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To: Ontario Ministry of Municipal Affairs and Housing

Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

In response to the MMAH's request for comments related to the proposed Provincial Planning Statement the Mount Pleasant Group of Cemeteries (MPGC) is pleased to have an opportunity to submit our comments below as they related to Planning Policies that impact the development of new cemeteries in Ontario.

About MPGC

- MPGC is a not-for-profit, non-share capital company incorporated under the laws of Ontario with a history stretching back to its establishment in 1826.
- MPGC was the first cemetery operator authorized to offer non-denominational, non-sectarian burials to the residents of Toronto.
- Today, together with our funeral affiliate, Canadian Memorial Services, we have grown to employ over 500 employees, operate 10 cemeteries (with more than 700,000 decedents in our care), nine funeral centres (six of which are located on our cemetery properties), and four cremation centres equipped with some of the most environmentally-advanced cremation equipment in North America.
- We offer culturally-appropriate services to people of all faith traditions and communities, ensuring everyone feels welcome and supported during their time of need.

Background:

- Many of MPGC's existing cemeteries with available grave spaces within urban boundaries are reaching the end of their life cycle as active burial grounds while at the same time the population and number of deaths in Ontario continues to grow.
- Unlike in other parts of the world Ontario cemeteries have the added legal responsibility to exist and be maintained in perpetuity under the Provincial Funeral Burial and Cremation Services Act (FBCSA) making existing licensed cemeteries a finite, non-renewable resource for the communities they serve.
- Cemeteries are not just places of burial. They are properties of cultural importance, contributing to the establishment of complete communities within our Province and also serve as important green spaces that are protected indefinitely after their "active" phase ends, providing a perpetual benefit to the communities within which they exist.
- The current PPS, and subsequently the lower tier Official Plans, restrict the creation of new cemeteries to areas well outside of established settlement areas.

Issues:

- **Population Growth and Mortality Rates** – Ontario’s population is projected to increase by 38% to over 20 million by 2046. Furthermore, our population is aging and by 2031, all baby boomers will be 65 or older. Deaths are expected to increase rapidly and will exceed 170,000 annually by 2046.
 - The rise in both population and deaths increases the demand for cemetery services but the lack of suitable cemetery lands and their inclusion in land use planning will negatively affect the communities we serve at their greatest time of need
- **Religious and Cultural Needs** – Although cremation may reduce the impact on land use Ontario has the most culturally diverse population in Canada, meaning that cremation is not a viable option for numerous faith-based and traditionalist groups.
 - This segment of the population will continue to require “traditional” cemetery lands in perpetuity.
- **Perpetual Obligation** – Cemetery lots in Ontario are sold in perpetuity,
 - Lots cannot be replenished, reused or resold once utilized.
- **Restrictive Policies, Zoning and Finite Land** – Cemetery space is required within every community across the province; however, the current PPS restricts cemetery use (As-of-Right) to lands designated as Rural only (versus Agricultural or other white belt lands), often well outside the urban boundary.
 - Such lands are typically unsuitable for agriculture due to factors such as quarries, escarpments, or forested areas, all of which make the lands similarly unsuitable for cemetery development.
 - Due to the above, cemetery operators across the province must undertake a lengthy, complicated and potentially risky approval process requiring amendments to Official Plans, Zoning Bylaws etc. if they wish to establish new cemeteries outside of Rural lands which creates a significant barrier to our ability to continue serving communities after existing cemetery lands are depleted.
 - This challenge is amplified in proximity to large population centres like the GTA where land availability and affordability is also a restrictive factor, increasing the risk associated with acquisition of property for (potential) cemetery use.
- Current planning frameworks permit development of cemeteries based on local needs, but don’t take into account the ability of cemeteries to serve broader Regional areas that may not correspond to municipally defined boundaries.

Summary:

- While generally accepted by the public that cemeteries provide important services and function within every community in Ontario the reality is most cemeteries in the Province were established years (or decades) ago, under different Planning Policies than those that exist today.
- Changes to the Provincial Policy Statements, and subsequent lower tier Official Plans, have gradually (and we believe unintentionally) excluded cemeteries as an approved land use and made it more difficult to establish new Cemeteries “As-of-Right” in proximity to the communities they are intended to serve.
- We believe that cemeteries form part of a Complete Community as envisioned by the PPS, but are specifically excluded from land use definitions that would permit the establishment of new cemeteries within those communities.
- Maintaining the current policies and restrictions on where new cemeteries may be developed will eventually force communities to bury their loved ones well outside of the city limits once existing cemeteries are depleted.
- This challenge is currently being experienced within the GTHA but, if left unaddressed, will become a more widespread Provincial issue as other population centres grow and their existing cemeteries reach capacity.

Suggested Policy directions for consideration:

To address the concerns noted above we would suggest that a revised PPS could:

- Reflect cemeteries as a foundational requirement for growth, and recognize the diverse needs for death planning and accommodation of religious requirements for traditional in-ground interment when considering other planning objectives, like housing.
- Recognize that the service areas of cemeteries cross geo-political jurisdictions, and should not be restricted by municipal or regional boundaries. Jurisdictional boundaries are often restrictive of cemetery development due to insufficient land inventory set aside for this land use within local plans, and/or the absence of any/adequate direction for cemetery uses within these planning instruments.
- Include definitions and terminology for cemeteries and all associated death care uses consistent with those found in the Provincial ***Funeral, Burial and Cremation Services Act, 2002 (FBCSA)*** and Cemetery land uses should be defined to include any and all subsidiary and associated uses allowed by the Provincial Act
- Recognize cemeteries as a permitted land use within designated white belt lands to eliminate the need for ad-hoc amendments to local Official Plans and Zoning By-laws which make the acquisition of new lands for cemetery use risky for operators.
- Allow/encourage the expansion of existing cemeteries to allow cemeteries to continue fulfilling their important role as part of a complete community.
- Recognize the 100-year planning horizon for cemeteries which is significantly longer than the provincially- mandated 25- to 30-year land use planning horizon as required for Official Plans. Specifically, recognize that the timeframes associated with the acquisition, licensing and establishment of a new cemetery can currently take decades, so planning must begin well in advance of need.

We welcome this opportunity to provide our comments to the MMAH and MPGC would be happy to discuss further as the consultation process moves forward.