



## **Province poised to deliver fatal blow to agriculture and the environment while worsening the housing crisis**

May 18, 2023

On April 6, the Ontario government announced a proposal to gut two of Ontario's key planning tools – elimination of the Growth Plan for the Greater Golden Horseshoe and rewriting the Provincial Policy Statement under the Planning Act. The Province claims that these changes would address the current housing crisis. In fact, they would do exactly the opposite, squandering the scarce resources and developer capacity needed to address housing shortages, while destroying irreplaceable farmland and key natural areas and undermining long-term economic and social prosperity. Specifically, these proposed changes would:

- Forever change agriculture in the province so that it becomes extremely difficult for farmers to continue to grow the food we all rely on by allowing virtually unrestricted development on prime agricultural lands.
- Turbo-charge expensive and unsustainable sprawl development that would fragment and isolate farms and farm communities and force municipalities to spend more and more taxpayer dollars to build new infrastructure to service geographically dispersed development;
- Remove policies that require developers to build the diverse housing types Ontarians want and can afford in the neighbourhoods they want to live in;
- Worsen the homelessness crisis by eliminating policies needed to build truly affordable housing.

Building on the destructive planning changes that the Province passed in Fall 2022 (see [here](#) for our analysis), this latest round of attacks on Ontario's once-praised land-use planning system would remove the few remaining planning powers that democratically elected municipal councils have to guide growth and sustainable development in their communities. This would create a "wild west" where developers could build what they want, where they want and when they want. It would allow already powerful developers to further maximize their returns, regardless of the cost to others or how this would harm community interests. For the agricultural sector in Ontario, the consequences will be fatal as prime agricultural soils are forever lost to development.

### **Provincial Changes Completely Unnecessary**

The Province repeatedly states that these changes are necessary to address the housing crisis, which they insist can be fixed simply by opening up more rural and prime agricultural land to development. But they have not presented any evidence to support this land scarcity claim or the purported effectiveness of the rural sprawl "solution."

To the contrary, study after study has shown there is more than enough land already designated for urban growth in southern Ontario to meet all housing needs until at least 2050 (see [here](#), [here](#) and [here](#)). What is missing, and where the Province has repeatedly refused to act, is implementation of new planning rules that would incentivize and require the development of diverse housing types within existing towns and cities that meet the needs of Ontarians.

## **Civil Society Responds**

We, the undersigned, call on the Province to abandon its proposed land use planning changes and instead work with municipalities, civil society organizations and the land development sector to find solutions that will address Ontario's housing challenges and protect other values that are critical to the long-term prosperity and health of Ontario. We represent organizations from the following sectors: agriculture, land use planning, housing, tenants, environment, neighbourhood associations, labour, healthcare, academia and business.

### **Endorsed by:**

See the full list of over 250 individuals and 73 organisations, starting on page 6.

### **Spokespeople:**

Anne Golden (former Chair, Task Force on the Future of the GTA), David Crombie (Friends of the Golden Horseshoe), Mark Reusser (Farmer, Waterloo Region), Alejandra Ruiz Vargas (Toronto ACORN Leader and Board Member), Tim Gray (Environmental Defence Canada), Franz Hartmann (Alliance for a Liveable Ontario).

## **About the Alliance for a Liveable Ontario (ALO)**

We are an Alliance of people and groups representing hundreds of thousands of Ontarians from many different sectors. We want to build a liveable Ontario and stop the Provincial Government policies that falsely claim they will solve the housing issues facing us, while harming our communities and undermining the protection of our farmland, natural areas and democratic institutions.

Learn more at: [www.liveableontario.ca](http://www.liveableontario.ca)

## Summary Impacts and Detailed Analysis

At its highest level, the proposed elimination of the Growth Plan for the Greater Golden Horseshoe (GGH) with a revised Provincial Policy Statement (PPS) under the Planning Act represents an explicit abandonment of provincially led regional planning in the GGH. It discards the Growth Plan's strong economic, environmental and social emphases on accommodating growth and revitalizing our cities through intensification and redevelopment. It replaces this approach with much weaker, generic and non-binding "advice" to municipalities to build compact, complete and transit-supportive urban communities which would apply throughout Ontario.

