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Dear Mr. Helfinger and Mr. Petersen,

*RE: 013-4293 Bill 66: Restoring Ontario's Competitiveness Act, 2018; 013-4125
Proposed open-for-business planning tool; 013-4239 New Regulation under the
Planning Act for open-for-business planning tool*

The Ontario Greenbelt Alliance members have deep concerns about many aspects of Bill 66, *Restoring Ontario's Competitiveness Act, 2018*. The proposed legislation would override critical requirements, under several provincial laws and policies that are designed to protect water, farmland, natural heritage and human health. It would do so in a fashion that undermines fair, consistent and transparent public engagement in decision-making and sets the stage for costly property tax increases to subsidize economically inefficient sprawl development.

Collectively, our organizations represent thousands of citizens across the Greater Golden Horseshoe. On their behalf we urge the government not to proceed with Bill 66, Schedule 10 for the reasons outlined below and trust that they will be considered with respect to all three relevant ERO postings (i.e., 013-4293, 013-4125, 013-4239).

Bill 66 would allow municipalities to pass "open-for-business" zoning by-laws that would circumvent fundamental protections for drinking water, farmland, natural heritage and human health set out in Ontario's key planning laws and policies and in municipal official plans. The potential negative impact is far-reaching and profound. For example, policies that would not apply in open-for-business zoning by-law areas include:



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- Those addressing significant threats to municipal drinking water (e.g., landfills, sewage systems, and the storage or handling of fuel, fertilizers, manure, pesticides, road salt, organic solvents and other substances on lands near wells or surface water intake pipes used by municipal drinking water systems);
- Those protecting farmland, provincially significant wetlands, woodlands, valley lands and habitat of species at risk;
- Those supporting active transportation, affordable housing, green infrastructure and climate resiliency;
- Those protecting key natural heritage features, key hydrologic features, natural core areas and natural linkage areas across the Oak Ridges Moraine;
- Those protecting two-million acres of natural areas and farmland across the Greenbelt;
- Those protecting freshwater and the ecological health of the Lake Simcoe watershed;
- Those supporting smart, integrated, long-term planning for the Greater Golden Horseshoe, a heavily developed region facing intense development pressures.

These and other outcomes of Bill 66 would run contrary to interests and desires of the people of Ontario: a [2016 Nanos poll](#) found that 90 percent of Ontarians believe the government is responsible to ensure a healthy environment for all, and 97 percent support the right to clean air and water.

Our provincial laws and policies establish a fair and coherent rule set and system of governance that uphold the provincial interest, with some flexibility provided locally through municipal official plans. In contrast, the outcome of Bill 66 would be a piecemeal, directionless approach to land-use planning and decision-making, leaving communities vulnerable to the whims of changing councils and powerful and influential developers.

The vulnerability of Ontarians is heightened by the fact that open-for-business zoning by-laws could be passed without any prior public notice or meetings and could not be appealed to the Local Planning Appeal Tribunal. In other words, by-laws passed behind closed doors would trump laws, policies and municipal official plans developed through extensive and open public consultation. Communities would have no recourse to influence or challenge them.

Contrary to the government's contention that Bill 66 cuts regulations that are out of date, almost all the laws and policies affected were recently passed or updated with extensive public consultation. They include the *Clean Water Act, 2006*, the *Toxic*



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Reduction Act, 2009, the Great Lakes Protection Act, 2015, the Provincial Policy Statement (revised in 2014) and the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Growth Plan for the Great Golden Horseshoe (all revised in 2017). Municipal plans themselves are to be updated every five years.

It is also important to remember that many aspects of the modern land-use planning and land conservation framework now in place in Ontario were initiated by Progressive Conservative governments. For example, early work to limit sprawl occurred under the Harris government's Smart Growth Program and the establishment and protection of the Oak Ridges Moraine was a signature PC government achievement. Undermining that legacy makes no sense.

Finally, there is no evidence to support making more employment lands available for development of new businesses or associated commercial, retail or residential development, the ostensible purpose of open-for-business zoning by-laws. At the Growth Plan implementation consultation held on November 8, 2018 at Queen's Park many municipalities indicated that they have a surplus of employment lands and would like to see these converted to residential.

Since the introduction of Bill 66, many municipal councils and planners (e.g., Sudbury, Waterloo, Kitchener, Wilmot, Guelph, Aurora, Burlington, Bradford, Mulmur, Ajax, Wellesley, Puslinch, Whitchurch Stouffville, Georgina, Barrie, Halton, Hamilton, Toronto) have expressed serious concerns about its implications and/or have pointed out the presence of significant employment land surpluses within their respective municipalities. Many of these municipalities have also passed resolutions saying that they will not be using the OFBPBL.

