

August 3, 2023

The Hon. Steve Clark
Ministry of Municipal Affairs and Housing
17th floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO 019-6813)

Dear Minister Clark,

For more than a century, the Ontario Chamber of Commerce (OCC) has supported economic growth by advocating for business priorities on behalf of our 60,000 members, including local chambers of commerce and boards of trades in close to 160 communities.

Following a series of recent land use and municipal governance changes, the Province of Ontario has published a proposal to create a single province-wide land use planning policy document with language adapted from the Provincial Policy Statement, 2020 (2020 PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow) 2019.

The OCC welcomes the opportunity to provide feedback on the proposed 2023 Provincial Planning Statement (2023 PPS) policies, on behalf of Ontario's business community.

Overview

Both the 2020 PPS and A Place to Grow aim to support short- and long-term economic growth, resilience, and sustainability across all communities in Ontario.

The OCC and its members support the Ontario government's commitment to achieving its housing supply targets and improving housing affordability throughout the province. We commend the government for its efforts to establish a policy environment that is conducive to accelerating development, reducing barriers, and ensuring the right mix of housing supply to meet the needs and growth projections of local communities.

We appreciate and support the provincial government's commitment to maintaining the current Greenbelt Plan (2017) policies in the 2023 PPS and ensuring that the existing Greenbelt Plan standards and policy connections between the Greenbelt Plan, 2020 PPS, and A Place to Grow remain in effect.

That said, we would urge the government to ensure the policies outlined in the proposed provincial planning statement **prioritize the utilization of existing settlement areas and the built environment through gentle densification while minimizing the disruption to critical, scarce, and sensitive lands**. This includes employment lands, natural assets and resources, electricity distribution and transmission land corridors, and agricultural lands. From a planning perspective, more than enough land has already been [designated](#) for housing and we would encourage the 2023 PPS to focus on affordability, complete communities, and quality of life.

Continued comprehensive regional planning alongside local planning and development is vital for commercial and economic opportunities. A Place to Grow aimed to ensure coordinated policies aligning growth with employment zones, infrastructure, and water resources. As the largest economic zone and fastest-growing population center in the province, the Greater Golden Horseshoe requires tailored planning for its success. We need policies that **integrate growth with existing infrastructure, including electricity distribution and transmission infrastructure, transportation and transit systems, water resource systems, and employment zones**.

Employment Lands and Competitive Communities

- Employment lands, including manufacturing, retail, and warehousing, are essential for driving economic growth, greater certainty for investors, competition, and job creation in local communities, and should be protected.
- While increasing housing supply is necessary for improving affordability and attracting and retaining workers, a balanced approach to land use planning is necessary for ensuring the availability of quality employment opportunities that complement residential development.
- The proposed, modified definition of ‘areas of employment’ would enable the conversion of employment zones for residential development, which can impact long-term economic planning and development in local communities. Residential development should take place in designated residential areas before employment land conversions are permitted. Not doing so may result in an over-designation of residential land and undermine densification efforts, while also compromising the availability of employment lands. It concerns us that the potential impacts on commercial and employment systems in a complex region have not been fully assessed. Businesses require predictability and certainty on the availability of employment and industrial lands to make investments and plan for the long-term.
 - Consider a pause on implementing proposed policies related to employment lands in the Provincial Planning Statement to allow for additional consultations with relevant stakeholders and opportunities to further explore protections for employment areas.
- The final Provincial Planning Statement policies should aim to:
 - Define the need for critical employment lands in official plans while maintaining and protecting the existing volume of employment lands in the pursuit of residential zoning.
 - Recognize that employment lands must sustainably co-exist alongside other community zoning purposes.

