



October 31, 2016

Hon. Kathleen Wynne, MPP
Premier of Ontario

Hon. Bill Mauro, MPP
Minister of Municipal Affairs

Hon. Kathryn McGarry, MPP
Minister of Natural Resources and Forestry

RE: Co-ordinated Land Use Planning Review (CLUPR)

Dear Premier and Ministers,

The Federation of North Toronto Residents Associations (FoNTRA) provides its comments on the proposed changes to the four provincial Land Use Plans:

- The Growth Plan for the Greater Golden Horseshoe,
- The Greenbelt Plan,
- The Oak Ridges Moraine Conservation Plan, and
- The Niagara Escarpment Plan.

The proposed changes follow a provincial review aimed at improving the laws passed to permanently protect agricultural and natural lands, and promote smart development in the Greater Golden Horseshoe. They are intended to allow communities to continue to grow while minimizing impacts of urban growth on productive farmland, heritage buildings and landscapes, archeological resources, green spaces, and important natural areas.

The more than 40 proposed changes (which are listed in the Appendix to this letter) span the following themes:

- Building Complete Communities
- Supporting Agriculture
- Protecting Natural Heritage and Water
- Growing the Greenbelt
- Addressing Climate Change
- Integrating Infrastructure
- Improving Plan Implementation, and
- Measuring Performance, Promoting Awareness and Increasing Engagement

We have examined the proposed changes and in principle we support them. However, we have some comments and concerns particularly with respect to the Growth Plan and the Greenbelt Plan:

A. The Growth Plan and Toronto

The Growth Plan and the proposed changes are focussed on the growth of communities and their impact on farmland. This is appropriate in the “905” but we question whether and to what degree the Growth Plan addresses Toronto’s issues, which involved already developed lands, not farmland?

In the City of Toronto, which we understand is exceeding its Growth Plan population and density targets, the municipality has been unable to control the density and spatial expression of intensification, and is allowing major growth in previously stable communities without adequate comprehensive planning for physical infrastructure (transportation, utilities) and social services. A recent article in the Toronto Star (Yonge corridor can’t handle more development¹) identified this problem, and the failure of City Planning to address it. (No doubt the prevalent fear of the OMB among planners and politicians is at least partly to blame). The over-development in the Yonge Eglinton area is identified in the Midtown in Focus Study, and is now being experienced in conjunction with the Eglinton LRT. New development applications approved along Eglinton Avenue are far exceeding the planned levels of intensification approved by City Council in 2014 (see Eglinton Connects Study and Plan).

Based on Toronto’s experience we would caution against overly zealous *implementation* of growth targets. Growth needs to be monitored, moderated, and managed according to municipal secondary plans, to achieve provincial targets, but in a way that allows for balanced growth that complies with Official Plan policies such as maintaining neighbourhood character. And growth needs to be in harmony with required expansion of physical (water, sewage, hydro, etc) and social and educational services. And a fair ways of paying for this services expansion, that does not penalize existing residents, needs to be found.

We suggest that it is high time that the Province turned its attention to assisting municipalities with this process.

B. Integration with Regional Transportation Planning

A frequently cited planning principle is that regional transportation planning needs to be integrated with regional land use planning. The success or failure of the Greenbelt in protecting needed green space without at the same time leading to overdevelopment within the central portion of the GTA is crucially dependent on developing growth centres such as Barrie, beyond the Greenbelt, that are linked to the central city by high-quality fast transit. (Note that this also ties in with concerns about housing prices in the GTA. The more transit-served development opportunities created beyond the Greenbelt, the more competition will dampen price growth in Toronto and adjacent areas).

¹ <https://www.thestar.com/opinion/commentary/2016/07/06/yonge-st-corridor-cant-handle-more-development.html>

The Province, through Metrolinx, is making major investments in transit to develop frequent and regular (“all day”) service on GO corridors. However this shift to transit will be undermined by MTO and GTA municipalities who are still planning car-dependent growth which will encourage sprawl and pressure on the greenbelt.

In December 2015, the Ministry of Transportation (MTO) suspended work on the environmental assessment of the Greater Toronto Area West Highway Corridor (GTA West), in order to review the work undertaken to date and to ensure the project still aligned with changes in government policy and emerging technologies. GTA West has attracted objections for its anticipated environmental impacts, including concerns about its footprint on designated farmland in the Greenbelt and allegations that it will encourage urban sprawl and induce road traffic. It appears that the Panel appointed by MTO in the spring of 2016 has not yet reported.

