



May 10, 2024

Re: ERO# 019-8369 Proposed Bill 185, Cutting Red Tape to Build More Homes Act 2024

Gravel Watch Ontario (GWO) is a province-wide coalition of citizen groups and individuals that acts in the interests of residents and communities to protect the health, safety, quality of life of Ontarians and the natural environment in matters that relate to aggregate resources. Formed in 2003 we have over 20 years of experience assisting both communities and government agencies in matters related to aggregate and members from all across the province.

Our objections to Bill 185 and the proposed PPS (2024) include:

- Removing 3<sup>rd</sup> party appeals to Ontario Land Tribunal (OLT) while maintaining appeal rights for developers creates an even more unbalanced planning scheme in Ontario. The right of 3<sup>rd</sup> parties to appeal land use decisions is critical to ensuring these decisions have all the information available for long-term planning. Removal of this right is a fundamental negative change and is virtually guaranteed to produce less informed planning decisions which are a requirement for long-term healthy communities. The long-term goal of healthy and well-planned communities whether urban, rural or in between should not be sacrificed.
- Due to the removal of the Growth Plan for the Greater Golden Horseshoe without transferring its important policies to the PPS as promised, significant guiding principles and protections will be lost. This plan was constructed over many years with input from all stakeholders and the new proposals simply dispose of its most important policies, those relating to protection of natural ecosystems and intensification of human development inside existing boundaries. These two pillars work together to maintain vital resources such as farmland and groundwater which are especially essential to rural Ontario.
- Substituting “Intensification Targets” with an encouragement-only approach. The Province’s housing issues are not solely based on quantity, but also on affordability. Removal of intensification targets wastes the former focus on economies of scale to build the right kind of housing (affordable) in the right places (urban areas). The end result will be fewer residential units spread over much larger areas of land, ensuring the cost of these units will be higher and slower to construct. It also makes the cost of infrastructure (water, sewer, roads, transit) higher. Coupled with green lighting settlement boundary expansion and subdivision on rural lands, natural heritage and agricultural systems will suffer in Ontario while not addressing the core need for affordable housing at scale.
- Abandoning mapping of the Natural Heritage, Water Resource Identification and Agricultural Systems will result in additional loss and degradation of these resources which are critical to long-term planning. These initiatives were constructed for a reason and with significant input from all stakeholders. Without them, sprawl which is one of the primary enemies of farmland and natural/water systems is encouraged and once in place, is irreversible. These initiatives seem to dismiss many of the lessons learned from the Walkerton Inquiry. This represents short-

term thinking and is a direct threat to the long-term viability of a healthy environment and thriving communities for all Ontarians.

- Removal of pre-consult requirements will make it much harder to make long-term plans that are effective in producing housing affordably at scale. Land use planning is hard work and done properly results in a combination of economic and residential opportunities. Without pre-consult, the result will be a hodgepodge of developments with no clear goals and significant threats to long-term planning. Better to have as much information as possible, available as soon as possible before decisions are made, to allow effective planning without resorting to short-term thinking, which values efficiency over effectiveness.
- Removal of planning authority from upper tier municipalities. Long-term planning for healthy communities requires a larger scale systematic approach to accommodate infrastructure planning for issues as far-reaching as where to build residential, fire and police requirements, green spaces, school requirements, where aggregate will be extracted and processed, etc... While some of these may be possible to plan economically within urban areas at the lower tier, many associated rural areas simply do not have the resources at the lower tier to effectively plan for all the aspects of growth, especially at large scales in short timeframes. Again, the result is likely to be sprawl with little to no attention paid to infrastructure and services required to construct effective communities.

Unfortunately, these two recent government initiatives appear to be simply recycled versions of the previous round while ignoring the vast majority of legitimate input from Ontarians, input that should have been taken seriously by any government informed by both the short and long-term public interests of all Ontarians.

While we all want solutions to the province's current housing issues, we are very concerned that Bill 185 and the revised PPS (2024) are NOT the answer and will make the problem worse. We urge the government to withdraw both Bill 185 and the PPS (2024) and produce replacements that respect the rights of all Ontarians to fully engage in the process (including appeal rights) to ensure the long-term viability and effective planning for Ontario's growth.