# Memo

To: Ministry of Municipal Affairs and Housing

From: Planning, Development and Building Services, Legal and Finance Departments and Economic Development, Town of Oakville

Date: June 29, 2023

Subject: ERO number 019-6813 – Review of proposed policies adapted from A Places to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

**Comments**

The Town of Oakville is aligned with the province’s goal of building 1.5 million homes over the next 10 years. The town also supports the purpose and intent sustaining the province’s land use planning framework exemplified in the Planning Act, A Place to Grow (the Growth Plan) and the Provincial Policy Statement.

The town welcomes the opportunity to provide comments to the Ministry of Municipal Affairs and Housing on the Minister’s proposed changes to replace and combine the Growth Plan and Provincial Policy Statement into an integrated province-wide land use planning policy document.

Staff prepared a report to Planning and Development Council, titled “[Information and Update Report on Provincial Initiatives – Bill 109, Bill 23, Bill 97 and the proposed Provincial Planning Statement 2023 – May 15, 2023](https://pub-oakville.escribemeetings.com/filestream.ashx?DocumentId=55110)”. Please see the hyperlinked report for staff responses to the proposed Provincial Planning Statement, presented under the following themes:

* Planning for People and Homes
* Housing
* Growth Management and Intensification
* Employment Areas and Land Use Compatibility
* Climate Change and Environment
* Agriculture
* Cultural Heritage
* Natural Heritage
* Implementation and Transition

The report highlights concerns around the proposed changes to the definition of employment areas, particularly with impacts to the town’s employment land supply, reduced protections for those areas and the exclusion of institutional, commercial, retail, and office uses from an area of employment.

At the Planning and Development Council Meeting of May 15, 2023, Oakville Council received the report and endorsed the comments it contained and reiterated the importance of good community planning in the public interest embodied in the town’s urban structure and growth management policies.

Council emphasized that infrastructure to support provincially required growth must be accompanied by provincial investment in public infrastructure and public service facilities. Council also wishes to see a greater emphasis placed on green building standards and more tools for green buildings in the Ontario Building Code.

Furthermore, staff has identified how the proposed provincial legislation may have impacts to the town’s economic development strategy that could result in reduced employment opportunities for knowledge-based industries.

Upon further review of the legislative implications to the town, staff provides additional comments from an economic development perspective. The proposed policies are potentially detrimental to the film production industry and could potentially drive investment out of Ontario.

The proposed Provincial Planning Statement and its definition of employment areas is not clear on whether film production is considered as manufacturing, and this question determines whether it scopes in or out of the narrowed definition of employment lands.

If film production is not considered a manufacturing and/or industrial employment use:

* Future studio builds will not be able to access employment lands and would be forced to compete with other uses for land that is potentially more expensive and less suitable.
* Oakville and the GTHA would be seen as challenging for investment, and global developers may choose to invest elsewhere, taking future production spend and job growth with them.
* Existing studios could be impacted by new, adjacent developments that are incompatible with studio uses, as film production is a 24-hour industry with fleets of large production vehicles.
* The film industry could lose existing studio stock, as the land will increase in value if it can be sold to developers for other uses, potentially motivating some owners of existing studios to cash out.

On the other hand, if film production is considered manufacturing and/or industrial employment use, the new scarcity of employment lands created by the proposed policies would drive up the price of available employment land, thereby potentially pricing studios out of a market already dominated by last mile logistics and the substantially resourced companies in that sector that can afford to pay higher prices for land, while engaging in less employment-intensive industry on that land.

Regardless of whether film production is defined as manufacturing and/or industrial, the proposed Provincial Planning Statement would cause unintentional negative impacts to the industry. Conversion or removal of employment areas destabilizes the film industry:

* The ability to request conversions from or removal of employment lands at any time creates uncertainty that disincentivizes investment and potentially lowers the value of existing and future studio stock.
* The global film industry works in ‘hubs’, which are precincts or large areas, where studios and adjacent industries congregate for greatest efficiency. Reducing the availability of employment lands undermines this model, thereby incenting investment in studio infrastructure and the resulting jobs and production spend to relocate outside Ontario.

Overall, town staff supports increased flexibility to build more housing, however there are concerns pertaining to the fast-pace and sweeping changes in direction to Ontario’s planning framework.

New challenges are ahead for municipalities regarding employment areas, growth management practices, infrastructure planning and settlement area boundary policies. The province should also be mindful that the overall shift to a pre-Growth Plan era could increase pressure for greenfield development across the province at the expense of growing in place within existing built areas.

The Town of Oakville will continue to adapt to the changes enacted by the province. With respect to housing, the town will keep increasing housing supply through improved processes and efficiencies. The town looks forward to ongoing and future consultation with the province in delivering an appropriate range and mix of housing.

Should there be any questions or follow-up from this Memo, please contact Planning Services at the Town of Oakville.