



ONTARIO  
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ALLIANCE

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Provincial Land Use Planning  
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Toronto, ON  
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By email: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

Re: ERO-019-6177 – Review of A Place to Grow and Provincial Policy Statement

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems across the province. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

The ORA is writing to express our serious concerns and opposition over the Ministry of Municipal Affairs and Housing (MMAH) review of *A Place to Grow (Growth Plan)* and the *Provincial Policy Statement (PPS)*. The MMAH is seeking input on how to create a streamlined province-wide land use planning policy framework that enables municipalities to approve housing faster to increase housing supply.

The province claims that “*Ontario needs more housing, and we need it now. That’s why the Ontario government is taking bold and transformative action to get 1.5 million homes built over the next 10 years.*”<sup>1</sup> This Environmental Registry of Ontario (ERO) posting is only one component of a large series of other interconnected ERO postings relating to Bill 23. Due to the short comment period at this busiest time of year for such a complex, vague, poorly considered, and destructive policy and legislative “*streamlining*”, it is impossible to fully understand the full scope or depth of resulting effects to provide any kind of meaningful input. It is crucial that all ERO postings are well planned, concisely written and defined in clear policy language so the public fully understands what is being proposed and its potential positive and negative effects.

The Ontario government, through Bill 23 and its multitude of complex and interconnected legislation and policy amendments, has:

- Removed municipal jurisdiction from upper-tier municipalities to make policy decisions on land use planning matters that are based on local community interests.
- Removed a significant financial source (permits/building fees) in which to help pay for water and wastewater services, sewers, transportation infrastructure, and community parks needed to service 1.5 million additional homes.
- Prohibited Conservation Authorities all across Ontario from providing practical advice to municipalities, their ability to issue permits, or provide input into environmental concerns.
- Failed to provide adequate public and Indigenous consultation relating to Bill 23 matters.
- Is proposing to streamline the qualifications program for Building Practitioners (ERO-019-6433).



It is obvious that this government considers citizens' interests, the environment and local municipal planning as a barrier that must be removed rather than as crucial considerations that must be balanced with responsible and sustainable development. This concerning mindset will ultimately lead to increased property taxes, pollution and compromised freshwater resources, poorly planned and ineffective infrastructure, gridlock, and increased vulnerability to climate change. Bill 23 will line the pockets of developers at the expense of Ontarians.

The *Places to Grow Act* and the *Growth Plan* were created to ensure that growth did not encroach on important agricultural lands and valued natural heritage areas and have provided key policy direction for municipalities regarding wetland protection.

The protection of our environment, agricultural lands, wetlands and natural resources must be assured. Yes, we must plan for an increase in population, housing, green spaces and infrastructure, but it must be done in an economically, socially and environmentally sustainable manner.

The *Growth Plan* is not a barrier to housing development, and there has been no evidence offered to support a need to revise either the *PPS* or the *Growth Plan* to increase available land for housing. There is plenty of space to grow within the existing settlement area boundaries without expanding into agricultural or natural heritage areas.

All of the above is in sharp contrast to Minister Steve Clark's May 2019 message in his *More Homes, More Choice: Ontario's Housing Supply Action Plan*, in which he states (underlining is for emphasis only), "We must build smart, and we must be flexible. Housing must be built in the right places, so we can maintain Ontario's vibrant agricultural sector and employment lands, protect sensitive areas like the Greenbelt and preserve cultural heritage. Every community should build in response to local interests and demand, building a mix of housing to accommodate diverse needs."<sup>2</sup>

ORA strongly opposes Bill 23 and any changes to the *PPS* or the *Growth Plan* that would result in the loss of protections for the Greenbelt or any natural heritage features or agricultural lands. This developer-centric proposal is designed to place developers' interests front and centre and above local community interests, the environment and agricultural and natural heritage values.

### **Recommendations:**

The ORA recommends that:

1. The review of *A Place to Grow* and the *Provincial Policy Statement* be withdrawn.
2. There be no further stripping away of protection for agricultural lands and natural heritage features.
3. The government must instead focus on ensuring environmentally and socially sustainable development.
4. There must be further consultation on the cumulative social and environmental effects of all of the policy and legislative changes resulting from Bill 23.

This government's primary focus should be on sustainable development and increasing resilience to climate change. Instead, it is increasing risks to communities and making Ontarians more vulnerable to the effects of a warming climate.



Thank you for this opportunity to comment!

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
(705) 866-1677

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<sup>1</sup> Review of A Place to Grow and Provincial Policy Statement, ERO 019-6177.

<sup>2</sup> More Homes, More Choice: Ontario's Housing Supply Action Plan, May 2019 – Steve Clark, Minister of Municipal Affairs and Housing. P-2/19. Online: <https://files.ontario.ca/mmah-housing-supply-action-plan-21may2019.pdf>