



Cordelia Clarke Julien
Assistant Deputy Minister
Ontario Growth Secretariat (OGS)
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 2304, 23rd Floor
Toronto, ON M5G 2E5
growthplanning@ontario.ca

February 28, 2019

Re: Proposed Amendment to the Growth Plan, ERO 013-4504

Dear Ms. Clarke Julien,

ProtectNatureTO is a coalition of over 20 nature- and stewardship-based groups advocating for the protection of wildlife and improvement of natural areas across the City of Toronto.

We, are writing on behalf of our organization to express our disagreement with **Proposed Amendment to the Growth Plan, ERO 013-4504**.

One of the key strengths of the Growth Plan is the requirement to use a Municipal Comprehensive Review (MCR) process to guide regional planning through an evidence-based framework that encourages efficient use of land. This provincial and regional guidance is key for smaller municipalities with few resources to enable them to move toward a consistent, public interest-based approach to growth management.

During the 2015 Growth Plan review it became clear that the MCR process had ensured that there is a sufficient supply of undeveloped greenfield land available to meet housing and employment needs as well as a supply of land within our urban areas to meet intensification targets. Proposed reductions to the designated greenfield targets (DGA) and allowing municipalities to ask for even lower targets is contrary to the goal of creating complete, compact communities. Gentle density and hard boundaries move us away from the wasteful low-density model of development.

For almost 40 years, successive Ontario governments have been incrementally encouraging less urban sprawl, more compact urban growth, and moves toward greater public transit capacity.

But this will now change if the Ontario government's proposed weakening of the Growth Plan proceeds.

On behalf of ProtectNatureTO, we submit the following comments and suggestions on Growth Plan Amendment:

- Allowing urban boundaries to expand without proper evaluation of need. This will increase rates of sprawl and eat up more farmland and natural areas. We know that this is not needed as provincial data shows there is enough land designated to meet housing needs to at least 2031.
- Reducing the requirements to build within cities instead of outside them. This lowers the priority of building new development within the existing town or city and also lowers the priority that new areas are developed more densely than the past. In other words, it encourages low-density sprawl over redevelopment and revitalization.
- Removing the requirement to plan for future housing needs based on what is actually needed. This marks a return to the bad old days of building more detached single family homes on farmland because that is what was done in the past.
- Allowing new public transit stations to be built and developed around in areas of low population and employment instead of in mobility hubs that service large numbers of people. This is the return of the “GO station in a cornfield” model which encourages more sprawl, cars and highways.

In the long run, a return to sprawl-focused development will eat up the farm lands and natural areas that surround our cities and towns. It will decrease our quality of life, increase our commute time, increase our property taxes and diminish the quality of our air, water and food. It will also eventually bring development right to the boundary of the Greenbelt and other protected lands which could lead future government to argue for opening them up to development.

The proposed changes to the Growth Plan are not prudent and will contribute negatively to climate change, water quality, environmental degradation, undermine quality of life and future vision for all Ontarians.

Keep the existing 2017 Growth Plan approach to maintain denser, compact cities and towns that can only grow after a full review based on evidence:

- Save farmland for healthy local food, employment and food security
- Revitalize our urban areas by [keeping intensification targets for missing housing types, so](#) housing that people want and need (e.g. rental, row houses, town houses, smaller mainstreet condos, smaller homes for seniors and new buyers) is what is built – not monster homes on big lots.
- Build purpose built rental housing and supportive housing options near major transit hubs (subway, bus and train stations)
- Base Growth Plan changes on good information, involvement by local citizens and long term planning of infrastructure needs, costs and tax implications

Sincerely,

On behalf of ProtectNatureTO

cc. Minister of Municipal Affairs and Housing, Steve Clark steve.clark@pc.ola.org