Bill 66 would turn back the clock on many years of good planning, community input and strong leadership from governments of all political stripes. Open-for-business by-laws would sidestep laws and policies intended to protect the long-term health and resilience of our communities and would facilitate sprawling and unchecked development, threatening farmland, water resources and sensitive natural features upon which we all rely. The Ontario Greenbelt Alliance believes that Schedule 10 should be wholly deleted from Bill 66. Please find the Ontario Greenbelt Alliance submission below.

Yours truly,

Franz Hartmann, PhD
Chair, The Ontario Greenbelt Alliance Steering Committee
On behalf of the Ontario Greenbelt Alliance

cc. Hon. Rod Phillips, Minister of the Environment, Conservation and Parks
cc. Hon. Steve Clark, Minister of Municipal Affairs and Housing
cc. Hon Todd A. Smith, Minister of Economic Development, Job Creation and Trade



Submission on Bill 66, Schedule 10

1. Executive Summary

The Ontario Greenbelt Alliance is a coalition of over 150 community groups and individuals across the Greater Golden Horseshoe who support growing and strengthening the Greenbelt to ensure clean water resources, healthy communities and a thriving farming sector.

The Ontario Greenbelt Alliance strongly opposes the proposed MMAH/Planning Act changes found in [Bill 66](#) *Restoring Ontario's Competitiveness Act* to provide a new mechanism to allow municipalities, with ministerial approval, to pass "Open For Business" bylaws (OFBPBL) that will override important provincial laws. The legislative framework being ousted by Schedule 10 was carefully developed by the province with considerable input from Ontarians, non-government organizations and other stakeholders. In addition, the various components of this framework have been in place for years (and, in some cases, decades) in order to safeguard public and private interests throughout Ontario. Our comments on Bill 66 are directed specifically at Schedule 10 of Bill 66, where these provisions are described.

The proposed OFBPBL surpasses planning and environment laws and is very unpopular with Ontario residents. To date over 15,000 people have sent a letter asking the province to reject Bill 66.

There is already enough land for development needs to 2041. Many communities in the Greater Golden Horseshoe have a surplus of employment land. In fact, many land budgets based on past growth trends were inaccurate inflating the amount of land needed for employment uses. It is unclear what the rationale is for allowing the creation of employment lands (and possibly retail, commercial and residential designations) within areas currently off-limits.

Allowing the development of employment lands in the countryside, requires the expansion of infrastructure, roads, water and sewer servicing and will lead to higher property taxes for the people of impacted communities and all of Ontario. Municipalities typically service growth in an incremental and contiguous fashion and allowing new uses beyond the urban boundary is not in keeping with this logical and cost effective/efficient pattern of providing infrastructure.

Bill 66 threatens farmland and the agri-food economy. Only 5% of the land base in Ontario is available for farming. Ontario is already losing 175 acres of farmland daily. If the province focused employment growth in town and cities the loss of farmland



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could be reduced. Many communities throughout the GGH would welcome employment uses in their towns and villages. The consideration of new employment uses should occur in a orderly manner to use infrastructure efficiently and involve public participation; the foundation of good planning.

This Bill and the [provincial housing consultation](#) work together to move us away from a public interest based land use planning system that manages and coordinates growth and development regionally. Relying only on local planning to determine large scale employment uses undermines watershed based source water protection, regional infrastructure and transportation planning and may result in increased debt, traffic and taxes.

The province already has the power to override local planning rules to designate land for development if they want to use it. This power is called a [Minister's zoning order](#) (MZO). This Bill proposes to bypass provincial and regional planning rules and allow for multiple applications, from multiple lower tier municipalities, to move forward at the same time.

The promise not to open up the Greenbelt to new development should be kept and Schedule 10 deleted from Bill 66. The health and vibrancy of our region depends on valuing our farms, forests, clean water sources, nature and building well planned communities.

By putting business interests ahead of the public interest, Bill 66 undermines the fundamentals of building healthy communities that support jobs by balancing the public interest among competing interests, including the environment, public health, and economic interests.

