

Comment on Provincial Policy Statement and Place to Grow Integration
Greenspace Alliance of Canada's Capital
[\[https://ero.ontario.ca/notice/019-6177\]](https://ero.ontario.ca/notice/019-6177)

General comment

In our view, there is no advantage in merging the Place to Grow growth plan and the Provincial Policy Statement. If there are many overlaps and uncertainties created by inconsistencies between them in the Golden Horseshoe where both apply, then by all means resolve these, either by area specific changes to the PPS or amendments to Place to Grow. However, do not export the provisions of the latter beyond the Golden Horseshoe. A Place to Grow was developed to deal with the unique growth problems of this vast conurbation and is not well adapted to the growth issues elsewhere in Ontario. Eastern Ontario has its own planning and governance context and dynamics. As it stands, Ottawa's new Official Plan, just freshly minted and approved, meshes well with the PPS and provides adequate guidance regarding all the land use core elements outlined in this proposal.

Should it be thought necessary to complement these with a higher order growth plan, then an Eastern Ontario growth plan would be welcomed, consistent with the premises of the recent Eastern Ontario Transportation Plan, so long as it is developed through an open and inclusive process and gives due attention to the conservation of natural system resources, agricultural land, and the rural character and cultural heritage of the countryside.

Finally, since the PPS is quasi-law, it is essential that proposed amended text be provided. Without it, this consultation is fundamentally flawed. We urge the government to engage in a second round of consultations based on proposed text. We provide comment on the consultation questions below in so far as the intent of amendments can be discerned.

Comments on the consultation questions

These are presented in line with each of the core elements listed below.

Residential Land Supply

1. **Settlement Area Boundary Expansions** – streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth

It should not be made any easier to expand the urban boundary. Outward growth is the least efficient and the most costly, both financially and in terms of carbon budget. Sprawling growth effectively subsidizes high cost growth with taxpayer dollars without providing taxpayers any direct or indirect benefits such as increased access to amenities or increased levels of

affordable housing. Making expansion easier de-incentivises and counteracts local policies that favour intensification, which is the most efficient and least costly financially and in terms of carbon emissions.

2. **Rural Housing** – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas

Self-sufficient growth should be encouraged in rural settlement areas (villages) to make them into complete liveable communities with adequate infrastructure and amenities. In the rural countryside, growth should not occur in prime agricultural areas and environmentally sensitive areas. However, allowance should be made to create smaller agricultural holdings for sustainable local food production and mixed farming to encourage new operators to settle and thrive. Finally, country lot estates should be prohibited as they are in the City of Ottawa because this type of development is extremely destructive to connectivity in the natural environment and very costly to service.

3. **Employment Area Conversions** – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate

Agree, as long as lands converted are not valued green space.

Attainable Housing Supply and Mix

1. **Housing Mix** – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs

Hard quotas or dwelling type shares should not be specified in policy. These have been used to justify larger urban expansions than necessary solely on the basis of providing more of a given dwelling type deemed to be in short supply. Rather, policy direction should be provided to avoid monoculture of any given dwelling type anywhere in the urban area and let the mix be provided by the market given this constraint.

2. **Major Transit Station Areas** – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario

Agree, as per Ottawa's new Official Plan.

3. **Urban Growth Centres** – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur.

Agree, as per the overlays developed for this purpose in Ottawa’s new Official Plan. Emphasis should be given to community-building or placemaking, in former brown-fields, warehousing and industrial areas that need regenerating, in places that are close to transit links.

Growth Management

1. **Population and Employment Forecasts** – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment

Population and dwelling type projections are the foundations of good planning and must be of the highest standard and quality. These are however subject to assumptions that are unique to each planning authority, with reliable historical precedents and path dependency. So while a preferred projection methodology could be set in policy, based on extensive consultation and peer review, local planning authorities must have the final say in the assumptions fed into the projection model.

2. **Intensification** – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas

Intensification must benefit residents, bringing social cohesion and amenities to the neighbourhood level commensurate with equity considerations and forecasted population increases; creating compact, green, walkable, connected, healthy and inclusive communities. This kind of gentle densification can meet intensification targets while improving liveability – the kind of intensification residents can support.

It is for this reason that we call for an increased focus on neighbourhood intensification, providing clarity on where and how much, and involving neighbourhood residents themselves in planning a transition to walkability, consistent with the “15 minute” neighbourhood principle. We also recognize the need to intensify at hubs, including a focus on affordable housing. Hubs are generally areas of major redevelopment, and are not now built up residential neighbourhoods. We support that they be rebuilt as complete walkable communities. This reconstruction is very different from intensification in existing neighbourhoods, and should be given separate policy direction.

However, we oppose intensifying along corridors. The reason for this is that corridors provide long linear strips of intensification which cut off and isolate neighbourhoods, while continuing to serve their main purpose as fast pass through for motor vehicles. Development in corridors is car-centric, attracting car-centric shops that challenge viable models for small walkable shops.

Our vision is of urban villages, not urban canyons, and for communities built around neighbourhood identities and fabric, clustered around local amenities and gathering spaces, where there is room for trees and greenspace, with housing diversity and affordability for all.

3. **Large and Fast-growing Municipalities** – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit

Agreed, in the context of an Eastern Ontario growth plan, as discussed under General comments above.

Environment and Natural Resources

1. **Agriculture** – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations

Generally agree but with the caveats expounded in **Rural Housing** above, including prohibition of country lot estates.

