

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs
PDF via charles.o'hara@ontario.ca

February 22, 2019

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

Dear Mr O'Hara,

The Ontario Headwaters Institute, a registered charity working to protect the province's headwaters, natural heritage, and watersheds, offers the following comments on the review of the Growth Plan.

Please note that these comments are supplemental to our endorsement of the submission from the Ontario Greenbelt Alliance on this initiative, and in no way under-mine our support for the OGA's well-articulated positions.

We take the liberty of offering these supplementary comments because, over the last several months, the Province has launched numerous efforts to address various aspects of housing and employment lands expansion. These efforts have included the Open for Business suite of proposals, including Bill 66; the launch of the Housing Strategy; invitation-only stakeholder discussion on the potential review of the Planning Act and the Provincial Policy Statement; the Regional Municipalities Act; and the review of the Growth Plan.

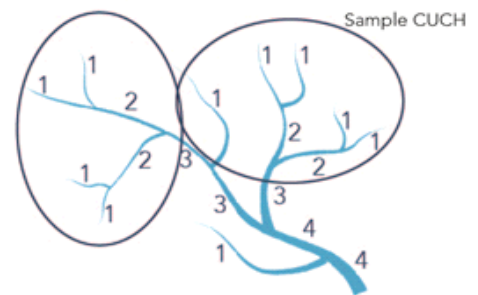
Individually and cumulatively, these government efforts on the need for new housing and employment lands are positioned as a quantitative crisis, in which key priorities for housing are speed, mix, and cost, and for which there have been no larger discussion about the qualitative aspects of new development.

Without the broader framework, we perceive the government's initiatives as being short-sighted ecologically and that they will lead to unintended disastrous economic consequences in the mid- to longer term. For example:

- Ecologically, both the planet and south-central Ontario appear to be approaching various tipping points, including those related to greenhouse gas emissions, access to clean water, and food security. Aggressive outward expansion of Ontario's urban boundaries without a lens for sustainable planning is irresponsible; and,
- Economically, outward expansion of urban housing will soon run in to the disappearance of boomers from the housing landscape. This may result in a glut of housing and a crash in the market. In particular, we are concerned that the short-term quantitative approach will lead to an over-supply of housing and employment lands that may leave developers with a significant lull in future markets, financial institutions and borrowers with mortgages exceeding real value, and home owners trapped in economic circumstances restricting their mobility and financial well-being.

In the face of these realities, we urge the government to counter-balance the quantitative strategies you are pursuing with a meaningful qualitative approach. Such an approach could include efforts to:

1. Establish provincial standards based the national guidelines in How Much Habitat is Enough;
2. Strengthen article 2.2.1 a of the Provincial Policy Statement that “Planning authorities shall protect, improve or restore the quality and quantity of water by: a. using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development” by providing the required resources for provincial agencies and conservation authorities;
3. Provide minimal standards for natural heritage protection based on the Ontario Natural Heritage Reference Manual or, for areas under the jurisdiction of conservation authorities, for guidelines required under O. Reg. 97/04 regarding Development, Interference with Wetlands and Alterations to Shorelines And Watercourses;
4. Develop procedures to identify and protect Continuous Upland Headwater Catchments (CUCHs - areas where first and second order catchments touch as per the drawing), where our research shows that such CUCHs constitute critical reservoirs that protect regional ecological integrity and that might benefit from innovative policies in watersheds facing increasing development;
5. Strengthen programs to support agriculture across the province, farm succession, and the transition to more sustainable agricultural practices;
6. Strengthen aspects of the Provincial Policy Statement and/or link the PPS with codicil documents to encourage the evolution of Sustainable Land Use Planning, District Heating and Cooling, and Complete Communities;
7. Encourage the design and construction of buildings with reduced environmental footprints; and,
8. Identify efforts in 5, 6, and 7 above to facilitate the evolution of employment skills for the 21st century.



In conclusion, the Ontario Headwaters Institute is not opposed to initiatives to streamline factors that hinder or make the development of housing or employment lands more expensive, as long as such initiatives do not negatively impact ecological integrity that is already strained in many regions across Ontario.

We urge the government, however, to heed its own call for innovation in the Housing Strategy and to counter-balance its quantitative focus on housing and employment lands with a qualitative approach founded on ecological protection, food security, sustainable planning, and employment for the 21st century.

Sincerely,

Andrew McCammon

Executive Director

cc Premier Ford, Minister Clark, other selected recipients