



Credit Valley Conservation  
Nottawasaga Valley Conservation  
Toronto and Region Conservation  
Lake Simcoe Region Conservation  
Central Lake Ontario Conservation  
Kawartha Conservation  
Ganaraska Region Conservation  
Otonabee Conservation  
Lower Trent Conservation

May 27, 2015

Mr. Richard Stromberg  
Manager  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Mr. Stromberg:

**Re: Conservation Authorities Moraine Coalition Comments in Response to the Co-ordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan (Registry #012-3256)**

The Conservation Authorities Moraine Coalition (CAMC) would like to thank the Ministries of the Environment and Climate Change and Municipal Affairs and Housing for the opportunity to comment on the co-ordinated 10-year review of the four Provincial Plans. The CAMC is the coalition of nine Conservation Authorities (CAs) with watersheds on the Oak Ridges Moraine (ORM). The CAMC was formed in 2000, in response to the need for a comprehensive policy, planning and management approach geared to sustaining the health of the entire ORM. The CAMC is a partnership organization, collaborating with numerous groups and individuals to achieve common objectives which include undertaking science-based research on the ORM. The CAMC members provide opportunities for recreation across the ORM, take action for the protection and restoration of the ORM, and provide expert advice for environmental planning and policy matters to support a robust and resilient environment across the ORM landscape.

The CAs that comprise the CAMC strongly support the Provincial Plans and assist with the implementation of the Oak Ridges Moraine Conservation Plan (ORMCP) and Greenbelt Plan (GBP) policies by providing technical review of development applications through our role as a commenting agency under the *Planning Act*. Additionally, CAs undertake watershed and subwatershed plans (which are considered by the Province to be an indicator of success on the ORM) to inform municipalities in their creation and updating of official plan policies to achieve conformity with the ORMCP and GBP. In our work to support provincial interests and to help inform the review of the Provincial Plans, CAMC developed the *Report Card on the Environmental Health of the Oak Ridges Moraine and Adjacent Greenbelt Lands* (Report Card), to provide up-to-date, science-based monitoring data and analysis to report on the environmental health of the ORM and Greenbelt lands ([www.morainecoalition.ca](http://www.morainecoalition.ca)).

The following comments are based on the CAMC's extensive experience working within the framework of the ORMCP and GBP. Key themes are outlined below, while a more detailed chart focusing on the consultation discussion questions is attached (Attachment 1).

#### Effectiveness of the ORMCP and GBP

To date, both the ORMCP and GBP have been largely effective in achieving their respective purposes of landform, agricultural land, and Key Natural Heritage/Hydrological Features protection. This protection has been achieved because both Plans provide municipalities, Conservation Authorities and other stakeholders with a number of strong policy tools. One of the most effective policy tools has been the ability to delineate natural heritage systems, Key Natural

Heritage/Hydrological Features and protect these areas from incompatible development and use. Additionally, the Plans have raised public awareness and have resulted in increased public involvement in activities to protect the ORM and Greenbelt lands.

It is essential that the strong protection policies of the ORMCP, GBP and Niagara Escarpment Plan (NEP) are maintained as separate and distinct Plans to benefit the unique landscapes, livelihoods and natural areas protected by each of the Plans. The three environmental plans, along with the Growth Plan for the Greater Golden Horseshoe (Growth Plan), have been effective in working together to protect bio-regional scale environmental systems and important agricultural lands, while seeking to minimize urban sprawl. The objectives of all four Plans are necessary in working together to address climate change and achieve resilient communities in the Greater Golden Horseshoe Region.

While the Plans have been effective at the broad landscape scale, there are still many local scale and site-specific implementation issues that continue to undermine the intent of the Plans and continue to degrade environmental quality and agricultural lands. Some of these activities include large and small scale fill projects, cutting down woodlots without or prior to receiving permits, solar farms covering agricultural lands instead of on industrial rooftops, and lack of use or inadequate enforcement of the use of sediment controls on development sites. The effects of these implementation issues on the environmental quality of the ORM are documented in the Report Card and identified below, along with proposed solutions to strengthen the Plans. We must do more than just maintain the ORM in its current state - we must also invest in restoring and enhancing this environmentally significant landscape.

