



The Ontario Headwaters Institute

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Insert Date

**RE: ERO 019 – 1680 Proposed Amendment 1 to a Place to Grow:
Growth Plan for the Greater Golden Horseshoe**

Dear Ms Bickford,

In addition to having supported a joint submission led by the Canadian Environmental Law Association, Environmental Defence, and Ontario Nature, the Ontario Headwaters Institute provides this brief note to emphasize one point in that sub and make an additional one of our own.

1. Removal of the term “hydrologic functions” from the definition of “Ecological Functions”

In addition to the points raised in the joint submission that the OHI has endorsed, we note that:

- While reassuring words could have been offered that could have suggested that hydrologic functions could be included within a holistic approach to ecological function, no such assurance was provided;
- Absent that wording, one can draw a conclusion that there is another, less holistic and wholesome purpose to the removal, such as the effort in Bill 66 to exclude special zoning areas from the Clean Water Act; and,
- The removal may present downstream issues of consistency with the Provincial Policy Statement, particularly for sections that refer to hydrologic functions and S 2.2.1 a. that refers to using the watershed as the ecologically meaningful scale for integrated and long-term planning.

Recommendation 1: That the proposed amendment retain the term “hydrologic function” within the definition of “ecological functions” to be consistent with the intent of the current Growth Plan as well as the Provincial Policy Statement and aligned initiatives, including federal and provincial efforts to protect the Great Lakes Basin.

2. Ending the Government’s confusion on growth and its aversion to public engagement

Much has been stated in the last few years about environmental red tape, duplication, and gaps.

In reality, lack of consistency, lack of evidence, lack of public engagement, and the lack of any vision for sustainable development in the multiple agencies involved in land use planning dwarf any questions about environmental red tape and demonstrate both the Government’s confusion on growth and its aversion to public engagement.

To be clear, this is not the fault of provincial staff, but of poor and biased program directives from a Government seeking to turn back some clock rather than look to a sustainable future.

Key elements in the Government's confusion and aversion include:

- An opening line in the proposed amendment that “The Greater Golden Horseshoe (GGH) is one of the fastest growing regions in North America” (and will remain so for years), against a constant drumming of unproven allegations that environmental red tape might impact that future;
- Inconsistent numbers from your office, the Ministry of Finance, and a consultant's report on population growth and which bring planning and financial uncertainty to municipalities;
- Ministries apparently vying for some sort of cabinet supremacy at the expense of the established expertise in the One Window approach to planning, perhaps evident in the unconscionable effort under Bill 66, as mentioned above, and the mind-numbing waste of time spent on municipal amalgamation;
- Refusals to repeated requests for background studies, including on what type of housing may be desired by Generations Y and Z on the Housing Action Plan, amplified by amendments to the Provincial Policy Statement without the required reports on indicators;
- The use of omnibus bills that have an impact of reduced democratic participation. For example, one bill sought to amend 40 acts while allowed 6 hours for deputations at committee - a maximum of 24 fifteen-minute time slots on 40 acts;
- Clear efforts to keep members of the environmental stewardship community from consultations on issues such as aggregates, flooding, and conservation authorities; and,
- A provincial fable that the Made-in-Ontario Environment Plan is something more than a draft when it lacks cabinet approval and a decision notice on the Environmental Registry.

Clearly, the Government has a confused approach to growth at any cost, with little appetite for sustainable development, and a palpable aversion to public engagement and government accountability.

This favours private profit over the public trust, and flies in the face of needed efforts to avoid a sixth mass extinction, limit the on-coming climate crisis, and shift society toward a post-pandemic green and just economic platform.

Recommendation 2: That the Government balance its framework on proposed amendment 1 to the Growth Plan for the GGH -- as well as its general approach to the Housing Action Plan, the COVID-19 Economic Recovery Act, and similar initiatives -- with a commitment to develop a sustainability lens for land use planning, including commitments to sustainable development and operating practices, complete communities, sustainable buildings, and public engagement.

Please feel free to contact the undersigned at your convenience for any needed clarification.

Sincerely,

Andrew McCammon

Executive Director