

June 6, 2023

Provincial Land Use Plans Branch
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Submitted by email: growthplanning@ontario.ca

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Dear Provincial Land Use Plans staff,

RE: ERO 019-6813 Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Thank you for the opportunity to comment on the proposed policies adapted from A Place to Grow and the PPS (ERO 019-6813). Below, please find our specific comments regarding the policies proposed.

The Province of Ontario's proposed combination of the Provincial Policy Statement 2000 (PPS) and the Growth Plan for the Greater Golden Horseshoe (Growth Plan), presents policies and definitions not required for the creation of more, and affordable, housing, which we had been led to believe was the problem Ontario was trying to solve. The policies proposed in the replacement of the PPS and the Growth Plan are going to harm communities, commuters, the environment, and people, all while not addressing the problem Ontario purports to address: affordability.

The proposed changes to the PPS and Growth Plan are taking the province back to the development approach of the 1950's and 1960's, when anything could be built anywhere. It has taken the past 50 years to 'heal' the impacts of these short-sighted development decisions and to develop policies and legislation which consider development for the long term benefit of this province. We strongly recommend that the 1950's approach to development not occur again. The integrity of this province has too much to lose in the short and long term.

It is very clear that the proposed policies and legislation were prepared based on the direction and to the satisfaction of the building industry and land development associations. Municipalities of all sizes were excluded from the discussion and yet the municipalities will be expected to do the approvals and to provide the various services. The citizens and taxpayers

of this province deserve much better: science-based land use planning, which appreciates and respects all residents and landowners, not only developers and future developers.

It has been proven in many reports that at present there are sufficient dwellings at various states of planning approvals, and land designated for growth in Official Plans, to meet the province's perceived demand. It is not the municipalities but the developers who have chosen to hold back construction. These residential units "in the pipeline" are situated in areas which can be adequately serviced without negative impacts to the valued natural heritage resources, agricultural lands, water and top-soil resources of this province. These should be the priority, not new approvals in Greenfields and the Greenbelt.

These changes will exacerbate affordability problems

The proposed legislation and policies, being presented erroneously to create more affordable housing, are based on a very strong top-down approach. The definition of 'Affordable' has been removed from the PPS, which tells us everything we need to know about the province's intention to address this crisis.

There has been no meaningful municipal involvement or reference as to how each municipality will be able to afford to provide the wide variety of infrastructures and services required for housing on lands not identified for the proposed use in the official plan, regardless of the density or location. This approach will increase the price of all types of housing, in the form of higher taxes for less services for the existing and future residents. Thus the result is not housing affordability, but the creation of residential units for the rental market based on an unsustainable approach.

Allowing for greater numbers of multiple families and culturally appropriate housing (definition unknown) appears to be another means of increasing density in low-density residential areas. Increasing the number of occupants in a single-family dwelling has been shown to have immediate negative impacts on all of the existing services and infrastructure planned for the intended population. Allowing significantly greater numbers of residential units and people living within each unit, will have a long-term impact on the quality and quantity of water from the context of surface water and aquifers.

Natural Heritage

Ontario citizens have learned over the years of development, to appreciate and protect our natural resources. Natural heritage features and functions, water bodies, water courses, topsoil, wildlife, open spaces and clean water and air are essential to our future and yet are often taken for granted. Why is this science-based knowledge, interest and foresight being negated to build residential dwellings which will be not affordable to most of the province's population? The proposed policies will result in a decrease in the number of 'affordable' units.

The proposal to change the existing policy language from "shall" to "should" reduces the protection of the natural heritage area and their features and function, which encourages

development in areas which contain identified flood plains, flood-prone areas, high water tables and susceptibility to erosion. The avoidance of such areas is crucial to protect future development areas from the impacts of severe weather events, in particular extreme rain events, which are occurring more frequently and with greater severity.

Why have the natural heritage policies and definitions been 'set aside' for future discussion? These policies and definitions are integral parts of long-term sustainable development in Ontario.

The Lake Simcoe Protection Plan identifies a target of 40% high quality natural cover, and "no loss of wetlands". These targets cannot be met if natural heritage policies are weakened. And if the province's solution is to protect it all with land trusts, do understand that this would be the least economically sensible way to protect lands. Our provincial Natural Heritage policies currently protect 21% of the Lake Simcoe watershed very well. Is the province going to buy up all that land? Of course not. We need more policy protection for Natural Heritage features in the PPS, not less.

Upper Tier Government Changes

Regarding the dissolution of Upper-tier governments, this too needs much greater consideration. Democratic representativeness and reflecting one's own Council direction are areas that need improvement in regional governments. But the "entire system" is not useless or broken. The idea that many small rural municipalities can handle growth, environmental plan review, the coordination of infrastructure, and efficient use of tax dollars is a fantasy. We have seen no specifics about how municipalities can reasonably do this, and your government is ignoring all the experts in this field. It's a complete abdication of responsibility.

Simcoe County has 16 lower-tier municipalities and 2 separated cities (Barrie and Orillia). Only one of those municipalities has a population over 50,000 people, according to the 2021 census (Barrie). Most of them (13) have a population less than 30,000 people. This means that the tax generation of many of the municipalities in our area is lower and generally this translates to few staff at the municipal level as well. Consequently, those municipalities rely on provincial policy to help guide them.

Simcoe County has been at the center of Ontario's sprawling past and was once referred to as the 'wild west' of planning. Regional staff and local governments have largely tried to turn that reputation around and commit to growth that is sustainable, financially sound and evidence-based. All of these changes will remove much of the good work that has been done. To underscore the real and present danger our natural, agricultural and watershed communities face, recognize that even though there are tens of thousands of housing units fully approved that aren't being built, developers still requested an additional 15, 886 acres of land to build on.

Our recommendations:

- Do not proceed with these proposals.
- Stop threatening regional planning dissolution; instead address the actual regional problems in these reviews. Those are: coordinating infrastructure; watershed

management; water / wastewater planning; climate adaptation and mitigation; local job procurement; regional road building, and building an appropriate supply of affordable housing.

- Give Conservation Authorities' plan-review and Natural Heritage protection powers back.
- Abandon this initiative in lieu of more consultation with municipalities, Indigenous governments, community organizations and other stakeholders to ensure that unintended consequences of these policy proposals are mitigated or avoided
- Do not eliminate the Natural Heritage System or the Agricultural systems in the Growth Plan.
- Remove the ability to sever rural agricultural lots beyond one severance. This isn't even supported by farm associations. It's to promote more sprawl and is dangerously short-sighted.
- Maintain urban, suburban intensification requirements, and Greenfield density targets in order to best use our limited building and infrastructure resources and dollars.
- Develop a credible plan for increasing our province's affordable housing stock in every single town and city.
- Do not force municipalities to enter into servicing agreements with developers in lands that were not a part of the municipality's designated growth areas, or for infrastructure that wasn't included in capital plans.

As the saying goes, 'the devil is in the details'. The citizens of Ontario, especially Southern Ontario, which appears to be the focus of these changes, will only benefit from maintaining the existing PPS and Growth Plan. We urge you not to proceed with the proposed policy changes proposed.

Sincerely,



Claire Malcolmson

Executive Director, Rescue Lake Simcoe Coalition

& Gail White, RLSC Board Member, and former senior planner for Simcoe County