2. Employment Land needs

Ontario is enjoying a period of stable employment. The unemployment rate has remained below 6% since 2017¹. In the recent Neptis Foundation report, Planning the next GGH, a slowing trend in employment growth in the 905 is revealed². With stable employment, a slowdown in employment growth and an aging population employment land needs are decreasing. It is unclear what projections the province is using to propose allowing employment land growth anywhere in Ontario. At the same time as the province is consulting on Bill 66, the [Growth Plan Consultation](#) was released which identifies provincially significant employment areas.

¹ <https://www.ontario.ca/page/labour-market#section-6>

² <http://www.neptis.org/publications/planning-next-ggh>



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The Municipalities are currently undertaking studies as part of the Growth Plan requirements to determine land needs for employment uses. This data is essential for responsible planning. Many areas in the Greater Golden Horseshoe such as Simcoe County have completed the calculations to determine they have an excess of employment land.³

Employment Land by Regional Municipalities in the GGH (2015-2017)			
Region (hectares)	Total Vacant Emp. Lands	Total # Emp. Lands	% Total Emp. Lands
York	2588	7759	33%
Halton	2800	6099	46%
Peel (exl. Caledon)	2070	10772*	19%
Durham	3147	5611	56%
City of Hamilton	918	4554	20%
Simcoe	2919	6527	45%
Niagara	2300	6895*	33%
Total hectares	16742	48217	35%
York = https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar+22+vacant+ex.pdf?MOD=AJPERES Halton = http://beta.halton.ca/repository/Halton-Competitiveness-Study-2016 Peel = http://www5.mississauga.ca/research_catalogue/N_12_2016_VacantLands_Profile.pdf (Mississauga) http://www.brampton.ca/EN/City-Hall/meetings-agendas/PDD%20Committee%202010/20151207pis_Full%20Agenda.pdf (Brampton) Durham= https://www.durham.ca/en/living-here/resources/Documents/EnvironmentalStability/EAServicing_Durham.pdf Hamilton = https://www.hamilton.ca/mapping-business-reporting/activity-reports/employment-area-inventory Simcoe= https://www.simcoe.ca/Planning/Documents/SimcoeCountyLandBudget_DataCollectionandAnalysis_PhaseEmployment_HemsonConsulting_June17.pdf Niagara = https://niagararegion.ca/council/Council%20Documents/ICP%208-2014.pdf *Indicates total employment land measured on Neptis Geoweb			

[Peel Region](#) had an excess of employment land as evidenced through the recent plan review (MCR process) which converted three employment land areas in Mississauga

³https://www.simcoe.ca/Planning/Documents/OM_EmploymentLandBudget_Results_June2017.pdf



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and 13 in Brampton to residential. Experience indicates if too much employment land is designated it puts pressure on municipalities to convert those lands to residential.

Employment lands are normally located within an urban or town boundary serviced by infrastructure that can support businesses such as water, sewers, internet and a good road network. Allowing employment uses (like factories) far from this infrastructure, as the open for business bylaw would allow, will put a huge burden on municipalities and utilities to provide services and upgrade roads. These services are expensive and building new infrastructure will cause property tax increases and make it even more expensive to build public transit for employees.

Remarkably and inexplicably, in a related consultation as part of the Ontario government's [housing consultation](#), the province is asking whether there should be more flexibility regarding the conversion of existing employment lands in urban areas to residential development. The same consultation is asking for ways to reduce costs and streamline processes to support timely development of housing. Some municipalities such as York Region (which has 2588 ha of vacant employment land), have identified surplus lands for new employment uses but it is important that these excess lands not be automatically converted to residential uses. Typically these same communities with excess employment lands also have an excess of residential lands. A land needs assessment, as part of a Municipal Comprehensive Review, allows municipalities to identify and allocate the appropriate quantity of lands based on projected needs. It is essential that municipalities use the data obtained through a land needs assessment to understand whether there is a need to expand settlement boundaries.

In cities like Kitchener and Hamilton where factories have shut down there may be an excess of serviced employment land in the inner city near existing and proposed transit lines where conversion to mixed use residential and live work spaces may be appropriate. In some newer greenfield communities developers own unserviced employment lands they want to build subdivisions on. Conversion of greenfield employment lands to housing requires extension of expensive infrastructure which will be costly, take time and not address immediate housing needs.

The scatter shot approach to employment land creation proposed in Bill 66 undermines land use planning principles. There is no need to open up the countryside to employment uses. Municipalities should use the surplus employment lands in towns and cities across the region for future job growth.