Below is a list outlining the impact of the proposed changes, accompanied by a more detailed analysis:

**1. The Province would abandon planning tools that have coordinated how almost 10.8 million people living in the Greater Golden Horseshoe (GGH) design and build the places where they live**

- Repeal of the Growth Plan for the GGH
- No reference to the GGH in the new PPS
- No Growth Plan maps brought into the new PPS
- Complete abandonment of the "intensification first" vision for growth planning in the GGH
- Removal of all upper-tier(regional) municipal responsibility for allocation of population/employment oversight of urban boundary expansions and approval of official plans (lower tier municipalities now responsible)
- Allows "new" settlements to be developed in farmland across the countryside

**2. The Province would turbo-charge low-density urban sprawl and scattered development**

- Would abandon intensification targets in the current Growth Plan for the GGH.
- Would remove any requirement for comprehensive planning review to support urban boundary expansions, allowing these instead to happen incrementally at any time
- Would identify 29 "large and fast growing" municipalities to which only some policies apply and those are in the form of "encouragement" rather than mandated growth management rules (e.g. 50 people/jobs per hectare). The remainder – including 71 lower-tier (local) municipalities in the GGH are allowed to adopt their own density targets
- Would return to past permission for estate residential subdivisions in the countryside, further fragmenting the agricultural community and its supporting infrastructure of agri-food businesses
- Would require municipalities to designate "greenfield" development land for "at least" 25 years of housing supply (rather than "up to" 25 years)
- Would allow 96 lower-tier municipalities in the GGH to develop their own population/employment forecasts (for 25 years or longer )

- Would change rules so that Ministerial Zoning Orders (MZOs) – special directives from the Minister of Municipal Affairs and Housing – do not need to be consistent with any provincial policies/plans or municipal official plans
- Would provide the Minister with more authority and power over use of MZOs where the Minister can now apply an MZO for housing on lands that are not designated for housing within an official plan and force the municipality to provide infrastructure and servicing to the development.

**3. The Province would eliminate farmland protection rules, erect barriers to future farmers, and undermine the agricultural sector.**

- Would allow every landowner the ability to sever every “lot or parcel of land” they own to create 3 new lots, even in prime agricultural areas, regardless of whether they had any prior severances. And, under Bill 23, each lot can have up to 3 units on it, similar to towns and cities. This would create uncontrolled development and traffic congestion on rural roads and increased conflicts between rural homeowners and farmers. It would be increasingly difficult to maintain Minimum Distance Separation (MDS) guidelines and make it harder for farmers to farm.
- This will also lead to an even greater increase in farmland prices. Young farmers cannot afford farmland now. With 65% of the farming community nearing retirement age, this would undermine the future of our agricultural communities.
- Would allow aggregate operations on specialty crop lands (e.g. grape, tender fruit, Holland Marsh)
- Would abandon the Agricultural System map and policies that municipalities have been working on for years to be able to plan for the protection of prime agricultural lands and services that support the agri-food industry in Ontario.

**4. The Province would eliminate important methods for identifying and creating truly affordable housing**

- Would abandon definitions for “affordable” housing and “low/moderate income households ”
- Would remove “rooming houses” from the definition of housing options

**5. The Province would remove planning methods that could be used to build different housing types in places where people want to live**

- Would abandon intensification targets in the Growth Plan for the GGH
- Would abandon entire “intensification first” vision for growth planning in the GGH
- Would allow “new” settlements, which is likely to create major sprawl in the countryside
- Would promote low-density sprawl that would create deficits of structural infrastructure (e.g. sewer and water lines, roads)
- Would allow developers to direct the limited supply of skilled construction workers and materials to sprawl development

**6. The Province would abandon community-building**

- Would abandon Growth Plan policy (e.g. a sense of place) by stopping the promotion of well-designed built form and cultural planning, and by eliminating tools that help define character, including built heritage resources and cultural heritage landscapes
- Would abandon the defined term “public realm”

