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Hon. Steve Clark, Minister  
c/o Planning Consultation  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 13th floor  
Toronto Ontario M5G 2E5

### Provincial Policy Statement Review – Draft Policies

Dear Minister:

The *Federation of North Toronto Residents' Associations* ("FoNTRA") is an umbrella organization representing over 30 residents' associations in central Toronto engaged in public policy debates on planning and development issues that directly affect our member organizations. In particular, FoNTRA had commented on previous draft Provincial Policy Statements ("PPS"), starting in 2004, and appreciates the opportunity to comment on the latest ones prior to their finalization, as follows:

1. While FoNTRA supports the stated goals of encouraging an increased mix and supply of housing, protecting of the environment, creating jobs and a strong economy, reducing barriers and costs for development, and providing greater predictability, it notes that many of the proposed policies pay only lip service to these goals. Loosening environmental standards related to wastewater servicing, further facilitating sprawl by increasing the opportunities for settlement boundary changes, lowering the protection of employment lands by allowing conversions outside of the municipal review process, or reducing predictability and certainty by constantly changing provincial planning legislation, policies, and plans in rapid succession – these are all examples of draft policies that undermine the government's professed commitment to an orderly growth management. Also, in FoNTRA's view, the central issue of climate change is neglected.
2. FoNTRA believes that Ontario can achieve better planning processes which lead to more sustainable development by committing to four principles to be enshrined in all provincial planning legislation, policies, and plans including, in particular, the PPS:
  - *Predictability and Certainty*: Pursue certainty and predictability of planning outcomes for stable urban areas with well-defined development rules and their strong enforcement without constant modifications and even Ministerial overrides.
  - *Flexibility to Respond to Uncertainty and Complexity*: Create principles and criteria that set out general rules, but preserve flexibility in specific decision-making for urban/suburban areas undergoing change within a well-defined policy framework.
  - *Political Legitimacy and Accountability*: Restore democratic authority over planning by ensuring that development is guided by adopted public policy and elected officials at all levels of government.
  - *Efficiency and Effectiveness*: Ensure effectiveness in planning policy and decision-making, and clearly assess its efficiency in linking public investments to needs.

3. FoNTRA notes that the key proposed changes to the PPS seem to focus on increasing housing supply, choices, and affordability based on some of the following assumptions: increased residential land supply lowers land cost and increases housing affordability (if developers pass along the savings; the undefined determination of 'market demand' will be one of the key approval criteria and will not lengthen the approval processes; permitting lower servicing standards and easier settlement boundary expansions will not create more sprawl; and, housing option policies will not be misused to direct growth to where it is not needed.
4. FoNTRA's primary concern relates to the latter issue. Its member organizations represent areas covered by both the Downtown and the Yonge-Eglinton designated Growth Centres where the growth targets of the Growth Plan have not only been met but exceeded. Today, in 2019, the City of Toronto as a whole has already achieved 96% of the residential units needed to meet the provincial population targets of 2041. And yet, the Minister found it necessary to intervene in the municipal planning processes related to the Secondary Plans for these Growth Centres and to also specify minimum density targets for Major Transit Station Areas in the recently revised Growth Plan that have no realistic relationships to Toronto's actual growth targets of the same plan.
5. FoNTRA urges the government to better coordinate the provincial planning documents which currently contain inconsistencies, redundancies, overlaps, and different definitions. As a general comment, FoNTRA notes an increasing proliferation of provincial policies, directives, and regulations in the field of land use planning which not only detract from an efficient planning system but in our view also, unnecessarily, interfere with a timely and cost-effective delivery of municipal services and approvals.

FoNTRA is available to discuss these issues in more detail and looks forward to the government's response to the public input.

Sincerely Yours,  
**Federation of North Toronto Residents' Associations**

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FoNTRA Members and Others

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of more than 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.