- Include a fully developed framework that protects employment lands. The proposed process using section 47 of the *Planning Act* (Ministerial Zoning Orders) needs to be detailed and take effect simultaneously with the new policy.
 - Ensure that zoning of Employment Areas incorporates additional considerations for mixed-use zoning communities and live-work units.
 - Protect employment uses that are dependent on or directly related to major facilities such as airports and marine ports for their economic value and for future economic growth, including access and egress for the movement of goods.
 - Maintain the current timeframe for when a conversion of employment lands can be considered, i.e., only when municipalities are undertaking their Five-year Official Plan review, absent the Municipal Comprehensive Review concept.
 - Require municipalities to determine that sensitive land uses proposed near manufacturing, warehousing, and other major facilities are or can be made compatible prior to permitting a sensitive land use.
 - Retain the existing Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail, and major office will avoid (or where avoidance is not possible, minimize and mitigate) adverse impacts on industrial, manufacturing, or other major facilities.
 - Include broader provisions for appropriate buffer space between residential and industrial areas. Exclusion zones may be necessary to maintain distance from companies that require nighttime operations, noise, or emissions, and to ensure access and egress for the movement of goods.
- Revised protections for Employment Areas need to fulfill the original policy intent of Provincially Significant Employment Zones (PSEZs) as a vital component of supporting economic development, including ensuring that the Province retains the authority to designate new Employment Areas as well as ongoing consultations with relevant stakeholders on appropriate land use planning policies and designations.

Agriculture

- Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fueling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP.¹

Ontario's farmland is a limited resource, making up less than five percent of all the land in the province. It is vital that the province has a strong, viable, and sustainable supply of food products grown, harvested, and processed locally. Food system security is especially critical given increasing threats to global food production due to geopolitical instability and climate change.

¹ <https://ofa.on.ca/newsroom/joint-statement-from-ontarios-farm-leaders-on-bill-97-and-proposed-provincial-planning-statement/>

We appreciate that the Ministry chose to withdraw the proposed large-scale changes to farmland and rural areas that would have allowed for additional severances and lot adjustments. These changes would have negatively affected the long-term viability of farms due to the occasionally disruptive nature of farming operations.

Rural municipalities with limited fiscal resources would have also faced additional infrastructure burdens to accommodate the previously proposed low-density growth in agricultural regions.

- Ontario's already shrinking agricultural land base is alarming and unsustainable. The current rate of loss is measured at 319 acres per day, according to the 2021 Census of Agriculture.² To better adapt to climate change and ensure the security of our food systems, the final planning statement should include policies that help preserve critical farmlands and prime agricultural areas, and consider:
 - Redefining prime agricultural land to include Canada Land Inventory Class 1 to 4 soils and specialty crop lands.
 - Protecting Class 5 to 6 soils, which can be improved through activities such as tile drainage and can be used to support agricultural activities such as grazing livestock.
 - Recognizing and protecting the next best agricultural lands for their agriculture use in a given region where Class 1 to 4 soils are not present.
 - Requiring the extension of agricultural systems mapping across the province, rather than "encouraging". The provincial agricultural systems mapping has been an important tool for businesses in supporting the agricultural industry.
- The proposed policies governing farmland and rural areas should aim to continue protecting the right to farm and the Agriculture System in Ontario.

Sustainable Resource Management

- The Natural Heritage System policies from A Place to Grow do not appear to be carried forward into the proposed 2023 PPS. A Place to Grow had policies prohibiting development, outside of settlement areas, in key natural heritage features within the Natural Heritage System. The Natural Heritage System is a region-wide approach to environmental management that is key to supporting Ontario's biodiversity.
- Natural heritage features such as forests and wetlands serve critical roles in reducing the flow of water, storing floodwaters and carbon, and mitigating drought, thereby enhancing biodiversity, climate resilience, and public safety. The integrated protection and adaptation of these systems helps maintain healthy watersheds, safeguard public health, and protect drinking water sources.
- The natural environment is integral to land use planning and should not be seen as a barrier to development. Municipalities need access to natural heritage features and sufficient time to comment on proposed Natural Heritage policies, especially since conservation authorities can no longer provide such advice.

