



# **OFIFC**

Ontario Federation of  
Indigenous Friendship Centres

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Response to the Provincial Policy  
Statement Review

October, 2019

## About the OFIFC

Founded in 1971, the Ontario Federation of Indigenous Friendship Centres (OFIFC) works to support, advocate for, and build the capacity of member Friendship Centres across Ontario.

Emerging from a nation-wide, grass-roots movement dating back to the 50's, Friendship Centres are community hubs where Indigenous people living in towns, cities, and urban centres can access culturally-based and culturally-appropriate programs and services every day. Today, Friendship Centres are dynamic hubs of economic and social convergence that create space for Indigenous communities to thrive. Friendship Centres are idea incubators for young Indigenous people attaining their education and employment goals, they are sites of cultural resurgence for Indigenous families who want to raise their children to be proud of who they are, and they are safe havens for Indigenous community members requiring supports.

In Ontario more than 85 per cent of Indigenous people live in urban communities. The OFIFC is the largest urban Indigenous service network in the province supporting this vibrant, diverse, and quickly-growing population through programs and initiatives that span justice, health, family support, long-term care, healing and wellness, employment and training, education, research, and more.

Friendship Centres receive their mandate from their communities, and they are inclusive of all Indigenous people – First Nation, Status/Non-Status, Métis, Inuit, and those who self-identify as Indigenous.

## Introduction

This submission responds to proposed amendments to the Provincial Policy Statement (PPS). These policy changes seek to:

- Increase the mix and supply of housing;
- Protect the environment and public safety;
- Reduce barriers and costs for development and providing greater flexibility;
- Support rural, northern and Indigenous communities; and,
- Support the economy and jobs.

In Ontario, over 85 per cent of Indigenous people live in urban and rural communities. To live a full, self-determining life with your family and community, is largely dependent on having the means to access and provide basic needs such as clean water, nutritious food, adequate housing, clothing, and health care.<sup>1</sup> This is why the PPS matters to Friendship Centres and the OFIFC. Sound land-use planning can support Indigenous people's access to opportunities that provide the means to ensure family and individual basic needs are met. By taking a people-centered approach, the PPS can support Indigenous people's labour-market and economic participation, access to housing, and access to necessary services including reliable transportation, child care, education, and health care.

In framing our submission, it is worth noting the following ways in which land use planning, and the goals of the proposed amendments, are relevant to Friendship Centres and the OFIFC:

- 1) Indigenous people are disproportionately impacted by housing inadequacy and homelessness – Friendship Centres actively work to address this crisis everyday through programs, services, and the development of supportive housing infrastructure;
- 2) Friendship Centres are involved in local planning committees, advisory boards, and situation tables and contribute valuable insights to these social planning processes;
- 3) The OFIFC is connected to municipal social service policy through formal partnership agreements with the Ontario Municipal Social Services Association and the Northern Ontario Service Deliverers Association the benefit our respective memberships;
- 4) Friendship Centres often have on-site child care, health care, and educational facilities considered to be *sensitive land uses* per the Policy Statement;
- 5) Application of the Urban Indigenous Action Plan (UIAP), which establishes minimum standards of engagement with urban Indigenous communities and organizations, satisfies the more general requirements of the Provincial Policy Statement.

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<sup>1</sup> Ontario Federation of Indigenous Friendship Centres. (2019) Policy Fact Sheet: Labour Force.

These are just a few of the general ways in which the Provincial Policy Statement and proposed amendments are relevant to Friendship Centres and the OFIFC. This submission will make some general recommendations per the goals listed above and also examine in more detail particular amendments. This submission takes into account the questions posed in the consultation document and embeds the answers throughout unless otherwise noted.

## **Consistency with the Provincial Policy Statement and Human Rights**

Of equal weight and importance to the proposed PPS changes, is ensuring municipal councils, local boards, planning boards, and elected officials are consistent with the PPS in their comments, submissions, and advice, and are also equipped with information about how to ensure consistency with human rights principles in land-use planning. It has been the experience of Friendship Centres that rezoning processes often expose Indigenous community members in need of housing, who are part of Code-protected groups, to discriminatory opposition. Discriminatory opposition to affordable housing happens when people hold negative attitudes or stereotypes about the people who live in affordable housing or use emergency shelters. This can be expressed in many ways, sometimes based on exaggerated concerns about changes to the neighbourhood impact on traffic, or about the building form.<sup>2</sup> Friendship Centres that have gone through re-zoning processes find that discriminatory opposition is often expressed during public hearings and community meetings but may also occur during closed-door meetings with municipal councilors. These experiences, which vary between communities, may make Friendship Centres reluctant to initiate certain projects that would support the goals of the PPS, including increasing the mix and supply of housing. Discriminatory opposition takes a significant toll on community members, Friendship Centres, and other advocates that are trying to build affordable housing for community members in need.