#### Recommended Improvements to Increase the Effectiveness of the ORMCP and GBP

The following key themes should be addressed to maintain and enhance the strength of these Plans:

#### ***Additional Tools and Support to Implement the Plans are Required***

The CAMC Report Card shows that almost half of the watersheds within the Plans' area had surface water quality grades of fair, poor or very poor. The Report Card concludes that implementation of the ORMCP and GBP through *Planning Act* applications is generally satisfactory to maintain existing conditions, but is not sufficient on its own to achieve the Plans' other goals and objectives to restore and enhance the health and integrity of these environmentally significant lands. Other tools are needed.

The Province needs to prescribe a greater range of tools which can support the implementation of the Plan objectives. These additional tools and programs could include:

- Increased funding for private land stewardship, land acquisition and Environmental Farm Plans;
- Filling gaps in environmental monitoring;
- Planting native vegetation in priority areas to create linkages, restore riparian lands, and increase forest interior to improve natural heritage systems, surface water quality, aquatic habitat and resilience to climate change impacts;
- Increased implementation and enforcement of municipal by-laws under the *Municipal Act* (i.e., tree cutting, fill, and erosion and sediment controls) and;
- Making more robust use of section 28 permits under the *Conservation Authorities Act*.

Additionally, practitioners using the Plans would greatly benefit by addressing consistency issues with respect to policy interpretation and application of policies, through the harmonization of terminology and the associated technical guidance papers. A provincial website should be developed that compiles all the relevant policy interpretations that provincial staff have provided over the years to various issues and questions raised during site-specific implementation of the policies.

### ***Increased Flexibility for Agriculture, Rural Livelihoods and Conservation Authority Owned Lands***

Flexibility for agricultural and rural land uses is somewhat lacking from the ORMCP and GBP which can limit economic opportunities for rural land owners. For example, bed and breakfast establishments, home businesses, dwellings for farm workers, nature-based tourism and value added agricultural uses could be allowed some additional flexibility in the scale and scope of their operations, as long as these uses were subject to meeting the environmental policies and tests of the Plans. It is recommended that all four Plans be tailored to harmonize the definitions of agriculture and its related activities with the language used in the 2014 Provincial Policy Statement to permit rural agri-business innovation while maintaining the Plans' integrity with regard to protection of water resources and natural heritage.

The Plans should also include policies to allow for additional flexibility for Conservation Authority owned lands and facilities to provide environment-based recreation, education and tourism opportunities that respond to changing trends in these fields. It is suggested that a definition for "Conservation Projects" (see Attachment 1) should be added to the ORMCP and GBP to support and confirm Conservation Authority land uses and provide flexibility for Conservation Authorities to meet the recreational demands of the growing Greater Golden Horseshoe population.

### ***Strengthen Policy Requirements for Transportation, Infrastructure, and Utilities***

The ORMCP policies, in practice, take a "business as usual" approach with respect to transportation, infrastructure and utility development activities. There is a need for clear direction (in the Plans or related guidance documents) on how to "demonstrate the need" for and assessment of "no reasonable alternatives", which is a key test in the ORMCP related to allowing infrastructure in the Natural Core and Linkage Area designations. There should be added policy requirements for enhancement and ecological compensation when Key Natural Heritage/Hydrological Features are negatively impacted by infrastructure planning and siting. Additionally, the ORMCP should clarify that the requirements for a Natural Heritage Evaluation and Hydrological Evaluation apply to transportation, infrastructure and utilities development activities and not just to development and site alteration under the *Planning Act*.

### ***Recognize the Role of Conservation Authorities in Implementing the Plans***

The Plans should be amended to acknowledge the various implementing roles of Conservation Authorities in: watershed planning; as a resource management agency; providing comments to municipalities on development applications via service agreements; and assisting in natural heritage identification, mapping and impact assessment as part of the development process. Conservation Authorities should be clearly defined as a "public body" and also recognized for their role as a land manager as the owners of the largest blocks of significant environmental and recreational lands in the Greenbelt. This is fairly well reflected in the GBP, but not at all in the ORMCP or Growth Plan.