We recommend that the province develop additional growth centres and reserve land for transit corridors that can serve them.

C. Concerns identified by the Ontario Greenbelt Alliance

Environmental groups have expressed concerns about the ability of the recommendations to prevent urban sprawl incursions into the protected Greenbelt. According to the Ontario Greenbelt Alliance (OGA), the Greenbelt is threatened by requests to remove protected land from the Greenbelt that have come forward through the provincial government’s review of the Growth Plan and the Greenbelt Plan.

The OGA recently released a map (attached) showing the location of over 200 out of more than 650 requests by developers and municipalities to remove protected land from Ontario’s Greenbelt, which currently has about 1.8M acres of protected farmland and green spaces surrounding the Greater Golden Horseshoe. The portion mapped is almost 11,000 hectares (27,000 acres). The map also shows existing towns and villages in the Greenbelt that could be ringed with more sprawl subdivisions if developers get their way.

The OGA have urged the province to make sure the new Greenbelt and Growth Plans stop urban sprawl from getting into the Greenbelt:

1. Not allow any land swaps or land removals from within the Greenbelt.

We support the OGA in opposing the removal of land from the Greenbelt. There is already a huge amount of land already allocated for future growth. In the GTHA alone, there is more land already approved for development than the size of Mississauga and Oakville combined. However we feel that there may be site specific situations where changes are required as identified in the CLUP:

2. Resist efforts to water down municipal density targets in the Growth Plan that are designed to promote smart growth that prepares us for climate change.

We support this recommendation, but from the perspective of our previously stated concerns about “unbalanced growth” (see Growth Plan and Toronto comments above).

3. Do not proceed with draft changes to the Greenbelt Plan and the Growth Plan that allow towns and villages within the Greenbelt to expand their urban boundaries to allow more development.

We support this recommendation for careful consideration by the province.

We appreciate the opportunity to review and comment on the proposed changes.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA
129 Hanna Road
Toronto, Ontario
M4G 3N6
gkettel@gmail.com

Cathie Macdonald
Co-Chair, FoNTRA
57 Duggan Road
Toronto, ON
M4V 1Y1
cathie.macdonald@sympatico.ca

Appendix: Summary of Proposed Changes to the Four Plans

Attachment: Ontario Greenbelt Alliance Map of Requested Removals from the Greenbelt

C.c: Mayor John Tory and Councillors
Jennifer Keesmaat, Chief Planner and Executive Director, City Planning Division
Ontario Greenbelt Alliance
Confederation of Resident and Ratepayers Assns
Federation of Urban Neighbourhoods (Ontario)

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

Appendix: Summary of Proposed Changes to the Four Plans

1. Complete communities

- Provide more guidance on achieving complete communities and require municipalities to plan for sustainable and livable communities.
- Increase the intensification target in the Growth Plan to a minimum of 60 per cent of all new residential development occurring annually in the existing built-up area.
- Increase the designated greenfield area density target in the Growth Plan to a minimum of 80 residents and jobs per hectare (excluding certain non-developable natural heritage features, such as wetlands and woodlands, rights of way for certain infrastructure, and “prime employment areas”).
- Require municipalities to plan for density targets around major transit stations which support that type of transit.
- Show priority transit corridors in the Growth Plan where municipalities would focus transit-related planning, zoning and development efforts. New policies would also provide the province with the authority to identify additional priority transit corridors.
- Support the development of community hubs by encouraging public services to be located together in existing facilities near strategic growth areas, accessible by active transportation and transit.
- Establish stronger environmental, agricultural and planning criteria in the Growth Plan for settlement area boundary expansions.
- Require municipalities to identify and protect prime employment areas. Prime employment areas, as defined in the Growth Plan, typically accommodate uses such as warehousing, logistics, and manufacturing that require a lot of land and access to transportation infrastructure, such as highways and railway lines. Certain employment uses, such as stand-alone office buildings, would be permitted in employment areas that are not identified as “prime”. New policies would serve to improve transit connections for employment areas.
- Require the province, through direction in the Growth Plan, to establish a standard methodology used by all municipalities across the Greater Golden Horseshoe for assessing land needs.
- Provide new policies in the Growth Plan to help municipalities in the outer ring (outside the Greater Toronto and Hamilton Area) manage any lands that are designated but not required for growth to 2041, and provide specific tests and flexibility for appropriate growth in these municipalities.
- Strengthen policies regarding the preservation of cultural heritage to align with those in the Provincial Policy Statement.

