

December 29, 2022

To Whom It May Concern:

Re: ERO #019-6177 Review of A Place To Grow and Provincial Policy Statement

Introduction

Following is my response to the questions posed regarding the above review of the legislative and regulatory changes to combine The Place to Grow with the Provincial Policy Statement (PPS) to create a streamlined, province-wide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply.

General Observation & Overall Comments

The choice of timing to post this ERO over the Christmas holidays couldn't have happened at a worse time for the public to respond. Tabling most of the ERO policy changes related to Bill 23 during December has not gone unnoticed as another attempt to thwart public participation during the holiday season when people and communities are pre-occupied attending to celebratory preparations and events. In addition, insufficient time is being allowed for meaningfully public input related to the magnitude of the changes proposed. The questions are also leading questions, narrowly focussed on the supply of housing rather than on the complexity inherent in the current crises of affordability. Combining a specific planning document such as a growth plan, to be at par or to indeed trump a visionary policy statement such as a PPS, is backwards, short-sighted and a maladaptive governance approach to address the concept of good planning that is required to deal with the complexity and inter-connectedness of societal issues.

Question 1 – What are your thoughts on the proposed core elements to be included?

RESIDENTIAL LAND SUPPLY

1. Settlement Area Boundaries

Expanding municipal boundaries to develop affordable housing places additional burdens on municipalities to open up lands for development which requires additional human and financial resources, as well as additional resources to meet the need for the required infrastructure. These costs will ultimately be transferred to the public through increased property taxes.

2. Rural Housing

Taking up more land to develop housing increases sprawl and the need to build roads and transportation networks to get people from rural areas into the cities where the employment and services are. Suburbia has limitations in regards to meeting broader societal outcomes for community vitality, accessibility to services, walkability and affordable living standards.

ATTAINABLE HOUSING SUPPLY AND MIX

1. Housing Mix – to meet project market demand

Reliance on a housing market which is currently out of control, both from the standpoint of increased cost for single family dwellings as well as sky-rocketing rental rates, does not ensure

that the proposed supply of housing will be anywhere near affordable. No evidence is provided of commitment from developers to provide affordable housing or to build below market rates.

2. Major Transit Station Areas

Rather than increasing municipal responsibilities through increased sprawl and costs for the tax payer, the Ontario Housing Affordability Task Force identified there is land already available. To identify future housing that will become available over the next ten years, conduct future demographic predictions regarding the aging baby boomer population. Empty buildings could be renovated which would be less costly and also reduce the need to develop additional infrastructure.

3. Urban Growth Centres

Intensification of urban areas is a positive approach to make cities more liveable, walkable and inclusive. Provide additional greenspace within urban and rural areas to provide the required recreational and leisure spaces which contributes to healthy lifestyles.

GROWTH MANAGEMENT

There is lack of recognition regarding the limits to growth. Environmental and social thresholds can and do collapse where the likely outcome becomes worsening environmental degradation, increasing impacts of climate change and mounting costs to the public purse to fix problems when they occur.

ENVIRONMENT AND NATURAL RESOURCES

1. Agriculture

Protecting the Greenbelt from development will help meet the government's objective to minimize negative impacts to farmland and farm operations. Ontarians are experiencing a cost-of-living crisis where food security has become a major issue for many families. Paving over farm land is counter-intuitive and counter-productive. Responsible governments need to ensure a consistent healthy food supply at affordable prices rather than trade off food security for housing. The Ontario's Housing Affordability Task Force noted there is sufficient land already available for housing. This land should be developed long before agricultural land is compromised.

2. Natural Heritage

Natural living systems such as wetlands cannot be created like a machine. Offsetting wetlands by establishing them in another area will not mitigate local ecosystem impacts caused by paving over or otherwise impacting sensitive wetlands. Offsetting defeats the integrity needs of local eco-systems.

3. Natural and Human Made Hazards

The dismantling of Conservation Authorities' (CA) responsibilities regarding watershed management and prohibiting municipalities from accessing their services reduces environmental protections of natural features and the effectiveness and efficiency of decades of CA knowledge, expertise and services since the late 1940s. Transferring responsibility to a non-government agency such as Ducks Unlimited leaves little institutional confidence or accountability for the public interest.

4. Aggregates

Aggregates are not a sustainable resource and aggregate extraction has the potential to create social and environmental impacts that can have long term and/or irreversible effects. Aggregate development conflicts with and is incompatible with established land uses. Environmental hazards occur to the vulnerable surface and ground water, air quality, ecosystems and biodiversity; health hazards stem from contaminated water, diesel fumes and aggregate dust effects children, the elderly, people with asthma, heart disease and diabetes. It also contains silica which is a known carcinogen; safety hazards stem from increased truck traffic, damage to provincial roads and private property; noise levels due to crushing rocks and truck traffic; as well as aesthetics in terms of views and vistas. In short, a deterioration in the overall quality of life.

Simplifying policy direction to enable unencumbered aggregate extraction based on close to market criteria opens the door to increased conflict between other land users. The approach is short sighted and maladaptive to deal with the long term consequences that can result from unrestricted expansion. In addition, considering the changes being proposed by the movement of excess soils and below water pit development, environmental assessments would be required to gain a deeper understanding of groundwater flows and their relationship to aquifer, lake and stream health as well as a better attempt at identifying the nuances of habitat alteration and the social impacts of resource extraction to reduce uncertainty regarding long term or irreversible impacts as well as identify and to address cumulative effects.