**7. The Province would abandon building transit-supportive communities**

- The entire “transit first” priority of the Growth Plan for the GGH would be abandoned
- Density targets and spatial delineation requirements for Major Transit Station Areas outside of Large and Fast-Growing Municipalities would be deleted
- Minimum transit-supportive densities (people/jobs per hectare) would be abandoned
- Requirement and metrics for major office developments to locate on existing/planned transit corridors would be deleted
- Emphasis would be solely on transit corridors and stations – i.e. community-wide transit-supportive development patterns would be lost

**8. The Province would harm our sewer and water infrastructure**

- Would weaken commitment to planning in relation to life-cycle costs of infrastructure (i.e. changed from requiring to encouraging)
- Promotion of low-density sprawl reveals lack of understanding that this development pattern creates structural infrastructure deficits
- Would abandon the policy prohibiting Great Lakes water pipelines to inland communities (except in cases of health concerns)
- Would abandon the requirement for environmental assessments for sewer/water infrastructure to accompany urban boundary expansions

**9. The Province would harm Ontario’s watersheds**

- Would weaken the commitment to watershed planning and would rely on municipalities rather than on conservation authorities to prepare watershed plans
- Would remove the requirement for watershed plans to be completed in advance of urban boundary expansions

**10. The Province would damage the efforts to protect our built heritage**

- Policies would be weakened to speak only to “protected heritage policies” rather than “cultural heritage resources,” meaning that only heritage-designated properties would be protected or planned for; would align with revised Heritage Act

**11. The Province would eliminate tools to help Ontario become climate-resilient**

- Would eliminate the entire Climate Section of the Growth Plan for the GGH
- Would remove the policy on “alternative energy systems” (i.e. renewables)
- Would abandon the policy calling for municipalities to plan water resource systems with a climate change lens

## **12. The Province would remove the employment areas that we need to keep and create jobs**

- Redefines employment areas to remove office, institutional and commercial areas (in keeping with change to Planning Act definition)
- Would allow incremental removal of employment lands where previously, that was permitted only through a comprehensive official plan review
- Would abandon the strategic employment and gateway economic zones framework of the Growth Plan for the GGH (provincially significant employment zones still to be determined)

## **13. The Province would undermine efforts to manage our increasingly precious soil**

- Would abandon the policy requiring municipalities to prepare strategies to manage and oversee the removal and placement of excess soil (e.g. from subway, condominium and other urban excavations) – a policy that ensures contaminated soils are not placed on farmland

### **This Report has been endorsed by the following individuals and organisations:**

ACORN Canada	Bill James-Abra, Climate Momentum (Stratford, ON)
Alda Bianco-Dolino	Bill Patterson
Alexis Harriman	Brent Kopperson, Windfall Ecology Centre
Alja Pirosok	Bruce Novakowski
Amanda Lewis	Burkhard Mausberg, Small Change Fund
Andrei Luca	Carol Good
Andy Fisher	Carol Goodwillie
Angela Skrllec Cordeiro	Carolanne Forster
Angus Inksetter, Saugeen Nature	Carolyn Heath
Anita Payne De Gaia	Cath Blue
Ann Rait	Catherine Brown
Ann Raney, Great Blue Marble Group	Catherine Flear, Climate Action King
Anne Bell, Ontario Nature	Charlene. Jones
Anne Forbath	Charlotte frederickson
Anne Golden, former Chair, Task Force on the Future of the GTA	Cheryl Lewandowski, Blue Dot York Region
Anne Purvis	Cindy Weiner, St. Andrew's Ratepayers Association
Annemarie Reimer	Claire Malcolmson, Rescue Lake Simcoe Coalition
Annette Gibbons	Claudia Espindola
Annette Taylor	Colleen Cooper
Anurita Gurukar	Craig Bamford, Pickering Matters and Stop Sprawl Matters
Autumn Jordan	Dana Snell
Barbara Emanuel	David Braden, Windrush Farm
Barbara Schumacher, 50by30 Waterloo Region	David Chapman, West Willowdale Neighbourhood Assoc (member)
Barry Stanley	David Crombie, Friends of the Golden Horseshoe
Beate Bowron, Beate Bowron Etcetera	David Kraft
Becki	David Lubell, Council of Canadians
Beth Doubt	David Martin, HoT GLACiER FILMS
Beth Savan	David Milne
Bev Falco, Earth Works West Grey	David Strachan
Beverley Golden	

