

Continuing to Promote Sprawl in Simcoe County

Campaign Lake Simcoe's Response
to the Proposed Simcoe Amendment to the Growth Plan



Comments re: the Ministry of Infrastructure's "Proposed Amendment 1 (2010) to the Growth Plan for the Greater Golden Horseshoe, 2006: An Amendment and implementation tools for the Simcoe sub-area"

January 31st, 2011

Executive Summary

We strongly oppose the most recently proposed Simcoe County Growth Plan population allocations and employment zones, as they represent an unjustified comprise that directs growth almost everywhere.

The proposed growth in Simcoe County sets the stage for very large development projects that will choke Highway 400, endanger Lake Simcoe and foul the air and water of our community. The proposal also runs counter to the Government of Ontario's own Growth Plan, goals of the *Lake Simcoe Protection Act*, and the wishes of Simcoe County's residents who support the *Greenbelt Act* and *Lake Simcoe Protection Act*. Finally, the Plan says nothing about reducing the ecological footprint of development such as energy use and water consumption, a long-overdue and necessary reform.

Not all the proposed changes are negative; moving some population allocations out of the stressed Lake Simcoe watershed should relieve some of the pressure it faces, and a 20-year restriction on sprawl via the interim settlement boundary policy is most welcome. However, the health, social and environmental benefits to Simcoe County's residents from these modest gains are completely obliterated in the rush to allocate unnecessary employment areas along Highway 400 that will only promote sprawl, traffic congestion and bad air; allocating insufficient population densities that make meaningful public transit options unviable; insufficient transitional planning that leaves loopholes wide open for abuse by developers; and, the lack of a green building standard to reduce the impact of new developments the province expects in the watershed over the next 20 years.

Modest Improvements:

- Some population moved out of Lake Simcoe watershed;
- Some population allocations went to northern communities, albeit at too low densities;
- Restricting sprawl to land needed for 20 years, through the creation of interim settlement boundaries, via policy 6.3.2.2.

Recommendations:

- Population allocations must consider the assimilative capacity of the receiving bodies of water, and must not result in an increase in Phosphorus to Lake Simcoe;
- Do not proceed with employment areas on Highway 400. They are unnecessary and will lead to further sprawl and unsustainable development;
- Establish clear transition rules from the "Wild West" of planning that exists now to the framework proposed in this Amendment, and make implementation of the Amendment fair in all communities;
- Extend the requirement under the Lake Simcoe Protection Plan to undertake environment assessments on supporting infrastructure before approving land use designations, to all of Simcoe County and especially for the Big Bay Point mega-marina and resort;

- Do not decrease the density allowed anywhere in this plan, and instead increase density targets to 75 jobs and residents per hectare (j&r/ha) and use that number as a condition for future population allocations;
- Introduce a community design, water/wastewater management and green building standard against which population allocations can be assessed; and,
- Grow the Greenbelt in communities contiguous to the existing Greenbelt for example, Bradford West Gwillimbury.

Introduction

The residents of Simcoe County have a right to know why the Government of Ontario is proposing policies that run counter to its own provincial plans, the advice of public health officials and the wishes of its constituents in the proposed Simcoe Amendment to the Growth Plan. The government is obliged to reverse these decisions before the damage to our community's health and its environment cannot be repaired.

In October 2010, the province unveiled 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". While this Amendment offered some modest improvements over the 2009 "Simcoe Area: A Strategic Vision for Growth", the viability of a sustainable Simcoe County is still clearly imperiled by short-sighted and development-industry inspired adaptations, seemingly designed to promote and reward sprawl.

The logic behind this Amendment is baffling; support for protecting green space in the province is high, according to an Environics poll from November 2010: "Even in hard economic times, 88% of people agreed that upholding environmental policy is important. In addition, 91% of people say that the Greenbelt should not only be protected, but it should be expanded to bring in more farmland and natural heritage lands and protect it from further growth and development." Further, Campaign Lake Simcoe's 2006 Oracle poll survey of Simcoe County found that 78% of respondents said they supported "directing urban development away from important water sources such as Lake Simcoe."

These responses show clear public support for two provincial policies this government should be proud of, namely the *Lake Simcoe Protection Act*, and the *Greenbelt Act*. With this kind of support for growing the Greenbelt and saving Lake Simcoe, what is driving the province to support poorly planned growth, and unsustainable land uses? Attention should be paid to the carrying capacity of the area if the province is not to erode the gains of its environmental policies.

