

Ontario Nature's Position on the Greater Golden Horseshoe Growth Plan

The Ontario government released the final approved Greater Golden Horseshoe Growth Plan (please visit www.pir.gov.on.ca) on June 16, 2006. The Plan came into force on that date. Ontario Nature welcomes the Province's re-engagement in broad, inter-municipal regional planning and the emphasis on curbing urban sprawl through urban intensification in order to protect natural areas and prime agricultural lands. We also appreciate the Province's efforts to integrate land use planning with the planning of major infrastructure (highways, roads, sewer and water lines, etc.).

Ontario Nature strongly supports the Growth Plan's intentions to foster compact, transit-supported, mixed-used urban communities and to protect the countryside, and many of the Growth Plan's policies are expected to help realize those intentions to some extent. We sincerely want the Growth Plan to succeed in its goals. However, we are concerned that the Growth Plan has evolved from its original bold vision for stopping sprawl, improving air quality, reducing greenhouse gas emissions, protecting natural areas and prime agricultural lands, and safeguarding sources of drinking water towards being an affirmation of "business as usual" development.

Specifically:

- The protections from urbanization for natural areas and prime agricultural lands outside of the Greenbelt are weak.
- Some of the Plan's elements, such as the extension of Highway 404 through Greenbelt lands north to Lake Simcoe, are contrary to the intent of stopping automobile-dependent sprawl, concentrating development in existing urban areas, and preserving natural areas and farmlands, particularly north of the Oak Ridges Moraine.
- Crucial details on infrastructure, land use and the protection of natural areas and prime farmlands have been deferred to the Sub-Area Assessments (for the five Sub-Areas of the total area covered by the Growth Plan). This may lead to inconsistencies in implementation of these features of the Growth Plan. We note in particular that the Ministry of Transportation's five-year Southern Ontario Highways Program, announced on the same day as the Growth Plan, suggests that key infrastructure decisions have been made before the completion of the Sub-Area Assessments.
- The intensification and density targets and the urban boundary expansion rules in the Plan are more affirmations of business as usual than catalysts for major changes in the location and form of urban development. For example, the minimum intensification target within the "built-up areas" of our cities, at 40%, is considerably lower than targets in many other jurisdictions facing similar urban development challenges and is only about 15% higher than what is already being achieved in some Greater Golden Horseshoe municipalities. Also, the density of 50 jobs and residents combined per hectare for "greenfields" (areas where there has not yet been any development) is barely sufficient to support any form of public transit.

- The employment and population growth projections on which the plan is premised have been seriously challenged by qualified research consultants such as those retained by the Neptis Foundation, a Toronto-based urban development think tank.

Ontario Nature also notes areas in which the final Growth Plan steps *backwards* from the November 2005 Proposed Plan in a number of important respects:

- The Plan's minimum density target for "greenfield" development is 50 jobs and residents combined per hectare. However, the Growth Plan has been modified to state that in the Greater Golden Horseshoe beyond the Greater Toronto Area and Hamilton – an area called the "outer ring" which includes Niagara and Waterloo Regions, Brant and Wellington Counties, Simcoe and Peterborough Counties, which are all subject to intense development pressures – the Province may permit alternative density targets. This will almost certainly mean lower, more sprawling and transit-unsupportive densities in these areas.
- Rural sprawl in the form of new multiple-lot development is expressly permitted outside of existing settlement areas. Such development was not permitted in the November 2005 Proposed Plan. This will be allowed only where an Official Plan had designated such development for specific parcels of land. However, developers may not even have filed development applications yet but will still be "grandparented" under this weakening of the Growth Plan.
- A provision in the November 2005 Proposed Plan that new lots and land uses in rural areas be compatible with and not hinder surrounding farming operations has been deleted.
- Although the implications are as yet unclear, the policy that actually defines the "Natural System" has been deleted from the Growth Plan. By contrast, prime agricultural areas are fully defined in the Growth Plan, although only specialty crop lands (e.g., tender fruit, grape and Holland Marsh lands) are actually protected from urbanization.

At the time of the release of the Growth Plan on June 16, a regulation was approved under the *Places to Grow Act* that deals with development applications that were already part way through the planning approvals process on June 16. If a developer has already filed an application for an urban boundary expansion of fewer than 300 hectares (almost 750 acres) but it has not yet been approved by a municipal council, then the developer is totally exempt from the provisions of the Growth Plan. Ontario Nature takes the position that the exemption limit is far too generous: Any urban boundary expansion application of any size that has been applied for but not yet dealt with by a municipal council should be subject to all the sprawl-curbing policies of the Growth Plan. This approach of making council decisions on these applications comply with provincial plans and policies in place on the date of the council decision is in keeping with the government's proposed amendments to the Planning Act under Bill 51.

Next Steps

Ontario Nature will be actively involved in monitoring the implementation of the Greater Golden Horseshoe Growth Plan through the Sub-Area Assessments, especially the delineation of a Natural System to be protected from urban development.