Debbie Fletcher-Queen  
 Debra Foster  
 Diana Jardine, High Park Tenants Association  
 Diana Turchin  
 Diane Chin, Architectural Conservancy Ontario  
 Diane Wilson  
 Don Young  
 Don Young, Federation of South Toronto Residents Associations (FoSTRA)  
 Donna Czosnek  
 Donna Deneault  
 Donna Ferguson  
 Dorothy Thomas  
 Dorothy Wilson, Nith Valley EcoBoosters  
 Doug Haymes  
 Doug Winch, Climate Action Sarnia Lambton  
 Douglas Buck  
 Dr. Claudette Holloway, RNAO  
 Dr. David T. Brown, Dept. of Geography and Tourism Studies, Brock University  
 Dr. Doris Grinspun, RNAO  
 Dr. Paul Kraehling, University of Guelph  
 elizabeth estall  
 Erika , The Green Vibes  
 Erin Bycroft  
 Eugene Todd  
 Fiona McMurran, Biodiversity and Climate Action Niagara  
 Fred Hahn, CUPE Ontario  
 Gabriella Kalapos , Clean Air Partnership  
 Gail Fairley, SCAN  
 Gail Schenk  
 Gary Davidson, The Davidson Group Inc.  
 Geoff Green  
 Geoff Kettel and Carol Burtin Fripp, Co-Presidents , Leaside Residents Association  
 Geordie Dent, FMTA  
 Ginny Colling, Scugog Climate Action Now  
 Giulio Papillo  
 Gloria Marsh, York Region Environmental Alliance  
 Gord Irish  
 Gord McNulty  
 Gordon Bogden, Moore Park Residents Association  
 Guillermo Vega  
 Gwen Harris  
 Harold Fisher  
 Heather Patterson  
 Hélène Pauly  
 Hilde Reis-Smart  
 Irene O'Toole  
 J. Bruce Craig Concerned Citizens of King Township  
 Jacinta McDonnell , Plant Based Treaty  
 Jaime Kearnan  
 Jaimee Gaunce

Jamal Stetieh  
 Jan Beveridge, Save Our Water  
 Jane Woolsey  
 Jeff Latto, SEDRA (South Eglinton Davisville Residents Association)  
 Jeffrey Aarles  
 Jenn Brasch  
 Jerry Asling, Saugeen Nature  
 Jill Black  
 Jill Jones  
 Jill Tonini  
 Jim Stevens  
 Joan Telfer Faux, Greenbelt West Coalition  
 Joanne Harrington  
 Jocelyn Davie  
 Joe Nobrega , Wenderly Park Community Association INC  
 Johanne Fortier  
 John Atkinson, Ontario Public Health Association  
 Judith Man  
 Judy debeer  
 Judy Maddren  
 Judy Walker  
 Karen Goldenberg  
 Karen Jones  
 Karen May, Design climate action  
 Karen Nystrom  
 Kate Chung  
 Kathleen OHara  
 Katie Harper  
 Katie Krelove, Wilderness Committee Ontario  
 Kelley Hindrichs, Biodiversity and Climate Change Niagara  
 Ken Greenberg, Greenberg Consultants  
 Kenneth Brown  
 Kerry Hill  
 Kevin Eby  
 Kevin Rupasinghe, Scarborough Community Leader  
 Kevin Thomason, Grand River Environmental Network  
 Kim Perrotta, Canadian Health Association for Sustainability and Equity (CHASE)  
 Klara Young-Chin  
 Kringen Henein  
 Kuntesh Chandaria  
 Laurel Rothman  
 Laurna Germscheid  
 Leslie B. Baird  
 Leslie Pomer, St. Andrew's Ratepayer's Association  
 Leslie Yeates  
 Letitia Charbonneau, SCAN Ottawa  
 Linda Heron  
 Linda Lackey  
 Linda Pim

