In its current for, I absolutely:

* Oppose Bill 66 – Schedule 10
* Oppose the open-for-business planning Tool
* Oppose the New Regulation under the Planning Act for open-for-business planning tool

The potential damage of Bill 66 – Schedule 10 and the associated open-for-business planning tool and new regulations go far beyond the obvious threats to public health if The Clean Water Act is no longer prioritized. The Bill, Tool, and New Regulation can undo decades of valuable legislation and directly contradicts the government’s own future plans. Biodiversity will decline further and efforts to restore habitat and reduce pollution will be seriously impinged. The damage done has the potential to escalate over time due to human nature and will reduce the liveability and sustainability of communities in Southern Ontario. The Ontario Government must withdraw Schedule 10 from Bill 66 and withdraw the open-for-business planning Tool and its associated New Regulation under the Planning Act.

The effort, time, expertise, and public consultation that went into developing regional plans exemplifies thoughtful, democratic regional planning that must be respected. For example, to develop The Oak Ridges Moraine Plan, an advisory panel of 14 stakeholders, an inter-ministry team of senior government officials, four public consultation forums involving 2000 people, approximately 1200 written submissions eventually led to the regulations recognized today in numerous other planning documents and all local official plans. (Ontario, 2018). Similar processes have been followed for almost two decades to create other legislation so that planning decisions within local municipalities are compatible regionally and are based on ecology, sound research, and public engagement. Schedule 10 of Bill 66 was not the result of consultation and was announced strategically to minimize the ability of citizens, organization, and municipal governments to appropriately respond. It authorizes municipalities to create bylaws to allow job-creating developments to occur that do not meet the purposeful and beneficial constraints of nine Acts and potentially additional provisions. This completely undermines the purposes of these Acts and creates unfair discrepancies in obligations between properties. The Canadian Environmental Law Association provides a thorough explanation, in plain language, of exactly what provisions from these Acts can be ignored for the potential benefit of quick approval and as few as 50 jobs. (Lintner, 2018) These Acts were specifically created for the conservation of land and water that provide valuable ecosystem services, protect biodiversity, and help with climate change adaptation and mitigation, for increasing liveability and sustainability of growing communities, and for safeguarding the health of the residents of Ontario. Schedule 10 directly conflicts with Dufferin County’s Official Plan (2.0, 2.1, 2.2, 3.3.1 (a)) and the Conservative’s own *Ontario’s Environment Plan*, “to continue to protect and identify vulnerable waterways and inland waters…and continue to implement the Lake Simcoe Protection Plan” (p.13) and, “protect and enhance our natural areas, support conservation efforts, continue to conserve species at risk, develop adaptation strategies, and promote the importance of healthy natural spaces for future generations to use and enjoy” (p. 46). It also clearly states, “The Ontario government is committed to protecting the Greenbelt for future generations.” (p. 48). Allowing development according to Schedule 10 and the Planning Tool does not demonstrate any such commitment.

The ecosystems of the Greenbelt and the proposed expansion need more protection, not less. The primary threat to the 97% of the 78 provincially listed species at risk that live on the Greenbelt is loss and fragmentation of habitat (David Suzuki Foundation & Ontario Nature, 2011). Many species require intact expanses of forests, but some are still able to survive if corridors of natural spaces are protected and expanded so that species can migrate and fulfill their needs throughout all parts of their lifecycle. To this end, virtually all conservation authorities work extensively to restore forest, meadow, and aquatic habitat, engage landowners through education programs and planting programs to restore private land, and engage youth through education and volunteer experiences. Credit Valley Conservation has planted nearly 6 million trees in their history. (CVC Foundation, 2017) Many other organizations, community groups, and private landowners (myself included) also work hard to expand and improve local ecosystems. Schedule 10 and the Planning Tool will completely undermine and will likely undo many of the improvements made in local ecosystems by removing pockets of habitat and increasing fragmentation. The ecological restoration work benefits humans too by improving water quality, absorbing excess rainfall, and reducing temperatures. For mental and physical health, people need access to nature. Irresponsible development will push natural spaces farther away from the communities that need them most. Already there are high school students who think the few trees near the school fence or along a local creek are a forest.

If there exists an opportunity to take shortcuts and profit whatever the cost to the environment, too many people will not hesitate for a moment and Southern Ontario will return to a low density sprawl model that is clearly flawed. Municipal Councils and the Province itself are already under tremendous pressure from developers and speculators to open protected land, even without Schedule 10 and the associated Planning Tool. In the 2017 Greenbelt review process, there were over 650 requests to remove land from protection, totaling a land area of almost 11,000 Ha. (Greenbelt Alliance) (interactive map at [https://www.google.com/maps/d/viewer?mid=1PbYE-LkNpKxDQwlrw\_yNu3E8KM&ll=44.18268322910164%2C-79.84305599999999&z=8](https://www.google.com/maps/d/viewer?mid=1PbYE--LkNpKxDQwlrw_yNu3E8KM&ll=44.18268322910164%2C-79.84305599999999&z=8) ). Fortunately, the province refused these requests. Schedule 10 and the Planning Tool will remove this level of due process and allow development to occur in a haphazard and sprawling manner. Although many municipalities have already stated their opposition, the existence of such an easy route to development will eventually, or very quickly, lead to intense lobbying that some councils will succumb to. Development approvals with no opportunities for comment and no opportunities to appeal remove democratic citizen engagement. The jobs that these sites are required to provide will not be accessible to people without cars because they will be beyond the reach of town and city transit systems. Transit becomes efficient and cost effective for municipalities and a viable option for commuters when densities are high enough to justify frequent service. If commuters can live close to their workplace in complete communities, they may also be able to commute by bicycle and cycling infrastructure can effectively be incorporated into city design. In a time when the region has been trying to focus on improving transit and encouraging active transportation to reduce traffic congestion and carbon emissions, a mechanism to encourage sprawl is catastrophic.

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