2. **Natural Heritage** – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation (**Proposed Updates to the Ontario Wetland Evaluation System**)

We are strongly opposed to the changes made to the OWES as we believe they will over time lead to the destruction of large wetland complexes surrounding Ottawa. This position is more fully developed in our ERO posting on the subject. <https://ero.ontario.ca/notice/019-6160>], shown in Appendix 1.

Regarding offsets, we support the approach embedded in Ottawa’s new Official Plan, which includes offset policies for certain types of greenspace. However, we do not believe that offsetting is a viable policy for significant wetlands. This position is further elaborated in our ERO posting on this topic, <https://ero.ontario.ca/notice/019-6161>], shown in Appendix 2.

Please see also Ontario Nature's 2017 report, https://ontarionature.org/wp-content/uploads/2017/11/wetlands_report_Final_Web.pdf

3. **Natural and human-made hazards** - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk

No comment

4. **Aggregates** – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed

No comment

5. **Cultural heritage** –policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply (**Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022**)

No comment

Community Infrastructure

1. **Infrastructure Supply and Capacity** – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning

Fully support. Gating policies that tie new development approval to availability of community infrastructure should be adopted.

2. **School Capacity** – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education's proposal to support the development of an urban schools' framework for rapidly growing areas

Fully support.

Streamlined Planning Framework

1. **Outcomes-Focused** – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes

2. **Relevance** – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests
3. **Speed and Flexibility** – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier

All of these principles are of course valid. However, there is a glaring omission. Public engagement remains essential to achieving successful land use planning outcomes. The means of effectively engaging with the public in an open and transparent process should also be streamlined and improved.

Beyond this, it is not possible to give an opinion on a streamlined planning framework without seeing a fleshed out proposal.

Appendix 1:

**Comment on Bill 23 – Ontario Wetlands Evaluation System
Greenspace Alliance of Canada's Capital**

Provincially Significant Wetlands enjoy the highest level of protection against development and any other alterations. The Ontario Wetlands Evaluation System is used to determine if a wetland is provincially significant or not. Bill 23 proposes a number of changes to this evaluation system.

If the proposed changes to the Ontario Wetland Evaluation System (OWES) go ahead, here is what will happen. Rather than evaluating a wetland complex as whole, existing provincially significant wetland complexes will be broken apart, with each small wetland re-evaluated separately.

The threshold for significance remains the same, so an individual wetland must attain the same score as the much larger wetland complex to remain significant.

It will be almost impossible for these individual components of large wetland complexes to be evaluated as provincially significant.

As a result, Provincially Significant Wetlands will be gradually dismantled and will lose their protection.

It will then be possible to drain and fill them, making them available for development, thus leading to their eventual disappearance. This is an unacceptable ecological cost to bear, causing great harm to local ecosystems, populations and economies.

We demand that wetland complexes be mandatorily evaluated as a whole and not piece-meal as proposed.

Further, if implemented as proposed, the Province will have no role in reviewing or approving wetland evaluations, will no longer keep wetland evaluation files nor maintain significant wetland mapping or provide information for use in wetland evaluations. These responsibilities will be delegated to the municipalities, without additional budgets or provincial assistance, and the municipalities will have NO authority to review and approve wetland evaluations submitted by landowners. The wetland evaluator will only be accountable for the objectivity and accuracy of the wetland evaluation to the person paying for it. As consequence, the property owner or developer seeking to remove the significant wetland designation will be the only authority determining if the wetland evaluation is valid. This is intolerable from an ethical and democratic perspective.

We demand that the Province maintain a role in the management of Provincially Significant Wetlands and that, if not the province, then the municipalities be given the authority to review and approve wetland evaluations.

Appendix 2:

***Comment on Conserving Ontario's Natural Heritage policy
Greenspace Alliance of Canada's Capital***

These comments are in response to the discussion paper seeking feedback on how Ontario could offset development pressures on wetlands, woodlands, and other natural wildlife habitat. We agree that offset policies that would require a net positive impact or at minimum no net loss for these features could help staunch and reverse the decades-long trend of natural heritage loss in Ontario.

We would offer as an example to follow in this regard the greenspace protection regime introduced in the City of Ottawa's new Official Plan. The various types of greenspace to be protected are enumerated and defined in Policy 7 of the OP. The relevant protection policies are found in Policy 4.8.1, which sets strategic directions, and Policy 5.6.4, which describes the Natural Heritage overlay and the protections afforded to the areas so covered. These policies were not modified by the Minister in approving the OP.

*These protections can be summarized as a hierarchy of protections arranged in descending order from a positive obligation **to maintain and improve** ecological function, where development and site alteration is prohibited and a wide buffer required in the case of adjacent development, down through **no negative impact** and finally to **no net loss**. It is in this latter category of protection that offsetting is considered as a means of achieving no net loss in ecological function.*

In general, offsetting is not an option for "higher value" greenspace, such as Provincially Significant Wetlands and other features that are part of the City's Natural Heritage System. For "lower value" greenspace, such as evaluated wetlands that are not provincially significant or rural forest cover that is not part of a significant woodland, the no net loss regime applies, meaning that offsetting can be used to compensate for loss due to development.

Appendix 1 contains a table providing more detail on the full hierarchy of protections in the Official Plan, while the table in Appendix 2 itemizes all the greenspace types, the cross-references to the Official Plan policies in which they are defined and the associated protections.