Rather than leading the way in developing ecologically based planning systems to protect the Lake Simcoe watershed, the provincial government is pulling Simcoe County in opposing directions. While the *Lake Simcoe Protection Plan* sets a target of having 40% of the land that drains into the lake in "high quality natural cover", the proposed Growth Plan Amendment in Simcoe County focuses on paving greenfields for

residential and new employment areas, contributing to sprawl, vehicle emissions, and water pollution.

Importantly, the province has missed an opportunity to define and prioritize sustainable greenfield development. Ontario's *Places to Grow*, the *Water Conservation and Opportunities Act*, and the *Lake Simcoe Protection Act*, provide directions for increasing the sustainability of our communities. These directions must be embraced, and built in to future decisions regarding population allocations in Simcoe County.

We understand that the province must balance competing interests. We applaud the Government of Ontario for making some positive changes since the Simcoe "Vision" document of June 2009, primarily by applying the brakes on some of the land speculation and "Wild West" sprawl, in a necessary albeit limited way. As well, the proposed changes to population allocations would reduce the additional pollution going to Lake Simcoe, compared to the 2009 "Vision" document.

Environmental Defence, the Rescue Lake Simcoe Coalition, Ontario Nature, and AWARE Simcoe participated in writing this response, with the Lakewatch Society supporting our submission. We believe that this response speaks for those who value the long-term environmental sustainability of the region, and the creation and maintenance of healthy communities.

Further recommendations are bulleted after the sections that follow.

Group Support for Campaign Lake Simcoe's Comments on the Growth Plan Amendment for the Simcoe Sub-area

AWARE Simcoe
Environmental Defence
Ontario Nature
Rescue Lake Simcoe Coalition

Positive Changes to the Simcoe Amendment to the Growth Plan

Slightly smaller impact on Lake Simcoe

Campaign Lake Simcoe is pleased that the province responded to our request that population allocations be reduced in the Lake Simcoe watershed, and that more population be directed to northern communities. Population allocations went down by just 2,000 people in Innisfil and by 1,500 in Bradford West Gwillimbury (BWG). Penetang and Midland were added, together, as an “urban node”.

Campaign Lake Simcoe suggests that these changes will help develop complete northern communities and reduce the proportion of people who commute over the Greenbelt to Toronto. This will reduce the number of unnecessary single occupant vehicle trips in the County, and aligns with the Simcoe-Muskoka Health Unit’s *Healthy Community Design: Policy Statements for Official Plans, 2010*. There is a heavy caveat to this “improvement” however; recent studies show that the planned development will add Phosphorus to the lake, which works against the goals of *Lake Simcoe Protection Act and Plan*.



Enjoying Cooks Bay, Innisfil. Photo credit C. Malcolmson

Interim settlement area boundary

Restricting sprawl to the land needed for 20 years, through the creation of interim settlement boundaries, via proposed Amendment policy 6.3.2.2, was a needed measure in Simcoe County, currently the “Wild West” of sprawl. This should have the effect of curbing poorly planned growth, and making the best use of expensive infrastructure like roads and sewers. The Growth Plan sets the employment and residential population target for Simcoe County at 667,000 people by the year 2031 (2006 population was 437,100), though according to the Toronto Star, “development interests have plans for more than 1 million people”.

The policy prioritizes development within a new interim settlement area boundary before allowing growth in the areas outside of it. The municipality must make the determination of the boundary. Which development applications are considered in or out of the interim boundary will be based on how much land the municipality needs for 20 years, and on the stage of approvals of development applications. At the technical briefing in Toronto, November 17, 2010, developers and their lawyers pointed out that this might result in numerous appeals to the OMB, never-ending Official Plan conformity exercises, and additional costs for the municipalities.

- Clear transition rules must be developed by the province to address these scenarios, and to make the implementation of the Amendment fair in all municipalities.

Recommendations

Population Allocations and Environmental Impacts

It is unacceptable that one arm of the government undo the work of another. But if the population allocations outlined in the Ministry of Infrastructure’s Amendment are approved, Lake Simcoe will become further polluted, directly contradicting the objective of the Ministry of the Environment’s *Lake Simcoe Protection Act*.

In September 2010, the Louis Berger Group Inc. from Washington, U.S.A. wrote “Estimation of Phosphorus Loadings to Lake Simcoe – 2010”, a report published by the Lake Simcoe Region Conservation Authority. It describes the results of modelling scenarios designed to measure the impacts of planned development in the Lake Simcoe watershed, based on adopted and draft official plans. It reports an anticipated addition of 14,328 kg/yr in Phosphorus resulting from the growth scenario.

