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Ontario Greenbelt Alliance Submission on:

***Places to Grow:
Better Choices. Brighter Future.***

A Growth Plan for the Greater Golden Horseshoe

September 24, 2004

Introduction

The province of Ontario released a draft Growth Management Plan for the Golden Horseshoe Region in July 2004. The Plan is intended to set the direction for land-use and infrastructure planning in the region for the next thirty years. The Ontario Greenbelt Alliance – which includes over fifty environmental organizations, community groups and associations of health professionals – has prepared this response to the Ministry of Public Infrastructure Renewal’s Discussion Paper, *Places to Grow: Better Choices. Brighter Future*.

The Ontario Greenbelt Alliance (www.greenbelt.ca) welcomes the provincial government’s Greater Golden Horseshoe Growth Management Plan initiative, and regards it as an important first step towards more sustainable urban development patterns in the region. *Places to Grow* highlights the potential consequences of the continuation of ‘business-as-usual’ development patterns in the region in terms of the loss of prime agricultural and natural heritage lands, increasing congestion, declining air quality, affordable housing availability, and infrastructure construction and maintenance costs.¹ These impacts are summarized in Table 1.

Table 1: The Impact of Business-as-Usual Urban Sprawl in the Toronto-Related Region

Issue	Impact
Population	<ul style="list-style-type: none"> The region’s population will grow from 7.4 million in 2000 to 10.5 million in 2031, an increase of 43%.
Land use	<ul style="list-style-type: none"> In the region, 1,070 square kilometres of land will be urbanized. This is almost double the area of the City of Toronto and represents a 45% increase in the amount of urbanized land in the region. Of the land on which this urban growth will occur, 92% will be Class 1, 2, or 3 agricultural lands as classified by the Canada Land Inventory; 69% will be Class 1 land.
Transportation	<ul style="list-style-type: none"> Automobile ownership in the region will increase by 50% to 19 million vehicles. The cost of delays due to traffic congestion, principally in the 905 region surrounding Toronto, will increase from about \$1 billion per year to \$3.8 billion per year. Daily vehicle kilometres of auto travel in the region will increase by 64%. Costs associated with automobile accidents, reflecting this increase in auto travel, will rise from \$3.8 billion in 2000 to \$6.3 billion in 2031. Reflecting the low levels of public transit use in the regions outside of the City of Toronto, where most of the growth will occur, the total public transit modal share will decrease by 11% (public transit modal

¹ Ministry of Public Infrastructure Renewal, *Places to Grow: A Growth Plan for the Greater Golden Horseshoe* (Toronto: Queen’s Printer, July 2004), pg. 5. These projections reflect the findings in IBI Group in association with Dillon Consulting Limited *Toronto-Related Region Futures Study Interim Report: Implications of Business-as-Usual Development* (Toronto: Neptis Foundation, August 2002).

	<p>share for Toronto: 28%; public transit modal share for surrounding area: 5.4%).</p> <ul style="list-style-type: none"> • Emissions of transportation-related greenhouse gases (GHG) are projected to increase by 42%. • Reflecting reliance on the automobile for transportation, GHG emissions in new suburban areas are projected to increase 526% relative to their current levels.
Infrastructure	<ul style="list-style-type: none"> • Projections suggest that \$33 billion in new investments will be needed in water and waste water treatment infrastructure. • Between 2000 and 2031, \$43.8 billion in investments in transportation infrastructure are projected. Of these investments, 68% are projected to be in roads and highways under business-as-usual scenarios.

The Greenbelt Alliance supports *Places to Grow*'s overall focus on accommodating future population and economic growth in the region through the intensification of existing urban areas, the promotion of more compact development forms, focusing growth in priority and emerging urban centres, and adopting a more rigorous approach to the expansion of urban boundaries. The Plan also gives primacy to the role of public transit in moving people throughout the region.

This submission draws on the comments of the Pembina Institute on the proposed Growth Management Plan. The Pembina Institute's submission should be referenced for a more detailed discussion of the rationale for the recommendations contained in this submission. The Greenbelt Alliance's submission should also be read in conjunction with the submissions of the Pembina Institute, the Canadian Environmental Law Association, Ontario Nature, the Conservation Council of Ontario and the Sierra Legal Defence Fund regarding the proposed revised *Planning Act* Provincial Policy Statement issued by the province in June 2004.