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3. Permanent Protection of the Greenbelt and Oak Ridges Moraine

3.1 The Greenbelt Act

Bill 66 allows development sites for businesses in the Greenbelt. The Greenbelt Plan promises permanent protection of farmland and natural areas. [Public opinion polls](#) show that Ontario's Greenbelt is valued by 89% of Ontarians. The Greenbelt is already home to significant economic activity and employment in agriculture and agri-food, recreation and tourism, and other resource-based activities, supporting 161,000 jobs and contributing over [\\$9.1 billion](#) to the economy annually. Exempting developments passed under an Open for Business by-law from conforming to the Greenbelt Act puts our food security, agricultural and agri-food, resource-based, and tourism sectors, and natural areas at risk.

The Greenbelt is home to 750,000 acres of some of the most productive farmland in Canada, supporting rural jobs, a strong agricultural business sector, and providing food security. The agricultural industry is an integral part of the Greenbelt. Its natural advantages of unique soils and favourable climate means that a significant volume of produce is grown in the Greenbelt. For instance, while the Greenbelt comprises only 6.1% of Ontario's total farmland, nearly 53% of Ontario's fruit acreage and 11% of Ontario's vegetable acreage is in the Greenbelt. Farms in the Greenbelt are significantly more productive than farms in the rest of the province, producing an average of \$1,975 in revenue per acre compared to \$1,177 per acre for farms in the rest of the province. The market value of assets employment within the Greenbelt is \$13.2 billion, which is 10% of Ontario's agriculture's entire capital base of \$131.8 billion.

In addition to farming, the Greenbelt supports businesses throughout the entire agricultural and agri-food economy, as 60% of Ontario's food processing capacity is located within immediate vicinity of the Greenbelt. The Greenbelt's proximity to Canada's largest markets in the Greater Golden Horseshoe (GGH) region means that Greenbelt farmers benefit from greater market access, and GGH residents benefit from greater food access. If Bill 66 is passed, this significant component of Ontario's agricultural and agri-food economy is threatened to be undermined. Like any business, a secure land base, the raw material in agriculture, is needed to support investment and long-term viability of the industry. If the Province's goal is to stimulate business investment, create jobs, and make Ontario more competitive, then Greenbelt farmers' contribution to the agricultural and agri-food economy and the permanent protection the Greenbelt provides to this industry cannot be overlooked.

Furthermore, the Greenbelt's agricultural and natural areas are integral to sustaining ecological and human health within the region. Its forests clean our air, and its soils filter our water, absorb carbon pollution, and reduce flooding. In total, the estimated



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value of the Greenbelt's natural capital is \$3.2 billion a year. The total value of carbon stored in the Greenbelt's forests, wetlands, and agriculture is estimated to be \$11.7 billion annually. The value of property protection from flooding is estimated to be \$224 million per year. The health benefit provided by air quality improvements resulting from the Greenbelt's forest cover is estimated to be \$18 million a year.

The Greenbelt's natural capital not only sustains the region's ecological and human health, but also forms the basis of a significant recreation and tourism industry. Recreation in the Greenbelt accounts for two thirds of its value of ecosystem services, generating a total of \$2.1 billion annually. Recreation and tourism provides nearly 100,000 jobs and contributes over \$400 million GDP to Greenbelt municipalities. As with the agricultural and agri-food industry, protecting and enhancing the Greenbelt's natural resources is integral to supporting a strong recreation and tourism industry. Protecting the Greenbelt therefore means not only protecting natural resources and land necessary to sustain ecosystems and human health, but also protecting substantial economic activities across the agricultural, tourism, and resource-based sectors that could become undermined if Bill 66 is passed.

3.2 Oak Ridges Moraine Conservation Act

The Oak Ridges Moraine Conservation Plan was created by the Harris government to protect groundwater supplies from contamination. Oak Ridges Moraine provides clean drinking water from groundwater wells fed by aquifers for 250,000 residents and thousands of farms. The sand and gravel soils of the moraine make it particularly susceptible to groundwater contamination which is why development is prohibited in aquifer vulnerable areas and key hydrological areas. Bill 66 puts at risk key natural heritage features, key hydrologic features, natural core areas and natural linkage areas across the Oak Ridges Moraine.

Recommendation: The government should live up to its promise not to open up the Greenbelt by removing exemptions under Schedule 10 that allow municipalities to bypass the Oak Ridges Moraine Act and the Greenbelt Act.

4. The Clean Water Act and Source Water Protection

The new regulations proposed under the Planning Act to create OFBPBLs for use by municipalities is deeply concerning and represents a significant threat to our safe and clean drinking water in Ontario.