We broke the results down, and selected subwatersheds that are in whole, or in part, in Simcoe County. According to data found in this report, with business as usual practices, growth from these areas in Simcoe County will add approximately 4,576 kg/year of Phosphorus to the lake. The same level of growth, with selected agricultural Best Management Practices applied, will add 3,210 kg/year of Phosphorus to the lake.

The authors state, “The purpose of the study is to estimate the existing

Phosphorus levels delivered to the lake under existing (Base-Case) and future conditions (Growth Scenario) as well as under conditions when best management practices are implemented on agricultural areas (BMP Scenario)” (Berger, 2010, p.26). We acknowledge that the results do not take into account the recommended and required improvements to development practices, and the use of “Low Impact Development” (LID). But this worst-case scenario is important, because LID is not yet required in the Lake Simcoe watershed. This forecast indicates that unless development practices change immediately, and provide a net reduction in Phosphorus loads to the lake, **the development proposed in the Amendment undermines the *Lake Simcoe Protection Act and Plan*.**

Additionally, the current forest cover in the areas analyzed is an average of 20% of each subwatershed. This is well below the Lake Simcoe Protection Plan target of 40% high quality natural cover.

The case of Alliston/New Tecumseh is illustrative of the contradictions in the Amendment. In Simcoe, the largest employer by far is Honda, but Alliston/New Tecumseh was only allocated 56,000 for population to 2031, not nearly enough to accommodate future growth and employment. As it stands, Alliston does not and will not have enough residential units allocated to house even a fraction of the Honda Plant employees, forcing them to drive to work from miles around. Instead of creating new places to work along the congested Highway 400 corridor, and then sprawling residential development to house the new employees, the Plan should prioritize moving people closer to existing jobs in Simcoe County.

Changes in Phosphorus loads to Lake Simcoe: Existing base scenario, growth scenario, and with agricultural Best Management Practices:

Location	Forest cover	Base scenario (kg/year)	Growth scenario (kg/year)	Growth with BMPs scenario (kg/year)
Hewitt Creek	11%	377	511	475
Lovers Creek	17%	808	1,158	1,099
Innisfil Creeks	17%	3,490	4,504	4,250
Hawkestone Creek	29%	556	572	540
Oro Creeks North	28%	5,629	6,507	6,285
Oro Creeks South	28%	1,058	1,325	1,278
Ramara Creeks	12%	2,066	2,407	2,352
West Holland	16%	7,589	9,165	8,504
Totals	average 20%	21,573	26,149	24,783

More than base scenario (kg/ year)			4,576	3,210
	means a reduction in Phosphorus from the base scenario			
	means an increase in Phosphorus from the base scenario			

Data in this table was found in “Estimation of Phosphorus Loadings to Lake Simcoe – 2010” on p. 28, Table 5-1, and p.13, Table 2-3.

- Population allocations must consider the assimilative capacity of the receiving bodies of water, and must not result in an increase in Phosphorus to Lake Simcoe;
- Low Impact Development policies from the Lake Simcoe Protection Plan must be implemented immediately, across Simcoe County (policies 4.6, 4.17, 4.20, 4.21);
- Alternatively, a Green Building Standard could be applied to the area which includes the above, and other measures to reduce the impact of growth;
- Any additional growth in the watershed should be done in such a way that forest cover is not reduced. As a condition of Official Plan approval municipalities could be required to demonstrate plans and land use allocations that would meet the 40% high quality natural cover target as per the Lake Simcoe Protection Plan;
- If the province is serious about creating “complete communities” it should direct new residential development where real employment lands already exist;
- The province should award municipalities that have strong environmental planning and development policies with population allocations.

Employment lands

We understand creating “complete communities” is a challenge in a suburban landscape. In general we submit that approving the employment zones in Innisfil and BWG on Highway 400 is unjustified because the GTHA has already has 30,000 acres of unused and approved employment land and there is only a need for another 10,000 to meet demand for the projected growth. This can easily be found in the whitebelt south of the Greenbelt – nearer important services like transit, rail yards and airports. According to Growth Plan conformity work, only about 1/3 of the whitebelt is needed to accommodate growth to 2051. So there is no justification to leapfrog the Greenbelt to find more employment land. This Amendment effectively legalizes leapfrogging the Greenbelt, and might initiate the unraveling of its protection of 1 million acres of green space.