General Comments

The Greenbelt Alliance's concerns focus on several aspects of the Plan. Firstly, despite its focus on containing urban sprawl, the Plan proposes relatively weak tests regarding the need for expansions of the urban settlement area in the region. A much more rigorous approach to this issue is needed, particularly in light of recent studies, referenced in *Places to Grow*.² This research projects that population growth in the region can be accommodated within the existing designated urban envelope over the next fifteen to twenty-five years at relatively low densities.³

Secondly, the Plan includes proposals for a number of major new economic corridors (i.e. highways) in the region. These proposals have major implications for the integrity of key natural heritage features, including the Niagara Escarpment, the Oak Ridges Moraine and the Lake Iroquois Shoreline, and may undermine efforts to contain urban sprawl in the region. The rationale and need for these undertakings must be examined carefully, as well as the potential to optimize the use of existing road and rail corridors.

In addition, despite, as noted in *Places to Grow*,⁴ the concentration of Canada's prime agricultural lands in the Greater Golden Horseshoe region, the protection of these lands from urban development under the Plan would be limited to specialty croplands. Permanent protection for the prime agricultural lands in the region should be provided through the Plan.

The completion of an ecologically viable permanent greenbelt, urban separators and a greenways network in the region should be integral components of the Plan.

The Plan highlights the importance of taking steps to reduce demand for mineral aggregate, and balancing aggregate extraction with other competing land uses, such as natural heritage protection, but does not articulate specific strategies to achieve these goals. The Plan needs to include specific measures to reduce demand for newly extracted aggregate. Reforms to the approvals process for aggregate operations to ensure the protection of the integrity of hydrogeological and ecological systems, and natural features and functions, and to strengthen requirements regarding the remediation of aggregate extraction sites are needed as well.

In recent months, the provincial government has highlighted the importance of developing renewable energy sources, and creating a 'culture of conservation' in Ontario. Surprisingly, *Places to Grow* makes no reference to these themes. The Plan should be supportive of the incorporation of energy efficiency into community design, and the provision of opportunities for the generation and use of renewable energy.

² *Places to Grow*, pg.9.

³ See IBI Group and Dillon Consulting Ltd, *Toronto-Related Region Futures Study: Interim Report* pp.E-17-E19.

⁴ *Places to Grow*, pg.43.

Places to Grow is premised on the province taking a more directive role in land-use planning in the region, through both legislative and fiscal measures. This directive role needs to be more strongly complemented with specific guidance and support to municipalities in making and implementing planning and infrastructure decisions regarding future development in the region. A commitment to the provision of such support is prominently absent from *Places to Grow*.

Specific Recommendations Regarding *Places to Grow*

Future Growth Areas:

Approaches to Permitting Urban Boundary Expansions

In light of the available information regarding the ability of existing designated settlement areas in the Golden Horseshoe region to accommodate projected housing and employment needs over the next fifteen to twenty years, *Places to Grow* should incorporate a rigorous approach to the issue of settlement area expansions.

1. The Growth Management Plan should not permit expansions of the existing designated settlement area during the first five years of its implementation.
2. The Growth Management Plan should incorporate a clear hierarchy of priorities for the provision of employment opportunities and housing:
 - First, maximize the potential for redevelopment of existing urban areas through brownfield and greyfield redevelopment, infill, and intensification
 - Second, if sufficient development capacity cannot be provided in this way, then permit development of undeveloped designated growth areas within settlement areas
 - Third, consider expansions of settlement areas.

Clear tests need to be established for each step in this hierarchy.

3. Before the development of unurbanized designated growth areas can proceed, the municipality should be required to demonstrate consideration of the full potential for intensification and redevelopment, such as brownfields, greyfields and transit corridors within the municipality. This would include:
 - The completion and incorporation into estimates of available development capacity of an ‘urban capacity study’ (as per the United Kingdom) to investigate the potential for redevelopment in the existing urban area for housing and employment uses.⁵

⁵ See Office of the Deputy Prime Minister, *Sustainable Communities, Building for the Future* (London: ODPM, February 2001), pp.38-40.