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Since the Walkerton Tragedy in 2000, Ontario has progressed to have a strong multi-barrier approach to protecting drinking water. If Bill 66 passes in its current form, this will no longer be the case. Section 39 of the *Clean Water Act* is one of the provisions listed in Schedule 10 of Bill 66. Schedule 10 proposes to exclude Section 39 and its subsections (1) through (8) from applying to a development authorized by an open-for-business bylaw. This implies serious consequences and threats to drinking water across the province. The *Clean Water Act* was enacted as a result of the Walkerton Tragedy in 2000 and subsequent public inquiry, where 2,300 fell ill and seven people died as a result of drinking water contamination. Rolling back multi-barrier drinking water protections such as source water protection plans invites a repeat occurrence of this tragedy and is a step in the wrong direction in keeping our precious drinking water safe from contamination.

Section 39 of the *Clean Water Act* is a vitally important section because it is the section which requires that provincial and municipal planning decisions under the *Planning Act* conform to the relevant local source protection plan and associated actions for the land in question. Source protection plans and actions are developed by locally organized and multi-stakeholder, science led source protection committees. Source protection committees and their plans are organized on the watershed level, as set out by the *Clean Water Act*. They include actions to prevent source water contamination and each of Ontario's 38 source water protection plans include specific actions to prevent contamination according to [the localized threats](#). For example: fuel lines, agriculture and manure spreading, road salt or other contamination risks as identified as locally relevant. Source protection committees are comprised of regional experts and are exceptionally well suited to protect drinking water at its source.

In Ontario, [97% of the population lives in a drinking water source protection area](#), as covered by the *Clean Water Act*. The ability for an open-for-business bylaw to allow a development to bypass these protections is extremely disconcerting. Schedule 10 enables municipalities to approve large scale developments even if they represent, by virtue of their operations, a significant risk to drinking water sources. There should not be any developments, anywhere in Ontario that put the province's safe drinking water at risk. Schedule 39 of the *Clean Water Act* currently ensures this protection, however if Bill 66 passes as its written this will no longer be the case. Source water protection plans and committees have helped our province become a leader in clean drinking water for its citizens; and we must not undercut this progress.

In fact, in the government's own Made-in-Ontario [Environment Plan](#), there are several mentions of the important role source protection plans play in safeguarding our drinking water in Ontario. In the Environment Plan, it is explicitly stated that the government would "build on the Ministry's monitoring and drinking water source protection activities" (pg. 13)[3]. The Environment Plan also states that the Ministry



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would ensure that the knowledge gained through drinking water source protection programs would continue to inform water management programs going forward. The proposed exemptions to the *Clean Water Act* under Bill 66 directly contradict these statements. The Environment Plan is still early in its development, while Bill 66 is legislation. Bill 66 and OFBPBLs represent a legislative threat to drinking water and source protection plans across Ontario, while the assurances in the Environment Plan are not yet backed by funding, legislation or regulation.

The exemptions in Schedule 10 for OFBPBLs directly contradict the Ministry of Environment, Conservation and Parks' promise to uphold source water protection and build on source protection activities. Schedule 10 of Bill 66 puts drinking water at risk by municipalities to bypass the *Clean Water Act* and undermine source protection plans across the province.

Recommendation: Schedule 10 of Bill 66 is removed, and Section 39 of the *Clean Water Act*, including subsections (1) through (8) is upheld in any planning decision by both municipal and provincial governments. A multi-barrier approach to protecting drinking water in Ontario, under the *Clean Water Act*, is maintained and is never compromised for any development application, proposal or planning decision. We recommend that the government follow its Environment Plan by building on drinking water source protection activities and continue to use knowledge gained through the source protection plans to inform water resource management going forward.

5. Lake Simcoe Protection Plan

The Lake Simcoe Protection Plan (LSPP) is grounded in a report on the lake's health, produced by a provincially-appointed team of scientists. The regulations of the LSPP were developed by provincial staff, advised by a multi-stakeholder committee. The regulations are necessary to ensure the long-term health of the Lake Simcoe watershed ecosystem.

Lake Simcoe's main problem is excessive phosphorus pollution, flowing into the lake from exposed soils and nutrients on farms and new developments, stormwater runoff in urban areas, sewage treatment and septic systems, and the atmosphere. The Lake Simcoe Protection Plan policies and its associated Phosphorus Reduction Strategy aim to bring phosphorus loads down from approximately 85 tonnes per year, to 44 tonnes per year.

