

South Lake Simcoe Naturalists (Ontario Nature)  
Paul Harpley, President  
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February 28, 2019

Cordelia Clarke Julien  
Assistant Deputy Minister  
Ontario Growth Secretariat (OGS)  
Ministry of Municipal Affairs and Housing  
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**Re: Proposed Amendment to the Growth Plan, ERO 013-4504**

Dear Ms. Clarke Julie

The South Lake Simcoe Naturalists (SLSN), consistent with Ontario Nature the Ontario Greenbelt Alliance (OGA) and others, supports the principles of the Growth Plan to curb expensive low-density development that drives up municipal taxes and debt, increases gridlock, degrades our water, paves over productive agricultural land and leaves us with a legacy of failing infrastructure, and transit starved cities across the Greater Golden Horseshoe (GGH). It is important that any changes to the Growth Plan support the ongoing shift in the regional growth model toward greater urban density and curbing of sprawl. In this regard and context we offer further detailed comment for your Ontario Government Review with particular geographic reference to the South Lake Simcoe area, and Lake Simcoe itself.

I was able to attend a Growth Plan for the Greater Golden Horseshoe Regional Roundtable in Pickering, February 7, 2019. I have reviewed the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017, and am familiar with the existing Growth Plan for the Greater Golden Horseshoe, 2017, which our organization has previously commented on at its establishment, and various reviews over more than a decade of research and planning supporting it. At the February 7, 2019 Roundtable forum I submitted comments on the planning comments boards for facilitator led topics of interest. Some of my comments herein build on our offered Roundtable ideas and revolved around the assertion that one of the key strengths of the current Growth Plan is the requirement to use a Municipal Comprehensive Review (MCR) process (from 2015 to 2017) to guide regional planning through an evidence-based framework that encourages efficient use of land. This provincial and regional guidance is key for smaller municipalities with few resources to enable them to move toward a consistent, public interest-

based approach to growth management. This is particularly important in the Lake Simcoe watershed where much of the landscape is small towns and hamlets and important agricultural and natural heritage landscapes.

The recent Growth Plan process was very recent and involved much public time and resources, including our organization and membership, and many others. It is concerning that now with this "Review" more duplication is occurring with the current Provincial Government in this Growth Plan Review process focused on landscape, rather than getting on with assisting existing and new businesses in advancing their business plans, education in business and investment and advancing human resources and performance.

Gentle density and hard boundaries move us away from the wasteful low-density model of development.

In addition, holding the line on settlement area boundary expansions between MCR processes is key to creating complete communities, making expansions based on a complete package of evidence, maximizing infrastructure efficiency, limiting the loss of productive and precious farmland and maintaining our clean water resources.

## **Agricultural and Natural Heritage System Implementation**

### Natural Heritage System Implementation

Mapping a natural heritage system provides clarity and reduces duplication between various levels of government. The current piecemeal approach to natural heritage protection is not working. For example between 2000 and 2011, we lost 6152 hectares of wetlands in southern Ontario (Ontario Nature, 2016). Wetlands are valuable; they can reduce the financial costs of floods by up to 38 per cent and provide water and nutrient filtration services as well as critical wildlife habitat and recreational opportunities. The same could be said of upland forests and increasing rare grassland meadows and their wildlife.

*We urge the province to use recently completed Ministry of the Natural Resources and Forestry mapping as a baseline and incorporate more refined conservation authority mapping if it is available and can be shown to more accurately characterize the mapped features or functions. We understand some special interest development related organizations and some municipalities have advised the mapping is not good enough, but details are hard to find in this regard. They should contribute and defend specific improvements to the MNRF to advance rigour, but not soy dispersions on a whole body of work and process.*

The current provincial government needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.

