**ERO Postings 019-6177, 019-6216 & 019-6172**

**Review of A Place to Grow and Provincial Policy Statement**

**AND**

**Proposed Amendments to the Greenbelt Plan**

**AND**

**Proposed Planning Act and Development Charges Act, 1997 Changes: Providing Greater Cost Certainty for Municipal Development-related Charges**

To whom it may concern,

I’m writing to express my profound disappointment and concern with sweeping changes proposed to Ontario’s planning framework (through the redistribution of responsibility and revenue-generation capacity); its keystone planning policies (in the Frankenstein amalgamation of the PPS and Places to Grow), and the crown jewel of Ontario’s generational reforms of the mid-2000s (via corrosion of the Greenbelt). The regressive policy directions signalled in these postings are troubling – but the specifics of the changes are shady at best, and abhorrent land-speculation-turned-insider-trading at worst.

Proposed changes to the PPS and the Growth Plan for the Greater Golden Horseshoe are confusing, given the Growth Plan’s design as an area-specific tool for intensification and transit-oriented development within Ontario’s economic engine, and the PPS’ fundamentally different, higher-level role in guiding the form and location of development across Ontario’s range of urban and rural areas. If the resultant document is used to provide more support for resilient development in communities outside the GGH – i.e. expanding rather than contracting the reach of requirements for compact community-building – then perhaps the long-term impacts could be stomached. However, the focus on expanding settlement boundaries, restricting density targets to MTSAs, and supporting residential development in rural areas devoid of hard and soft services outlined in the posting description are tiresome, ecologically deleterious, and socially damaging. These harms are not debatable outcomes of sprawl – they’re well-documented in the literature and obvious throughout southern Ontario. To see them put forth so brazenly in these postings as policy objectives is distressing to say the least.

The dispersion of planning responsibilities from the Minister’s least-favourite upper-tier municipalities to lower-tiers and MMAH is bizarre and promises not to make approvals simpler and faster, but more complex – bogging down lower-tier planning offices and the OPS alike, saddling already-stretched staff with limited experience processing subdivision applications with additional work, and reducing the ability of urban regions (a level of government becoming more important in the 21st century, not less) to service their increasingly-contiguous and expansive settlement areas in a coordinated and efficient manner. Widespread revisions to urban boundaries in many recent Official Plan approvals by the Minister’s Office pose an extra maddening short-term challenge for upper-tiers (should they continue to exist), as they scramble to revise servicing plans for farther-flung greenfield areas that should not be developed given their agricultural and natural heritage values, at the same time that their planning teeth are forcibly removed, and development charges (used to fund these expansions) and other sources of financing are clawed back. It’s despicable policy-making that trades short-term land supply (not to be confused with guaranteed housing supply – very little has been done to change the economics of homebuilding) for long-term public costs: budget shortfalls associated with DCs will have to be financed by municipal property tax increases, a political bill we can only hope this government will be forced to pay, but will more likely be laid at the feet of municipal councils facing no other choice but to tighten the regressive screws on its tax base in the years to come. The probable chaos and buck-passing, it appears, is the point.

Proposed land swaps in the Greenbelt are particularly appalling – a review of ownership for many of these lands reveals a patently-obvious theme of favouritism and shameful knee-bending on the part of Minister Clark to BILD and its lobby, whose desire to pave farmland and fill wetlands in favour of sprawling 1970s development patterns is laughably well-advertised. There are also perverse consequences associated with adding the Paris-Galt Moraine to Greenbelt lands, as the additional extractive potential under Greenbelt policies present new vulnerabilities for important groundwater resources compared to existing protections under municipal land-use policies. In sum, these proposals represent an obvious net-negative for the province. All land is not created equally in terms of natural heritage, water resources, and agricultural productivity – a notion inexplicably lost on our most important decision-makers.

I would urge the government to take a different, more incremental approach to the reform of our planning and land development system in Ontario, with at least a partial eye to the long run and recognition of the well-documented social and cultural consequences of further suburban expansion and environmental encroachment – and the costs to society this path entails.

Regards,

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