Unfettered development is an irresponsible government approach to aggregates since the outcome has the potential to impact current and future generations and seriously harm ecosystems which can take decades to restore. A pause or moratorium is needed regarding further aggregates development until a demand-supply plan is completed on a watershed basis, that carefully and responsibly identifies the need and appropriate locations to enable win-win solutions.

COMMUNITY INFRASTRUCTURE

1. Servicing New Development

Taking up agricultural lands and expanding municipality boundaries creates the demand for investment spending by municipalities. This approach favours industry by increasing business opportunities at the expense of tax payers. Overlooked is land that is already currently available as identified by the Ontario Housing Affordability Task Force as well as the housing that will become available over the next 10 years due to the aging baby-boomer population. Many cities have empty buildings that have the potential for renovation which would save building costs as well as the need for the related infrastructure and additional services.

2. School Capacity

Planning within budget and considering alternatives would reduce the need for new schools and future public expenditures which would contribute to a responsible fiscal management plan.

STREAMLINED PLANNING FRAMEWORK

1. Outcome Focussed

From a planning perspective, increasing supply is an output not an outcome. Increasing housing supply is an objective and the number supplied provides a measure of the output achieved. Outcomes relate to the change that occurs in society that are more esoteric in nature such as liveability, equity, fairness, increased social capital and the achievement of Ontario's statement of environmental values. The output of supply needs to be measured against these standards.

Streamlining, conceptually means ‘to reduce resistance’. Resistance is interpreted within Bill 23 and the accompanying policy changes as the public and the environmental safeguards that protect bio-diversity, prime 1 agricultural land and water. This approach disregards the long held awareness of the link between economic development and environmental degradation at the detriment of decades of scientific learning and international agreements that are in place to reverse the damage already done and to ensure future generations are not compromised from meeting their own needs.

2. Relevance - Reflecting provincial interests.

The government’s provincial interests pertain to being ‘open for business’. Overlooked is the provincial responsibility to protect the public interest and stewardship of the natural environment to ensure a good quality of life, good air to breathe, a safe home, good health, and roof over our heads. Focus on business development without consideration of achieving these other outcomes increases mistrust for government.

3. Speed and Flexibility - Reduces complexity and increase flexibility

Societal issues **are complex and interdependent**. They require a conscientious, holistic approach that considers all facets of society and their supporting mechanisms. The government’s narrowly defined focus on supply favours industry which creates divisiveness and widespread discontent. To address complexity and increase flexibility, a common vision is required that is inclusive and progressive rather than fast paced and regressive that trades one aspect of society off for another.

Question 2 – What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types.

Ontario’s long-standing policy framework promotes sound environmental stewardship for strong, sustainable, resilient communities through balancing social, economic and environmental values. This approach needs to be maintained.

Question 3 – How should the government further streamline land use planning policy to increase the supply of housing?

As stated above, streamlining is a process to reduce resistance that, in the context of Bill 23 and accompany policy changes, align with the government’s ‘open for business’ agenda and leads to more business opportunities in terms of infrastructure development, schools, etc. Streamlining in this context provides no evidence that affordability will be achieved. The government needs to create an inclusive task force to help design an approach to meet the outcomes identified above.

Question 4 – What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?

The concept of sustainable development needs to be maintained and built upon to further the initiatives that address climate change and the environmental crises we are currently experiencing. Sustainable development aims to achieve the outcomes of liveable cities and a healthy natural environment by protecting and augmenting the things that give us life.

SUMMARY

Ontarians are in the midst of a cost-of-living crisis where affordable housing is merely one component. The limited supply is merely an indicator and a symptom of broader societal problems. No evidence is provided that affordability will be achieved by streamlining the province wide land use planning policy framework by combining A Place to Grow with the PPS. The province is large and diverse. Planning is not a cookie cutter approach but must respond to the local context and surrounding landscape. Enabling municipalities to approve housing faster to increase housing supply will favour the real estate, banking, construction and extractive industries. Overlooked is the high cost to build houses, high interest rates and a 6.8% inflation rate all of which effect the purchaser, communities, endangered species, natural environment and vulnerable ecosystems.

Key aspects that not being addressed are Climate Change and the Duty to Consult and Accommodate Indigenous peoples. It was disconcerting to witness the Minister of Municipal Affairs and Housing answer a question in the legislature regarding Bill 23 and consultation with Indigenous people. His response insinuated that inclusion of an appointed Metis CEA of an Aboriginal Housing Corporation was sufficient to address indigenous concerns. The Minister's response was indicative of a limited awareness by the Ontario government of the nature of Indigenous Canadian relations and its implications if they are not addressed which possess additional financial risk to tax payers. When governments violate indigenous rights (whether knowingly or not) and they are challenged in court, it's the tax payer who has to pay the cost, not the individuals or the party who made the error. The concept of meaningful consultation with Indigenous peoples needs to be accepted and Treaties need to be recognized for what they are: international agreements that cannot be ignored and side-stepped by any domestic authority.

Bill 23 and the accompanying policy changes has spurred wide spread, non-partisan discontent which continues to rise across the province. The prescriptive, narrowly defined and non-inclusive approach to affordable housing is a solution that does not fit the problem. Bill 23 and the accompanying policy and regulatory changes need to be repealed and a new integrative and inclusionary process be implemented before there is further divisiveness and public mistrust. Creating and maintaining the capacity to address complex societal issues needs an inclusive process that incorporates a broad base of stakeholder involvement including the public, local and indigenous knowledge through listening, weighing alternatives, collaboration and compromise. Respect and inclusiveness will build a strong society and confidence in the decisions that will ultimately affect all our lives.

Respectfully submitted,

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