One wonders why these Highway 400 employment land approvals were given. There is nothing innovative about the community or building design to warrant approval. We suggest that there are two primary reasons. One is that land speculators owning land on Highway 400 were successful in lobbying for changes to the Growth Plan. We anticipate that running services along undeveloped lands, in both cases, from the nearest town to the employment zone, will justify further greenfield development

along the path of the pipes, due to the cost of running services across undeveloped lands. While this is wonderful news for land speculators, this is not how the provincial government promised to change land use planning in Ontario. For example, the proposed expansion of the Hamlet of Bond Head is proposed in the middle of extremely high value agricultural land, some of the best in Ontario, just west of the BWG employment lands, would benefit from the taxpayer-subsidized extension of water and wastewater servicing. This is an example of the public subsidizing private developer gains through planning approvals.

The second reason is that the existing towns of Innisfil and BWG had become bedroom communities with a distinctly rural character, and that putting employment lands near homes would be distasteful to those accustomed to the separation of uses that has characterized suburban development since its inception. There is not much we can do about the existing pattern of development now.

Much of this planning runs counter to the Healthy Communities Design document put forward by the Simcoe-Muskoka District Health Unit which recognizes that “the design and layout of the built environment is critical in preserving water supplies and watersheds and ensure enough greenspace to allow for a safe hydrological system, which affects water quality”. Clearly, paving over greenfields and laying the foundation for even more sprawl have a detrimental impact on the watershed.

Approving these employment zones will encourage even more single occupant car trips into and around the region and flies in the face of the advice provided by the Simcoe Muskoka District Health Unit’s Healthy Communities Design document.

- Do not proceed with employment areas on Highway 400. They are unnecessary and will lead to further sprawl and unsustainable development.

Compliance

No matter how great a strategy is, it is not worth the paper it is printed on if people do not have to follow it. In Simcoe County, time and again, developers and unscrupulous land-owners have found loopholes, compliant local authorities and provincial agencies like the Ontario Municipal Board to undo much of the work local people have put in for years to make their communities livable. From bait-and-switch farmland severances, to golf courses that get new licenses to withdraw millions of litres a day in water-poor communities, second-home “resorts” being exempted from growth plans, to municipal governments approving settlement expansions that contradict their Official Plan, residents know all too well how easily developers can circumvent official planning to install whatever unsustainable mega-projects they want, wherever they want. While this Amendment is not perfect, it at least provides a framework for development and land conservation that should be consistently applied and predictable for residents.

- The provincial government must close any and all loopholes in the plan, and not allow developers or municipal governments to circumvent the wishes of long-time residents to build massive, sprawling and unsustainable projects.

Density

Some of the good news in this Amendment is negated by the fact that the impact of development has not been addressed. The Growth Plan generally calls for 50 residents and jobs combined per hectare in green field development, which is predominantly what we may see in Simcoe. What is proposed in this Amendment would achieve an average of 41 residents and jobs combined per hectare in Simcoe. BWG, Collingwood, Midland, New Tecumseth, Penetang and Innisfil are supposed to achieve 50 residents and jobs / hectare, and everywhere else only 32.



Hypothetical streetscape depicting the Growth Plan's density targets for designated greenfield areas (above: density of approximately 50 residents and jobs combined per hectare)

Density of 50 residents and jobs per hectare. Photo credit Ontario Growth Secretariat

In effect, this policy is only curbing sprawl in the short term, in some places, while allowing development to pave more acres of Ontario's precious farm land and green space per person than is otherwise allowed by this government.

The development industry generally vilifies density, and in so doing, denies much opportunity for age, income and racial diversity in a community. The profitable alternative, sprawl, contributes to an environmentally and socially unhealthy and unsustainable built form. Many developers and municipal politicians threaten that high-rise buildings are the only way to achieve the province's density targets. Our

recommendation is that new communities should be built at 75 residents and jobs / hectare. There are many ways for towns in Simcoe County to reach 50 or more residents and jobs per hectare, without building high-rise buildings; laneways can be developed, granny suites and backyard suites allowed, mansions subdivided, and low to medium-rise apartment or condo blocks built.

- The province should deliver strong public education campaigns on the benefits of achieving density, or support planning firms or NGO's to do so.
- Do not decrease the density allowed anywhere in this plan, and instead increase density targets to 75 residents and jobs / hectare.
- These densities should be delivered via a uniform green community design standard.