The OFIFC is working to address barriers to affordable housing development, including discriminatory opposition, by providing direct supports to Friendship Centres engaged in rezoning processes and through our various relationships with the Association of Municipalities Ontario, OMSSA, NOSDA, Ontario Aboriginal Housing Services, and others. The Ontario Human Rights Commission's publication, "In the Zone: Housing, Human Rights and Municipal Planning", should be (re)identified to municipal councils, local boards, and planning boards by the Ministry of Municipal Affairs and Housing alongside the release of the PPS once amended. Information sessions and training on human rights and land-use planning should also be made available to municipal councils, local boards, and planning boards, if not already offered on an ongoing or as-needed basis. When human rights are violated, impacted groups and communities bear the significant burden of labour required to seek justice and remediation. Human rights

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<sup>2</sup> Government of Ontario. (2011). In the zone: housing human rights and municipal planning. Toronto, ON: Ontario Human Rights Commission. (8). Accessed: [http://www.ohrc.on.ca/sites/default/files/In%20the%20zone\\_housing\\_human%20rights%20and%20municipal%20planning\\_0.pdf](http://www.ohrc.on.ca/sites/default/files/In%20the%20zone_housing_human%20rights%20and%20municipal%20planning_0.pdf)

training that is specific to land-use planning could relieve some of this burden through a prevention-based approach.

## Quality of Life and Affordable Housing

As described in the introduction, amendments to the PPS have the power to shape people's lives as well as the quality of built and natural environments. During consultations for *More Homes, More Choice: Ontario's Housing Supply Action Plan*, the government heard that affordability is the top priority for Ontarians (52% of survey respondents) when it comes to housing and that access to nearby services was the next most important priority area (24% of respondents).<sup>3</sup> Housing affordability and access to services are key areas of concern for Friendship Centres and the OFIFC. It is important that legislation is aligned in government policy so that Ministries can utilize common language that supports integration and collaboration – after all, people do not live completely compartmentalized lives – employment, housing, transportation, and broader issues of health, wellbeing, and environmental integrity are interconnected.

It is also important that land-use planning policies related to housing adequacy, including affordability and access to services retain a focus on improving the quality of life for people and communities. This focus has been diminished in Policies 1.1.1., 1.4.3., and 1.7.1., which have been amended to reflect “market-based range” and “market-based need” instead of individual, family, and community needs. Sustaining healthy, safe and livable communities and ensuring long-term economic prosperity is achieved in service to people and communities, not markets. Market-based demand and the real need for safe, affordable housing are not antithetical but should be framed to include public sector and not-for-profit responses and interventions. The OFIFC offers the following feedback and recommendations to re-center the needs of people in the PPS while still supporting the broader policy change goals:

1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns		
Section	Text	Notes and Recommendations
1.1.1.	<p>Healthy, livable and safe communities are sustained by:</p> <p>b) accommodating an appropriate <b>market-based</b> range and mix of residential <b>types</b> (including <b>single-detached, additional residential units, multi-unit housing, affordable housing, community housing, co-op housing</b>, and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p>	<p><b>Comment:</b> Market-based demand for a range of housing options does necessarily include a robust community housing sector – a critical part of the housing continuum that should be reflected and supported in government policy.</p> <p><b>Recommendation:</b> - Replace “market based” with needs based. - Add “community housing” and “co-op” housing – these housing types provide</p>

<sup>3</sup> Ontario. 2019. *Housing Supply Action Plan*. Queen's Printer for Ontario. Accessed: <https://files.ontario.ca/mmah-housing-supply-action-plan-21may2019.pdf>

		additional benefits to people and are distinct from the proposed catalogue.
<b>1.4 Housing</b>		
1.4.3	<p>Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected <b>market-based needs</b> of current and future residents of the regional market area by:</p> <p>a) establishing and implementing minimum targets for the provision of housing which is affordable to low- and moderate-income households and which aligns with applicable housing and homelessness plans...</p>	<p><b>Recommendation:</b></p> <ul style="list-style-type: none"> <li>- Emphasize that housing need is driven by, first and foremost, the needs of people, not the needs of “the market”.</li> </ul>
<b>1.7 Long Term Economic Prosperity</b>		
1.7.1	<p>Long-term economic prosperity should be supported by:</p> <p>b) <b>encouraging residential uses to respond to market-based people’s needs and provide necessary housing supply and range of housing options to support economic participation for a diverse workforce;</b></p>	<p><b>Recommendation:</b></p> <ul style="list-style-type: none"> <li>- Focus on how a range of housing options can support economic participation to generate prosperity.</li> <li>- Add “people” and “economic participation”</li> </ul>

Adequate housing basic human right that can be met through a balance of both private and public investment. Adequate public investment in community housing is required to meet the needs of a diverse population, including those recovering from homelessness, who may require affordable housing coupled with therapeutic supports. Indigenous people are overrepresented homeless populations across the province and require specific housing and homelessness strategies, interventions, and approaches, including policy approaches, to ensure this disparity is addressed. Any government effort to increase housing supply and mix should result in increased housing adequacy and affordability for Indigenous people.

