

# Anglican Creation Caretakers, Ajax/Pickering

Called to safeguard the integrity of God's creation, and respect, sustain and renew the life of the earth

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November 15, 2022

Thank you for the opportunity to submit our comments with respect to the revocation of the Central Pickering Development Plan (the "Plan"), some of which concerns land in the Greenbelt.

We are Anglican Churches in Durham Region, and are part of the Diocese of Toronto. We serve the spiritual and physical needs of our communities, working to reduce poverty and advocating for affordable housing. Safeguarding the integrity of God's creation – the land, water and air that sustains us all – is a priority for us. We use our voice in public witness for a more just, sustainable, liveable and humane world. These are the values that lead us to make our comments with respect to the Plan and the proposed legislation, Bill 23.

We oppose this reduction of protections and greenspace, particularly if the Duffins Rouge Agricultural Preserve is developed, and the policies and approaches of the government with respect to housing development and the environment, as they are set out in the Plan and in Bill 23.

Bill 23 was introduced as a "bold action to address the housing crisis in Ontario, ensuring that cities, towns and rural communities grow with a mix of ownership and rental housing types that meet the needs of all Ontarios, from single family homes to townhomes and midrise apartments." While we support the creation of housing, we know that the crisis in Ontario is not only supply; it is affordability. We are concerned that the bill allows the Minister to cancel provisions that preserve affordable housing units. The bill does not go far enough in ensuring affordability. Tax incentives and tax cuts for developers are not matched by a requirement to create affordable housing.

By opening the Greenbelt, the Plan and the Bill proposes to allow development in currently protected wetlands, woodlands and wildlife habitat, as well as prime agricultural land, increasing urban sprawl. This is not necessary. Other municipalities in Hamilton, Halton and Waterloo have adopted official plans that provide housing density in existing neighbourhoods, which creates

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greener communities served by existing infrastructure and transportation. Urban sprawl is the most expensive, and most environmentally damaging form of housing provision.

We are deeply concerned that Bill 23 allows the Minister to amend any municipal official plan by order without recourse. It will allow housing projects approved under the Planning act to be exempt from Conservation Authority regulations, on interference with rivers, watercourses, and wetlands, controlling flooding and erosion. It further removes the power of Conservation Authorities to regulate and refuse permits based on concerns about pollution or the conservation of land and removes the obligation of the Minister to consider such matters on appeal. Further, the Bill prohibits Conservation Authorities from providing municipalities with the information they need to build land and water protections into planning approvals. With this inhibition of Conservation Authorities it is unclear who is to protect our lands and waters from pollution, to preserve habitat for Ontario's species at risk, or to protect the ecological function and viability of wetlands – or whether they will be protected at all.

We are losing 319 acres of farmland a day in Ontario, losing species at risk, and experiencing catastrophic climate events. The Plan and the Bill will be a major setback. They will compromise our local food supply, our watersheds and the ability of wetlands and floodplains to mitigate flooding during extreme weather events. The habitats of Ontario's floral and fauna will be more vulnerable to extinction as habitat is destroyed.

We urge our government to consider the legacy of such backward and damaging legislation, provide affordable housing, restore our Conservation Authorities, and protect our environment.

The Durham Region Council has questioned the reduction of power of Conservation Authorities and expressed concern about the way Bill 23 will impact municipal planning and recovery of costs associated with growth. As Chair of Council Mr. John Henry said, "Everyone deserves a place to call home, but successful urban planning also requires a vision – a bigger picture. It's about shaping communities that balance growth, services and protecting our environment for our residents. We need to protect our wetlands to mitigate flooding; and to take care of the woodlands

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that support the air we breathe," he continued. "Ensuring a safe, prosperous and healthy future is what we have been elected to do." We couldn't agree more.

We urge you to revisit the provisions of the Plan and the Bill.

Respectfully submitted,

The Rev. Susan Spicer

Anglican Creation Caretakers, Ajax/Pickering

## SOURCES

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