



environmental  
defence

August 3, 2023

The Honorable Steve Clark  
Minister of Municipal Affairs and Housing  
College Park, 17th Floor, 77 Bay Street  
Toronto ON M7A 2J3

Attention Minister Clark:

**Re:” ERO 019-6813 Repeal of Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement and introduction of a New “Provincial Planning Statements”**

Further to the submission which Environmental Defence made jointly with Ontario Nature and other organizations on June 5th, these are the additional comments of Environmental Defence regarding the Minister’s proposal to repeal the current Growth Plan for the Greater Golden Horseshoe, and to replace the current Provincial Policy Statement with a new document referred to as the “Provincial Planning Statement”.

Firstly, Environmental Defence is making these further comments at the request of the Minister of Environment, Dave Piccini, following our conversation with him. These submissions do not replace or resile in any way from our opposition to the proposal, as set out in our June 5th letter.

As indicated in our earlier submissions, eliminating the Growth Plan for the Greater Golden Horseshoe and replacing the Provincial Policy Statement with the “Provincial Planning Statement” posted on the registry would **substantively** change the types of development that are permitted and incentivized in Ontario in ways that cause far more destruction of Ontario’s scarce remaining farmland and wildlife habitats, discourage the development of communities that are walkable and cost-effective to service, and ultimately make it much harder to produce the number of lower-cost homes Ontarians need as quickly as they are needed. Of particular concern is that the proposed Planning Statement would remove incentives for landowners and municipalities to maximize the number of homes created and the number people housed for each unit of labour and serviced land invested, by:

- Eliminating the mandate that at least 50 residents be housed on each hectare of farmland and wildlife habitat sacrificed for residential development. This comes after the government had already reduced the number of homes required from a previous 80 residents per hectare standard.
- Eliminating the requirement that regions like Peel, York, Halton and Waterloo, where housing shortages – and constraints on construction capacity – are most acute, make use of their existing infrastructure and serviced land by upzoning them to accommodate at least 50% of their planned new households. The Ontario government has already reduced the mandate from 60%, but it would now be removed entirely.

- Eliminating the Provincial Policy Statement requirement that municipalities seize all opportunities for efficient infill development, and improve the efficiency of existing development plans, before they are permitted to extend settlement boundaries into farms and forests.
- Allowing land speculators to push through inefficient, on-demand piecemeal boundary expansions rather than requiring that they be coordinated as part of periodic reviews.

While we are pleased that Minister Piccini committed (on Minister Clark's behalf) to remove another aspect of the proposed Planning Statement which would have promoted the conversion of farms to large residential lots by permitting severances of farmland, any new planning policy which the Minister ultimately adopts must also:

- Maintain the prohibition (set out in the current PPS) on any extension of settlement area boundaries except where it is proven that it is not *possible* for the relevant municipality to meet housing need, while strengthening the language to make it clear that political opposition to densification is not a relevant consideration in assessing what is possible. Housing need should be assessed for housing types defined based on unit size (with all units in excess of 1000 square feet treated as interchangeable, regardless of whether they are single or semi-detached, townhomes, apartment units), and level of car traffic on the street where they are located.
- Increase the minimum intensification rates for all Greater Golden Horseshoe municipalities to 70% while making it clear that minimum intensification rates do not alter the prohibition on extending settlement boundaries while it remains possible to accommodate it by adding *more* than 70% of new homes to existing neighborhoods..
- Maintain minimum density targets for greenfield development, extending them to apply to unbuilt designated greenfield area that was added prior to 2022, and increasing them to no less than 100 residents per hectare (from 80 combined residents and jobs per hectare) across the entire designated greenfield area of each municipality, so that all new neighborhoods have sufficient density to support amenities and cost-effective, high quality public transit within walking distance of almost all residents
- Maintain the prohibition on any settlement boundary expansions except as part of fixed-date Municipal Comprehensive Reviews conducted at least 5 years after any prior settlement boundary expansion took effect.

Any new or altered planning regime for Ontario should also increase the share of Greater Golden Horseshoe population growth that the City of Toronto absorbs so that the City's share of the Greater Golden Horseshoe's overall population consistently increases (rather than decreases) over the planning period, and never drops below 40%. The Growth Plan and/or all other applicable planning documents should require, in addition to this increased population target itself, that Toronto plan to house more than 1,460,000 net new residents by 2051, and to reliably add at least 400,000 net new "family-sized" (1000sf) homes on low-car-traffic side-streets, including apartments, townhomes and garden suites.

We were encouraged by comments from Minister Piccini which suggested the fundamental purpose of eliminating the free-standing Growth Plan for the Greater Golden Horseshoe was not to weaken density requirements or permit less transit-supportive forms of development, but rather to eliminate *procedural* duplication, and improve the ease with which developers and municipal governments interpret land use planning rules. If this is indeed accurate, then Environmental Defence would strongly urge the Ontario government to maintain the substantive content of the Growth Plan for the Greater Golden Horseshoe (with the improvements identified above and in our previous

submissions) as a regionally specific Part of any new Provincial Policy Statement or Provincial Planning Statement.

Environmental Defence - together with housing advocates like More Neighbours Toronto and More Neighbours Hamilton, and Sustainable Mississauga - have consistently reminded Minister Clark, Minister Piccini, Premier Ford, and the government more broadly, that Ontario is not faced with choice, or “balance” between increasing housing supply and preventing environmentally destructive sprawl sprawl. On the contrary, our current housing shortages are the “coming home to roost” of many decades of sprawl land use planning that directed growth to low-density, car-dependent, sprawl developments of large and expensive houses, while making it difficult and unappealing to densify existing suburban neighborhoods. This means that the policies Ontario must adopt to end housing shortages are precisely the same as those we must adopt to stop any sprawl and densify our suburban neighborhoods into places where most residents don’t need a car. Unfortunately the policies in the proposed Provincial Planning Statement would do the opposite.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Gray', with a stylized, cursive script.

Tim Gray,  
Executive Director  
Environmental Defence

A handwritten signature in black ink, appearing to read 'Phil Pothen', with a stylized, cursive script.

Phil Pothen, J.D., M.L.A.  
Ontario Environment Program Manager  
Environmental Defence