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Sent via e-mail to growthplanning@ontario.ca

Provincial Land Use Plans Branch
13th Flr, 777 Bay St
Toronto, ON M7A 2J3

Re: ERO #019-6813 Replacement of PPS and the Growth Plan

Ecojustice is a national environmental law organization with offices across Canada. For more than 25 years we have gone to court to protect wilderness and wildlife, challenge industrial projects, and keep harmful chemicals out of the air, water, and ecosystems we all depend on. We represent community groups, non-profits, Indigenous communities and individual Canadians in the frontlines of the fight for environmental justice. This submission is made on behalf of Ecojustice and not on behalf of any client organization.

We agree with the submissions of the Canadian Environmental Law Association (CELA) as well as the coalition comments submitted by Ontario Nature to the Minister of Municipal Affairs and Housing, which are broadly consistent with these comments. In particular, we agree that the underlying premise of these changes is false and that the proposed changes needlessly accelerate urban sprawl without providing housing benefits.

In addition to those comments, we would like to highlight a few additional points:

- Unlimited planning horizons are extremely problematic and should not be permitted (proposed Policy 2.1.1) longer planning horizons are too speculative to be useful as a planning tool and lead to inflated and unrealistic projections for growth. Municipalities are then forced to service that growth at huge expense. Planning horizons need to be constrained and should be no longer than 10 years.
- The changes will promote disorderly and poorly phased development on the fringes of urban areas as well as “leapfrog” developments in un-serviced or poorly serviced areas inaccessible by transit.
- The changes allow expensive and inappropriate servicing plans in order to facilitate leapfrog developments (proposed Policy 2.1.2(b)) This will be hugely expensive and potentially financially catastrophic for municipal taxpayers, will result in not enough funds being allocated to maintaining and upgrading existing services in built-up areas and will have resulting pollution and water quality impacts.

- The type of housing that will be promoted by these changes will be the most expensive, least affordable and accessible housing possible and with the most negative social and environmental impacts.
- There is a loss of focus on transit-supportive development and built forms that will result in new areas that will never be transit-supportive and are dysfunctional in the long-term as a result. Forecasted population growth will never be possible to accommodate with vehicles alone. This will come with significant public health and climate costs from pollution and inactivity. The changes dealing with active transportation and transit appear to be inconsistent and poorly conceived. Transit needs to be provided outside of strategic growth areas and accessible to all residents in an equitable manner.
- Inadequate separation of uses will occur through reliance exclusively on MECP for the regulation of this issue under proposed policy 3.5.
- Expansion of private sewage services (proposed Policy 3.6) is a huge mistake that will have catastrophic water quality impacts.
- The loss of key growth plan policies around ensuring assimilative capacity for sewage and water services (Policy 3.2.6.2(c) and 3.2.6.3) and stormwater management (Policy 3.2.7) will have long-term adverse health and environmental consequences.
- There is no justification for removing climate from the stormwater management provisions given that heavy rainfall events are key to stormwater management planning.
- Watershed planning was previously the purview of conservation authorities, the policy that merely encourages municipalities to undertake watershed planning further undermines the integration of watershed planning in Ontario. Watershed planning needs to be mandatory.
- We are concerned about an undefined reference to “integrated waste management” this provision needs to be defined and should exclude incineration.

These changes overall undermine good planning and will harm future generations for years to come. They are catastrophic changes to Ontario’s planning system that will have un-measurable adverse impacts on human health, climate and the environment.

In late June the ERO posting was amended to include the natural heritage provisions. We are pleased to see that these provisions are largely unchanged from the 2020 PPS. We reiterate that important natural heritage provisions from the Growth Plan which are not reflected in the PPS will result in an impoverished assessment of the impacts of development on surface water and aquatic systems. We also object to the removal of the requirement to evaluate the impacts of a changing climate within the natural heritage policies.

Sincerely,



Laura Bowman
Barrister & Solicitor