

DRAFT

June 5, 2023

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

Dear Minister Clark,

Re. ERO #019-6813 Replacement of the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe

On behalf of the 62 undersigned organizations, 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 (Growth Plan) with the new Provincial Planning Statement. The proposed changes would accelerate urban sprawl and the ongoing loss of farmland and natural areas in Ontario, especially in the Greater Golden Horseshoe, one of the largest and fastest growing regions in North America.

The government's underlying premise, that more land is needed for housing development outside existing settlement boundaries, is demonstrably false. Research has shown that there is more than enough land already designated for urban growth in southern Ontario to meet all housing needs until at least 2050.¹ Your ministry has provided no evidence to the contrary. In fact, the 2022 report of the government-appointed Housing Affordability Task Force clearly indicated that a shortage of land is not the cause of Ontario's 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 proposed replacement of the PPS and the Growth Plan is deeply concerning, given that these key provincial policies provide comprehensive, integrated, balanced direction on land use planning. Instead, the proposed new Provincial Planning Statement would jeopardize decades of progress on land use policy with changes that would:

- Eliminate mandatory intensification and greenfield density targets that were designed to rein in urban sprawl.
- Remove the requirement for municipalities to plan according to specific population and employment targets for a horizon year, thus eliminating a fundamental aspect of coordinated growth planning for Ontario.

¹ See, for example, Kevin Eby (February, 2023), "Review of Existing Housing Unit Capacity Identified in Municipal Land Needs Assessments Prepared for Upper- and Single-tier Municipalities in the Greater Golden Horseshoe."

- Allow municipalities to expand settlement areas at any time without a comprehensive review of associated infrastructure needs or potential impacts on farmland and natural areas.
- Remove the policy for and definition of “affordable” housing, so that it would no longer be required to be built as part of residential developments.
- Force municipalities to allow three lots to be severed from every farm, even in prime agricultural areas.
- Exempt lands that are the subject of [Minister’s Zoning Orders](#) (MZOs) from complying with provincial policies and official plans. For example, the Minister would have the power to apply an MZO for housing on lands not designated for housing and force the municipality to provide infrastructure and servicing for the development (paid for by taxpayers).
- Weaken the commitment to watershed planning and remove the requirement for municipalities to complete watershed plans prior to expanding urban boundaries.
- Allow aggregate operations on specialty crop lands (e.g., tender fruit, grape, Holland Marsh).
- Weaken and eliminate policies that address climate change. Growth Plan climate policies – for example, those focusing on achieving more compact, transit supportive design through increased intensification and denser greenfield development – would be abandoned in their entirety.

These are only some of the proposed changes that would fundamentally undermine smart growth and sustainable land use planning in Ontario. Others involve weakening rules and standards for water pipelines, employment areas and development along public transit lines.

In sum, we are deeply concerned that the government is abandoning its long-standing policy commitment to promote compact, transit-friendly development and prevent sprawl. Instead, it appears that the new policy thrust is to allow unfettered growth and scattered residential lots and subdivisions anytime and anywhere, including on prime agricultural land.

This approach spells disaster for the lands and waters that sustain us, especially in places that support high levels of biodiversity and at-risk species, such as southern Ontario. The approach would also fuel more farmland loss which is already occurring at the shocking average rate of 319 acres per day.²

We urge you not to proceed with the proposed policy changes outlined above.

Yours truly,

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² Ontario Federation of Agriculture, “Ontario farmland under intense pressure,” <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure/>

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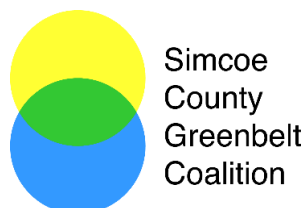
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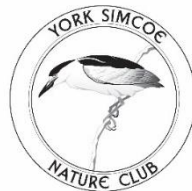
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