² <https://ontariofarmlandtrust.ca/2022/07/04/ontario-losing-319-acres-of-farmland-every-day/#:~:text=According%20to%20the%20new%20statistics,to%20319%20acres%20per%20day.>

- Climate change is included in the proposed 2023 PPS but to a lesser extent than the 2020 PPS and A Place to Grow. Clear guidance, best practices, and examples are crucial to tackling climate change and promoting climate adaptation effectively in land use planning, ensuring it is treated with the seriousness it warrants, given the growing threat of severe weather and climate change.
- The water policies in the proposed 2023 PPS appear to include weaker protections for water resource systems than the 2020 PPS and A Place to Grow. For example, municipalities are only encouraged to undertake watershed planning, and any reference to sub-watersheds is removed, including for planning for large-scale development in designated greenfield areas. These proposed changes should be reversed, as they may weaken protections in downstream areas, could lead to a fragmented municipal management approach, and may ultimately threaten the region's water resource systems.

Indigenous Relations

- Incorporating Indigenous perspectives and recognizing the rights and roles of Indigenous Nations is of utmost importance for the 2023 PPS. It is a fiduciary obligation of the province, and key to advancing reconciliation. The document must acknowledge and support the implementation of the Duty to Consult and Accommodate, principles of free, prior, informed consent, and the United Nations Declaration on the Rights of Indigenous Peoples. These elements need to be integrated into the document, and further consultations with Indigenous Nations should take place before finalizing the 2023 PPS.

Infrastructure and Settlement Area Boundary Expansions

- Adequate infrastructure and community services are an integral part of supporting densification and housing development. The final planning statement should prioritize and maximize the use of existing infrastructure, including addressing infrastructure backlogs and deficits, while further aligning growth with water resources, electricity distribution and transmission infrastructure, and transit and transportation systems.

We would also encourage policies that:

- Prioritize gentle densification and the development of missing middle solutions that minimize the disruption to employment lands, natural assets and resources, farmlands, and critical electricity infrastructure.
 - End exclusionary zoning and encourage the expansion of as-of-right and inclusionary zoning in Official Plans.
- Continue to explore opportunities to reduce friction and delays in the planning, development, and approvals process for housing and infrastructure. This could include adopting tools such as the one-window digital platform to better align targets, regulations, and approvals across and between different levels of government.

- To better support gentle densification and help avoid or minimize the disruption to critical, sensitive, and agricultural lands, continue to apply evidence-based analysis such as infrastructure capacity, compliance with minimum distance separation, and agricultural impact assessments for settlement area boundary expansions.
- Protect against the expansion of urban settlement boundaries into critical agricultural and sensitive lands and consider policies requiring mandatory intensification within the existing built urban areas as well as “greenfield” density requirements to better utilize infrastructure and improve the financial viability of public transit.
- Protect against further encroachment of residential developments into noise-impacted areas in the vicinity of major facilities, including airports and marine ports. Tall buildings that penetrate height limitations associated with both Transport Canada airport zoning regulations and international operating standards for take-off surfaces can affect aircraft safety and severely reduce capacity and operations at airports, thereby impacting their economic viability.

In closing, we would like to thank you for the opportunity to comment on these important policies. The OCC and our members look forward to working with you and the Ontario government to achieve its housing targets under a province-wide land use planning policy document that safeguards both short- and long-term economic growth, resilience, and sustainability across all communities.

Sincerely,



Rocco Rossi
President and CEO
Ontario Chamber of Commerce

cc:

The Honourable Caroline Mulroney, Minister of Transportation

The Honourable Greg Rickford, Minister of Indigenous Affairs

The Honourable Kinga, Surma, Minister of Infrastructure

The Honourable Monte McNaughton, Minister of Labour, Immigration, Training and Skills Development

The Honourable Parm Gill, Minister of Red Tape Reduction

The Honourable Todd Smith, Minister of Energy

The Honourable Victor Fedeli, Minister of Economic Development, Job Creation and Trade

The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs

OFA Board of Directors