Where there are conflicts in mapping occur as the Ontario Greenbelt Alliance (OGA) advise, the more restrictive mapping should apply or an NHS comparison/evaluation process (as described in b above) should take place. Further, the proposed policies (5.2.2.3 and 4.2.2.5 and 4.2.6.9) which allow municipalities to seek technical changes to and refine the provincial NHS should be modified to include and expand on the same proviso as contained in the NHS refinement policy of the Greenbelt Plan (policy 3.2.2.5) which reads “may be refined, with greater precision, in a manner that is consistent with this Plan ....(in this case the Growth Plan) and the GGH Natural Heritage system map”. This language is important to ensure that local refinements or technical changes are not merely a way to revert to a smaller locally identified NHS.

Natural Heritage mapping must be applied consistently across the Greater Golden Horseshoe, including whitebelt lands. b

### Agricultural System Implementation

Between 2011 and 2016 Ontario lost 319,700 acres of productive agricultural land (175 acres per day) (StatsCan, 2016). Not only is this loss unsustainable from a food security perspective but it symptomatic of an unaffordable pattern of urban growth. The South Lake Simcoe Naturalists concur with the OGA recommendations and support the provincial Agricultural System to consistently protect farmland across the Greater Golden Horseshoe. Farming is a business and the agri- food sector is a key economic sector in Ontario.

Further, it is important to maintain fixed urban boundaries for existing urban and rural settlement areas throughout the GGH. Create permanent growth boundaries where mapping shows a healthy agricultural system or natural heritage feature/system. And, ensure municipal official plan mapping and zoning of prime agricultural land is consistent with Provincial agricultural system mapping.

Similarly, land swaps of Greenbelt land are not acceptable. The Greenbelt permanently protects land. Opening lands in the Greenbelt for development would signal the end of the Greenbelt Plan to millions of Ontarians. This is particularly important in the South Lake Simcoe area where current Greenbelt and Secondary Plan areas and boundaries have been delineated through long-term evidence-based science and planning are essential moving forward for the health of Lake Simcoe.

### **Settlement Boundary Expansions**

Data produced to date indicates that there is more than enough land already allocated to accommodate expected population growth in the Greater Golden Horseshoe within existing urban boundaries to 2031(York Public). In some regions there is an excess of land, for example, York Region has a 23 year supply of land for housing and an excess supply of employment land (City Building Institute).

If urban boundary expansions proceed when there is excess land then land use is not maximized resulting in inefficiencies, such as lost revenue for municipalities from vacant land and costs for infrastructure expansions resulting in higher taxes. Of additional note is that exempting 40 hectare settlement boundary expansions from an MCR is a recipe for many smaller, unserviced settlements to expand incrementally and a signal for the development industry to speculate on farmland around these small settlements given this exemption. This is not good planning and a major problem we have with the proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017. This is particularly the case in the sensitive Lake Simcoe watersheds areas.

Key recommendations would be to hold the line on urban boundary expansions to support intensification to prevent sprawl, farmland loss and maximize the efficiency of existing infrastructure. To not encourage rounding out to rural settlement boundaries or the boundaries of towns and villages or hamlets in the Greenbelt Plan.

### **Small Rural Settlements**

These settlements often referred to as hamlets in planning are important small local places, and consistent with the Greenbelt which surround them in the Greater Toronto Area (G.T.A.) agricultural and natural heritage landscape must not have any increased development in them except limited infill. It was pointed out by many at the February 7, 2019 Roundtable that this was highly supported. Also, it was noted that more research and good planning-based Policy and tight planning controls for municipalities is needed to best formalize this going forward in any implementation of an Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017, to prevent poor or bad planning here.

### **Density and Intensification Targets**

It remains my understanding, and has been the position of the OGA and others that the Growth Plans (2006 and 2017) have always allowed Regional and County governments to account for variations and infrastructure capability of lower tiers when allocating growth – and all have utilized this ability. Also 75% of the forecasted growth is in greenfield areas that are contiguous to urban areas and most areas are supported by the regional transportation plan. Allowing all municipalities to lower growth targets as proposed in the Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017, is contrary to the principals of compact transit supportive growth in the Growth Plan and will make it difficult to ever be able to provide appropriate levels of transit to low density areas in both the inner and outer ring. This particularly true for Regions like York and Durham in the Lake Simcoe watershed. The current debates about the proposed Newmarket Go Station, and the northward extension of the T.T.C. Yonge Subway into York Region are ample evidence of this. While support of maintenance of the existing targets – should the Government proceed, these Regions should have a density target of 60 pjh so that

the entire GTHA has the same target – and a better opportunity to support our \$50 billion regional transportation plan that has been touted.

