July 31, 2023

**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.**

I am against the proposed changes to the Provincial Policy Statement and the Places to Grow.

The Province needs to withdraw ERO 019-6813 and retain much of former Provincial Policy Statements. A PPS should be an overarching visionary document stating what Ontarians hold to value for the wellbeing of all beings. Not a roadmap for development at the expense of important systems, features and functions.

I continue to be opposed to the irresponsible attacks on our natural world, the Greenbelt and on prime agricultural lands, on vital ecosystems like wetlands and woodlands, and on careless destruction of species-at-risk and their habitats. This all for the unnecessary expansion of climate destroying urban sprawl. This despite the demonstrated capacity to provide needed housing within existing urban boundaries. This despite strong public opposition. This despite the very high cost to install the needed new road, water, sewer, utilities, commercial and institutional infrastructures.

The legislative changes already made, and proposed changes will have generational impacts on the health and quality of life of Ontarians and could well negatively impact our food supply, our air and our economy. We have seen global temperatures rising dramatically resulting in unknown casualties. We are starting to see global food shortages.

Our global ecosystems and climates are interrelated and interdependent, without borders, and impact most of our existence.

It is unacceptable that this Ontario government forces changes on its citizens, and low tier Agencies, without genuine consultation and without a willingness to make compromises. The exclusion of our original founders, the First Nations, is disrespectful.

This government is forcing changes through the legislature without proper review, pushing legislative changes through without genuine consultation, and without proper multi-party legislative review.

It is governments’ responsibility to safeguard our public health, our food and water supply, our ecological sustainability, our social equity, and our economic vitality. The interests of developers cannot override our long-term ecological sustainability and well-being of all.

I am concerned when land use planning is being pursued in crisis mode, as it is now in Ontario. Rush makes for bad economic, ecological and social policy.

The stated 5 pillars of the new Provincial Statement are urban-centric and short-sighted, focused on rapid land development, without commitments to afford housing. This government is wanting to provide more protection to rocks (*Provincially Significant Mineral Potential Index*), than to life-giving ecosystems. **Why isn’t the protection of our life-giving natural ecosystems, our prime agricultural lands, and species habitats a 6th pillar that Ontarians hold valuable?**

Is “implementation” nothing more than ‘forced compliance’?

*Based on what the government has heard, the* *Province has combined the elements of A Place to Grow and the PPS into a new land use policy document that the* *Province is proposing for public feedback. Through this proposed new Provincial Planning Statement, the government is proposing policies grouped under five pillars:*

* *Generate an appropriate housing supply.*
* *Make land available for development.*
* *Provide infrastructure to support development.*
* *Balance housing with resources*
* *Implementation*

The Provincial Policy Statement has in the past protected “significant” wetlands, woodlands, ANSIs, Species-at-Risk habitat, and Cultural Heritage and Archeology. Is the Provincial government attempting to lessen the protection for these important areas? Furthermore, will species at risk continue to receive the necessary protections needed to prevent their extinction? Furthermore, our natural heritage systems play an important role in helping to reduce the effects of Climate Change. The province with the largest population should lead the way on combating the damaging ecological and economic impacts of Climate Change. Nature can help us win this fight. Love Nature.

*update is proposed to the definition of “significant” as it relates to wetlands, coastal wetlands, areas of natural and scientific interest and woodlands.*

I offered the following concerns as comments:

* the abolition of regional planning efficiencies, and short-sighted restrictions to the mandate of conservation authorities, especially during our climate crisis.
* land conversion that will turn expanses of natural heritage and even areas of the Greenbelt into housing, shopping malls, recreational facilities, and unnecessary expressways. All adding to our climate crisis.
* significant reductions of agriculture land, especially “scarce” prime agricultural lands, which threaten the future of farming, and our very food supply. The best agricultural soils are in Ontario. Prime food producing soils cannot be recreated.
* autocratic Ministerial amendments to Municipal Official Plans, setting aside local Municipal needs, that will create sprawl communities that will exacerbate the climate crisis and increase air emissions, and reduce groundwater replenishment, thus adding to storm-water infrastructure costs, and flood damage.
* a weak framework for attainable and affordable housing. There is no real mandate or target to build enough affordable housing. Where will low-income families and immigrants live in safety and dignity?
* the absence of any genuine and meaningful public and First Nations’ consultation on most land use planning initiatives over the last few years.
* the reductions on life-sustaining natural heritage protections are an unacceptable abdication of provincial ecological governance. This negligence will cost future generations dearly.

