

**May 31, 2023**

**Re: PH4.8 - City Comments on the Proposed Provincial Planning Statement**

Dear Members of the Planning and Housing Committee

ABC Residents Association (“ABCRA”) is an incorporated volunteer body that has been in existence since 1957. ABCRA represents the interests of residents who live in the area between Yonge Street and Avenue Road and Bloor Street to the CPR tracks.

ABCRA appreciates the opportunity to bring to your attention its concerns regarding the proposed Provincial Planning Statement (“PPS”) within the ‘streamlined’ planning system, and wants to indicate our support for the Overall Conclusions raised by The Federation of North Toronto Residents’ Associations (“FoNTRA”) letter dated May 25, 2023 and reproduced below.

1. The Ministry does not have effective procedures and systems in place to ensure that land use planning in the Greater Golden Horseshoe is consistent with good land - use planning practices , and opportunities remain for land - use planning to be better integrated with planning processes for infrastructure and services, such as highways, transit, schools, and hospitals, according to the Auditor General of Ontario.
2. The assertion that the housing affordability crisis is the product of Ontario’s land use planning and environmental protection framework, and municipalities slow to approve planning applications is objectively false, according to the Association of Municipalities Ontario (AMO).
3. Data does not support the popular narrative that a lack of supply is the cause of the affordability crisis, and the solution is to build more houses, according to Professor Fallis of York University.
4. The housing supply inventory contains currently – in year 2 of the province’s 10 - year horizon - 1,276,960 units in 21 municipalities that represent 70% of the province’s population, according to the Regional Planning Commissioners of Ontario (RPCO).
5. No valid statistical analysis supporting the call for 1.5 million new housing units by 2031 has been made public, according to Professor Doucet of the University of Waterloo.
6. Recent changes to the statutory planning framework limit meaningful public engagement, impede protections for the environment, and negatively impact coordination of infrastructure and growth planning across regions, according to the Ontario Professional Planners Institute.
7. The new PPS eliminates density targets and removes restrictions on the expansion of municipal settlement boundaries, effectively, encouraging low - density sprawl on natural and agricultural land with car - reliant subdivisions – all moves directly counterproductive to intelligent climate change adaptation.



8. The exclusive focus on housing supply anywhere overlooks the basic requirement of the Planning Act that the Minister, in exercising his or her authority, shall have regard to all 20 provincial interests listed in the legislation, not just “the adequate provision of a full range of housing, including affordable housing.”

ABCRA has submitted a letter of support of FoNTRA's position to the Province in response to the call for comments, which concludes that the proposed Provincial Planning Statement (PPS) and the simultaneous repeal of the Growth Plan should not proceed since these initiatives are not only harmful, but also entirely unnecessary. FoNTRA, respectfully, urged the Ontario Government to withdraw the proposed Provincial Planning Statement and to maintain the Growth Plan for the Greater Golden Horseshoe

Our review of City Planning's subject report indicates that its recommendations and FoNTRA's position on the matter are very similar. The major difference is that City Planning wants the foundational elements of the Growth Plan and of the 2020 Provincial Policy Statement (PPS) transferred to the Provincial Planning Statement, while FoNTRA is saying, “save the trouble, and leave the old instruments in place”.

In summary, therefore, ABCRA agrees with FoNTRA and City Planning's analysis of the Statement in relation to the current approved documents and supports the solution FoNTRA has outlined in their letter to Minister Clark.

Yours truly,

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CC. Councillor Dianne Saxe