

August 18, 2023

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Auditor General of Ontario
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J. David Wake, K.C., Integrity Commissioner
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Dear Ms. Lysyk and Mr. Wake,

The Auditor General's recent *Special Report on Changes to the Greenbelt* revealed that some extremely serious, disturbing and indefensible processes were followed by the Minister's Office at the Ministry of Municipal Affairs and Housing (MMAH) with respect to the removal of land from Greenbelt protection in November 2022.

In particular the report cited:

- Lack of need for additional land to accommodate the Province's housing targets as demonstrated by the Province's own Housing Affordability Task Force and other independent studies.
- Lack of consultation with Indigenous peoples and leaders, important stakeholders and the public.
- Lack of meaningful input and direction by experts.
- Dropping of servicing capabilities and environmental screening criteria when they conflicted with the selection of preferred developer lands.
- Huge financial benefits for a select few property developers without discernible benefit to the people of Ontario, including taxpayers.
- About 92% of the land removed was identified in documents submitted to the MMAH Chief of Staff by two developers.

We know that the Integrity Commissioner is investigating these processes and activities.

We, the undersigned, are concerned that the problems identified by the Auditor General run deeper and merit more attention by the Integrity Commissioner and **an additional, new investigation by the Auditor General.**

As noted in the Auditor General's report, since July 2022 MMAH has made a host of policy changes with respect to Ontario land use planning. There was little to no public input in the

proposals to date and virtually no changes were made to the original proposals despite significant public opposition to these changes. These changes include:

- Expanded use of Ministerial Zoning Orders (MZOs) with little or no public input.
- Significant legislative changes made through Bill 23 (for example, dramatically reducing the powers of Conservation Authorities and transferring significant development related costs to taxpayers).
- Elimination of the Growth Plan for the Greater Golden Horseshoe and upper tier official plans.
- Eliminating density targets for new development and thus locking in inefficient use of land and accelerated farmland and natural areas loss.
- Removing planning decision making from upper tier municipalities.
- Forcing municipalities to significantly expand their urban boundaries to include lands not required to accommodate forecasted growth or to meet provincial housing targets.
- Gutting Ontario's Wetland Evaluation System to such a degree that Conservation Authorities have estimated that over 80% of the wetlands that currently receive protection will lose this status.

We, the undersigned, are concerned that these policy changes and others may have been the result of indefensible processes similar to those identified with the Greenbelt land removal. For example, to the best of our knowledge no consultation except with the development industry occurred during the formulation of the significant policy, fiscal and governance changes proposed through Bill 23.

Accordingly, we ask the Auditor General to investigate the processes that were followed to make the above policy decisions. We would like to know whether these processes are defensible, whether, as with the Greenbelt exclusions, these decisions stand to benefit only a small number of select interests — and whether this decision-making structure and its outcomes provide Ontarians with value for money.

We also ask the Integrity Commissioner to expand his investigation to include these additional policy changes.

Transparent, defensible and unbiased land use planning is a cornerstone of a healthy economy and democracy. We are concerned that, given the revelations from the Auditor General's report about the Greenbelt land removal, there is a disturbing possibility that other recent provincial land use planning policies may have and may come from equally problematic processes.

Investigating the provincial government's land use decision-making processes requires an expanded investigation by the Integrity Commissioner and a new investigation by the Auditor General. We urge your office to make these investigations a priority.

Sincerely,

Alliance for a Liveable Ontario Coordinating Committee Groups and Members

ACORN Canada	Jane Fogal, Halton Hills Climate Action
Anne Bell, Ontario Nature	Lynn Morrow
Franz Hartmann, Alliance for a Liveable Ontario	Kevin Rupasinghe
Fred Hahn, Canadian Union of Public Employees, Ontario	Mark Reusser, Farmer
Ian Borsuk, Environment Hamilton	Max Hansgen, National Farmers Union - Ontario
Jaimee Gaunce	Tim Gray, Environmental Defence Canada

Alliance for a Liveable Ontario Founders and Others

Anne Golden, Former Chair, Task Force on the Future of the GTA
Burkhard Mausberg, Small Change Fund
Cherise Burda, Toronto Metropolitan University
David Crombie, Friends of the Golden Horseshoe
Joan Faux, Greenbelt West Coalition
Ken Greenberg, Greenberg Consultants Inc
Kevin Eby, RPP, PLE
Kevin Thomason, Grand River Environment Network
Liz Benneian, Biodiversity and Climate Action Niagara
Margaret Prophet, Simcoe County Greenbelt Coalition
Mark Winfield