Green building standard

We repeat a comment from Paving Simcoe County: Campaign Lake Simcoe's Response to Simcoe – A Strategic Vision for Growth, 2009. "We are disheartened that the Growth Strategy does not provide for a very open and public competition for new greenfield projects in places like Innisfil, Alliston and Bradford West Gwillimbury that would set a new standard for energy and water conservation. Lake Simcoe's special watershed requires new thinking in terms of built form and energy use, which this strategy fails to address. The Province should have followed the City of Toronto's lead by creating a new green building standard, tailored to this watershed's particular needs." Nothing has changed in this regard, in the proposed Amendment.

- The province should assert its planning oversight function and require new developments within the County to be designed in accordance with widely accepted sustainable community design principles for greenfield developments.
- Before development is allocated studies must be conducted to estimate how large a population the ecosystem can sustainably support. The Growth Plan population allocations must be reconciled with The Lake Simcoe and Nottawasaga River Assimilative Capacity Study (ACS) report findings.
- Extend the water conservation policy 5.3- SA from the Lake Simcoe Protection Plan to all of Simcoe County, which includes an evaluation of "...water conservation measures such as improved management practices, the use of flow-restricting devices and other hardware, water reuse and recycling, and practices and technologies associated with water reuse and recycling."
- A target of 50% reduced treated water for each household should become the standard to meet, and strong preference should be given to projects meeting a very achievable 50% energy reduction in new home design.
- Implement a new requirement under policy 4.8c) -DP in the Lake Simcoe Protection Plan that "an *integrated treatment train approach* will be used to minimize stormwater management flows and reliance on end-of-pipe controls through measures including source controls, lot-level controls and conveyance

- techniques, such as grass swales.”
- Reduce the impact of the development process by adopting policy 4.20-DP from the Lake Simcoe Protection Plan regarding environmental measures applied to subdivision agreements and site plan agreements.

Transportation study and water wastewater servicing plan

The province identifies the need to conduct a transportation study and a water /wastewater servicing plan after the proposed Simcoe Amendment to the Growth Plan and Official Plan Amendments are complete. The intention is for the transportation plan to conform to the Growth Plan, which prioritizes public transit. By assigning growth and employment to specific areas before thorough transportation analysis, the province has put the cart before the horse.

To make public transit feasible, places need to be built with “transit-supportive densities”. Where bus stops are placed every 250 meters, and arrive every 15 minutes, there need to be 300 – 400 residents and jobs / hectare within 400 meters, or a five minute walk, from a bus stop. The province has approved an average of 41 residents and jobs / hectare in Simcoe County, which eliminates the possibility of feasible public transit in most of the County. When the transportation study is complete, this will surely be one of its conclusions. We know that not everyone everywhere wants to or needs to use public transit. But if Ontario is to do its part to climate change, sprawling development far from work and homes must stop.

Furthermore, allowing new servicing to spread throughout Innisfil via new wastewater pipes to service, for example, the proposed Big Bay Point mega-marina and resort should also be made contrary to this plan. Pipes through undeveloped areas invite more sprawl.

- Make the provision of public transit, and achieving transit supportive densities, a requirement for municipalities now, but especially to receive higher population allocations after 2031.
- Water and wastewater servicing plans must come earlier in the development application process. This is a recommendation that may be outside the scope of this Amendment, but the process is at odds with provincial aims, and must be changed.
- Extend the requirement under the Lake Simcoe Protection Plan to undertake environment assessments on supporting infrastructure before approving land use designations, to Simcoe County.
- So-called “second homes” and resorts that require the same services as first homes should not slip through the Growth Strategy calculations.



Parking lot packed with car-dependent shoppers. Photo credit C. Malcolmson

Conclusion

While the proposed Simcoe Amendment to the Growth Plan provides some needed changes to curb sprawl in Simcoe County, it does not go far enough to prioritize environmental sustainability through community design, water and energy conservation or transportation planning. We believe plunking new employment lands in the middle of farm fields to be very short-sighted and a clear gift to land speculators. New “green” residential development be given a priority in areas with existing jobs. Population and employment allocations must respond to the assimilative capacity of the receiving body of water, municipalities’ achievement of transit supportive densities, sustainable water and wastewater servicing, and green building standards.

To improve the water quality in Lake Simcoe, we must first improve the planning, design and building of new developments around it. The Simcoe County Growth Plan presents a wonderful opportunity to “green” new development as a condition of approval – this Plan needlessly squanders a very important moment in the Lake’s history. Without these changes, the health of the Lake will certainly deteriorate.

Sources

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