2. Supporting Agriculture

- Require that the province, in collaboration with municipalities, identify an agriculture system for the entire Greater Golden Horseshoe that builds on the Greenbelt. Municipalities would be required to plan to protect the agricultural system’s long-term viability.
- Clarify the types of uses permitted in prime agricultural areas (e.g., on-farm diversified uses such as home industries and agri-tourism) to align with the Provincial Policy Statement.

- Clarify how setbacks from natural features (e.g., streams) would apply to new or expanded buildings for agricultural uses, agricultural-related uses and on-farm diversified uses on agricultural land.

3. Protecting natural heritage and water:

- Require the province to identify a natural heritage system across the Greater Golden Horseshoe.
- Apply natural heritage and water protection policies consistent with the Greenbelt Plan outside settlement areas across the entire Greater Golden Horseshoe.
- Direct municipalities to avoid settlement area expansion into natural heritage systems with important water features, where possible.
- Require that natural heritage systems are protected if and when they are incorporated into an expanded settlement area.
- Require watershed planning across the Greater Golden Horseshoe.
- Encourage municipalities to develop soil re-use strategies and sustainably manage excess soil through planning approvals.
- Update land use designation mapping in the Niagara Escarpment Plan to reflect the most current and accurate information.

4. Growing the Greenbelt:

- Grow the Greenbelt to include major river valleys and large coastal wetlands. “Urban River Valley” policies in the Greenbelt Plan would apply only to publicly owned lands in these areas (existing land use permissions on privately owned lands in “Urban River Valley” areas would not change).
- Not require municipal support to add lands to the Greenbelt.
- Add four parcels of land identified by the City of Hamilton and Niagara Region to the Greenbelt Plan’s “Protected Countryside” designation. Protected Countryside policies would apply to both public and private land in these four new areas.

5. Addressing Climate Change:

- Require upper- and single-tier municipalities to incorporate climate change policies in their official plans, consistent with the objectives of the province’s Climate Change Strategy and greenhouse gas reduction targets.
- Encourage municipalities to develop greenhouse gas inventories, emission reduction strategies, and related targets and performance measures.
- Require municipalities to undertake more comprehensive stormwater management planning for their settlement areas and for major developments and to examine their infrastructure for weaknesses associated with climate change.
- Encourage the use of green infrastructure and require low-impact development techniques that include integrating green space in design strategies, landscaping with native plants, and using natural water systems to generate less runoff from developed land.
- Enhance policies to align with those in the Provincial Policy Statement regarding planning for resilient infrastructure.

6. Integrating Infrastructure:

- Direct planning authorities to take an integrated approach to land use and infrastructure planning.
- Include mapping of planned, conceptual, and existing transportation corridors, as well as major ports and intermodal hubs.
- Include mapping of the region's higher order transit network, including priority transit corridors.
- Clarify requirements in the Growth Plan to protect infrastructure corridors and support the movement of goods.
- Encourage the placement of linear infrastructure together in the same areas or corridors, where appropriate.

7. Improving Plan Implementation:

- Align with other provincial initiatives which complement the land use planning framework in the region (e.g., the Lake Simcoe Protection Plan, Ontario's Great Lakes Strategy and source water protection plans).
- Clarify in the Growth Plan how municipalities allocate and plan to accommodate their forecasted growth to ensure opportunities for intensification, support for transit and the development of complete communities are maximized.
- Require in the Growth Plan that only those upper- and single-tier municipalities in the outer ring of the Greater Golden Horseshoe without urban growth centres would be eligible for alternative targets for intensification and greenfield density.
- Municipalities would have to revisit their existing targets. Revised policies would also require that any alternative target for a municipality be publicly requested by its council.
- Require upper- and single-tier municipalities to measure and report on implementation.
- Update and streamline the Niagara Escarpment Plan's policies and land use designations and align them with those found in the other plans and the Provincial Policy Statement.

8. Measuring Performance, Promoting Awareness and Increasing Engagement

- The province will work with stakeholders, municipalities, conservation authorities, First Nations and Métis communities, experts and the general public to monitor the implementation and progress of the plans. In addition, upper- and single-tier municipalities would have to report on plan implementation regularly.
- The province and the Niagara Escarpment Commission will, over the longer-term, build on their existing education and outreach programs to explain the intent of the plans, report on their progress, and promote their benefits

End