



**FRIENDS OF RURAL COMMUNITIES & THE ENVIRONMENT
(FORCE)**

**SUBMISSION TO THE MINISTRY OF PUBLIC
INFRASTRUCTURE RENEWAL RE: PROPOSED GROWTH
PLAN FOR THE GREATER GOLDEN HORSESHOE
(NOVEMBER 2005)
EBR#XR05E0002**

JANUARY 17th, 2006

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FORCE SUBMISSION TO THE MINISTRY OF PUBLIC INFRASTRUCTURE RENEWAL – JANUARY 2006

INTRODUCTION

Friends of Rural Communities and the Environment (FORCE) thank the Ministry of Public Infrastructure Renewal for the opportunity to input to the Proposed Growth Plan for the Greater Golden Horseshoe, the latest evolution in the *Places to Grow* initiative and the growth management plan for this area. We also welcome the government's corollary initiatives to establish and protect a permanent Greenbelt in the Golden Horseshoe, the establishment of policies and procedures through the Strong Communities Act and its Provincial Policy Statement, the *Clean Water* legislation, and this Plan to promote more compact urban growth in order to protect and conserve our drinking water and natural heritage features. The Proposed Growth Plan for the Greater Golden Horseshoe is an important first step towards more sustainable urban development patterns in this region. The plan contains many strong directions to contain sprawl and protect what is valuable. Some improvements and refinements will make it even better and more effective.

FRIENDS OF RURAL COMMUNITIES AND THE ENVIRONMENT (FORCE)

Friends of Rural Communities and the Environment (FORCE) is a federally registered not for profit corporation. It is a citizen-based advocacy group with hundreds of supporters in Campbellville, Kilbride, Mountsberg, Freelton, and Carlisle. FORCE was formed in June 2004 to protect our natural and built environments in the face of a proposed large-scale, below the established groundwater table, aggregate development in the Northeast Flamborough portion of the amalgamated City of Hamilton. We note upfront that our organization is not anti-aggregate nor anti-road; indeed, our area is home to some of Ontario and Canada's largest aggregate operations. We do, however, have significant issues with the pending application in its proposed location for substantive reasons. We also believe that our organization has a responsibility to promote good government in the area and in the provincial arena and ergo, we have a responsibility to input to the broader planning reform processes which bear upon the approvals process for development proposals such as the one before our communities. As such, we have made previous submissions with respect to the growth management initiative.

Further, FORCE is a member of the Ontario Greenbelt Alliance. We support its general directions in response to this issue and notably those of lead groups like Ontario Nature, Environmental Defence and the Pembina Institute. Our submission focuses, however, on experience in the Hamilton and western Halton regions and specifically on the 'Protecting What is Valuable' subsection.

COMMENTS ON THE DRAFT GROWTH MANAGEMENT PLAN

General Comments

FORCE supports the *Places to Grow's* overall focus on accommodating future population and economic growth in the Golden Horseshoe through the intensification of existing urban areas, the

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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. Transit as the top priority for transportation planning and infrastructure investment is commendable. We do note, with concern, comments from the latest Environment Commissioner of Ontario's report when he documents that PIR has simply accepted population growth projections without an assessment of the ecological and other carrying capacity of the region to bear them. This kind of analysis and societal debate is fundamental.

The Plan should incorporate a stronger focus on the completion of an ecologically viable permanent Greenbelt and greenways network in the region. In addition, the protection of agricultural land is limited with its focus on prime and specialty crop areas.

The Plan appears to place greater emphasis on managing the demand for aggregates than did the draft Plan and than some other recent government discussion papers. We note that it does fall short of the type of comprehensive conservation framework called for by the Environment Commissioner of Ontario in recent annual reports and by the Pembina Institute (Rebalancing the Load – January 2005). The Plan fails to articulate specific strategies to achieve its “wise use” goals and these specific strategies – to reduce demand for aggregate materials and to better balance aggregate extraction with other competing land uses, such as source water and natural heritage protection - are also lacking in corollary government initiatives, such as the draft Provincial Policy Statement.

Places to Grow is premised on the province retaking a much more directive role in land use planning through policy, legislative and fiscal measures. This directive role needs to be more consistent within the Plan (i.e. for Built Boundaries and Natural System boundaries) and across related provincial government initiatives (i.e. permanent Greenbelt establishment and protection, source water protection, viable agricultural and rural strategy, planning reform, and the as yet untouched aggregate resources reform). The role also needs to be complemented with specific implementation guidance and tools for municipalities.