- The incorporation into estimates of development capacity of an infill/redevelopment target established by the province. The redevelopment target should be 60 to 70 per cent of new development, as is the case in the Sydney Metropolitan Strategy⁶ and in the UK,⁷ as opposed to the 40 per cent target proposed in *Places to Grow*.⁸ The development capacity estimate should also include provincially established density targets for transit corridors
 - The impact on development capacity of a minimum density requirement as per the UK (i.e. 30 dwellings per ha)⁹ for expansions beyond the existing urban area and for transit corridors. This will help ensure the efficient use of land, as well as support the viability of transit services and the provision of public services and commercial establishments within walking distance of residences in new developments.
 - The demonstration of the environmental capacity to support the projected growth, particularly in terms of the sustainability of required water takings and accommodation within the relevant watershed based Source Water Protection Plan.¹⁰
 - Consideration of the development capacity available through redevelopment within the regional market area, not just the individual municipality proposing development.
4. Proposals for expansions of the settlement area should only be permitted at the time of a review/revision of the relevant official plan initiated under s.26 of the *Planning Act*.¹¹ Proposals for the expansion of the settlement area should be required to demonstrate that future employment and housing needs cannot be met, in respect to the following considerations:
- urban capacity for infill and redevelopment
 - development of designated growth areas, including the potential for development beyond the minimum densities established by the province
 - available development capacity, including redevelopment potential, on a regional (as opposed to regional market area) basis

⁶ Note that the Golden Horseshoe Growth Plan suggests a 40% intensification target as the test for expansion. *Places to Grow*, pg.21.

⁷ Office of the Deputy Prime Minister, *Sustainable Communities; building the Future*, February 2001, pg.38.

⁸ *Places to Grow*, pg.21.

⁹ Office of the Deputy Prime Minister, *Sustainable Communities; building the Future*, February 2001, pg.40.

¹⁰ These tests are drawn from *Places to Grow*, pg.21.

¹¹ S.26 of the Planning Act currently only requires that a review be considered every five years, but does not require that a review take place, or set a minimum time period between reviews.

5. Proposals for settlement area expansions should be subject to an external, independent review to ensure full consideration of alternative options. A specific application should be required by the province, and a hearing conducted before the Ontario Municipal Board prior to the granting of settlement area expansions.
6. Expansions into designated growth areas should not be permitted to occur until:
 - the necessary infrastructure is approved under the *Environmental Assessment Act* and other relevant legislation, and a plan for staging, financing and provision of infrastructure is in place.¹²
 - A transportation infrastructure and demand management plan is in place to reduce the need for motorized journeys
 - Planning and protection of natural heritage systems and resources is in place
 - Plans are in place for the provision of the necessary health services.
7. Specialty croplands and prime agricultural areas¹³ should be protected from urban development and inclusion in settlement areas, as well as inappropriate rural development, and irremediable aggregate or mineral development. This should apply to all cases.
8. The framework for consideration of the need for settlement area expansions should be defined in terms of utilization of capacity to accommodate additional development, rather than the land and time based horizon suggested in *Places to Grow*.¹⁴ Reviews of the need for settlement area expansions should not be permitted until a municipality has utilized 80 per cent of its available development capacity, as identified in its official plan, via assessments of urban redevelopment capacity, and the use of designated undeveloped lands within the current settlement area. Longer term planning should emphasize the capacity of communities to accommodate housing needs, in a context that emphasizes economic, social and environmental sustainability and well being, rather than simply “growth.”
9. Upper-tier and single-tier municipalities should be required to prepare plans for future community sustainability and well being that are consistent with the province’s overall Growth Management Plan for the region. At the same time, consistent with the direction of Bill 26,¹⁵ municipalities should not be required to

¹² From 1995 *Comprehensive Policy Statement*, Policy B.8.c)iii).

¹³ See discussion in section 3.3.4 of this submission.

¹⁴ *Places to Grow* pg.21. Note also that the timeframe for land needs to justify settlement expansion proposed in *Places to Grow* is longer than that in the proposed revised PPS (15 years vs. 10 years).

¹⁵ Bill 26, *The Strong Communities Act*, 2003, s.7.

expand their settlement areas, or establish new urban settlement areas, against their wishes.

Infrastructure to Support Growth:

Provincial Infrastructure Investments

10. Provincial infrastructure investments should be based on whether investments are consistent with the Growth Plan's objectives, and provincial investments should be aligned with the Growth Plan's priorities. Strategies for the revitalization of downtowns and mainstreets should include the location of provincial institutions and facilities. Provincial funding formulas for educational and health facilities should be reviewed to ensure that they do not provide incentives for the location of new facilities in greenfield locations.
11. Planning, approvals, and financing of large infrastructure projects with significant development implications for the region, such as major sewer and water projects and highway extensions, should be placed in abeyance pending completion of the Growth Management Plan initiative.

Environmental Assessment

12. All significant infrastructure projects should be subject to an environmental assessment, including consideration of the need for proposed projects and possible alternatives. A Class Environmental Assessment should be developed for transit projects within existing settlement areas.

