



May 27, 2015

AWARE Simcoe Input To 2015 Co-ordinated Provincial Planning Review

Introduction

AWARE Simcoe would like to thank Premier Wynne and her government for initiating this coordinated review of Ontario's land use planning legislation. We also appreciate the government's extensive efforts to engage the public and solicit their vision, ideas and hopes for the future of Ontario. AWARE Simcoe appreciates the opportunity to provide feedback on the 2015 Co-ordinated Provincial Planning Review.

AWARE Simcoe is a citizens' group that works to protect water, the environment, health, and food land through transparency and accountability in government. Please visit our website www.aware-simcoe.ca. We are attaching our AWARE Simcoe Vision for Simcoe County brochure.

AWARE Simcoe will address the following aspects of the Co-ordinated Review:

1. Growing the Greenbelt
2. Policy Conflicts
3. Performance Indicators Metrics
4. The Land Budget Methodology
5. Density and Intensification Targets
6. Urban Growth Centres/Rural Areas

1 Growing the Greenbelt

There are presently six criteria that MMAH considers when making decisions on expanding the Greenbelt

Criteria #2 states: "The request identifies a proposed expansion area that is adjacent to the Greenbelt or demonstrates a clear functional relationship to the Greenbelt area and how the Greenbelt Plan policies will apply."

This implies that only areas directly adjacent to the existing Greenbelt can be considered for Greenbelt expansion. This criterion creates an unnecessary barrier for outer ring municipalities including Simcoe County when submitting a request for the expansion of the Greenbelt to accommodate areas of environmental or

agricultural significance that would represent a logical extension to the Greenbelt while not directly adjacent to it.

The Province should change the criteria to expand the Greenbelt and ensure that a level of flexibility is considered so that communities are not automatically excluded. Failure to include the outer ring municipalities including Simcoe County as a minimum threatens the viability of critical agricultural communities due to leapfrog development. Without the expansion of the Greenbelt, it will be business as usual requiring expensive infrastructure to be built and maintained in order to accommodate low density housing in the outer ring communities. The outer ring communities should not serve as the “relief valve” for the growth issues inside the GTA.

The Province must recognize the unique character of the rural communities in Simcoe County and other outer ring communities and strive to preserve these lands for future generations. Growth and economic opportunities must be compatible with and complementary to the existing agricultural and tourism based economy. The idea is to capitalize on the attributes of the land while protecting the unique character and features of communities for the long haul. This includes recognition of the importance of significant woodlands as an integral element of complete communities.

Small scale agri-businesses complement the tourism sector and vice-versa. The preservation of Class 1, 2 and 3 (as a minimum for Simcoe County) must be a top priority for the Province. This is a non-renewable resource that provides many spin-off jobs providing fresh, healthy food to Ontario and beyond is a main economic driver in Simcoe County.

2 Policy Conflicts

The Growth Plan states;

“As provided for in the Places to Grow Act, 2005, the Growth Plan prevails where there is a conflict between the Growth Plan and the PPS”.

“Where there is a conflict between the Greenbelt, Niagara Escarpment or Oak Ridges Moraine Conservation Plans and the Growth Plan regarding the natural environment or human health, then the direction that provides more protection to the natural environment or human health prevails”.

The Provincial Policy Statement says: *“Provincial plans are to be read in conjunction with the PPS. They take precedence over the policies of the PPS to the extent of any conflict, except where the relevant legislation provides otherwise.”*

Unfortunately the policies of the Growth Plan undermine the fundamental principles set out in the PPS that are intended to provide long-term prosperity and social well-being for all municipalities in the Province of Ontario. The Growth Plan, as stated in

the Environmental Commissioner of Ontario's (ECO) 2006/2007 Annual Report, is forcing municipalities to plan for population increases without being able to set limits.

The ECO states in his 2013/2014 Annual Report, *Managing New Challenges*, "The current approach gives little, if any, weight to the fact that significant population growth may simply be inappropriate and ultimately unsustainable in some communities. Accepting the reality that there are limits to growth – and planning for that fact – is a basic tenet of sound land use planning."