Furthermore, the ORMCP, NEP and Growth Plan should be harmonized to include wording similar to that of sections 5.4 and 3.2.2.7 of the GBP with respect to section 28 of the *Conservation Authorities Act* which states, "Where there are regulations or standards that are more restrictive than those contained in these plans, the more restrictive provision prevails." Indeed, these statements should be explicitly stated at the front of all four Plans as arguments are often made by proponents of development that the intensification requirements of the Growth Plan trumps all other policies, which leads to protracted hearings and expenditures of significant public funds to defend natural heritage and natural hazard policies at the Ontario Municipal Board.

### ***Policies for New and Emerging Issues***

A number of new and emerging issues need to be adequately addressed in the Provincial Plan updates:

- Greater oversight and regulation of large-scale fill activities in Ontario.
- Policies related to green energy installations such as wind farms (visual impact, wild life impact) and solar farms (impacts on agricultural lands/natural heritage systems). A further review is needed to determine whether the ORM, Greenbelt, or Niagara Escarpment is the proper place for these Renewable Energy Projects to ensure they do not compromise the environmental integrity or agricultural viability of the lands.
- Requiring and promoting green infrastructure and the use of Low Impact Development techniques in the Settlement Areas to provide for resilient communities able to adapt to climate change.
- Sections 28, 29 and 42 ORMCP should be revised to align with the requirements of approved Source Protection Plans.

### ***Monitoring***

CAMC strongly encourages the Province to invest in a consistent long term environmental monitoring and reporting program to determine the effectiveness of the policies of the Plans in achieving their visions and objectives. Enhanced monitoring and indicators for all of the Plans would provide accountability in their implementation and help to assess cumulative impacts from land use activities and a changing climate. This is another role that Conservation Authorities, with appropriate funding, are well-suited to implementing, given our role as a resource manager on a watershed basis.

Further information and specific recommendations regarding the comments above are detailed in the attached table. Should you have any questions or require clarification on any of the comments submitted, please contact David Burnett, CAMC Coordinator, at 416-661-6600 extension 5361.

Sincerely,



Michael Walters  
2015 CAMC Chair  
Chief Administrative Officer  
Lake Simcoe Region Conservation Authority

Attachment 1 – Conservation Authorities Moraine Coalition (CAMC) Comments in Response to the 2015 Co-ordinated Provincial Plan Review