## Urban Indigenous Communities

The OFIFC acknowledges the strengthened language concerning Indigenous community engagement in Part IV: Vision for Ontario’s Land Use Planning System and Policy 2.6.5 Cultural Heritage. We recommend additional amendments to ensure that Indigenous engagement is not simply about “checking a box” but leads to the incorporation of Indigenous perspectives, knowledge, and expertise in decision making processes.

<b>Part IV: Vision for Ontario’s Land Use Planning System</b>		
<b>Section</b>	<b>Text</b>	<b>Notes and Recommendations</b>
--	<b>Ontario recognizes the unique role Indigenous communities have in land use planning and development, and the</b>	<b>Note:</b> UIAP would satisfy these general requirements with respect to urban Indigenous communities

	<p><b>contribution of Indigenous communities' perspectives, expertise, and traditional knowledge to sustainable land use planning decisions. The Province recognizes the importance of consulting with Aboriginal communities on planning matters that may affect their section 35 Aboriginal or treaty rights. Planning authorities are encouraged to build constructive, cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes, and to inform and incorporate Indigenous communities' knowledge, perspectives, and expertise into land-use planning decisions.</b></p>	<p>through the application of more specific engagement standards.</p> <p><b>Recommendation:</b></p> <ul style="list-style-type: none"> <li>- Ensure Indigenous perspectives, knowledge, and expertise is incorporated into decision-making processes, not just "informing".</li> <li>- Recognize not only traditional knowledge but also expertise.</li> </ul>
<b>2.6 Cultural Heritage</b>		
2.6.5	<p><b>Planning authorities shall engage with Indigenous communities and consider incorporate their interests when identifying, protecting and managing cultural heritage and archaeological resources.</b></p>	<p><b>Recommendation:</b></p> <ul style="list-style-type: none"> <li>- Interest should be incorporated for the purpose of protecting and managing cultural heritage and archeological resources.</li> </ul>

With the above-mentioned amendments to the PPS, Ministries can ensure cross-government alignment of culturally appropriate planning and the implementation of initiatives for urban Indigenous communities that integrate urban Indigenous priorities and approaches. Furthermore, the PPS can help ensure that provincial, local, and regional initiatives are addressing barriers to accessing services experienced by urban Indigenous communities.<sup>4</sup> These approaches not only support Indigenous-driven solutions to issues of housing inadequacy, poverty, and employment, but also spur social innovation and meaningful collaboration on initiatives such as: Indigenous child care centres; after school programming; and, transitional housing with culture-based supports. As the OFIFC has formal relationship agreements in place with OMSSA and NOSDA, our organization should be identified by the MMAH as a key resource for municipal councils, local boards, and planning boards seeking to learn more about meaningful Indigenous engagement.

## Additional Amendments and Recommendations

The OFIFC recommends that the following sections of the PPS be amended to create a stronger policy framework with increased emphasis on:

- Incorporating community transportation in more land use planning decisions;
- Employment lands that adapt to a changing economy, projected and envisioned future uses; and,
- Ecological integrity, planning for ecological rehabilitation not just "mitigation", and climate change.

<sup>4</sup> Ontario. (2018). *Urban Indigenous Action Plan*. Queen's Printer for Ontario. Accessed: <https://www.ontario.ca/page/urban-indigenous-action-plan>



## Transportation

<b>1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns</b>		
<b>Section</b>	<b>Text</b>	<b>Notes and Recommendations</b>
1.1.1	<p>Healthy, livable and safe communities are sustained by:</p> <p>e) promoting <b>a community centered approach</b> to the integration of land use planning, growth management, <b>transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments,</b> and standards to minimize land consumption and servicing costs;</p> <p>f) <b>incorporating transportation and land use considerations at all stages of the planning process;</b></p>	<p><b>Note:</b> Transportation is a significant issue for Friendship Centres and the community members who access services and cultural supports through Friendship Centres.</p> <p><b>Recommendation:</b> - That a community-centered approach to transportation be more deliberately integrated at all stages of land-use planning decisions to improve access to services.</p>

