

Rescue Lake Simcoe Coalition

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Cordelia Clarke Julien

Assistant Deputy Minister

Ontario Growth Secretariat (OGS)

Ministry of Municipal Affairs and Housing

777 Bay Street, Suite 2304, 23rd Floor

Toronto, ON   M5G 2E5

[growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

**Re: Proposed Amendment to the Growth Plan, ERO 013-4504**

Dear Ms. Clarke Julien,

The [Rescue Lake Simcoe Coalition](https://rescuelakesimcoe.org/) (RLSC) represents 21 groups in the Lake Simcoe watershed such as: concerned residents, people united by a local problem affecting Lake Simcoe, cottager groups and neighbourhood associations. We are a member of the Simcoe County Greenbelt Coalition and the Ontario Greenbelt Alliance and support their submissions. Their comments are incorporated in the following submission.

At the end of a provincial consultation session regarding proposed changes to the Growth Plan, the Executive Director of the RLSC asked, “**Outline how the province will meet the objectives of the Lake Simcoe Protection Plan, with all of the growth and reduced densities you are proposing?**” The proposed changes to the Growth Plan will eat up farmland and green spaces, cost municipalities and residents more money to deliver services, and add more pollution to Lake Simcoe.

We are not against growth per se. We are standing up for a healthy environment, for the sake of the creatures that rely on clean water and green spaces, for future generations, and for the viability of an economy that relies heavily on a healthy and attractive Lake Simcoe.

The RLSC is very concerned about the inevitable impacts on Lake Simcoe of land use planning that promotes sprawl. For decades, successive provincial governments have chosen to allocate population growth to the Lake Simcoe watershed with the full knowledge that the allocated growth exceeds the Lake’s ability to accomodate the phosphorus, nitrogen and salt that comes with new urban and suburban growth. The 2009 Lake Simcoe Protection Plan (LSPP) includes a phosphorus loading target which is approximately half of today’s load. The LSPP target is 44 tonnes of Phosphorus per year by the 2045. The average from 2004 - 2015 was 85.5 tonnes per year.

The Province of Ontario created the Lake Simcoe “[Phosphorus Reduction Strategy](https://www.ontario.ca/page/lake-simcoe-phosphorus-reduction-strategy)” in 2010 to work towards achieving the phosphorus loading target of the LSPP.  It says: “*...the preliminary estimate of the total area within the watershed where new development might occur to 2031 is approximately 17,000 hectares… Under the [Lake Simcoe Protection]Plan all new developments are required to have “enhanced” stormwater management controls in place, subject to limited exceptions. Accounting for these controls, analysis indicates the phosphorus load from these new developments would be 15.3 T/yr. Additional analysis indicates that combining “Enhanced” stormwater management controls with Low Impact Development (LID) practices would reduce the phosphorus load from new development to 9.2 T/yr.*

*While the Strategy and the Plan strongly encourage that effective measures are taken to mitigate and reduce phosphorus contributions from new development wherever possible,* ***significant phosphorus loadings from development will occur and should be offset in some way,****”* (pg. 30).

As evidenced above, achieving the LSPP’s phosphorus loading target will be extremely difficult, and can only be achieved if we maintain and / or increase the strength of the tools in place to minimize the impacts of growth. Those are specifically, the [Lake Simcoe Phosphorus Offset Program](https://www.lsrca.on.ca/watershed-health/phosphorus) and the [Watershed Development Guidelines.](https://www.lsrca.on.ca/Shared%20Documents/permits/watershed-development-guidelines.pdf) These must not be weakened.

The solution to accommodating the increased population allocation lies in creating more dense communities, more affordable homes and rental units, within existing settlement boundaries, where people can walk to transit. We support the development of complete, sustainable, and walkable communities. We already have plenty of low-density, car dependent, sprawling bedroom communities in the area, and the lake is past its limit to handle more of the same.

One of the key strengths of the Growth Plan is the requirement to use a Municipal Comprehensive Review (MCR) process 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.