We are not making enough progress. Despite \$50 million invested in Lake Simcoe from provincial and federal sources, and the policies of the LSPP, average phosphorus levels have remained stable over the past 10 years studied.



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Critical targets have no implementation plans. The Lake Simcoe Protection Plan sets a target of having 40% of the watershed in “high quality natural cover” in order to protect the watershed’s ecological health and biodiversity. Although more green space is protected through the LSPP, there is no plan to achieve the 40% target.

Achieving the 44 tonnes per year phosphorus load target relies on future innovation, as currently outlined in [the Phosphorus Reduction Strategy](#). This is not comforting or reliable.

Recommendation: The Lake Simcoe Protection Plan targets and policies are managed and implemented, rather than being swept aside by Bill 66. We recommend that work continues to protect Lake Simcoe from the additional sources of phosphorus pollution that new developments may contribute. We recommend that Schedule 10 is removed from Bill 66 and the health of Lake Simcoe continues to be prioritized in provincial and municipal planning decisions as per Section 6 of the *Lake Simcoe Protection Act*.

6. The Growth Plan

Bill 66 allows municipalities to exempt the Growth Plan when implementing the OFBPBL. As noted above employment trends show that employment growth is slowing in the 905 and growing in strategic areas like downtown Toronto and the airport zone. Allowing employment growth anywhere is unlikely to reverse these trends.

There are many reasons for locating businesses in towns and cities. More than 88% of [people polled](#) support directing growth to already built up areas. Supporting employment uses within cities and towns contributes to local economic development, supports transit investment and contributes to the local tax base. As most employees live in cities and towns locating businesses nearby allows workers to get to work without a long commute or contributing to gridlock on our highways.

The Greenbelt Plan and the Growth Plan work together to reduce the costs and increase the benefits of well-planned growth. Allocating employment uses to cities and towns with existing and planned infrastructure is more cost effective for municipalities and taxpayers.

Recommendation: Remove exemptions under Bill 66, Schedule 10 that exempt the Growth Plan. Continue to support regionally planned employment land uses in cities, towns and settlement areas.

7. Planning Act and PPS exemptions

7.1 Planning Act



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Bill 66, Schedule 10 exempts sections of the Planning Act that support public participation, such as mandatory public notice of an application for an OFBPBL and the subsequent public planning meeting that normally occurs with land use planning applications.

Public participation is fundamental to land use planning. Land use planning seeks to balance public and private interests. By exempting public consultation the OFBPBL aggravates the public and fails to meet the standard of good planning. People want to shape their community and should be allowed to express their opinion. Silencing public comment undermines good public policy processes and is fundamentally undemocratic.

7.2 PPS and Regional Coordination

Bill 66, Schedule 10 exempts the PPS, the Planning Act, and the site plan process. Through exemptions to the PPS the OFBPBL exempts matters of provincial interest. Land use planning requires a long term, orderly approach to planning. The prosperity and health of Ontario depends on the wise use of resources and the management of infrastructure to support efficient land use patterns which sustain the financial well being of province. Bypassing the requirement for OFBPBL to be consistent with the PPS the government may support development patterns that increase debt, taxes, traffic congestion, waste valuable resources such as prime agricultural land, degrade habitats and threaten water quality of towns, businesses and residents reliant on groundwater supplies.

Under Bill 66 Schedule 10, upper tier municipal coordination of employment uses is not required. The elimination of oversight by the Region, who is tasked with source water protection and the co-ordination and the supply of clean drinking water is irresponsible. Regional governments manage water supply and wastewater allocations to provide needed services they must be involved.

Recommendation: Maintain the requirement for consistency with the 2014 PPS. Keep provisions in the Planning Act that support public participation in land use planning and support regional and local government coordination of all land use planning applications.

8. Housing Supply

At this time there are three interrelated government initiatives under consideration, Bill 66, Amendments to the Growth Plan and Increasing [Housing Supply](#). It is unfortunate the Ministries couldn't coordinate the process to [reduce red tape](#) by providing one consultation period and process.



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Just the idea of opening up all of Ontario to real estate development fuels land speculation and increases the value of land. It is fairly easy to connect the dots to see that the result of Bill 66 will be higher land prices and reduced affordability.

There is more than enough land for housing until 2041 as shown by provincial data and mapping by [Neptis Foundation](#). But instead of basing land needs on evidence the province is proposing to remove the land needs assessment process from planning requirements under the Growth Plan amendments.