THEME	DISCUSSION QUESTIONS	COMMENTS
<p style="text-align: center;"><b>THEME 1: Protecting agricultural land, water and natural areas</b></p>	<p>1. How can the plans better support the long-term protection of agricultural lands, water and natural areas?</p>	<ul style="list-style-type: none"> <li>• <b>Ensure the ORMCP policies regarding the Natural Core and Linkage Area designations and the policies for Key Natural Heritage/Hydrologic Features and vegetation protection zones remain strong. The Plans should also include additional policies to strengthen the systems approach, for example:</b> <ul style="list-style-type: none"> <li>○ The ORMCP and Growth Plan language should more strongly emphasize the importance of systems to match the language in the GBP (3.2.1.3) especially regarding the importance of preserving the linkages between natural systems and the need to protect the headwaters of Lakes Ontario and Simcoe.</li> <li>○ The Plans should recognize the importance of planning for natural heritage systems at various scales. The Plans should acknowledge that although local natural features and areas may not appear to provide key functions at a larger scale, they do provide significant functions that are beneficial at the watershed and local scales.</li> </ul> </li> <li>• <b>Section 48 ORMCP Transition provision should be “sunset” immediately.</b> Landowners have had since 2002 to take advantage of this provision. It should not continue indefinitely as it would continue to exempt transitional applications from having to comply with the permitted use policies of the ORMCP.</li> <li>• <b>Section 41 ORMCP infrastructure planning and siting policies currently take a “business as usual” approach in the ORMCP. There is a need for clear direction (in the Plans or related guidance documents) on how to “demonstrate the need” for and assessment of “no reasonable alternatives”, which is a key test in the ORMCP related to allowing infrastructure in the Natural Core and Linkages Area designations. There should be added policy requirements in all Plans for enhancement and ecological compensation when Key Natural Heritage/Hydrologic Features or cultural heritage is negatively impacted by infrastructure planning and siting.</b> Additional revisions should include: <ul style="list-style-type: none"> <li>○ Adding a new section for infrastructure in the ORMCP’s Countryside and Settlement Areas and the GBP’s Protected Countryside to use Best Management Practices and require ecological compensation for Key Natural Heritage/ Hydrologic Features and cultural heritage that are negatively impacted.</li> <li>○ Sections 22 and 26 ORMCP should clarify that the requirement for a Natural Heritage Evaluation and a Hydrological Evaluation applies to transportation, infrastructure, and utilities as described in section 41.</li> </ul> </li> <li>• There is a need for <b>greater oversight, regulation and enforcement of large-scale fill activities</b> in Ontario, which is currently not adequately addressed in the ORMCP or GBP policies.</li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
		<ul style="list-style-type: none"> <li>• <b>The Growth Plan needs to provide clear direction that site specific studies are required to better safeguard water resources.</b> Currently, many studies are too limited in scope and occur too late in the development process to affect decisions about site feasibility. When groundwater issues are found at the detailed design stage, the solution is often permanent dewatering of the aquifer. This can have negative consequences on downstream flooding and erosion, and natural feature (aquatic or terrestrial) degradation.</li> </ul>
	<p>1 (b) Where are the opportunities to expand the Greenbelt both within urban areas, such as urban river valleys, and in rural areas beyond the Greater Toronto Area?</p>	<ul style="list-style-type: none"> <li>• <b>The Greenbelt should be expanded to protect sensitive ground water areas, including areas of high groundwater tables and ecologically significant groundwater recharge areas.</b></li> <li>• <b>Support growing the Greenbelt through urban river valleys and other contiguous regional and local scale system connections</b> (e.g., trails, terrestrial natural heritage, green infrastructure, important recharge/discharge areas, scenic vistas and cultural heritage landscapes, parklands, and other publicly owned connecting lands or corridors).</li> </ul>
	<p>1 (c) What new approaches or tools could be used to protect agricultural land, water and natural areas?</p>	<ul style="list-style-type: none"> <li>• <b>There needs to be clear direction provided on integrating the use of related tools with the Plans, without which has resulted in degradation of features on the ORM and Greenbelt lands. These tools could include:</b> <ul style="list-style-type: none"> <li>○ Land acquisition projects (i.e., TRCA’s Greenland’s Acquisition Program). These programs require a stable funding source for land acquisition and land care/management and make the most progress when the federal, provincial and municipal governments are all aligned towards the same goal.</li> <li>○ Private land stewardship.</li> <li>○ Environmental Farm Plans.</li> <li>○ Tree cutting by-laws.</li> <li>○ Fill by-laws.</li> <li>○ Erosion and sediment controls.</li> <li>○ Reference to section 28 permits under the <i>Conservation Authorities Act</i> should be included in the ORMCP and Growth Plan in a similar manner as sections 5.4 and 3.2.2.7 of the GBP which states, “Where there are regulations or standards that are more restrictive than those contained in these plans, the more restrictive provision prevails”.</li> <li>○ Incorporate principles of road ecology, such as barrier-free passage for wildlife.</li> </ul> </li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
