

Dear Premier Ford and other Members of the Legislative Assembly of Ontario,

We the undersigned urge you to not enact Bill 185 and the proposed changes to the Provincial Planning Statement (PPS). Doing so will only worsen the housing crisis and will undermine the few positive changes that have been made in the last couple of years to build the right type of housing in the right places.

These bills are the wrong medicine to solve the housing crisis. Your Government's prescription will actually make things worse.

For too long, your Government has been telling Ontarians that any type of new home construction is good because it increases supply. That's been your justification for changing the rules to make it easier to build more expensive, single family homes on farmland and natural areas.

What your Government fails to recognize is that every additional construction worker, piece of construction equipment and item of construction material that is used to build expensive, single family homes on farmland and natural areas comes at the expense of building more of the homes we need where people already live and services already exist.

Ontarians cannot afford their government making it easier to waste construction resources to build the wrong type of housing in the wrong places. We need to make it a priority to build the right affordable types and sizes of homes in the right places, where people already live and work and where we are spending tens of billions of dollars building transit.

Bill 185 and the proposed PPS send yet another signal to developers and municipalities to speed up building the wrong type of housing in the wrong places. This will be a disaster for Ontario.

Below is a description of key problems we've identified with Bill 185 and the proposed changes to the PPS. Aside from worsening the housing crisis, these changes will also further eliminate important protections that have safeguarded our farmland, natural assets and water resources for future generations and effectively eliminate any public oversight of new housing development, regardless of how bad it is.

There are some changes proposed in Bill 185 and the PPS that could actually help improve affordability. But any good that comes from these changes is undermined by all the bad that comes from building the wrong type of housing in the wrong places.

Please help solve the housing crisis. Scrap the changes that prioritize building the wrong homes in the wrong places. Start helping Ontarians build the right housing in the right places.

Sincerely,

**Analysis of Bill 185 and Proposed Changes to the Provincial Planning Statement (PPS):
Summary of Key Problems**

The overarching direction is to promote/facilitate low density sprawl on farmland beyond existing urban boundaries through a series of severely weakened policies. Low density sprawl consumes and/or degrades our water resources, farmland and natural areas, generates more greenhouse gases, does not support transit or active transportation – increasing gridlock and chronic diseases, relies on fiscally unsustainable infrastructure, and does not provide the types of housing that people need/can afford.

This is particularly true in the Greater Golden Horseshoe – where the overall vision and policy framework to contain sprawl and any efforts at provincial and upper tier regional planning have been completely abandoned.

Bill 185

Key Problem	Impact
Removes 3 rd party appeal rights to the Ontario Land Tribunal on official plans/amendments and zoning by-laws – including on settlement expansions – but allows developers to appeal their own applications for settlement expansion	Coupled with the PPS proposal to allow settlement expansions at any time without any comprehensive review – this facilitates developer led settlement expansions and developer appeal resulting in the OLT being primarily a developer only adjudicative tribunal
Formalizes removal of planning authority from the Regions of York, Peel and Halton while setting the stage for the removal of planning authority from all upper tiers in the Greater Golden Horseshoe – including the ability to appeal lower tier official plans and other planning instruments	Results in a highly fragmented and inefficient approach to land use, natural resource and infrastructure planning. Eleven upper tier governments are replaced with 89 lower tier ones. Most lower tiers do not have the expertise while upper tiers also have jurisdiction over sewer, water, major transportation, transit and affordable housing. This will slow down housing construction.
Removes ability for municipalities to require developers to pre-consult with them prior to submitting an application	Will lead to submission of less robust/incomplete applications/studies and pressure on municipalities to make decisions or face appeals to the OLT
Does not require municipalities to allow fourplexes	Permitting fourplexes has a long history and they are found in many older and newer parts of cities – providing more affordable housing forms

Proposed Provincial Planning Statement

Key Problem	Impact
No intensification targets mandating certain amounts of growth to be directed to existing built up areas (encouraged only)	Allows more low-density sprawl to be directed to farmland therefore reducing housing output, wasting existing infrastructure capacity and destroying farmland.
No greenfield density targets mandating efficient development (encouraged only) – and only in 29 large and fastest growing municipalities	Results in inefficient use and thus increased conversion of farmland – at densities which will not support transit or active transportation or types of housing forms people need/can afford. Will also reduce the number of homes built.
Settlement expansion allowed at any time and no requirement for comprehensive review	This makes the urban boundaries meaningless and removes/minimizes the need to comprehensively consider whether the conversion of farmland to accommodate future growth is necessary.
Residential subdivisions allowed on rural lands throughout Greater Golden Horseshoe	Reverses prior prohibition and will result in scattered residential development in the countryside unattached to any existing community, jobs, services, community facilities and sewer/water services creating more conflicts for agriculture and 100% car dependency
More flexible permissions to allow private and partial sewer and water services in rural areas	Is intended to facilitate scattered rural subdivisions in the countryside
Two additional residences allowed on every farm	Results in the potential for new non-farm residences on every farm and was unnecessary as existing policy already allow residences for farm help
Does not include the Agricultural and Natural Heritage System maps for the Greater Golden Horseshoe	Abandons these systems resulting in further loss and degradation of the regions water, farmland and natural areas