Strategies for Moving People

13. Transit funding from provincial gasoline tax revenues should be targeted for operating and capital maintenance costs. The funds should be distributed primarily on the basis of ridership, as this approach will reward success and provide incentives to increase transit use.
14. Public transit system expansion should be the focus of the proposed Greater Toronto Transportation Authority (GTTA). Proposals from the GTTA for provincial capital funding should be subject to review by the province on the basis of criteria intended to ensure that proposed projects will actually increase ridership and public transit modal share, be economically viable, improve air quality, and be linked to the adoption of transportation demand management and supportive land-use plans.

Strategies for Moving Goods

Places to Grow's discussion of future strategies for moving goods is focused almost exclusively on the use of highways for goods movement, especially with respect to the establishment of new infrastructure. The Greenbelt Alliance welcomes *Places to Grow*'s statement that the northward extensions of highways 427 and 404 are 'not immediate priorities.' Both projects were encouraging and facilitating leapfrog development north of the Oak Ridges Moraine, particularly in Simcoe County.¹⁶

15. Consistent with the direction of *Places to Grow*, planning, design and approvals for the northward extensions of Highways 427 and 404 should be halted.

Places to Grow places a strong emphasis on the importance of trade-related east-west corridors.

Three new economic corridors are proposed in *Places to Grow* – the eastward extension of Highway 407 to Highways 35/115, the Mid-Peninsula Highway in the Niagara Region, and a GTA East-West Corridor. All have significant regional implications for future development patterns and the protection of key natural heritage features, particularly the Niagara Escarpment and Oak Ridges Moraine.

16. The province should maximize the use of existing transportation corridors (road and rail) prior to considering the creation of new corridors.

At the July 28, 2004 public consultation meeting in Toronto, the Minister of Public Infrastructure Renewal committed to "full environmental assessments" of each of the proposed corridor projects. Such assessments should include an examination of the need for new highways (including assumptions about future traffic), and the availability of alternatives (modal and locational) to new corridors. Unfortunately, in the absence of intervenor funding and a reformed Environmental Review Tribunal, even broadly scoped assessments may only provide a limited opportunity to examine the issues related to the need for these projects.¹⁷

Given the scale of the investments needed to implement these proposals, as well as their potential impacts on development patterns, air quality and natural heritage features, the justification for the new highway corridors must be subject to a thorough public examination before the projects proceed.

¹⁶ See, for example, L.Birnbaum, L.Nicolet and Z.Taylor, *Simcoe County: The New Growth Frontier* (Toronto: Neptis Foundation, May 2004).

¹⁷ On weaknesses in current environmental assessment practice in Ontario see A.Levy, "Review of Environmental Assessment in Ontario," *Journal of Environmental Law and Practice*, 11 J.E.L.P., June 2002.

17. A public process, led by an agency other than the Ministry of Transportation, should be established to examine the assumptions regarding likely future goods movement patterns and needs underlying the corridors proposed in *Places to Grow*. This process should be completed prior to the undertaking of further planning and approvals for the corridors.

Sustainable Water and Waste Water Services

18. The protection of source waters and source water lands should be considered an integral part of providing sustainable water and wastewater services.
19. New developments in settlement areas should be required to be serviced by municipal sewer and water services.

Airports

20. Given its implications for the protection of ecologically significant and prime agricultural lands, the province should press for a rigorous justification of the need for the North Pickering Airport, and a full understanding of its implications for development in the region.
21. The viability of economic development proposals related to the Hamilton Airport should be examined carefully before being endorsed by the province, given that such development may have a significant effect on natural heritage areas and prime agricultural land.

Protecting What is Valuable:

Water Resources

22. The integration of land-use and infrastructure planning and source water planning in the region should be strengthened.
23. The overall Growth Management Plan, and project-specific development and infrastructure planning should be required to be consistent with the relevant source water protection plans, and accommodated within the relevant watershed-based water budgets.
24. Development that will negatively impact groundwater recharge areas, head-waters and aquifers that have been identified as sensitive, and development in significant ravine, valley river and stream corridors should not be permitted.

25. Development identified as constituting a “water risk” as defined in the proposed *Source Water Protection Act*, should not be permitted.

Natural Heritage and Greenspace

26. Completion of the Southern Ontario Greenways Strategy, as proposed by Ontario Nature, should be an integral component of the Growth Management Plan.
27. The Niagara Escarpment Plan should be expanded to its original borders.

