

June 14, 2023,

Sylvia Przedziecki
Toronto City Hall
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Item - 2023.PH4.8 - City Comments on the Proposed Provincial Planning Statement (PPS)

Dear City Council,

The Mimico Lakeshore Community Network (MLCN), represents a number of community groups as well as engaged individuals. We have been following with great dismay the proposed changes to the Provincial Planning Statement (PPS) which is part of the changes of Bill 97, Helping Homeowners, Protecting Tenants Act 2023, which is part of the provincial government's efforts to address the housing affordability crisis by increasing the housing supply, But it falls short of its goal because of the removal or alterations of certain definitions such as "Affordable Housing", "Low and Moderate Income Households", "Employment Areas" and "Provincially Significant Employment Zones" from the proposed Provincial Planning Statement. Those definitions are keys to living in a complete and affordable community, where potential employment is close to where one lives. 30% of renter households in Toronto are in core housing needs and the City's HousingTO Action Plan 2020-2030 needs to build 40,000 affordable rental and supportive homes by 2030.

The province through PPS 2023 wants to define affordable prices or rents at 80% of the average resale purchase price or market rent, rather than average income. Toronto's annual rent growth sits at just over 21 per cent – reaching an average of \$2,822 last month. Current Toronto MLS stats indicate an average house price of \$1,204,166. 80% of the \$2,822 rental average is \$2,257, while 80% of the \$1,200,166 average house price comes in at \$963,332, both well above what most people can afford. Because of the cost of housing and living in Toronto, there has been an exodus of 50,000 people leaving the city for other provinces which has created a labour shortage in Toronto. The elimination of the "affordable housing" and "low and moderate income households" definitions helps realize the possibility that only high-income earners are can afford to live in Toronto.

In Ontario's 2020 Provincial Policy Statement, affordable is defined as the least expensive of the income-based and market cost-based definitions. MLCN agrees with the city recommendation that the Province maintain the 2020 definitions of "Affordable Housing", & "Low and Moderate Income Households" which is 30 per cent or less of total household income. A household with annual income (before tax) of \$29,401 to \$52,500, can afford up to \$1,313 per month for housing. A Medium Income Household with an annual income of \$52,501 to \$83,900 can afford up to \$2,098 per month for housing. MLCN also believes that there should be provisions for municipalities to define climate change adaptation and green house gas emissions goals for new development.

Last year Toronto's Employment Areas employed almost 400,000 people, which is projected to rise to 500,000. The PPS's new definition of "Employment Areas" changes the protected land uses to exclude institutional and commercial uses, which means that sites that are currently designated as an "Area of Employment" in the official plan with an office building or a hospital will no longer be identified as "employment" This change in the "Area of Employment" definition comes despite the Land Needs Assessment finding that there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate 2051 population forecasts.

The definition change in "Employment Areas" impacts the film industry dramatically. The film industry spends \$2.5 billion annually in Toronto, and uses 35,000 local employees. Proposed policies could potentially drive film investment out of Ontario. MLCN agrees with the city that the Province revise the "Employment Areas" definition to include film production, clusters of office uses, and stand-alone convenience retail and services to serve businesses and workers within Employment Areas.

The PPS also makes significant changes that municipalities must follow when determining whether a conversion or removal of lands within an Employment Area will be permitted. The new policy allows for

conversions or removals of Employment Areas to be considered at any point in time, instead of only during a Municipal Comprehensive Review (MCR) every five years. An ongoing, site-by-site request, does not allow for comprehensive analysis and planning. MLCN agrees with the City's suggestion that the Province maintain the current time frame for conversion of employment lands when municipalities are reviewing their 5-year Official Plan.

The new PPS has eliminated the definition "Provincially Significant Employment Zones" (PSEZ). The Province will instead provide conversion protections for former Provincially Significant Employment Zones only through a Minister's Zoning Orders (MZOs), if those lands meet the proposed definition of "areas of employment" in Bill 97. The Ontario Food Terminal, which was labelled as a PSEZ in 2019 is not only the second largest fresh food distribution facility in North America, but is also a major employer in the Mimico area that employs 5,000 employees directly at the terminal and also supports 170,000 people who have direct or indirect employment affiliated with the terminal. PSEZs did not include protections from encroachment of residential uses. Proposed PPS policies related to employment and land use compatibility would require municipalities to permit residential uses on lands that no longer meet the Planning Act definition of "areas of employment". The city, along with MLCN request that the Province allow municipalities to determine whether sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible.

While Mimico Lakeshore Community Network applauds the province's efforts at solving the housing affordability crisis, the removal or modifications to definitions for "Affordable Housing", "Low and Moderate Income Households", "Employment Areas" and "Provincially Significant Employment Zones" is counterproductive to reaching that housing affordability goal.

Sincerely,

Les Veszlenyi and Angela Barnes, Co-Chairs of the Mimico Lakeshore Community Network