

The Atmospheric Fund's Response to Ontario's Proposed Provincial Planning Statement

On April 6, 2023, the provincial government introduced Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023*. Bill 97 proposes significant changes to the provincial planning framework and land use approvals systems. Combining elements from the Provincial Policy Statement, 2020, and the 2019 Growth Plan, Ontario's proposed provincial planning statement (PPS) commits to supporting the goal of building 1.5 million new homes by 2031. As the PPS provides minimum standards for municipal planning, these policy changes have a direct impact on how cities and communities are developed across the province.

TAF has significant concerns about the long-term energy and climate impacts of the new PPS. In the current PPS, Ontario directs development and land use patterns to prepare for the local and regional impacts of a changing climate. The Growth Plan also places sustainability and climate change as a key principle for guiding growth and development throughout its framework. The new PPS streamlines climate change policies by creating a separate section for them, weakening their role in growth management and planning.

TAF recommends that the province maintain the policy direction in the 2020 PPS and the Growth Plan to ensure land use and development supports energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate resilience.

We specifically suggest changing **section 2.9** to maintain the original reference to “**land use and development patterns**” that “encourage transit-supportive development,” “promote design and orientation which maximizes energy efficiency and conservation,” and “integrate green infrastructure”.

We also recommend maintaining the language in **section 3.1.1** that “infrastructure and public service facilities shall be provided in an efficient manner that **prepares for the impacts of a changing climate.**” Equally, the reference to “**green infrastructure**” in **section 3.1.2** should remain, as this is an important policy tool in responding to a changing climate.

Several municipalities have made robust recommendations to the provincial government on the PPS, including on climate change and energy policies. TAF supports the following municipal recommendations:

- The [City of Toronto](#) recommends the province maintain the current Provincial Policy Statement and Growth Plan policies that explicitly support energy efficiency, increased vegetation, and improved air quality.
- The [City of Brampton](#) recommends integrating climate change policies through the PPS 2023 that reflect the directions found in the PPS 2020 and Growth Plan, ensuring sustainable development patterns, requiring implementation of alternative and renewable energy systems, working to improve air quality and reduce greenhouse gas emissions, while ensuring climate risks, vulnerabilities and opportunities for adaptation are assessed and implemented through local official plans.

- The [City of Hamilton](#) recommends more robust climate change policies that include *targets* to provide municipalities with the ability to require green infrastructure and low impact development when reviewing Planning Act development applications. Specific reference should be made to the role of retrofitting existing buildings, including buildings of cultural heritage value, to achieve these goals.
- The [Town of Newmarket](#) recommends the province maintain the policies from the current PPS that direct development and land use patterns to promote transit supportive development, conserve biodiversity, and prepare for the regional and local impacts of a changing climate. These policy directions are important to help deter the inefficient use of land and infrastructure and protect natural heritage features.
- [Peel Region](#) recommends that climate change policies should be more fully integrated in the PPS and required more directly in growth management and infrastructure planning. This can be done by promoting efficient development and land use patterns and requiring that municipalities facilitate the introduction of renewable and alternative energy systems, including district energy, to support greenhouse gas emission reduction in planning decisions. Peel Region also requests that the province provide additional guidance to municipalities for conducting energy and emissions reduction planning and adaptation planning specific to land use planning.
- [York Region](#) recommends that climate change adaptation, mitigation, vulnerabilities, and increased resiliency should be integrated throughout the 2023 PPS, adequately reflecting their importance. The Region also argues that Public Health agencies should be included in the list of government agencies working to help identify and address health hazards associated with climate change.

Overall, greater consideration and integration of emissions-reductions policies must be incorporated into the provincial planning framework. Streamlining of provincial planning direction should not be at the expense of community and climate resiliency. Effective planning policies can protect and promote a healthy climate by improving air quality, supporting energy conservation and efficiency, promoting green infrastructure and transit supportive development, and reducing greenhouse gas emissions. Ontario has a responsibility to demonstrate leadership in providing planning direction and should take the opportunity to support municipalities in meeting both their housing and climate goals at the same time.