



Conservation Ontario Positioning on the Upcoming Provincial Review of the Growth Plan for the Greater Golden Horseshoe

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The following key themes have been developed by Conservation Ontario (CO) for consideration in advance of the Provincial review of the Growth Plan for the Greater Golden Horseshoe. Conservation Ontario is the network of Ontario's 36 Conservation Authorities (CAs). These key themes have been identified through consultation with CA planning staff who have extensive experience working within the framework of the four Provincial Plans, including the Greenbelt (GB), Growth Plan, Niagara Escarpment (NEP) and the Oak Ridges Moraine Conservation Plans (ORMCP) as well as in the context of the *Provincial Policy Statement* (PPS). These comments are not intended to limit consideration of comments shared individually by Conservation Authorities through the Provincial Plan review process as well as Conservation Ontario's comments related to the Greenbelt Plan Areas (including the NEP and ORMCP).

Through consultation on the Growth Plan, two key areas of concern have been identified by CA practitioners including: that the Growth Plan should be properly integrated with the policy objectives of other provincial plans and policy statements (especially with regard to intensification in natural hazard areas) and in addition to acknowledging the need for hard infrastructure and servicing, the Growth Plan must also acknowledge the varying ecological limits to growth within communities. Further detail on the key themes emerging through the CA review of the Growth Plan is provided below.

Key Theme: Natural Hazards, Natural Heritage and Water Resources

Conservation Ontario is concerned about the perceived conflicting policy objectives with regard to intensification in urban core areas as directed by the Growth Plan and the natural hazard policies presented in the PPS. In general, intensification in the built-boundaries should be directed outside of natural hazard areas to be consistent with other provincial policy objectives. The PPS provides a hierarchy of response for proposed development in areas prone to flooding, however, the Growth Plan is silent on how to integrate natural hazard policies into urban core area intensification. This results in conflicting provincial policy objectives and increases implementation challenges. The Growth Plan generally needs to be updated with further detailed direction on Special Policy Areas (SPAs), flood vulnerable areas (FVAs) and natural hazard issues in relation to redevelopment and intensification, especially in urban growth centres. The current SPA guidelines need to be updated to provide Growth Plan and PPS implementation support.

The Growth Plan should require comprehensive flood risk assessment plans and reiterate the need for flood remediation in existing FVAs and SPAs. Other tools that the Province should consider to enhance the Plan's objectives include the need for infrastructure to mitigate known natural hazards, and to

address the existing infrastructure deficit. The Growth Plan should also be augmented with a guiding principle that no increase in the level of flood risk due to intensification will be permitted.

While it is recognized that the *Provincial Policy Statement* provides a hierarchy of response to proposed development in a floodplain, there is no such remedy for other hazard areas. For example, in the downtown core of Oakville the erosion hazard is the limiting factor for development. Given the hazardous constraints of the area, there is little opportunity to meet the intensification targets as set out through the Growth Plan.

While the Growth Plan does a good job of acknowledging the need for hard infrastructure and servicing within communities, it fails to acknowledge the need to ensure that municipalities can accommodate the additional servicing capacity without compromising the ecosystem functions on which some of this servicing depends. When directing growth, the capacity of the watershed should be considered, including the resource-based targets established in subwatershed plans and other studies. Some municipalities have environmental constraints (e.g. the availability of water in the City of Guelph, downstream flooding and erosion in communities with well-defined valley features) and development must occur coincident with environmental sustainability. Conservation Authorities could assist the Province with identifying sustainable limits to growth by providing data, analysis and recommendations collected through their natural heritage studies, monitoring programs and subwatershed planning exercises. The Growth Plan should provide direction on how environmental sustainability is to be achieved in tandem with accommodating growth and Conservation Authorities have information which can support this analysis.

In general, Conservation Ontario encourages the Province to adopt a systems planning approach to integrate natural heritage systems, open space lands and green urban design technologies (including green roofs, permeable pavement, etc) to help manage stormwater, mitigate the potential impacts of climate change, provide resiliency and increase recreation opportunities in light of intensification in the Greater Golden Horseshoe. Wherever possible, the Growth Plan should highlight the importance of maintaining linkages and identifying, protecting and enhancing natural heritage systems needed to support the health and wellbeing of new and intensifying communities.

