

December 30, 2022

Provincial Land Use Plans Branch  
13th Flr, 777 Bay St Toronto, ON M7A 2J3  
Via website and e-mail to [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)



**RE: ERO 019-6177 - - Review (sic) of A Place to Grow and Provincial Policy Statement**

The Ontario Headwaters Institute (the OHI), a registered charity incorporated in Ontario, is focused on working to protect Ontario's watersheds, their natural heritage, and receiving waters such as the Great Lakes.

As such, we have been proud to have supported key issues that provided an integrated framework to facilitate development while protecting Ontario's environment sensitive and agricultural lands, several of which have received international recognition. This has included the Provincial Policy Statement (PPS), the Oak Ridges Moraine & the Greenbelt, Natural Heritage System Planning, the Clean Water Act and its Source Protection Authorities, the Ontario Wetland Evaluation System, the Ontario Biodiversity Council, the Four Plan Review and its recommendations, and the One Window Planning Service.

Unfortunately, and while we support a long-range vision for land use planning, we are deeply concerned that the current efforts of the Government to address an ill-defined housing crisis without a commitment to sustainable development represent a reckless pursuit of a single lens of economic expansion - - in place of a balanced perspective that embraces ecological integrity and social vitality.

In contrast to its lack of action in this regard, we suggest the government pursue the following higher-order crises in an integrated fashion:

- Recognize and adopt policies and implementation measures to address the climate, biodiversity, food security, water quality & quantity, and energy crises.
- Commit Ontario to the protection of significant portions of every watershed in the province, including those in the Far North, perhaps based on the federal guideline How Much Habitat is Enough and/or the Ontario Natural Heritage Reference Manual and in support of Canada's targets for protected areas;
- Reinforce the use of the watershed as the ecologically meaningful scale for integrated and long-term planning, as per s 2.2.1 a of the PPS; and,
- Rather than lowering the standards of A Place to Grow, the Province should develop and implement policies, goals, and guidelines for sustainable land use planning, sustainable communities, and sustainable buildings.

We look forward to a fulsome review, as this is not it. For the most part, the current posting announces vague direction, for which it has not provided the required performance data on how A Place to Grow and the PPS are performing, per existing regulation. While one could contend that such data is required only every ten years, proceeding to decision notices without data and further discussion would expose any proposed new policies as not being grounded in reality, as well as to criticisms of bias.

We expect a fulsome opportunity for detailed discussion downstream, and that such discussion will include meaningful consultation with First Nations.

Sincerely,

*Andrew McCammon*

Executive Director