



December 30, 2022

Minister Steve Clark
Ministry of Municipal Affairs and Housing
College Park 17th Floor
777 Bay St, Toronto, ON
M7A 2J3

Dear Minister Clark,

Re. ERO #019-6177, Review of A Place to Grow and Provincial Policy Statement

On behalf of Ontario Nature and Environmental Defence, we would like to express our strong opposition to the proposal to replace the Provincial Policy Statement (PPS) and the Growth Plan for the Greater Golden Horseshoe with a new policy instrument aimed at accelerating housing development at the expense of other matters of provincial interest such as environmental protection, agriculture and climate change mitigation. The singular focus of the proposed new policy instrument, which would prioritize development at the expense of these other provincial interests, is completely at odds with the purpose of the PPS and the Growth Plan which are intended to provide comprehensive, integrated, balanced policy direction on land use planning. We urge you not to proceed with replacing these two key policies, which have been developed, updated and improved over decades based on the experience of municipalities and planners and through intensive public consultation. They are needed to allow Ontario to develop sustainable, resilient, prosperous and healthy communities.

We are particularly concerned about proposed changes that would promote sprawl development and lead to increased loss of farmland and natural areas, particularly in southern Ontario where development pressures are most intense. These include:

- Promoting settlement boundary expansions;
- Enabling more residential development in rural areas;
- Enabling municipalities to “promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development”;
- “Streamlining” policies intended to protect natural heritage; and
- Requiring fewer studies to support policy directions.

We do not support these proposed changes. The government's key underlying premise, that more land is needed for housing development outside existing settlement boundaries, is simply false. In its [2022 report](#), Ontario's Housing Affordability Task Force stated that a shortage of land is not the cause of the housing shortage:

Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts. ... Most of the solution must come from densification. Greenbelts and other environmentally sensitive areas must be protected, and farms provide food and food security. Relying too heavily on undeveloped land would whittle away too much of the already small share of land devoted to agriculture." (p.10)

The amount of land already designated for development and added to municipal settlement boundaries far exceeds what is needed to meet long range housing targets. That includes, for example, 86,500 acres within the Greater Toronto and Hamilton Area alone.

Sprawl development will not solve current housing needs, as your government pretends. To "streamline" existing policies so that precious farmland and natural areas can be paved over with more "speed and flexibility" spells disaster for the lands, waters and wildlife that sustain us. It is a move that would line the pockets of developers at the expense of the rest of Ontarians. We strongly object to your "analysis of regulatory impact" which is silent on the adverse environmental, social and economic impacts of sprawl development, the inevitable outcome of the proposed changes. To state that only positive impacts are anticipated is to deliberately mislead the public.

The timing of and approach to this review are particularly concerning. Numerous law and policy changes related to land use planning have recently been made through Bills 23 and 39 and associated initiatives (e.g., Greenbelt land removals, overhaul of the Ontario Wetland Evaluation System). Replacing the PPS and the Growth Plan will greatly exacerbate the confusion, chaos and burden placed on communities attempting to cope with these sudden and drastic changes.

Only days ago, at the 15th Conference of the Parties to the United Nations Convention on Biological Diversity, world leaders agreed to "take urgent action to halt and reverse biodiversity loss" and embraced 23 targets to achieve that end, including protecting at least 30 percent of our lands and waters by 2030. The proposed replacement of the PPS and Growth Plan would take Ontario in exactly the opposite direction, by spurring unnecessary sprawl development, especially in places that support high levels of biodiversity and many at-risk species, such as southern Ontario.

We urge you not to proceed with this proposal.

Yours truly,

A handwritten signature in blue ink that reads "Caroline Schultz". The script is cursive and fluid.

Caroline Schultz
Executive Director
Ontario Nature

A handwritten signature in black ink that reads "Tim Gray". The script is cursive and somewhat stylized.

Tim Gray
Executive Director
Environmental Defence