Establishing a Golden Horseshoe Greenbelt

28. The completion of the Golden Horseshoe Greenbelt should be an integral part of the Growth Management Plan. As per the Liberal Party of Ontario’s October 2003 election platform, the Greenbelt should incorporate at least 600,000 ha of land in addition to that already protected through the Niagara Escarpment and Oak Ridges Moraine legislation and plans.
29. The Greenbelt should incorporate core natural areas (Oak Ridges Moraine, Niagara Escarpment, Trent-Severn system, as well as the linkages that connect them to one another and to Lake Ontario, Lake Simcoe and Georgian Bay), individually significant natural heritage areas, source water lands, and prime agricultural areas within the Greater Golden Horseshoe. The Greenbelt should contain an adequate amount of land to support a robust greenbelt ecosystem
30. The Greenbelt should be permanent, and operate within a clearly established legislative and regulatory framework. Incompatible (i.e. non-conservation and agricultural) land uses should be excluded from core areas of the Greenbelt. Such uses would include urban development, new transportation corridors, and aggregate extraction operations.
31. Municipal official plans, zoning by-laws and infrastructure plans should be required to be amended to bring them into conformance with the Greenbelt Plan. Future official plans, official plan amendments and other planning and infrastructure decisions should be required to conform with the Greenbelt Plan as well.
32. The construction of new infrastructure corridors across the Greenbelt, particularly for transportation purposes, should be avoided, given the potential impact of such corridors on the integrity of the Greenbelt, and their implications for urban development beyond the Greenbelt boundaries (the ‘leap-frog’ effect). The establishment of new corridors should only be permitted as an option of last resort

where there is a demonstrated need, and the use of all other existing modal corridors and alternatives has been maximized.

33. Planning and other measures need to be in place to ensure that ‘leapfrog’ development does not occur beyond the boundaries of the Greenbelt.
34. An expert adjudicative tribunal should be established to uphold the integrity of the Greenbelt Plan and legislation. A permanent fund should be established to support the maintenance and improvement of the Greenbelt, including the purchase of additional land easements. An advisory body or council, supported by an independent provincial agency, should be established and provided with adequate resources to review and report to the public annually on the implementation of the Greenbelt plan and the ecological health and integrity of the Greenbelt area. The advisory body should also be authorized to make recommendations to the province and local governments and agencies regarding the maintenance and enhancement of the Greenbelt, including comments on planning and infrastructure proposals that may affect the Greenbelt.

Agricultural Resources

35. Given the provincial and national importance and value of the region’s prime agricultural lands, the Growth Management Plan should incorporate protection from urban development for all prime agricultural areas within the Greater Golden Horseshoe region.
36. Prime agricultural areas should be defined as areas where there are significant specialty croplands, and significant concentrations of Canada Land Inventory Class 1, 2 and 3 soils. This definition should also include areas where there is significant potential for agriculture on Class 1, 2 and 3 soils, rather than only those areas that are already in production.¹⁸ Similarly, specialty crop areas should be defined as land where specialty crops may be grown, as opposed to areas where they are “predominantly” grown.

Mineral Aggregates

37. New and expanded aggregate operations should be assessed relative to other potential land uses in terms of which land uses will best serve the long-term public interest.¹⁹ Where aggregate extraction may occur, sites should be prioritized and phased for development.

¹⁸ For a detailed discussion of this issue see Canadian Environmental Law Association, Submission of the Canadian Environmental Law Association on the Provincial Policy Statement: Draft Policies, 2004 (Toronto: CELA, August 2004).

¹⁹ For a detailed discussion of this issue see CELA, Submission of the Canadian Environmental Law Association on the Provincial Policy Statement: Draft Policies, 2004

38. Proponents of new expanded extraction operations should be required to demonstrate the need for such operations, and the lack of alternatives for the establishment of such operations, on natural or cultural heritage, prime agricultural, and source water lands.
39. The province should develop a strategy to operationalize the directions outlined in *Places to Grow* to reduce demand for newly extracted aggregate. The strategy should include the promotion of reuse and recycling, particularly in respect to the following:
 - using municipal solid waste stream materials as replacements for aggregate (i.e. construction and demolition waste, glass, used tires)
 - assessing the impact of adopting more compact development forms and alternative development standards on future aggregate demand.
40. The province should review the aggregate licencing process to ensure that it protects the integrity of hydrogeological and ecological systems, and natural features and functions, and strengthens rehabilitation requirements. Aggregate operations in prime agricultural areas should, for example, be required to rehabilitate sites such that they can be returned to prime agricultural uses. The rehabilitation of older gravel pits should be required to be completed prior to the expansion of existing operations. Progressive rehabilitation should also be a requirement.