Protecting What is Valuable Subsection

4.2.1 Natural System

Important improvements from the draft Plan such as the Province setting the Built Boundaries and the application of the urban intensification target within each upper and single tier municipality rather than averaging across outer ring municipalities do not appear to have been replicated with respect to our natural greenways. The protection for the Natural System appears to be a low priority within this version of the Plan. The Natural System is left to have its identification, mapping and boundaries completed by PIR, MNR and municipalities and no protective policies are put in place beyond the provisions of the PPS. Yet if these systems, and the locally and regionally sensitive features and species therein, are not protected, we are simply allowing them to add to the growing list of those provincially and nationally threatened.

The Natural System should be part of the Growth Plan and its boundaries included, even if by amendment upon completion of the consultative mapping exercise. Protective policies should be

included upfront. No urban boundary extensions should be permitted into the Natural System. It is also important to provide and promote, if not require, connectivity between Natural Core Areas and Corridors. Similarly linkages between the Natural System, the Niagara Escarpment, the Oak Ridges Moraine and the balance of the Greenbelt are also critical.

4.2.2 Agricultural Resources

Given the provincial and national importance and value of the region's agricultural lands, the Growth Management Plan should incorporate protection from urban development for agricultural areas within the Greater Golden Horseshoe region and should include a policy relevant to near urban agriculture. Prime agricultural areas should be defined as areas where there are significant specialty crop lands, 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. Similarly, specialty crop areas should be defined as land where specialty crops may be grown, as opposed to areas where they are "predominantly" grown. We have also learned from our experience in this region that it is also important to note that the classification of soil is simply a guide to categorize the acreage and its ability to be farmed. Soil classification was established as a guide to establish a gradient in quality of farmland inventory in Ontario in the early 1960's. It is not the sole criteria in deciding what land should be farmed. Agricultural technology has since evolved—substantially – as have best practices. When applying best practices to farming, it is not uncommon for a farmer operating on class 3 soil to out perform an operation located on class 1 soil, in terms of yields & efficiency.

Agriculture is not just bigger farms with bulk, undifferentiated commodities for export. Near urban agriculture in this region is often about smaller but legendary farms, unique products, and local markets. This type of near urban agriculture is equally deserving of permanent boundary protection. It also requires planning, policy and fiscal support for value added activities and secondary uses not just primary food production. In this case, agriculture might include packing, treating, processing, marketing, selling, sorting, and storage of locally grown or raised products. Secondary uses might encompass commercial and industrial small-scale uses that when located on farms support the economic viability of the operations.

4.2.3 Mineral Aggregate Resources

The mineral aggregate provisions are directionally more progressive than those in some other recent government initiatives but they are not specific and they are still subject to further consultation with stakeholders. Mineral aggregate resources should be subject to the same "Culture of Conservation" as referenced in 4.2.4 for water, energy and waste management, among others. The 3Rs should equally be the upfront requirement for aggregates. We are also cautious given the "wise use" movement in the United States and the continuing reference to availability in the Greater Golden Horseshoe. The Environment Commissioner of Ontario has clearly articulated that there is no shortage of aggregate in the province. The societal debate needed is on how much of the resource we should be using and where it should come from – both in terms of 3Rs and extraction locations.

He has also documented the lack of current data on demand/consumption and supply as well as the analysis required to understand the existing licence volumes, some of which are not even operational.

Water Resources – Water and Sewer Infrastructure and Conservation Culture

The integration of land-use and source water planning in the region should be strengthened. Development that will negatively impact groundwater recharge areas, head-waters and aquifers that have been identified as sensitive, or in significant ravine, valley river and stream corridors should not be permitted. Development identified as constituting a “water risk” as defined in the *Clean Water Act*, should not be permitted. The provisions in these sections should be made more consistent with the newly introduced legislation and its definitions.

Provincial Implementation and Monitoring

As noted in the general comments, the implementation of the Growth Management Plan will require that the province play both directive and supportive roles. While provincial clarity and a more direct role in some areas are improved, strategies to assist municipalities in implementing the Plan are still noticeably absent in others. The province should provide guidance and support to municipalities, in addition to policy direction. Stronger provincial support and guidance is particularly needed in such areas as identifying and protecting source water, agricultural lands, and natural heritage lands, among others.

The impact and effectiveness of the Plan should be monitored and reviewed 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

FORCE believes that the initiatives noted above and the areas for suggested improvement are necessary to ensure sustainable urban and rural development patterns within the Golden Horseshoe. They are also necessary to support, rather than undermine, the government’s important directions in terms of permanent Greenbelt protection, source water protection, viable agriculture and rural strategy, and planning reform.

THANK YOU

FORCE thanks the Ministry again for the opportunity to input and looks forward to reviewing the government’s response to these important initiatives.