



January 31, 2011

Ms. Tija Dirks  
Director  
Ministry of Energy  
Ontario Growth Secretariat  
Growth Policy, Planning and Analysis  
Planning and Analysis  
777 Bay Street, Floor 4  
Toronto, ON M5G 2E5

**Proposed Amendment 1 (2010) to the  
Growth Plan for the Greater Golden Horseshoe, 2006:  
An amendment and implementation tools for the Simcoe Sub-Area  
EBR Registry Number: 011-1528**

Dear Ms. Dirks,

The Ontario Professional Planners Institute (OPPI) would like to thank the Ontario Growth Secretariat for the opportunity to make the enclosed submission on the Proposed Amendment 1 (2010) to the Growth Plan for the Greater Golden Horseshoe, 2006: An amendment and implementation tools for the Simcoe Sub-Area. OPPI members are committed to creating and fostering healthy communities throughout Ontario. We are pleased to provide comments.

Established in 1986, OPPI is the recognized voice of the Province's planning profession and provides vision and leadership on key planning issues. Government, private industry, agencies, and academic institutions employ more than 3000 practicing planners. In addition, we have approximately 500 student members. Members work in a wide variety of fields including urban and rural community development, urban design, environment, housing, transportation, health and social services, and economic development.

**Overview**

When *Places to Grow* was introduced in 2006, it was greeted by the planning profession as a significant improvement in long term planning in Ontario. The provincial government took a major step in being more actively involved in growth management in the Greater Golden Horseshoe and put into legislation many of the innovative approaches to growth management that municipalities were attempting to introduce and implement.

From its first inception, *Places to Grow* has generated a considerable amount of discussion. In particular, during the implementation phases, *Places to Grow* has focussed dialogue within the planning profession on the changes required to address global and regional issues such as the loss of agriculture, climate change, structural changes in the manufacturing sector, and the fiscal health of local governments. OPPI recognized this innovative Provincial initiative by awarding it the Leonard Gertler Award of Distinction in 2007. OPPI has continued to support the Growth Plan for the Greater Golden Horseshoe and Provincial efforts in regional planning.

Municipalities in the Greater Golden Horseshoe have been conducting the required conformity exercises and preparing Official Plan amendments to implement the policies of the Growth Plan. These municipalities have the onerous but exciting task of planning for significant levels of population and employment growth between now and 2031. A fundamental basis for the degree and timing of growth is the implementation of capital investments to municipal services.

The Growth Secretariat has been steadfast in their requirement that municipalities adhere to the policies of the Growth Plan for the Greater Golden Horseshoe and to the principles of smart growth contained in the Plan. However, this leadership is seriously jeopardized when the very same government agency that developed the Growth Plan, initiates the Simcoe Area: A Strategic Vision for Growth, to be implemented through Amendment 1 to the Growth Plan. This, in the Institute's view, runs counter to many of the principles established through the Growth Plan.

## **Background**

The proposed Amendment 1 focuses on four key areas by:

- identifying urban nodes where growth and intensification can be focused;
- providing population and employment growth forecasts for all communities in the Simcoe area to ensure that growth is focused where it can best be accommodated;
- requiring that communities assess the land they need to meet their forecasted growth by 2031, and manage the supply of land available for development; and
- identifying focused, strategic industrial employment areas along Highway 400 to support job creation, manufacturing and industrial activities and economic employment districts to support local employment.

The related servicing and transportation studies are to be completed at a later date through separate exercises and are not part of Amendment 1.

In addition to the above, Amendment 1 includes several new planning policies for managing growth. These include:

- *Interim Settlement Area Boundaries:* The Amendment requires interim settlement boundaries to be designated in Official Plans that reflect the lands needed to satisfy the growth requirements to 2031. The designated greenfield area that is not within the interim settlement area boundary is to be excluded from the area considered for the measurement of the density target for designated greenfield area. Development applications will not be approved unless they are within the interim settlement boundaries.
- *Strategic Industrial Employment Areas and Economic Employment Districts:* Four strategic employment areas are identified – none of which are immediately adjacent to an urban node. The economic employment districts are located on or near Highway 11 (Rama Road and Lake Simcoe Regional Airport) and the two economic employment districts are identified along Highway 400 (Innisfil and Bradford). These are to be considered as designated greenfield areas.
- *Specific Permitted Uses for Strategic Employment Areas and Economic Employment Districts:* The uses permitted within the strategic industrial employment areas are those which can benefit from the location adjacent to Highway 400. Major retail and residential uses are not permitted. It is interesting to note that in one of the designated areas, is confined to agricultural uses, agricultural-related uses and secondary uses
- *Alternative Intensification and Density Targets:* As per the policies in the Growth Plan which allow outer ring municipalities to seek lower intensification and density targets, the Amendment includes alternative intensification and density targets for each municipality. The intensification targets range from 40% to 20%, with a County-wide target of 33%. The proposed density targets range from 32 to 50 people and jobs per hectare.

### **Comments on the Amendment**

There are some positive aspects of Amendment No. 1 to the Growth Plan. The identification of the City of Barrie as the major centre for future developed is consistent with the principles of the Growth Plan. The concept of identifying six urban nodes for future growth and intensification is also consistent and should provide a strong foundation for smart growth. It is also recognized that the Amendment attempts to address the issue of oversupply of designated land. OPPI has concerns, however, with the use of interim settlement areas as the implementation tool selected.

Notwithstanding the above, the Amendment contains elements that appear to conflict with a number of foundation principles of the Growth Plan. More specifically, we have concerns that the Amendment may have limited effect in containing urban sprawl and producing complete communities that are transit supportive. We are also concerned that the identification of need and the tying of future growth to existing and planned infrastructure may not have been wholly considered in the preparation of the Amendment. In addition to this, the proposed interim settlement area boundary approach is inconsistent with Provincial standards

found elsewhere in the Province, where municipalities are encouraged to rationalize land supplies and tighten urban boundaries. Also, the Amendment is unclear as to how it complies with the Lake Simcoe Protection Plan. Lastly, the Amendment appears to have been prepared with little to no planning analysis which would have addressed all of the above issues in a comprehensive, transparent and public process. These concerns are further discussed below.

### **Containment of Urban Sprawl/Complete Communities**

The population and employment allocations in the Growth Plan are reflected in Amendment 1. The Amendment distributes population and employment to lower tier municipalities in the County of Simcoe and establishes two Strategic Employment Areas and two Employment Districts. While the Ministry argued that the employment districts represented opportunities for large lot industrial employment uses that could not easily be found in existing settlements, the fact remains that these areas are not part of existing settlement areas, do not represent complete communities and will encourage increased private automobile commuting rather than public transit or other active transportation systems. How these areas can be serviced is not discussed and appears to be left to detailed studies in the future along with transportation issues. Given the scale of the development it would be appropriate to address servicing implications, transportation, environmental and agricultural implications before, not after, the Amendment is approved.

While recognizing that the Bradford employment node was approved by the Ontario Municipal Board and will be implemented through a Minister's Zoning Order, the office uses provided for in the Strategic Industrial Employment Areas should be more appropriately located in existing settlement areas in order to support downtown development and existing transit infrastructure. The restrictions on office uses are found in the Implementation Section of Amendment 1 and are identified along with other uses as employment supportive uses. The overall potential amount of office use appears to be substantial.

### **Identification of Need**

The issue of whether the Lake Simcoe area is the appropriate location for so much future population and employment growth in view of the principles in the Growth Plan is important. Unfortunately, it is a question that was apparently not considered back in 2006 when the original Growth Plan allocations were made. It is difficult now to imagine that the Government will reassess its original allocation decisions.

### **Servicing and Infrastructure**

It seems particularly curious that the provision of water and sewer services to accommodate the scale of population and employment growth being allocated here would be left to servicing agreements between lower tier municipalities. Perhaps this is more of a governance issue than a pure planning issue but some serious thought should be given to providing for a County wide servicing agency in order to coordinate required approvals, provide efficiencies, and define priorities, if nothing else.