The Greenbelt Plan policies prevail over the Growth Plan policies where there is a conflict for those fortunate to live within these protected areas. In contrast, the outer ring municipalities would have to comply with the policies of the Growth Plan over the policies of the PPS if there is a conflict between the two plans.

The PPS and Growth Plan policies place precedence on economic interests while using weak or ambiguous language for environmental protection. The focus is on economic interests without a balanced approach to protect agricultural lands and the natural heritage systems.

An initiative hosted by the United Nations Environment Programme on the Economics of Ecosystems and Biodiversity (TEEB), released a global study that found nature provides trillions of dollars in ecosystem services each year. (*The Economics of Ecosystems & Biodiversity*, ISBN #978-3-9813410-3-4, www.Teeweb.org)

3 Performance Indicator Metrics

The province has developed 14 performance indicators for the Growth Plan in order to track implementation of the plan over time. The indicators are designed as a tool to help evaluate how growth and development in the region are unfolding against the Growth Plan policies. The metrics used to evaluate the Performance Indicators should be sourced from the best, most recent data available. It is difficult to assess whether the goals of the Growth Plan are being achieved as the Province did not set up a public and transparent process for monitoring the implementation of these policies and projections by municipalities.

Performance indicators should focus on local issues and not solely on provincial policy. Municipalities could provide additional indicators that may be more reliable or appropriate, in evaluating growth and development at the local level.

Municipalities can provide a measure of whether or not the Growth Plan policies are achieving the goals of:

- using land efficiently and
- reducing development pressures on natural areas outside of settlement areas and
- protecting, conserving and wisely using natural resources.

The Performance Indicators for the Growth Plan for the GGH, 2015 (ISBN 978-1-4606-5329-6) state that *“there are challenges in finding data that is consistent and accurate across all 110 municipalities in the GGH.”*

It is also worth noting that the ministry implemented changes and additions to the proposed indicators as a result of consultations with “interested individuals”. As a result the designated greenfield area density indicator was *significantly* revised in “partnership with a municipal working group.”

An excerpt from the document Towards Performance Indicators Preliminary Indicators for Discussion, March 3, 2014 (ISBN 978-1-4606-3322-9) states; *“When measuring indicators for designated Greenfield area density, there were significant limitations with the estimation of area and residential population that may have resulted in densities being inaccurately estimated. For example, it was not possible to exclude all natural heritage features from the calculations of the built designated greenfield area. It is also not clear if MPAC residential occupancy data is as accurate as Census data. Also, the Growth Plan target of 50 people and jobs per hectare is meant to be calculated across the entire designated greenfield area, but the densities are calculated just for the areas that were built between 2006 and 2011. The indicator is therefore a measure of progress towards achieving the target of 50 people and jobs per hectare over the life of the plan.”*

The indicator for “Land Consumption” did not include official plans that have not been approved by the Province, or official plans that are before the OMB. Therefore, this indicator omitted metrics for those plans and will not be updated for all municipalities across the region at the same time.

4 Land Budget Methodology

There is no standardized method for developing a land budget for Ontario and no requirement to direct larger amounts of growth within each upper-tier municipality to already urbanized areas or more urban municipalities. Municipalities that exclude more land from the density calculations are able to develop designated greenfield area land at overall lower densities compared with municipalities that exclude only the areas and features specified in the Growth Plan. These variations have led to Growth Plan implementations that are inconsistent.

The Growth Plan policies have permitted outer ring municipalities to designate more land for growth by manipulating the calculations in the land budgets.