### **Other Recommendations**

Given the importance of agricultural lands, natural heritage landscapes and wildlife habitat in Southern Ontario and particularly in the South Lake Simcoe area alternative development and business activity should be a priority of the present Ontario Government policy.

Recommendation that the Government of Ontario promote and implement alternative forms of housing and new types of ownership models in a new revised Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017. Local residents in small G.T.A. towns for years have been advocating for. **Alternative ownership and owners/rental arrangements** are a new option in Towns and Villages in South Lake Simcoe like Aurora, Keswick, Sutton, and beyond, that could be a foundational component of this Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017. Renovation and additions to existing buildings on approved properties, not impacting natural heritage or wildlife habitat, could increase affordable housing in-situ, and provide work and business. The Ontario Government should be advancing these arrangements now.

Also, in existing urban areas, Towns and Villages where appropriate alternative and cost friendly forms of housing like **“tiny houses”** and **pre-fabricated modular type homes** need to be supported and advanced now in these communities. Not increasing the development boundaries in communities but intensifying within (with appropriate municipal zoning and provincial code concurrence). This could also be considered for small business and enterprise. Again, the additional advantage of providing local construction business work, and limit the need to develop greenfield and Greenbelt lands well into the future. All the time conserving valuable and limited agricultural, natural heritage lands and wildlife heritage surrounding currently developed areas long into the future. Additional to these innovations **“Pocket neighbourhoods”** have been developed in other jurisdictions around the world, and they should be studied and advanced by the Government of Ontario now. **These developments in already urban areas, not impacting natural heritage or wildlife habitat, could increase affordable housing in-situ, and providing work and business should be a priority for Ontario rural communities.** One of our local municipalities, the Town of Georgina have supported the consideration of these kinds of ideas in their recent suggestions to the Province of Ontario for increasing housing supply in Ontario in response to the Province’s recent Consultation Document (Town of Georgina, 2019).

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References:

City Building Institute:

<https://www.citybuildinginstitute.ca/portfolio/missing-middle/>

Ontario Nature, 2016:

[https://ontarionature.org/wpcontent/uploads/2016/11/GLWCAP\\_Highlights\\_2005-2010\\_EN.pdf](https://ontarionature.org/wpcontent/uploads/2016/11/GLWCAP_Highlights_2005-2010_EN.pdf)

StatsCan (2016): <https://www.statcan.gc.ca/eng/ca2016>

Town of Georgina (2019) Increasing Housing Supply in Ontario Consultation Document, January 16.

York Public, <https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES>

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***About the South Lake Simcoe Naturalists***

*The South Lake Simcoe Naturalists (SLSN) is a fully federated member organization of Ontario Nature. Ontario Nature protects and restores natural habitats through research, education and conservation, connecting thousands of individuals and communities to nature. Ontario Nature is a charitable organization representing 25,000 members and supporters and over 140-member groups across Ontario. The South Lake Simcoe Naturalists represent individuals and families in Georgina and the greater South Lake Simcoe Region. Our membership includes a wide range of people from diverse backgrounds and experience, professional to amateur. Members are interested in nature, wildlife, natural and cultural landscape conservation, good planning and support of local and broader many past submissions including, but not limited to, the Town of Georgina Official Plans and Sutton/Jackson's Point and Pefferlaw Secondary Plan reviews, since the 1990's. Also, SLSN has in the past, and recently commented on previous and recent development proposals in the Georgina area, among other Regional and Provincial scale initiatives such as the Lake Simcoe Act and Plan, Ontario Greenbelt Act, Ontario Growth Plan and the Oak Ridges Moraine Act.*

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