Community Development and Implementation Tools:

Fiscal Tools

Development Charges Reform

41. Development charges should reflect the full cost of providing a complete range of infrastructure, including the social, cultural, recreational and educational facilities needed to support new development. Development charges should be applied on an actual site cost basis.

Land Transfer Tax Rebate Reform

42. The land transfer tax rebate program should be reformed to support resale housing and redevelopment for housing in existing urban areas.

Community Development

Greyfields and Brownfields

43. An orphan site remediation fund needs to be established to address the situation of contaminated lands where no responsible party can be identified, and the remediation costs of the property are likely to exceed its market value for redevelopment. Incentives should be provided to encourage better use of these underutilized urban lands (i.e. greyfields).

Development Standards

44. Standards for new development (both redevelopment and greenfield) should reflect the following Smart Growth principles:
- pedestrian friendly
 - mixed use
 - minimum densities sufficient to make public transit service viable
 - high levels of connectivity, allowing direct travel by both motorized and non-motorized means
 - connected green spaces
45. Infill and redevelopment projects should be sensitive to the scale and character of existing communities.²⁰

Employment Lands

46. The Growth Plan should set a minimum standard for new non-heavy industrial employment land development. The “compact suburban business district” defined by the Urban Land Institute provides a good example.²¹ The redevelopment and intensification of existing low-density business districts, similar to the Urban Land Institute example, should also be promoted to include the incorporation of mixed uses, pedestrian friendly places, and transit serviceable densities.

Affordable Housing

47. The province should set a specific target for the development of affordable housing. This should be set at 30 per cent of new dwellings in the area covered by each upper-tier official plan, with affordable housing defined as housing that is

²⁰ On this issue see D.Porter, *Making Smart Growth Work* (Washington, D.C.: The Urban Land Institute, 2002), pp.19-20, 132.

²¹ See Booth, Leonard and Pawlukiewicz, *Ten Principles for Reinventing American's Suburban Business Districts*.

affordable at the level of 30 per cent of gross income of the lowest 30 per cent of regional income distribution.

Alternative Energy and Energy Conservation

48. Energy efficiency and conservation should be an integral component of building and community design. This should be reflected in the province's Growth Management Plan.
49. The Growth Management Plan should include opportunities for the generation and use of alternative energy systems, and support the completion of land-use planning guidelines for the development of such facilities.

Provincial Implementation and Monitoring:

The implementation of the Growth Management Plan will require that the province play both directive and supportive roles. Strategies to assist municipalities in implementing the Plan are noticeably absent.

50. The province should provide guidance and support to municipalities, in addition to policy direction. Provincial support and guidance is particularly needed in such areas as assessing urban capacity for redevelopment, projecting future housing needs and employment trends, identifying and protecting source water and natural heritage lands, and developing and implementing alternative development standards.
51. An independent mechanism should be established to monitor and review the impact and effectiveness of the Plan on a regular basis. Performance indicators should be focused on actual outcomes in terms of the livability and sustainability of communities in the region, rather than simply the implementation of commitments contained in the Plan.

Conclusion

The Growth Management Plan is an important initiative for long-term sustainable growth in the Greater Golden Horseshoe region. The Ontario Greenbelt Alliance commends the provincial government on this key strategy, and believes that the Plan could be substantially improved by the inclusion of the recommendations made in this submission, and summarized below:

- The Plan needs to incorporate a stronger approach to the question of settlement area expansions
- The Ontario Greenbelt Alliance has serious concerns regarding proposals for new economic corridors contained in the Plan. These proposals have serious implications for the integrity of key natural heritage features in the region, including the Niagara Escarpment and Oak Ridges Moraine, as well as the proposed Greenbelt.
- The Plan needs to fully integrate the establishment of a Golden Horseshoe Greenbelt and Greenways Systems.
- The Plan should incorporate the protection of source water lands and prime agricultural areas in the region.
- The Plan should include measures to operationalize its directions regarding the reduction of demand for mineral aggregate.
- The Plan should include provisions to strengthen the approval process for new and expanded aggregate extraction operations to ensure the protection of the integrity of hydrogeological and ecological systems, and natural heritage features and functions. Stronger requirements regarding the remediation of aggregate extraction sites are needed as well.

The Ontario Greenbelt Alliance looks forward to the next stages in the development of the Growth Management Plan, and would welcome the opportunity to discuss this submission with the province.