During the 2015 Growth Plan review it became clear that the MCR process had ensured that there is a sufficient supply of undeveloped greenfield land available to meet housing and employment needs as well as a supply of land within our urban areas to meet intensification targets. Proposed reductions to the designated greenfield targets (DGA) and allowing municipalities to ask for even lower targets is contrary to the goal of creating complete, compact communities. 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.

On behalf of the Rescue Lake Simcoe Coalition I submit the following comments on Growth Plan Amendment one for your consideration.

Sincerely,

**Comments and recommendations regarding proposed changes to the Growth Plan**

1. **Employment area conversions**

The existing Municipal Comprehensive Review (MCR) process may in some cases be too onerous and hinder the creation of mixed-use projects. Employment uses are changing and work is becoming increasingly mobile. Economic development strategies are essential to understand local needs and employment trends and these strategies should inform any desired conversions.

Like all planning matters, conversions should be public and evidence based. Conversions should only occur if the employment lands are in excess of projected needs to 2041.

**Recommendations:**

The following conditions should apply to employment land conversions:

* 1. the proposed land designation conversion supports the objectives of the Growth Plan, in particular, the density targets for residents/jobs per ha are attained that support transit, 150 ppj/ha and 200 ppj/ha near subways and 80 ppj/ha for regular 10-15 minute bus service.
  2. the conversion is to mixed use, multi- storey buildings and prioritizes rental housing. Employment land is not converted to low-density single family housing.
  3. designated employment land within 500 m of a 400 series highway should be retained for employment uses and agriculture, not converted to housing or institutional uses due to health impacts from traffic pollution.
  4. conversions are evidence-based, a regional economic development strategy has been completed, the employment land retained by the municipality exceeds the need to 2041.

1. **Agricultural and Natural Heritage System Implementation**

**2.1 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.  Between 2000 and 2011, we lost 6152 hectares of wetlands in southern Ontario. 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 Lake Simcoe watershed needs more natural cover in order to meet the 40% “high quality natural cover” target of the Lake Simcoe Protection Plan. Implementing a provincial NHS as soon as possible would help to increase the protected lands and get us closer to the 40% target.

**Recommendations**:

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.

* 1. Since the Natural Heritage policies of the Greenbelt have already been incorporated in the provincial NHS, we recommend the Provincial NHS be implemented as soon as possible, and that the Greenbelt’s Protected Countryside policies be applied to agricultural lands in the part of the Lake Simcoe watershed that in not in the Greenbelt, primarily in Simcoe County.
  2. The province needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.
  3. Where there is a conflict in mapping the more restrictive mapping should apply or a NHS evaluation should take place.
  4. Natural Heritage mapping must be applied consistently across the Greater Golden Horseshoe, including whitebelt lands.

**2.2 Agricultural System Implementation**

Between 2011 and 2016 Ontario lost 319,700 acres of productive agricultural land (175 acres per day). Not only is this loss unsustainable from a food security perspective but it symptomatic of an unaffordable pattern of urban growth. Allowing boundary expansions of towns and cities paves over productive farmland.

**Recommendations:**

1. Since the Natural Heritage policies of the Greenbelt have already been incorporated in the provincial NHS, we recommend the Provincial NHS be implemented as soon as possible, and that the Greenbelt’s Protected Countryside policies be applied to agricultural lands in the part of the Lake Simcoe watershed that in not in the Greenbelt, primarily in Simcoe County.
2. 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.
3. 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.
4. Ensure municipal zoning of prime agricultural land is consistent with Provincial agricultural system mapping.
5. 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.
6. **Major Transit Station Areas**

Transit and growth should be integrated to support transit that connects urban growth centres. This will relieve congestion for citizens and goods moving throughout the Greater Golden Horseshoe and within urban growth centres. A 2014 Ministry of Health study estimated that 154 premature deaths and health benefits valued at $1 billion per year could be achieved by implementing the Big Move regional transit plan.

**Recommendations:**

Ensure density and transit are complementary and integrated (subways, 200 pp/ha., light rail transit 160 pp/ha., Go trains 150 pp/ha, 80pj/ha buses 10-15 minutes). Lower densities of 50 pp/ha make regular transit unsustainable.

