



April 30, 2014

Ministry of Infrastructure
Ontario Growth Secretariat
777 Bay Street, 4th Floor, Suite 425
Toronto, ON M5G 2E5
PlacestoGrow@ontario.ca

Places to Grow Review Team:

Re: Conservation Ontario's Comments on the proposed "Performance Indicators for the Growth Plan for the Greater Golden Horseshoe"

Thank you for the opportunity to provide comments on the proposed "Performance Indicators for the Growth Plan for the Greater Golden Horseshoe". The following comments are submitted for your consideration by Conservation Ontario (CO), which is the network of Ontario's 36 Conservation Authorities (CAs).

The letter is divided into two sections. The first highlights some general comments related to the development of the indicators, whereas the second section relates specifically to the four themes. The comments are intended to assist the Growth Secretariat with better correlating the proposed indicators to the main goals of the Growth Plan.

General Comments Related to the Development of the Indicators

Conservation Authority staff expressed concern about the Growth Secretariat developing these indicators without any consultation with municipalities or other agencies. In general it was felt that the proposed number of indicators (12) appears to be insufficient to measure the implementation progress of the Growth Plan. The focus of the proposed performance indicators is strongly weighted in respect to community density and economic growth, although it is felt that the success of the Growth Plan cannot be properly evaluated based on these metrics alone.

Conservation Authority staff encourage the Growth Secretariat to develop new, more holistic indicators to evaluate the efficacy of the Growth Plan in developing communities which "offer good mix of places to live, work, shop and play". In developing these additional indicators, the Growth Secretariat is encouraged to utilize data sources from a variety of partners, including municipalities and Conservation Authorities. Having data from a variety of sources may help to address concerns expressed regarding the quality of available census data.

Specific Comments on the Themes

Building Compact and Efficient Communities

One of the limitations identified under the indicator “Designated Greenfield Area Density” is that “it was not possible to exclude all natural heritage features from the calculations of the built designated Greenfield area”. In the planning of greenfield areas, the identification of natural heritage is a standard practice. As a result, excluding these features from the density targets should be possible for the Growth Secretariat through collaboration with municipalities and Conservation Authorities to obtain the necessary data. For example, Conservation Authorities regularly identify natural heritage systems within their watersheds and complete subwatershed planning; both of these activities could be important sources of data for the Growth Plan indicators.

Creating Vibrant and Complete Communities

In addition to the indicators which have been identified, it is recommended that an indicator related to open space be included. Community green space such as parks, trails, conservation areas, etc should be incorporated, as well as the overall area of natural heritage space as metrics for the indicator. Healthy ecosystems and green spaces provide safe water resources, healthy food, clean air, cooler environment, and opportunities for more physical activities in parks and conservation areas which contribute to both healthier bodies and minds. The inclusion of green space will help the Growth Secretariat determine if the Growth Plan is truly helping to provide Ontarians with “a healthy natural environment with clean air, land and water” which is protected for “current and future generations”. Moreover, the Growth Plan encourages “Municipalities, conservation authorities, non-governmental organizations, and other interested parties...to develop a system of publicly accessible parkland, open space and trails” so the establishment of these areas should be monitored.

Planning and Managing Growth to Support a Strong and Competitive Economy

No additional comments.

Protecting, Conserving, Enhancing and Wisely Using Natural Resources

While this fourth theme is intended to provide performance indicators which are environmental in nature, there is only one indicator identified. Conservation Authority staff felt that “land consumption” is very narrow in scope and does not actually measure whether the natural resources within settlement areas are being protected, conserved, enhanced or wisely used. It is suggested that an aggregated index for this theme be developed, which considers a number of factors. These factors could include: area of protected natural heritage features and systems, the protection of ground and surface water quality, the protection of people and property from hazards, per capita water consumption, per capita energy consumption, etc. There are existing examples of the aggregated index approach including the Water Quality Index and Indicators developed by the United Nations Environment Programme and there is likely interest beyond just Conservation Ontario in further exploring such an approach.

Once again, thank you for the opportunity to provide comment on the proposed "Performance Indicators for the Growth Plan for the Greater Golden Horseshoe". Should you have any questions regarding these comments, please contact myself at extension 226.

Sincerely,

A handwritten signature in black ink that reads "Leslie Rich". The signature is written in a cursive, flowing style.

Leslie Rich, MCIP RPP