	<p>1 (d) How can we grow and strengthen the region’s network of open spaces to provide for recreational opportunities?</p>	<ul style="list-style-type: none"> <li>• <b>A definition for “Conservation Projects” should be added to the ORMCP and GBP and should be defined as, “activities and uses, including accessory uses, associated with the operations and objects of a conservation authority.”</b> Currently conservation projects are listed as a permitted use within each of the land use designations within the ORMCP. Conservation Authorities conduct various types of activities to support the operations on their landholdings on the ORM and Greenbelt. These uses can provide operational revenues for Conservation Authorities from cultural and nature-based recreational activities, which can support the preservation and adaptive re-use of buildings with historical value. This definition is intended to support and confirm Conservation Authority land uses.</li> <li>• <b>A comprehensive trail plan for the Greenbelt should be developed.</b> This would provide direction on where trails should be located, to what they should connect, uses for the trails, and how the system of trails benefits the communities (e.g., ecologically, socially and economically).</li> <li>• Under-utilized school and municipal sites should be kept in public ownership and used as public parkland. The Province should map all public open spaces owned by all public bodies (including utilities) to provide a full picture of these lands and what can be connected.</li> </ul>
	<p>1 (e) How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario’s economy?</p>	<ul style="list-style-type: none"> <li>• <b>Flexibility for agricultural and rural land uses is somewhat lacking from the ORMCP and GBP which limits sustainable livelihoods for rural land owners. It is recommended to develop a broader definition of agricultural and rural land uses and their activities to encourage innovation while maintaining the Plans’ integrity with regard to protection of water resources and natural heritage.</b> <ul style="list-style-type: none"> <li>○ For example, bed and breakfast establishments, home businesses, dwellings for farm workers, nature based-tourism and value added agricultural uses could be allowed some additional flexibility in the scale and scope of their operations, as long as these uses were subject to meeting the environmental policies and tests of the Plans.</li> <li>○ <b>It is recommended to harmonize the definitions of agriculture and its related activities with the language used in the 2014 Provincial Policy Statement</b> to permit rural agri-business innovation while maintaining the Plans’ integrity with regard to protection of water resources and natural heritage.</li> </ul> </li> <li>• <b>The ORMCP and GBP should include policies to enhance investment and economic and community development in rural settlement areas to better protect agricultural lands.</b> These communities and landscapes need investment and support to ensure their continued sustainability.</li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
<p><b>THEME 2: Keeping people and goods moving, and building cost- effective infrastructure</b></p>	<p>2 (a) How can the plans better leverage transit investments across the region?</p>	<ul style="list-style-type: none"> <li>• <b>Active transportation should be incorporated into infrastructure corridors</b> (e.g., multi-use trail along highway corridors that link to other trail systems). Connections should be strengthened so that trips can be intermodal.</li> </ul>
	<p>2 (c) How can the plans align long-term infrastructure planning with planning for growth?</p>	<ul style="list-style-type: none"> <li>• The Growth Plan needs to address the existing infrastructure deficit, especially for infrastructure to mitigate known natural hazards (i.e., flooding and erosion) in order to continue to promote intensification and planning for sustainable growth. This requires planned and ongoing investment in the maintenance, renewal and improvement of both traditional flood mitigation infrastructure and green infrastructure, including the natural heritage system, in order for intensification or any further urban expansion to occur.</li> <li>• Priority should be given to infrastructure investments which would reduce the risk to human life and property associated with flood and erosion risks.</li> </ul>
	<p>2 (d) How can the plans better support goods movement by all modes of transportation?</p>	<ul style="list-style-type: none"> <li>• Promote connectivity and ease of connection between modes using an integrated systems approach.</li> </ul>
	<p>2 (e) How can the plans identify and better protect the strategic infrastructure corridors needed over the long term?</p>	<ul style="list-style-type: none"> <li>• Including multi-modal transportation systems in infrastructure corridors planning, such as active use, public transportation, and goods and services movement with connections to trail systems prevents building new corridors in future, in turn protecting natural and agricultural areas.</li> <li>• Planning for strategic infrastructure corridors should be done over a 50 to 100 year time frame and not the 20 year planning time frame for official plans.</li> </ul>
	<p>2 (f) How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?</p>	<ul style="list-style-type: none"> <li>• <b>The Growth Plan should provide direction on how environmental sustainability is to be achieved in tandem with accommodating growth.</b> The Growth Plan should require consideration of the threshold capacity of the watershed, including targets established in watershed/subwatershed plans, when directing growth to ensure that additional servicing capacity can be accommodated without compromising ecosystem function. This would include analyses of cumulative impacts and mitigation options. Conservation Authorities can support this analysis.</li> <li>• <b>Green infrastructure needs to be expanded to recognize/include the natural landscape in rural settlement areas on the ORM and Greenbelt.</b> Green infrastructure should include protection of valleylands and associated features in rural settlement areas to mitigate climate change impacts. As an additional benefit, green infrastructure can contribute to a contiguous inter-regional trail system which supports better health outcomes and opportunities to reduce GHG emissions.</li> </ul>