1. Maintain existing density targets for mobility hubs within urban growth centres.
2. Rezone lands around existing mobility hubs (Metrolinx Plan) to support transit oriented development while reducing congestion (include a mix of more affordable housing including rental, mid-rise and low- rise).
3. Existing policies already have flexibility i.e. Municipalities can shift density along transit corridor with existing policies.
4. Avoid using transit to direct growth to greenfield areas or the edge of settlement areas, instead use transit to revitalize downtowns and support complete communities.
5. **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. 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.   If we build more missing middle housing (4 - 10 story multi-unit buildings) we can reduce land consumption.   
  
For example, a recent study by Ryerson City Building Institute indicates that Mississauga can accommodate 174,000 mid-rise housing units within its existing urban footprint, 85% of Peel Region’s allocated growth.  Missing middle family housing provides affordable housing where urban services exist reducing municipal costs and retaining precious farmland.   
  
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.   
  
  
**Recommendations:**

a) Clarity is required to understand 1) who can make a request for a boundary expansion; and, 2) the number of boundary expansions that can be requested outside of an MCR process.

b) Hold the line on urban boundary expansions to support intensification to prevent sprawl, farmland loss and maximize the efficiency of existing infrastructure.

c) Keep the MCR process, essential for evidence-based planning. Expansions should only be considered within an MCR process.

d) No rounding out to rural settlement boundaries or the boundaries of towns and villages or hamlets in the Greenbelt Plan. Intensification in those places would add value and be economical and contribute to a better quality of life for all.

e) Do not proceed with allowing settlement boundary expansions of up to 40 hectares or multiple expansions. The addition of 40 ha to a settlement boundary is reckless. It does not promote evidence based planning. The target seems arbitrary and we question the problem this policy is trying to solve.

f) Expansions should not be considered if there is an excess of lands. The municipality should de-designate the excess lands before asking for an expansion.

**5. Density and Intensification Targets**  
  
There is an excess of land for housing in many communities due to the use of the 2006 Growth Plan market-based land assessment during MCR preparation.  During the 2017 Growth Plan review there was consensus reached among the multi-sector stakeholder panel to move to a target of 80 pj/ha. At the time industry concerns about the stock of single-family homes was found to be unsubstantiated as municipalities had planned for 800,000 ground related housing units providing for 80% of the expected population growth. Changes were made to calculating density targets by excluding employment areas, freeways, railways, pipelines, hydrolines, and cemeteries. Those exemptions and the new lower targets proposed further reduce densities in some areas below 2006 levels to 1990 densities.   
  
Housing trends and demographic shifts indicate a broader mix of housing is needed beyond tall condos and low density housing. A report by Ryerson’s City Building Institute indicates that most of our housing needs can be met through mid-rise (4-10 stories) missing middle development.  And transit supportive densities reduce congestion estimated by the Toronto Board of Trade to be costing our economy up to $15 billion per year by 2031. Beyond economic costs, increased traffic congestion has many implications for commuters including health costs and a loss of family time. A recent study by CMHC indicates a longer commute also reduces the affordability advantage provided by lower housing costs on the edge of the GGH.   
  
Regional and County governments can and do account for variations and infrastructure capability of lower tiers when allocating growth. 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 density and intensification targets is contrary to the principles 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.

**Simcoe County specific information regarding density and intensification:**

Currently, low density sprawl dominates Simcoe County. Densities around the county range from the 50 ppl/hectare to well below that in some of the more rural communities. The Ministry of Transportation’s own guidelines for building a transit supportive community suggests that to provide basic bus service, a minimum of 50 people per hectare is needed, otherwise the transit service is inefficient and difficult to sustain economically.  Even a bus service supported by 50 people per hectare, such as in Barrie, isn’t the kind of transit that is widely available to all residents or allows enough reliability and flexibility to shift transportation patterns away from single vehicle use toward more efficient modes of mass transit. The proposed “status quo” targets literally cement a development pattern that increases pollution, inequity and municipal debt for the long term.