We need to look beyond new housing to meet our housing needs. There are over [700,000 units](#) of existing single family homes coming on the market in the next 20 years due to aging baby boomers. These units can house over 2.1 million people.

The demand for housing in Toronto is high because people want to live close to work in a vibrant neighbourhood with restaurants, night life, transit and shopping all in a convenient location. Housing affordability is not a problem in many Ontario towns. To address housing affordability in areas under pressure we need to reduce speculation, make smaller homes people can afford and build more rental units in cities near transit.

Recommendation: Remove Schedule 10 from Bill 66 and coordinate the three consultations to find ways to ensure a prosperous, sustainable Ontario that supports a variety of housing options.

9. Inconsistency with current Made in Ontario Environment Plan

Bill 66 is inconsistent with the Province's recently proposed Made in Ontario Environment Plan, put forward by the Ministry of the Environment, Conservation and Parks and the need to build resilient communities.

Bill 66's Open for Business Planning bylaw would allow development in previously protected areas including Ontario's Greenbelt. These protected areas are crucial in combating climate change in Ontario for a few reasons:

1. Protected areas directly absorb carbon - the Greenbelt alone keeps an estimated [172 million tonnes of greenhouse gases](#) out of the atmosphere[i], locked away in its rich soils and vegetation. This is more than Ontario's entire greenhouse gas emissions for 2016.
2. Protected areas help prevent sprawl, which adds significant carbon pollution from longer travel times by single-occupant vehicles



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3. Protected areas help prevent flooding, forest fires, and other impacts of climate change as extreme weather increases across Ontario

Passing Bill 66 in its current form will likely cause millions of additional tonnes of greenhouse gas (GHG) emissions to be released in Ontario. This directly contradicts Ontario's Environment Plan, and Ontario's commitment to fight climate change by reducing GHG emissions over time.

Allowing development in protected areas like the Greenbelt will change natural areas from carbon sinks to carbon sources, which will speed up climate change. As humans pollute, plants suck carbon dioxide out of the atmosphere, storing it in their roots, stems, branches, and surrounding soils. This means that Ontario's green spaces play a critical role in helping to slow climate change. It also means that this stored carbon is released when they disappear. Each time the bulldozers arrive to build on protected lands, climate change gets worse. By allowing exemptions to the Greenbelt Act, the Oak Ridges Moraine Conservation Act, and other legislation protecting natural spaces from development, we'll lose valuable carbon storehouses to protect our future.

Recommendation: Allow no exemptions to vital environmental policies which protect Ontario's natural areas of carbon absorption, and revise Ontario's climate change policy framework to strengthen and expand the protection of green space and agricultural land in Ontario as a critical carbon storehouse.

9.1 Allowing sprawl instead of encouraging greater density will mean longer travel times, which will increase carbon pollution.

Sprawl is a simple way of describing an expansion of the built environment outwards from the edges. Usually sprawl comes in the form of large, low-density, single-family homes built over farmland. Urban services like transit, pedestrian infrastructure, or bike lanes are expensive and need to be supported by density. Commuters in the edge suburbs who want to use low carbon transportation options have few options. This creates a big spike in the number of single-occupant vehicles commuting long distances to work, school, and other places, as well as jamming up existing highways and roads with more traffic.

This increase in vehicle commuters adds up. In Ontario, [passenger vehicles](#) are already responsible for almost 20% of our total annual GHG emissions, and emissions from road transportation have risen more than any other sector since 1990. This number will rise if Bill 66 allows more low-density expansion into protected areas. This kind of expansion is the exact opposite of Ontario's careful vision to grow strategically in areas with existing or planned infrastructure, there is no need to sprawl into protected areas like the Greenbelt. On the flipside, growing up can make a huge dent in our GHG



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emissions. [Recent modeling](#) in the U.S. found that through urban densification alone, the U.S. could achieve half the carbon reductions needed to hold global temperatures rise to 2 degrees Celsius.

Recommendation: Prioritize long-term planning tools like Ontario's Growth Plan over short-term economic tools like the Open for Business Bylaw, ensuring development does not speed up climate change.

9.2 Allowing development in protected areas makes Ontario more vulnerable to the impacts of extreme weather from climate change.

