware of the importance of Provincial policy, including the Growth Plan and the Provincial Policy Statement, in directing municipal planning policy.

We have reviewed the proposed revisions to the PPS and have a number of overall concerns about the policy direction being proposed, including such matters as:

- The shift in policy language such as market considerations to play the major role in the determination of the range and mix of housing;
- The relaxation of the process and considerations in expanding settlement areas and converting land from employment uses to non-employment uses;
- The limitation of the municipality's ability to apply inclusionary zoning only to protected Major Transit Station Areas (MTSAs);
- The change from "shall" to "should" in several of the policies related to the efficient use of land and infrastructure. We recognise that the choice of language reflects the policy priorities of this government, but we are concerned that these instances of weaker direction is likely to lead to confusion, indecision and an increased number of appeals.

Especially concerning is the Province's policy assumption that an increase in supply will have a bearing on the cost of land or that a shorter approval process will result in a more affordable residential market place. The basis of this assumption is that the

development industry will pass along any savings to the purchaser of the new dwelling. Such assumptions are not justified based on the experience of the housing market in the City of Toronto.<sup>1</sup>

“...despite the supply of new (housing) units, and the number of units approved but not yet built, the cost of housing in the City has continued to rise over the period (2002 to 2018)”....

“The cost of housing and the housing market is influenced by many factors including new household formation, increases in income/purchasing power, immigration, aging in place, community facilities, transportation options, employment and activity rates, etc. It is paramount that these proposed increases in supply be tempered with good planning principles and the provisions required for healthy, sustainable and complete communities.”

Our detailed comments on specific PPS Policies are as follows:

1. P8, 1.1.1 b) states:

*Healthy, liveable and safe communities are sustained by:*

*“b) accommodating an appropriate market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;”*

- **the terms “market-based range”, “additional residential units”, “affordable housing” and “housing for older persons” are either not defined, or inadequately defined, and as such will pose significant problems when it comes to implementation.**

2. P10, 1.1.3.5 states:

*“Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas.”*

- **whereas local planning authorities are generally aware of what balance of land use policies is likely to maintain a reasonable quality of life**

---

<sup>1</sup> Quote from City of Toronto staff report on proposed PPS Policies  
[https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf?xd\\_co\\_f=NzAuNDguMTk3Ljc2LTI4NjE4MDE0MjQuMzA1NjYzMDY=](https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf?xd_co_f=NzAuNDguMTk3Ljc2LTI4NjE4MDE0MjQuMzA1NjYzMDY=)

**within their jurisdictions, the introduction of largely arbitrary provincial targets around such things as transit nodes is likely to create situations in which larger municipalities will be forced to accept excessive intensification with its inherent impacts on municipal infrastructure, schools, community services, parks, recreation facilities, traffic congestion, etc. all of which are likely to have a major negative impact on quality of life.**

3. P 18, 1.3.2.5 a) states:

*Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally-significant by a regional economic development corporation working together with affected upper- and single-tier municipalities and subject to the following:*

*“a) there is an identified need for the conversion and the land is not required for employment purposes over the long term;”*

- **what constitutes an “identified need for conversion” and who determines this? The proposed policy is vague and opened ended and invites re-designation applications from owners of employment lands intending to make a greater profit from a condominium, etc. than from an industrial use.**

4. P 19, 1.4.3 a) and f) state:

*Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based needs of current and future residents of the regional market area by:*

*a) establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homeless plans. ....*

- **the terms “market-based needs” and “regional market area” need to be better defined. How are integrated targets to be established and implemented for “regional market areas” made up of such areas as the GTA municipalities and neighbouring municipalities within the GTA commuter shed?**

*f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.*

- **while development standards can be adopted which will permit less expensive residential units to be constructed, such standards will only result in more affordable housing if developers pass the savings on to the consumer. Unfortunately there is a high probability that such savings will go the developer's bottom line not to the consumer. This in turn may simply further inflate housing prices.**

5. P.20, 1.5.1 states:

*Healthy, active communities SHOULD (instead of SHALL) be promoted by:*

- **Communities which are healthy and active are typically safer, have better outcomes, and save money in the long-term through reduced health-care costs, clearly meriting a "shall". Given that "shall" is used in multiple other contexts, covering topics as varied as sewage and water management or the protection of airports, why is it not specified here too?**

6. P 25, 1.6.8.4 states:

*The preservation and reuse of abandoned corridors for purposes that maintain the corridor's integrity and continuous linear characteristics should be encouraged, wherever feasible.*

- **The addition of "wherever feasible" to what is already a permissive policy makes this policy virtually meaningless.**

7. P 26, 1.6.11.1 states:

*Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and renewable energy systems and alternative energy systems, to accommodate current and projected needs*

- **In a period when greater emphasis is being put on moving to renewable energy systems, this policy fails to adequately reflect the need for planning authorities to be actively encouraging the development of such systems.**

Respectfully submitted,

Geoff Kettel and Carol Burtin Fripp

Co-Presidents

c.c. Kathleen Wynne, MPP Don Valley West  
Premier Doug Ford  
Andrea Horwath, Leader, New Democratic Party  
Mayor John Tory and Toronto City Council  
Gregg Lintern, Chief Planner and Executive Director, City of Toronto