Liz Benneian, Biodiversity and Climate Action Niagara  
 Lorraine Green, Grandmothers Act to Save the Planet (GASP)  
 Lucie Fridrich, St Andrew Rate Payers  
 Lucrezia Chiappetta, ecoCaledon  
 Lyn Folkes  
 Lynda Goodridge, Bert Miller Nature Club  
 Lynn Gilmore  
 Lynn Morrow, Friends of the Golden Horseshoe  
 Marc Willoughby  
 Margaret (Peggy) Stevens, Climate Action Newmarket-Aurora  
 Margaret Little  
 Margaret Newall  
 Margaret Prophet, Simcoe County Greenbelt Coalition  
 Margarete Wiebe  
 Marie Lloyd, 350.orgKingston  
 Marilyn Minden  
 Marjorie Edwards  
 Mark Reusser, Farmer  
 Martin Straathof, Ontario Farmland Trust  
 Mary Ann West  
 Mary Anne Wollison  
 Mary Buie  
 Mary Lou Knechtel, Brant Land Trust  
 Mary-Anne Draffin  
 MaryAnn Jansen  
 Matilda Samuel  
 Matt Adams, Fourth Pig Green & Natural Construction  
 Mauriça Connell  
 Max Hansgen, National Farmers Union - Ontario  
 Maxim Voronov, PhD  
 Maya Ferguson Klinowski  
 Mehrzad Namdari  
 Melinda Zytaruk  
 Michael Capotosto, West Lansing Homeowners' Association  
 Michael Douglas  
 Michael Nault  
 Michele Bruno, Liveable Richmond Hill  
 Michelle Davies  
 Michelle Distasi  
 Miria Ioannou, Republic Residents' Association  
 Monica Woodley  
 N. Trudell  
 Nasseem Hakimian  
 Natalie  
 Neda Noorbakhsh  
 Neva Lorenzon  
 Nikki May  
 Noella Kyser  
 Pamela Brohm  
 Pamela Johnson  
 Pamela Vega

Patrick Bednarek  
 Patrick McCartney  
 Paul Berger, CUSP - Citizens United for a Sustainable Planet  
 Paul Posesorski  
 Phil Dawes, Council of Canadians - Ottawa Chapter  
 Phyllis Creighton, Climate Action Committee, Christ Church Deer Park  
 Ralph McKim  
 Ravi Venkatesh  
 Rebecca Stevens  
 Rob Levery, Niagara Escarpment Foundation  
 Rob Samulack, Ontario Nurses for the Environment Interest Group - RNAO  
 Robert Garthson, Ontario Climate Emergency Campaign  
 Robert McGill  
 Robert Murray  
 Ron Reid  
 Rosemary Heather  
 Ruth and Andy Patterson  
 Sally, Sharon Creek Farm  
 Sandra Gregson  
 Sandra Marshall  
 Sandra St Germain  
 Sara Washburn  
 Scott Stevens, Teddington Park Residents Association  
 shannon rancourt  
 Sharon Moidie  
 Sharon Zeiler  
 Sheila  
 Sheila McKee-Protopapas  
 Steve Shales  
 Steven Frank  
 susan fulop  
 Susan Pepper  
 Susan Robertson, People Plan Community  
 Susan Sheard  
 Suzanne Thomas  
 Sylvia Puvko  
 Teresa Ganna Porter, Climate Action Newmarket Aurora  
 Teresa Porter, Climate Action Newmarket Aurora  
 Terry Poulton  
 Tim Gray, Environmental Defence Canada  
 Toronto & York Region Labour Council  
 Victor Doyle  
 Wanda Wrobel  
 Wayne Caldwell  
 William Murray  
 Yvonne Pigott  
 Zoe Green, Action 13