Natural areas like wetlands, forests, grasslands, and agricultural areas play an important role buffering populated areas from flooding. In fact, the average wetland within the Greenbelt provides over [\\$1 M per year in protection](#) to property by reducing flood risk. With the volume and intensity of rainfall on the rise in Ontario, ([Ontario government projections](#) estimate 24 per cent more precipitation in winter and 12 per cent in spring by 2050) paved urban areas will suffer from more flooding, causing massive financial damage and rising insurance costs. Granting exemptions to allow development in protected areas will mean less stormwater absorption on the outskirts of populated areas, and more flood damage to the basements and homes of Ontarians.

Expanding housing into previously undeveloped areas can also lead to increased forest fire risk - something Ontario needs to watch closely. In California, [recent studies](#) have shown that hotter weather attributed to climate change is drying out vegetation, creating more intense fires that spread quickly from rural areas to city subdivisions.[v] A bylaw allowing expansion into edge habitats will mean more people living closer to fire-prone areas, making their homes extremely vulnerable to future fires and increasing the risk of fires caused by human activity.

Recommendation: Allow no exemptions to vital environmental policies which protect important natural heritage functions to support resilience.



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Altona Forest Stewardship Committee	Earthroots
Arocha Canada	Ecological Farmers Association of Ontario
AWARE Simcoe	Ecosource
Belfountain Community Organization	EcoSpark
Better Growth In Brant	Environment Hamilton
Blue Mountain Watershed Trust Foundation	Environmental Defence
Bluebelt Protection Alliance	Federation of Urban Neighborhoods (Ontario)
Bruce Peninsula Biosphere Association	Food and Water First
BurlingtonGreen	Food Forward
Canadian Network for Respiratory Care	Friends of Boyd Park
Canadian Parks and Wilderness Society - Wildlands League	Friends of East Lake Prince Edward County
Castle Glen Ratepayers Association	Friends of Fraser Wetlands
Citizens Environment Alliance of Southwestern Ontario	Friends of Hope Conservation Group Inc.
Clear the Air Coalition	Friends of Luther Marsh
Climate Action Niagara	Friends of Rural Communities and the Environment (FORCE)
Coalition of Concerned Citizens of Caledon	Friends of the Farewell
Coalition on the Niagara Escarpment	Friends of the Fraser Wetlands Inc.
Concerned Citizens of Brant	Friends of the Pittock
Concerned Citizens of Ramara	Friends of the Rouge Watershed
Concerned Citizens of King Township	Friends of the Twelve (FOTT)
Conservation Development Alliance of Ontario	Glen Williams Resident's Association Inc.
CRAND	Grand River Environmental Network
Credit River Alliance	Gravel Watch- FORCE
Credit Valley Heritage Society	Green Durham
Durham Environment Watch	Greenlands Center Wellington
David Suzuki Foundation- Blue Dot	Greenpeace Canada



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Halton - Peel Woodlands and Wildlife Stewardship Council	Ratepayers Aurora South Yonge
Halton Environmental Network	Rare Nature Reserve
Help Our Moraine Environment (HOME)	Registered Nurses Association of Ontario
Henderson Forest Aurora Ratepayers Association	Rescue Lake Simcoe
Heritage Speed River Working Group	Richmond Hill Naturalists
Hold the Line Waterloo Region	Riversides
Humber Valley Heritage Trail Association - Kleinburg Chapter	Rural Burlington Greenbelt Coalition
Innisfil District Association	Save the Maskinonge
Kawartha Land Trust	Save the North Gwillimbury Forest
Keep Vaughan Green	Save the Oak Ridges Moraine Coalition
Land Over Landings	Sierra Club Peel
Langford Conservancy	Simcoe County Greenbelt Coalition
Midhurst Ratepayers Association	Smart Growth Waterloo Region
New Tech Caledon King Citizens for Clean Water	South Lake Simcoe Naturalists
Oak Ridges Moraine Land Trust	South Peel Naturalists Club
Oakville Green Conservation Association	Sunfish Lake Association
Ontario Farmland Trust	Sustainable Brant
Ontario Headwaters Institute	Sustainable Cobourg
Ontario Land Trust Alliance	Sustainable Urban Development Association
Ontario Nature	Sustainable Vaughan
Ontario Soil Regulation Task Force	The Humane Society of Canada
Palgrave Residents Association	The Lakewater Society
Park People	Toronto Environmental Alliance
PERL	Urban Green Environmental Organization
PitSense Niagara Escarpment Group Inc.	Wellington Water Watchers
Pomona Mills Park Conservationists Inc.	West Oro Ratepayers Association
Preston Lake Environmental Association (PLEA)	York Durham Ontario Woodlot Association
Protect our Water and Environmental Resources (POWER)	York Region Environmental Alliance