Finally, the Growth Plan should provide better direction with regard to safeguarding our water resources as a result of intensification. As development moves ever closer to the ORM-Greenbelt, CA practitioners are aware that development projects are increasingly running into unexpected groundwater issues with their foundations or underground parking structures. There have been many groundwater studies done at the regional level, but not a site specific level. Without clear direction in the Growth Plan that these studies are required, many of the studies that are currently undertaken are too limited in scope. When groundwater issues arise, the preferred solution often is the permanent and continuous dewatering of the aquifer. This solution can have potential consequences for features-based water balance where the groundwater regime is supporting wetlands, woodlands and cold water fisheries. It can also have erosion and thermal impacts if there is significant surface discharge of the groundwater to a receiving watercourse. Finally, there is concern regarding potential silting and clogging of municipal stormwater drainage systems and the “wasting” of a precious groundwater resource.

Key Theme: Implementation, Streamlining and Consistency

As illustrated above, there are serious concerns related to the consistency of provincial policy directions with regard to intensification in natural hazard prone areas. In general, it is felt that the Growth Plan

creates a planning environment where development pressures are so intense that municipalities and Conservation Authorities are pressured to approve development applications prior to having all of the appropriate studies completed. This results in a process that gets ahead of itself and is not as effective and efficient as it should be.

The planning process should take place in advance of the determination of settlement boundaries and the approval of *Planning Act* applications should only occur after the approval of a detailed environmental assessment(s) which illustrates that the planned expansion of settlement areas or intensive redevelopment is feasible. In general, many infrastructure upgrades are required in advance of development occurring. These upgrades include roads, bridges, wastewater treatment, pumping stations and water treatment plants. There is pressure to accelerate the EA process and to move quickly on approving the municipal EA documents to accommodate the growth. Unfortunately, at times, this results in significant differences between the EA documents and the subsequent design and construction drawings, resulting in a delayed permitting process under the *Conservation Authorities Act*. The Growth Plan should be modified to include a greater emphasis on the completion of appropriate environmental studies prior to approving new development.

As a result of intensification and redevelopment precipitated in part by the Growth Plan, there has been an increase in the movement of excess soil throughout the province, which is generally regulated outside of the planning and environmental assessment processes. The Growth Plan should promote the beneficial reuse of excess soil, including encouraging local projects to share excess soil whenever possible. Conservation Ontario is aware that the Ministry of the Environment and Climate Change (MOECC) has accepted an Environmental Bill of Rights Application for Review with regard to the movement of fill within the province and would be pleased to be part of any review that the MOECC undertakes.

Key Theme: Sustainability and Livelihoods

CA staff are supportive of the Growth Plan's objectives to "create complete communities that offer more options for living, working, learning, shopping and playing"; "Provide housing options to meet the needs of people at any age"; "curb sprawl and protect farmland and green spaces"; and "improving access to a greater range of transportation options", however this can only be achieved through balancing all aspects of sustainability (environmental, social and economic). Additional tools that the Province should consider to enhance the Growth Plan's objectives include the creation of a sustainable funding model to support the municipalities in the application of best management practices to address natural hazards and stormwater on the landscape, as well as to encourage innovative water conservation techniques and natural heritage systems identification and mapping. The Province should be looking for opportunities to incent municipalities to embrace the potential positive outcomes of these measures in order to successfully implement the Growth Plan.

In conclusion, while Conservation Ontario is supportive in principle of the Growth Plan's purported objectives, major implementation challenges have been identified by CA practitioners. The intensification targets of the Growth Plan appear to be in conflict with the natural hazard policies of the *Provincial Policy Statement*. The current SPA guidelines need to be updated to provide Growth Plan and PPS implementation support. It is recommended that intensification should only take place outside of natural hazard areas; the Growth Plan should make this clear. The Growth Plan also does a good job of identifying the hard infrastructure that is required to support development, but it fails to recognize the

green infrastructure that is required as well as the ecological limits to growth. Intensification targets should be set within the lens of complete sustainability and must do more to protect our water resources. The end product of the planning process should be one that maximizes the use of development lands while avoiding impacts on natural systems. Conservation Authorities have high quality information which can be used to help support this analysis.

Given that CAs are a commenting body in both the planning and environmental assessment processes necessary to implement the Growth Plan, and the extensive knowledge of CA planning staff regarding both the planning process and the carrying capacity of the watersheds that support such growth, Conservation Ontario is uniquely positioned to provide valuable input into the Growth Plan ten year review. We look forward to providing meaningful input into the 2015 Plan review process.

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