



AMO Response to the Combined Provincial Policy Statement and A Place to Grow: Growth Plan for the Greater Golden Horseshoe

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Preamble

AMO is a non-profit organization representing almost all of Ontario's 444 municipal governments. AMO supports and enhances strong and effective municipal government in Ontario and promotes the value of municipal government as a vital and essential component of Ontario and Canada's political system.

Introduction

AMO is pleased to provide comments on the proposed 2023 Provincial Planning Statement. The proposal makes significant changes in several areas, but our comments are limited to areas of municipal interest.

AMO appreciates the government's commitment to build 1.5 million homes by 2031. The Province's work is bold and, in many cases, aligns with our asks of government around the need to streamline.

We also appreciate the government's commitment to maintain the existing Greenbelt Plan standards as its own [Housing Affordability Task Force](#) has said that "a shortage of land isn't the cause of the problem. Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts" (p. 10). Future initiatives taken by the Province should consider exploring additional incentives for landowners to develop urban lands that have been approved for development but remain undeveloped.

The government should now look within its own line ministries and across external agencies (e.g., railways, Metrolinx, etc.) to address their timelines for responding to planning and development applications.

The government must also recognize the financial implications of the combined legislative and regulatory changes municipalities are experiencing from implementing Bill 23. The Minister's [November 30 letter](#) said that "municipalities would be kept whole for housing enabling infrastructure". This commitment must be carried through to address the financial implications from Bill 23.

In the end, the proposed PPS could create long-term policy certainty but also have unintended consequences if some concerns are not reconciled.

AMO shares in the Ontario Professional Planners Institute's (OPPI) concern that without changes, these policies may cause growth to occur haphazardly, create undue municipal budget burdens to deliver the required growth infrastructure, limit the ability to provide reliable transit service, and reduce farming opportunities on agricultural land.

We also appreciate that the Ministry decided to retract the proposed large-scale changes to rural areas and farmland by allowing additional severances and lot adjustments. This reversal recognizes the fragility of our domestic food supply chains, and the need to protect local agricultural resources. As others have highlighted, these changes had the potential to adversely impact the long-term viability of farms by introducing non-compatible land uses that would have limited farming operations.

The fragmentation of agricultural and other rural lands can have far reaching impacts. While the additional residential units (ARU) as of right on farm lots makes sense, the agricultural lot severances did not. That being said, it remains important to ensure that implementing ARUs on farm lots does not lead to potential issues related to private servicing.

Rural municipalities, which have limited fiscal resources, would have been shouldered with the cost of additional infrastructure burdens to support this low-density growth in agricultural areas.

Finally, the Province should carefully consider municipal feedback, including from municipal associations like ROMA, when finalizing the PPS and its implementation.

Infrastructure & Planning Coordination

There are significant concerns about the misalignment between municipal growth planning, infrastructure, and financial planning.

To date, municipalities have recently completed Official Plan updates following the Provincial Land Needs Assessment methodology. Collectively, this has produced an adequate supply of urban expansion for the next 30 years.

With the ability for further expansion of settlement boundaries and creation of additional settlement areas under the proposed PPS, capital infrastructure planning completed through Municipal Comprehensive Reviews will need to be redesigned. The process will take time and financial resources to achieve.

Orderly growth patterns used to establish multi-year capital programs with the requisite financing will be compromised by these changes.

These challenges to orderly and fiscally responsible planning and phasing of growth will be further compounded by the requirement for municipalities to provide land for a 25-year minimum, rather than a maximum timeline horizon. Servicing costs are prohibitive, such newly designated lands may either sit idle or be developed for higher-priced housing that is not within the reach of average home buyers and tenants in Ontario.

There is a need for flexibility to enable different approaches to water and sewage treatment systems in rural municipalities. However, there is a need to appropriately manage risks associated with the failure of these systems. Municipalities take very seriously their responsibility to ensure the water and wastewater systems remain operable and safely established under the *Safe Drinking Water Act* and MOE Guideline D-5-2. However, having municipalities bear the entire risk of failure of geographically scattered private communal water and sewage treatment systems, which in most cases cannot be connected to municipal systems, is not efficient nor, in many cases, fiscally sustainable. Ongoing discussion is required to explore different ways of managing this risk and supporting interventions when required.

Intensification

AMO supports intensification within areas that have hard and soft services already.

There is concern that taking a one-size-fits-all approach to planning through the removal of A Place to Grow has removed longstanding tools that would assist the Greater Toronto and Hamilton Area (GTHA) and adjacent dense urban municipalities. There must be consideration to and flexibility for the differing challenges experienced in urban, rural, and northern municipalities.

Although increased flexibility to plan is appreciated by some, the policy changes are likely to compromise high density planning and have other unintended consequences.

Further provincial direction is needed to encourage an appropriate level of density in greenfield areas and strategic growth areas, mix of housing typologies, and affordable housing in designated growth areas and Major Transit Station Areas, among other communities experiencing accelerated growth. This would ensure that areas that will experience growth in the coming years are developed as inclusive and complete communities.

Affordability & Complete Communities

Strong provincial policies are required to address affordability across the housing continuum.