The inconsistencies of how the land budgets are calculated are due to:

- A. Assumptions about housing diversity
- B. Assumptions about expected types of employment and their land requirements
- C. Variations in intensification targets and greenfield density targets

- D. Variations in what are considered “take-outs” (what lands are omitted from land budget calculations)

Growth Plan Policy 2.2.7.3 states; *“this density target will be measured over the entire designated greenfield area of each upper or single-tier municipality, excluding the following features where the features are both identified in any applicable official plan or provincial plan, and where the applicable provincial plan or policy statement prohibits development in the features: wetlands, coastal wetlands, woodlands, valley lands, areas of natural and scientific interest, habitat of endangered species and threatened species, wildlife habitat, and fish habitat. The area of the features will be defined in accordance with the applicable provincial plan or policy statement that prohibits development in the features.”*

Inconsistent assumptions of how to accommodate growth are permitting municipalities to continue patterns of development from the past while adopting the minimum intensification and Greenfield density targets of the Plan.

5 Density and Intensification Targets

Density

The Neptis Report, *Implementing the Growth Plan for the GGH, 2013*, indicated that most municipalities did not plan to exceed the targets set out in the Growth Plan. The Growth Plan’s attempt to encourage municipalities to exceed the minimum intensification and greenfield density targets has failed.

Urban Strategies Inc. prepared a document for the Ministry of Public Infrastructure (2005) Application of a Land-Use Intensification Target for the Greater Golden Horseshoe, which stated;

“One major finding of this comparative research is that a region-wide intensification target of 40% for the GGH would be significantly lower than in other jurisdictions. Other jurisdictions in Canada, the UK, and Australia aim for 60-80% intensification.”

“Experience with intensification targets in other jurisdictions shows that a fixed urban boundary is a crucial part of the package of policies that guide intensification.”

The ministry approved alternative (lower average) density targets and lower intensification targets for the majority of outer ring municipalities; the alternative density targets are below the suggested level needed to support basic transit service. The Growth Plan policies that allow the Minister to lower these targets are contrary to the spirit of smart growth and undermine efforts to change growth patterns and build for sustainable communities.

The lower greenfield density targets create the hallmarks of urban sprawl:

- A. The need for more greenfield lands to be consumed;
- B. More car dependent communities;
- C. Inefficient use of infrastructure;
- D. Social isolation

The Environmental Commissioner commented in the 2012/2013 Annual Report; *“the introduction of amendments to the Growth Plan in the absence of any comprehensive information on how the overall planning system is functioning is seriously disconcerting.”*

It seems backward to develop performance indicators several years after targets have been mandated, allowing for a delay in data collection and a too-late realization that progress towards the targets cannot be easily measured.

The ECO also raised concerns in the 2006/2007 Annual Report about the Growth Plan forcing municipalities to plan for population increases without being able to set limits. The current approach gives little, if any, weight to the fact that significant population growth may simply be inappropriate and ultimately unsustainable in some communities.

Intensification Targets

The Urban Strategies Inc. (Application of a Land-Use Intensification Target for the GGH) report further states: "Meeting the intensification target alone does not guarantee or even indicate that more compact, mixed-use development is being achieved in the remaining 60% of development which takes place on greenfield land unless appropriate policies are established."

"Experience with intensification targets in other jurisdictions shows that a fixed urban boundary is a crucial part of the package of policies that guide intensification. Urban Strategies therefore recommends that the Designated Settlement Area be fixed for a set period of time and that expansions only be considered for settlement areas that have achieved high levels of intensification."

6. Urban Growth Centres (UGCs)/Rural Areas

Urban Growth Centres

UGCs were intended to be the focus of growth with higher intensification targets supported by existing infrastructure for sewer, water, road and transit. The present policies enable the expansion of unsustainable low density urban development outside existing urban centres.

UGCs should be expanded to include a larger portion of the principal primary settlement area for cities such as Barrie so that intensification is directed to where

there is existing infrastructure. Downtown Barrie is the only *urban growth centre* in the Simcoe Sub-area and the City of Barrie is the principal primary settlement area. Expanded UGC's could accommodate more intensification which would in turn limit development onto new Greenfields outside the city limits. Communities that abut the city limits of Barrie should recognize Barrie as the UGC to better facilitate and promote intensification. Instead, the Minister permitted lower density and intensification targets in outer-ring municipalities such as Springwater Township rather than recognizing Barrie as the UGC for the Township.