## Employment Areas

<b>1.3.2 Employment Areas</b>		
<b>Section</b>	<b>Text</b>	<b>Notes and Recommendations</b>
1.3.2.2	<p><b>At the time of the official plan review or update, planning authorities should assess <i>employment areas</i> identified in local official plans to ensure that this designation is appropriate to the planned function of the <i>employment area</i>.</b></p> <p><b><i>Employment areas</i> planned for industrial and manufacturing uses shall provide for separation or mitigation from <i>sensitive land uses</i> to maintain the long-term operational and economic viability of the planned uses and function of these areas.</b></p>	<p><b>Note:</b> The economy is changing and the need for designated industrial and manufacturing employment areas is declining. Spaces of employment are increasingly embedded in multi-use areas and the rise of tele-commuting will affect “employment area” planning.</p> <p><b>Recommendation:</b> The PPS should reflect current and future employment use, including multi-use areas.</p>
1.3.2.5	<p><b>Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally-significant by a regional economic development corporation working together with affected upper- and single-tier municipalities and subject to the following:</b></p>	<p><b>Note:</b> It is not clear how will the province ensure that employment purposes and employment viability are in-line with the general public / municipality's needs and vision for their communities.</p>



	<p>a) there is an identified need for the conversion and the land is not required for employment purposes over the long term;</p> <p>b) the proposed uses would not adversely affect the overall viability of the <i>employment area</i>; and</p> <p>c) existing or planned <i>infrastructure</i> and <i>public service facilities</i> are available to accommodate the proposed uses.</p>	
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## Environment

1.7 Long Term Economic Prosperity		
Section	Text	Notes and Recommendations
1.7.1	<p>Long-term economic prosperity should be supported by:</p> <p>k) minimizing negative impacts from a changing climate and <del>considering the ecological benefits provided by nature;</del></p>	<p><b>Note:</b> “Nature” (in terms of natural environments) does not provide “benefits” it provides life.</p> <p><b>Recommendation:</b> Revise to: “...and ensuring the ecological function of ecosystems, species, and landscapes are sustained.”</p>

2.1 Natural Heritage		
Section	Text	Notes and Recommendations
2.1.10	<p>Planning authorities shall protect, improve or restore the <i>quality and quantity of water</i> by:</p> <p>c) <b>Planning</b>, evaluating, and preparing for the <i>impacts of a changing climate to water resource systems at the watershed level</i>;</p>	<p><b>Recommendation:</b> Should also implement restoration and improvement plans for water quantity and quality where applicable.</p>

## On Public Engagement and the Views of Ontario Communities

A key engagement question put forth by the Ministry is “How do these policies take into consideration the views of Ontario communities?” The OFIFC suggests that the answer will depend upon how the Ministry weighs and responds to public feedback. Of concern is the fact that the proposed policy changes have not been presented to the public in a way that is easy to understand. To understand the scope of the proposed changes, a line-by-line comparison of the 2014 version and the proposed version is required, something the general public is unlikely to undertake. Asking the public to provide feedback without being equipped with essential information is an approach that should not be repeated in future consultations.

In terms of designing engagement to solicit a variety of perspectives, the OFIFC is concerned that the Ministry has not done enough to ensure Indigenous communities and organisations are adequately engaged. Indigenous people are disproportionately impacted by housing inadequacy but are also a part of the solution, and this includes through involvement in land-use planning decisions at the highest levels. Part IV of the

PPS has certainly been improved but could be made more meaningful and effective through deliberate engagement with Indigenous communities and organisations. The OFIFC recognizes that the Ministry is balancing several important changes, pieces of legislation not necessarily designed to be harmonious, and priorities including the *Community Housing Renewal Strategy* and the *More Homes, More Choice Act, 2019*. That said, the Ministry could be missing an important area of expertise for supporting municipalities in making planning decisions that impact Indigenous people.

## Recommendations

It is recommended that the Ministry of Municipal Affairs and Housing:

- Foster respectful, responsive, transparent and accountable relationships with urban Indigenous organisations that create opportunities for meaningful engagement on land-use planning and other policy matters;
- Ensure that policy development processes incorporate, reflect and respect the voices and diversities of urban Indigenous communities;
- Work with the OHRC to promote human rights in municipal planning and develop human rights training for municipal councilors, local boards, and planning boards;
- Ensure that policies related to housing and employment retain a focus on improving the quality of life for people and communities;
- Identify the OFIFC as a key resource to municipal councils, local boards, and planning boards alongside the release of the PPS to inform urban Indigenous engagement practices; and,
- Revise technical language of PPS in key areas above (Indigenous engagement, transportation, employment and environment).