Infrastructure on the scale required to service the proposed development will potentially require significant inter-municipal connections and have costs and potential environmental effects that have yet to be addressed through any Master Planning or Environmental Assessment process. The Amendment appears to assume that at least part of the need and rationale for such infrastructure will be scoped out of any future environmental assessment, however, this would pre-judge the outcome of the required EA processes and, potentially, future decision(s) on Terms of Reference and EAs for one or more individual EAs by the Minister of the Environment. This issue again is one that should more reasonably have been addressed before adopting Amendment 1.

The decision to include the Rama Road and Lake Simcoe Regional Airport Economic Employment Districts seems to be based on existing local planning decisions rather than on any detailed servicing or need studies. It is unclear whether these areas are to be privately serviced or connected to municipal water and sewer services. There is concern regarding the impact on Lake Couchiching that would result from the development of these employment districts.

While an Environmental Assessment is underway to support the Rama Road project, a number of EA's would be needed to accommodate the growth and structure proposed in the Amendment. The implications of servicing are essentially unknown in part because it is not a County responsibility.

### **Interim Settlement Areas**

The oversupply of designated land within the existing settlement areas of most of the lower tier municipalities is recognized in Amendment 1. In order to manage the oversupply the Amendment calls for the identification of Interim Settlement Areas. The Amendment provides for the inclusion of additional lands within the Interim Settlement Areas subject to "municipal comprehensive reviews". The lower tier municipalities are responsible for identifying the need for additional lands. In the absence of an overall 'regional' market area approach, it is possible to foresee more pressure for expansion of the interim settlement area boundaries. The potential for each municipality to try to maximize its future development land areas and growth is much greater if left to area municipalities to decide. The Ministry has offered up a very sophisticated planning tool to deal with the oversupply of land and the concern is that local development decision making will be greatly challenged.

### **Conflict with Lake Simcoe Protection Plan**

Policy 4.1 which relates to Sewage Treatment in the Lake Simcoe Protection Plan requires that, within that portion of the County lying within the Plan area, an environmental assessment be carried out prior to among other things giving any approvals to development outside of a settlement area. It would appear that the designation of the Strategic Industrial Employment Areas in Innisfil Heights and in the Bradford West Gwillimbury, as well as, the Employment District associated with the Lake Simcoe Regional Airport, would be subject to this Policy.

In view of the ecological fragility of Lake Simcoe and in view of the phosphorus load reduction targets and other water quality and water quantity issues raised in the Lake Simcoe Protection Plan, it is difficult to understand why a detailed analysis was not carried out before hand to identify the impacts on the Lake of the development being proposed in Amendment 1 and potential effects on the feasibility of meeting the phosphorus target. At our meeting with Ministry of Infrastructure, an argument was made by the Ministry, that adjustments to development areas could be made later based on periodic 3 or 5 year plan reviews. By that time, the environmental damage could be already irrevocable. In any event, it is unreasonable to believe that development areas would be reduced in the future in any substantial way given the growth commitments in the Growth Plan and in Amendment 1.

### **Insufficient Analysis to Support Policy**

The Intergovernmental Action Plan (IGAP) for Simcoe, Barrie and Orillia provided a long term strategy for managing growth and development in Simcoe. The foundation for IGAP was a series of detailed technical volumes which supported the recommended policies and directions. In contrast, there appears to be no documentation of the analysis or technical work to support the Province's proposed Amendment 1. The lack of technical support and studies to support the Amendment suggests that little or no analysis was undertaken, let alone peer reviewed or publically vetted (as is usually the case with local or regional Official Plan amendments). The lack of technical analysis raises questions about the implications of the Amendment related to water and waste water servicing, transportation, land use, the assimilative capacity of Lake Simcoe and the Nottawasaga watershed, municipal finance and the natural environment.

We would welcome an opportunity to meet with you and your staff and further discuss our submission or answer questions you may have. To schedule a meeting or for further information, please contact Loretta Ryan, MCIP, RPP, Director, Public Affairs 416-483-1873, x226 or by e-mail at [policy@ontarioplanners.on.ca](mailto:policy@ontarioplanners.on.ca)

Sincerely,

A handwritten signature in black ink, appearing to read "Sue Cumming". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Sue Cumming, MCIP, RPP  
President  
Ontario Professional Planners Institute