In particular, I am deeply troubled about the Premier’s recent comments about the Greenbelt. When recorded in a meeting a few years ago that he would open the Greenbelt to development, he quickly retracted, stating “***Unequivocally, we won’t touch the Greenbelt...I’ve heard it loud and clear; people don’t want me touching the Greenbelt. We won’t touch the Greenbelt.***”

The voices of the people are louder today… Protect the Greenbelt, protect our agricultural heritage, protect our wetlands and woodlands, protect our species biodiversity. In other words, safeguard our ecological future, in order to assure our economic future.

Since then, the Premier has led efforts to repeal the law establishing the Duffins Rouge Agricultural Preserve, supported other Greenbelt carveouts, and endorsed multi-lane expressways through the Greenbelt. And earlier this month he stated “*Let’s just be honest, the Greenbelt was a failed policy, a flawed policy from the Liberal government. It was just a big scam as far as I’m concerned*.” As if food production capacity, dependant on natural systems (*pollinators, water, pest control, temperature mitigation, seasonal rains, flood mitigation, etc*.) is optional for our economic and quality of life.

**Clearly, the Premiere has been unable to offer clear and consistent leadership on the Greenbelt.**

We believe this has severely damaged public trust in the government’s commitment to the Greenbelt, and we urge the Provence to issue a clear sustainable vision for the future of the Greenbelt and the continued protection of its water, natural heritage, and agricultural lands.

With respect to water security, we find no merit in amalgamating the Provincial Policy Statement with A Place to Grow, especially given additional confusing and incomplete efforts in this regard. Especially with the new Provincial Statement’s focus on land development at the expense of natural systems.

Well-known examples of this include unimplemented aspects of the Clean Water Act; the lack of implementation of some aspects of Ontario’s flood protection regime; highly contentious and unscientific amendments to the **Ontario Wetland Evaluation System** resulting in a further loss of vital wetland systems, and reductions to the mandate of conservation authorities.

There has been inadequate analysis and discussion on drinking water, storm water, and sanitary sewage given the anticipated growth in population, the expansion of municipal boundaries into sensitive headwater areas and agricultural lands, and changes to the traditional level of financial support from development fees that would normally pay for municipal infrastructure. Potential negative outcomes could dwarf the impact of the Walkerton catastrophe.

In the face of these issues, many aspects of the posting are inadequately addressed with a bullet but lack any sense of how municipalities might in fact be able to deliver them.

Moreover, the **proposed Provincial Planning Statement must contain stronger protections on Natural Heritage, in the proposed s 4.1. These have been areas of significant interest…such as, wetlands, woodlands, species at risk, prime agricultural lands, groundwaters, etc.**

The Province needs to withdraw ERO 019-6813 and retain most of the former Provincial Policy Statements and focus its land development objectives within a separate Places to Grow policies.

Afterward, should the government want to proceed to amend the Provincial Policy Statement, it should do so only by **providing reports on its performance indicators, as required for a major review, and engage in extensive consultation with First Nations, municipalities, conservation authorities, the agricultural and other sectors, and of course civil society.**

Finally, the Province is essentially ignoring the Great Lakes, which will be impacted by the cumulative effects occurring in its watersheds.

Key aspects of this involve the absence of any meaningful Provincial presence at the **Great Lakes Public Forum** in November 2022 at Niagara Falls, recent missteps on a proposed intra-basin transfer without adhering to the protocols of the **Great Lakes–St. Lawrence River Basin Water Resources Compact**, and confusion over the changing roles of conservation authorities regarding Great Lakes.

As a result, I support the intent of the Township of Archipelago to ask the Great Lakes and St Lawrence Cities Initiative to express its concerns about the impact of Bill 23 while also calling for the reinstatement of many of the environmental protections that were abandoned in that bill.

Thank you for your consideration.