The definition of “affordable housing” should be maintained within the PPS to encourage continued progress toward targets for affordable and rental housing creation.

Stronger policies from the *Growth Plan* relating to intensification, infrastructure, and transit should be retained for the identified large and fast-growing municipalities to ensure the development of complete communities while delivering a broad range of housing. In addition, information on housing supply need should come not only from the education system, but also from other service providers including health care, social housing, employment centers, food banks, and transportation services. This will provide a better understanding of what is needed for ensuring complete communities.

Municipalities must balance between economic development, providing quality of life to residents, and building all types of housing across the continuum. As a general principle, the policies should not be vague as it will cause confusion, potential lengthy hearings at the Ontario Land Tribunal, and further the delays of construction of necessary housing.

Employment Lands

The proposed narrowed definition of employment lands in the PPS will make a mix of employment and residential uses in mixed use urban intensification areas harder.

In particular, the existing office developments removed from the definition of employment areas will not be able to compete with residential property valuation and will be lost in key employment and business park areas.

Combined with the removal of minimum intensification and density targets from *A Place to Grow*, the amended definition will cause problems and confusion amongst developers and municipalities alike.

That is why there must be considerable time to allow municipalities to amend their Official Plan policies to accommodate the new definition of “employment area”. The current timeline between now and the Fall 2023 is not realistic. It is also recommended that the proclamation of the definition of “employment lands” in Bill 97 continue to be stayed until clarity and timelines can be provided.

Environment & Indigenous Relations

The natural environment is a key part of land use planning in Ontario and should not be treated as a development impediment. Municipalities were pleased to see that many of the Natural Heritage policies from the previous Provincial Policy Statement were carried over to the new PPS.

We recognize that natural heritage features such as forests and wetlands play important roles to reduce flows, store floodwaters and mitigate drought, which reduce risk and allow people greater response time to flooding emergencies. It is noted that often, the natural heritage, water resource and natural hazard systems are inextricably linked and, therefore, the integrated protection of all these systems is necessary to support climate change resiliency, the maintenance of healthy watersheds, and to best protect public health and safety from natural hazards and protect drinking water sources. Under the new PPS, the responsibility to evaluate areas as potential natural heritage features falls to municipalities – a role for which many municipalities are not equipped. With the diminished role of Conservation Authorities and updates to the Ontario Wetland Evaluation System, it will be critical to ensure appropriate resources to support municipalities in this role, including additional provincial resources as well as transition funding for municipalities.

The relationship between municipalities and conservation authorities represents a longstanding working relationship that, while not always perfect, provides consistency, predictability, and cost savings in the environmental approvals process. As we move forward it is important to recognize this partnership to lessen the burden on municipalities and to maximize the value of conservation authorities.

Climate change was included in the proposed PPS, but to a much lesser degree than used to exist under the PPS, 2020 and *A Place to Grow*. It is critical that municipalities have the tools required to manage these overarching global concerns and do not retain more liability if building is allowed in areas outside of natural hazard areas.

It will be important to provide guidance and examples of how to tackle climate change and facilitate sustainability in land use planning as we are concerned that less rules around it will mean it will be taken less seriously. This is significantly concerning at a time where the threat of climate change and severe weather is only increasing.

AMO is pleased to see that more collaboration with Indigenous communities is being encouraged. However, more clarity is required regarding this additional proposed language in 6.2.2: “...and support the identification of potential impacts on decisions on the exercise of Aboriginal or treaty rights” (p. 29).

It is critical to incorporate Indigenous perspectives and acknowledge the rights and roles of Indigenous Nations into the PPS. The document should recognize the Duty to Consult and Accommodate, the principles of free, prior, informed consent, and the articles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). These important elements should be integrated into the document, along with additional consultations with Indigenous Nations before the Provincial Planning Statement is finalized.

Implementation Considerations

The Province must update its [D-Series Guidelines](#) which outline the environmental considerations and requirements for industrial land use, sensitive lands, sewage and water services, and private wells.

To support planning authorities and CAs, Conservation Ontario continues to recommend that the Province provide comprehensive, up-to-date implementation guidance concurrently with the issuance of the proposed planning instrument.

There is no “one-size-fits-all” solution in Ontario given the diverse geography and sizes of municipalities. With the *Place to Grow* not being carried forward, further consideration needs to be given to differentiating policies between urban, rural, and northern communities as they have different planning needs, respectively.

Since there is no appeal mechanism for the provincial policy changes, the Province should prioritize transparency and accountability to the public. Providing a detailed response with the notice of decision, outlining how all feedback was considered and addressed (or reasons for non-addressal), would foster this transparency.

There must be more clarity and direction across numerous policies and chapters in this document. Otherwise, it will create unintended ambiguity which can delay the planning process and subject planning applications to political, rather than policy-based approval processes and decisions.

Training, education, and guidance early and often with municipalities will be important to lessen the burden on municipalities and will enable them to reach the goal of the exercise – i.e., to streamline the planning process.

Conclusion

AMO looks forward to continuing to work with the government on issues related to justice and safety in the planning process. Maintaining public health and safety is a major goal of municipal governments. To do so appropriately requires services that evolve to meet public needs and expectations and demonstrate a commitment to value and excellence.