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THEME	DISCUSSION QUESTIONS	COMMENTS
<p style="text-align: center;"><b>THEME 3: Fostering healthy, livable and inclusive communities</b></p>	<p>3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?</p>	<ul style="list-style-type: none"> <li>• <b>The Plans should allow for additional flexibility for existing Conservation Authority facilities to provide environment-based recreation, education and tourism opportunities that respond to changing trends in these fields.</b> Many Conservation Authority facilities are aging and in need of refurbishment and upgrades to meet new accessibility standards. Conservation Authorities require flexibility in the ability to offer public uses complementary to its objectives, in order to generate revenues and achieve financial sustainability to maintain and upgrade its facilities to ensure they operate at the highest standards for environmental protection and accessibility to people of all abilities. It is suggested that a definition for “Conservation Projects” (see Theme 1 (d)) should be added to the ORMCP and GBP to support and confirm Conservation Authority land uses and provide flexibility for Conservation Authorities to meet the recreational, educational and local tourism demands of the growing Greater Golden Horseshoe population while meeting all the natural heritage and hazard tests of the PPS.</li>   <li>• As one of the largest title holders of natural areas within the Plan areas, <b>Conservation Authorities should be named as partners in the provision of parkland, open space and trails</b> across all four Provincial Plans (as per section 3.3.2 of the GBP).</li>   <li>• Policies should be developed that allow public agencies to designate site appropriate uses on public lands through master planning processes that outline areas for public use as well as natural and cultural heritage protection and enhancement.</li>   <li>• Policies for the protection of natural areas should be balanced with the ability to allow the public to access and experience environment-based recreation, education and tourism in an appropriate way.</li>   <li>• <b>Similar to policy 3.2.1.3 of the GBP, the Growth Plan “Culture of Conservation” section should be revised to include a much stronger emphasis on the need for natural “systems” planning and strengthening connections of natural systems in the Greenbelt and integrating them with local water resource and natural heritage systems in the urban areas of the Growth Plan.</b> This provides multiple benefits on the Growth Plan lands for community aesthetics, passive recreational opportunities, habitat connectivity and managing stormwater. A policy framework to require stronger protection of local natural systems within the Growth Plan lands is needed, as well as a policy framework to allow for ecological compensation for when features must be lost to either development or infrastructure.</li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
		<ul style="list-style-type: none"> <li>• <b>Growth Plan policies 4.2.1 (1) and 5.3.4 (d) Natural Systems identification and protection has not been implemented by the Minister.</b> These policies provide an important opportunity to identify natural systems in the context of urban growth and should be revised to ensure that natural systems are identified in the context of the Growth Plan as part of any future settlement area expansions.</li> <li>• Recognize the health and well-being benefits of greenspace/green infrastructure and access to and equitable distribution of greenspace for the growing urban population and integrate a “health in all policies” approach within the planning agenda to be congruent with the United Nations.</li> </ul>
	<p>3 (a) How can the plans provide more direction on designing:</p> <p>i. Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets?</p> <p>ii. A safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations?</p>	<ul style="list-style-type: none"> <li>• <b>The Growth Plan policies related to developing a “Culture of Conservation” should be enhanced by providing direction on building communities based on principles of systems planning and ecological design and reference to specific tools.</b></li> <li>• Develop a policy to require a comprehensive master plan process/integrated management plans to achieve active transportation, linked recreation “systems”, etc. in the community planning process.</li> </ul>
	<p>3 (c) How can the plans better protect heritage buildings, cultural heritage landscapes and archaeological resources?</p>	<ul style="list-style-type: none"> <li>• <b>The Plans do not include enough measures to identify, protect, interpret, and promote cultural heritage. There is a need for separate, definitive requirements within the Plans that will trigger the need for an archaeological assessment prior to ground disturbance activities at the municipal or other levels.</b> Municipal official plans and by-laws vary in how they address and protect cultural heritage and not all ground disturbing activities trigger a municipal by-law or permit that will require an ecological assessment. Coordination amongst the Plans is needed to strengthen existing heritage legislation in Ontario.</li> <li>• <b>The ORMCP, GBP and NEP should add a definition of cultural heritage conservation that includes landscapes, structures, parkland and trails.</b></li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
<p><b>THEME 4: Building communities that attract workers and create jobs</b></p>	<p>4 (a) How can the plans better support the development of vibrant office and mixed-use employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near critical transportation infrastructure?</p>	<ul style="list-style-type: none"> <li>• Employment lands should include sidewalks and connections to active transportation trails and creatively use open space, green infrastructure and Low Impact Development techniques such as green roofs, swales, rain gardens, etc., in an integrated systems planning approach to create vibrant mixed use areas.</li> </ul>
