**Draft 2019 Provincial Policy Statement**

**Comments**

Ontario is open for business. But not just any business; only the most creative, talented, innovative business. Right? Naturally. So, let’s get on with this.

The intention of this submission is to support Ontario’s new slogan and to help Ontario achieve its fullest potential. The Provincial Policy Statement is a great means through which to make that happen. I’m grateful for the opportunity to provide comment.

First off, I want to commend the Province of Ontario for the inclusion of **Indigenous** planning in the Vision section of the document. The addition of “shall coordinate on all planning matters” is a meaningful step towards recognition, respect and reconciliation. I trust that as municipalities are “creatures of the Province” and not able to consult nor accommodate Indigenous rights and interests, as the Crown cannot delegate its duty, that the requirement to coordinate is through the lens of meaningful engagement. Greater engagement will require greater capacity for First Nations, Métis and Inuit communities. I encourage the Province to support and guide where possible a collaboration between municipalities, First Nations, Métis and Inuit communities to explore mechanisms through which greater capacity can be realized through greater funding, investment and partnerships in order for meaningful engagement to become achievable and sustainable.

Referring to **a changing climate** instead of climate change leaves the Province of Ontario open to international criticism, which is highly undesirable. In order to be viewed as Open for Business, we need to act as progressive, innovative leaders, embracing change and making the best of present circumstances: business that’s in line with current realities. Please consider amending this language and referring to our changing climate for what it is, “climate change”. Consistent clear language is important for market creation and economic development alignment nationally and internationally. It’s important to be contemporary and in step with voices of the global economy.

The reference to **market-based and market use** as a test for determining settlement boundary expansions, housing form and type is unclear within a provincial planning policy context. Measures to determine land use change need to clear and measurable. Market analysis can be done in many ways. This varying approach to market analysis can appear inconsistent and leave room for criticism. Furthermore, it is up to the Province to determine the market for the common good of Ontarians. As all the people of Ontario, we’re looking for the best business can offer: progressive, innovative, cutting edge, sustainable. We trust the Province to set this vision, for all of us, not individual interest to determine what the market is and what it will bear. The use of these terms in a provincial planning policy context simplifies the complexity of what the market is: we are the market. I encourage the Province to reconsider the use of this language, to not reference it so frequently, and to not permit it to be a determinant for development and planning approvals as it is too vague and diminishes provincial power. At a minimum, a clear definition in the Definitions section is required.

The Clean Water Act arose out of a tragedy. Clean water should be a basic human right in a Province blessed with over 250,000 lakes and rivers. Many First Nations do not have this basic right. This is unacceptable. Encouraging flexibility for the installation of **private water and sewage systems** where municipal connections cannot be facilitated is a patch work approach that could lead to massive management and coordination challenges with little public oversight. The common good benefits from coordination of essential services. Municipally owned services are efficient, effective and safe. I would not deviate from a good thing. The Province cannot risk another Walkerton.

**Managing wetlands** is critical to protecting water from source to tap. Wetlands play a critical role in naturally filtering and purifying water as well as offer critical habitat to animals and wildlife. While many municipalities steward wetlands already, many are disappearing at an alarming rate, which takes away the natural benefit that wetlands offer public services. We need to view wetlands differently and finds ways to value and protect them as part of our greater community. Please clarify how municipalities may manage wetlands and to what end. Perhaps a definition in the definition section to provide clarity on intent for management of wetlands. Arguably with a conservation and preservation focus first.

Describing **municipalities as the greatest level of land use planning** is true, in a sense. They are the implementors, the vehicles of change, the local decision-making bodies. I applaud the Province in recognizing the significant role that municipalities play in land use planning. In the same vein, I encourage caution. There is a critical role for upper levels of government to play in planning policy, coordination and approvals. Petty squabbles over local planning matters are diminished with the greater authority and decision-maker comes into the room. I would encourage the Province to protect and maintain their provincial planning role as an overall coordinator, guide and authority on broader regional and provincial planning matters. It’s a macro level of analysis that the local planning levels have no reference point for. It’s that same macro level that should set the direction, intention and tenure of planning. We need the Province as a guide for the benefit of all of Ontarians at the planning table.

In closing, I want to thank you for the opportunity to provide comment. I look forward to making Ontario a better place tomorrow, than it is today. I believe that underlies the common vision that we all hope for and I look forward to continuing to support, learn from and follow provincial planning policy as a professional planner, now and into the future.