Rural Areas

Policies of the Growth Plan that are contrary to the spirit of the Growth Plan include:

Policy 2.2.9.2 (Rural Areas)

Development outside of settlement areas, may be permitted in rural areas in accordance with Policy 2.2.2.1(i)

Policy 2.2.2(i) (Managing Growth)

*Population and employment growth will be accommodated by:
Directing development to settlement areas, except where necessary for development related to the management or use of resources, resource-based recreational activities, and rural land uses that cannot be located in settlement areas.*

This policy is vague and open to interpretation as “activities” may be incompatible with the rural countryside.

These policies are contrary to the Growth Plan’s emphasis on “*intensification and optimizing the use of the existing land supply which makes better use of our existing infrastructure, and less on continuously expanding the urban area.*”

Recommendations

- 1. Expand the Greenbelt to include additional prime agricultural land and natural heritage systems of Simcoe County and ensure complete mapping of these systems including the outer ring communities.***
- 2. Revise the Criteria re. Growing the Greenbelt. The criteria that mandate expansion of the Greenbelt only to those areas adjacent to the Greenbelt should be removed.***
- 3. Revisit the proposal of implementing Interim Settlement Boundaries and caps on population targets.***
- 4. Support efficient growth in urban growth centres by enforcing targets for intensification and aligning growth with existing water, road, transit and sewer capacity. Focus growth around transit hubs and rail stations.***

- Urban Growth Centres should be the focus of growth with higher intensification targets supported by frequent local transit services. Prioritize investment in transit, rail and existing highways over new highways.***
- 5. Remove Growth Plan Policy 6.3.2.2 (Redesignation of lands not for urban uses to lands for urban uses)***
 - 6. Class 1, 2 and 3 prime agricultural land must be protected everywhere in Ontario (not just within the Greenbelt zone).***
 - 7. Growth Plan Policy 2.2.7.3 – Density targets should be achieved in each settlement area and not over entire designated greenfield area or each upper/single tier municipality.***
 - 8. Remove Growth Plan Policy 2.2.7.5 so that alternative density targets for outer-ring municipalities may not be reviewed or permitted.***
 - 9. Remove Growth Plan Policy 2.2.3.4 so that alternative intensification targets for outer-ring municipalities may not be reviewed or permitted.***
 - 10. Land Budget calculations must be based on a standardized method and must be strictly adhered to.***
 - 11. Growth Plan Policy 2.2.2.1 (i) should be revised to specify what “rural land uses” are permitted. Population and employment growth should not be accommodated on rural lands (especially housing, industrial or any non-agricultural related uses).***
 - 12. Growth Plan Policy 2.2.9.2 should be deleted so that development outside of settlement areas is not permitted.***
 - 13. Growth Plan Policy 2.2.9.3 should be deleted so that new multiple lots and units for residential development are not allowed in rural areas.***
 - 14. Intensification targets should be mandated and enforced at 50 or 60%.***
 - 15. Planning horizons should not be extended to accommodate medium and high densities.***
 - 16. Do not allow any new rural and/or natural lands to be designated urban over the next 10 years in the Outer Ring. Enforce hard urban boundaries.***

Conclusion

While well intentioned, the Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan have not served to adequately protect water, food land and ecological health in Simcoe County to date as witnessed by the unfortunate Special Rule allowing the loss of 300 hectares (so far) of prime farmland in the Midhurst Secondary Plan.

AWARE Simcoe would like to emphasize that the Greenbelt urgently needs to be expanded and must include Simcoe County. Failure to do this now will create significant and irreversible planning and environmental problems in the very near future due to leapfrog and low density development.

Protection of water, food security and environmental health for the long term must take precedence over all other land uses. Development interests that deplete food land and threaten water and ecological health must be curtailed starting now. Failure to protect our essential-to-life resources for future generations would be a tragic abdication of our responsibility.

Thank you again for the opportunity to comment.

Don Morgan, Chair,
AWARE Simcoe

Attachment: AWARE Simcoe Vision for Simcoe County