Simcoe County’s population could increase 96% by 2041 from 2011 level. As Hemson Consulting outlined, this could mean that our region could see as many as 900,000 residents by 2041 with Barrie alone growing to 253,000 people.  The way we grow in Simcoe County cannot be predicated on how we’ve grown in the past, but rather needs to be based on how we should build communities of the future. We would prefer that the province recognize the growth that Simcoe County will be facing and help support and usher in policies that ensure this growth is not a burden on our future economy.

If the province’s proposed density and intensification targets stand, and allow Simcoe County communities to build mostly as they have for the past few decades, a pattern of growth that has created the environmental and agricultural land supply problems we have, will be sustained. This will negatively impact  our economy by reducing our ability to rely on the many benefits provided by clean water, farmland, and green spaces. This effect could be seen clearly over one decade ago as outlined in the Intergovernmental Action Plan (2006):

*“Unique growth and development challenges exist in Simcoe County and the Cities of Barrie and Orillia (study area). South Simcoe and Barrie, in particular, are experiencing increased development pressure, and are expected to continue to have rapid growth. A number of the municipalities in the study area rely on inland water systems which have been demonstrated to be under strain (for example the Lake Simcoe watershed has known issues as a result of phosphorous loadings). Without intervening action, the available potable water and aquaculture of these watersheds are threatened.”*

This quote has aged well and could easily have been written today instead of over one decade ago. The effects of ill-managed growth continues to wreak havoc on our water systems.

The impacts are also seen in our loss of farmland and greenspace. According to Statistics Canada, Barrie’s footprint grew 550% over the past 40 years mostly gobbling up farmland and semi natural space for a total loss of roughly 150 km2.  Neptis Foundation determined that from 2006-2012, Simcoe County zoned 13,000 hectares of green space (mostly farmland) to designated greenfield areas - the most in the Greater Golden Horseshoe. This despite the fact that they were experiencing a fraction of growth compared to York, Waterloo and Peel and with an existing oversupply of land for development.

The province’s proposed changes to the Growth Plan are inconsistent with the realities that the province loses hundreds of acres of farmland per day to development; Lake Simcoe struggles to assimilate urbanization to the detriment of its ecology and dependent industries; and that the assimilative capacity of the Nottawasaga River has already been maxed. Further, there is no evidence that lowering denities and intensification targets alleviates any problems, nor that there is any need to zone more land for development in Simcoe County.

**Recommendations:**

1. Density targets from the 2017 Growth Plan should be upheld without alternative targets for Designated Growth Areas. Remove the opportunity for lower alternative targets. Allow municipalities to exceed targets if they so choose.
2. Intensification targets should be considered based on current population and future growth potential.  For example, Orillia (pop. 31,166) will be held to a higher minimum intensification target than two larger and faster growing communities of Bradford (pop 35, 325) or Innisfil (pop. 33,079).  Why?
3. Communities that are rural and with low growth projections should also be encouraged to infill their development to provide a range of housing and to best utilize minimal tax revenues.  Intensification should not be seen simply as a panacea for city centres. It is important to smaller communities too.
4. Unless the province wants to ensure car dependency in most of Simcoe County’s larger city centres, there must be more support and information about the benefits of intensification and density. At the current rate, very few communities in Simcoe County will have the density to feasibly support transit. Provincial planners should be working with communities, both urban and rural, to help them communicate and calculate the benefits of intensification vs. sprawl. This would go a long way to change our damaging development patterns.
5. Clarity and transparency is needed to improve monitoring and reporting on implementation to better understand problems and find the best solution.
6. Update growth projections based on the census and Ministry of Finance projections.

**6. Recommendations to reduce red tape:**  
a) Address housing affordability by getting rid of the right red tape (Section 37). Section 37 is a negotiation process that takes time and resources away from planning, reduces transparency in the planning process and inspires NIMBY’s.   
  
b) Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.

**7. Other recommendations:**  
a) Raise the profile of Indigenous interests, treaty rights, consultation, and planning approaches and priorities.

b) Increase support for land securement as a tool for growth management and natural/agricultural/cultural heritage protection, including enabling severances/land subdivision for conservation purposes and associated incentives.

c) Retain a long-term sustainable approach to growth management that focuses on more than the number of houses built but the vibrancy and resiliency of our communities.