	<p>4 (c) How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?</p>	<ul style="list-style-type: none"> <li>• Require comprehensive aggregate rehabilitation plans for extraction sites that are no longer in production.</li> <li>• Support for on-site small retail associated with agri-food. This can reduce the need to transport goods (reducing carbon emissions), and promote local community financial investment and returns.</li> </ul>
<p><b>THEME 5: Addressing climate change and building resilient communities</b></p>	<p>5. How can the plans help address climate change?</p>	<ul style="list-style-type: none"> <li>• Continuing the strong protection policies of the ORMCP, GBP and NEP to maintain environmental health plus new tools to improve and restore the Greenbelt landscape and natural systems are key strategies to addressing climate change and resilience for the GGH. Adding policies to the Growth Plan to protect local natural systems and connect them to this broader Greenbelt landscape, as well as requiring and promoting green infrastructure and the use of Low Impact Development techniques in the rural settlement areas on the ORM and Greenbelt will also provide for resilient communities able to adapt to climate change.</li> </ul>
	<p>5 (a) How can the plans contribute to reductions in greenhouse gas emissions?</p>	<ul style="list-style-type: none"> <li>• <b>The Growth Plan should include a much stronger emphasis using a systems planning approach to integrate natural heritage systems, open space lands and creatively using both green infrastructure and traditional stormwater infrastructure to mitigate the impacts of urbanization and climate change in both infill and greenfield development.</b></li> </ul>
	<p>5 (b) How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?</p>	<ul style="list-style-type: none"> <li>• <b>The Growth Plan should be properly integrated with the policy objectives of the PPS.</b> This should include a guiding principle that no increase in the level of flood risk and erosion due to intensification will be permitted and the Growth Plan should make specific reference to Provincial (MNRF) Natural Hazard Guidelines for use by municipalities.</li> <li>• <b>Greater direction on ecological design, including the use of green infrastructure and Low Impact Development, integrated with local parks and attractive, treed streetscapes designed for water management and reduction of urban heat island effects should be provided.</b></li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
	<p>5 (c) Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?</p>	<ul style="list-style-type: none"> <li>• The full requirement for parkland dedications should be provide outside of the natural heritage systems and hazard areas.</li> <li>• <b>The Growth Plan must acknowledge the ecological limits to growth within communities.</b> It should be augmented with a guiding principle that no increase in the level of flood risk and erosion hazards due to intensification will be permitted.</li> <li>• The Growth Plan should include a requirement to complete integrated studies (e.g., watershed/subwatershed plans, followed by Master Environmental Servicing Plans and then site-specific studies) prior to approving development in greenfield, intensification and re-development situations to avoid piecemeal planning.</li> <li>• Conventional stormwater management measures do not fully mitigate water quality and erosion impacts, and CAs and others have been advocating a change to stormwater management practices that incorporate Low Impact Development and green infrastructure in rural settlement areas on the ORM and Greenbelt to manage the quality and volume of stormwater runoff at source in order to effectively manage these issues.</li> <li>• In order to appropriately manage the peak rates, quality and volume of stormwater runoff, require a treatment train approach to stormwater management that consists of source, conveyance and end of pipe controls (source and conveyance being Low Impact Development techniques).</li> </ul>
<p><b>THEME 6: Improving implementation and better aligning the plans</b></p>	<p>6. How can the implementation of the plans be improved?</p>	<ul style="list-style-type: none"> <li>• <b>There has been inconsistent policy interpretation and application of policies across the Plans. Harmonization of terminology, definitions and an overall improved relationship between the Plans is needed to reduce inconsistencies and provide clarity.</b> Some examples include: <ul style="list-style-type: none"> <li>○ <b>Section 6(5) &amp; (7) ORMCP:</b> With respect to the reconstruction of an existing building or structure, the policies should clarify that “relocation” of a building or structure to a less sensitive part of the site is permitted if the option is available.</li> <li>○ <b>Section 32 ORMCP:</b> clarity should be provided that new lots and lot adjustments are “development” for the purposes of the plan and must be supported by a Natural Heritage Evaluation and/or Hydrologic Evaluation if proposed within the Area of Influence of Key Natural Heritage/Hydrologic Features. Finally, for additional clarity, this section should confirm that lots to be created or adjusted are to provide for minimum vegetation protection zones as per the requirements of Part III.</li> <li>○ <b>Section 36 ORMCP:</b> This policy regarding comprehensive aggregate rehabilitation plans should be strengthened from an “encouragement” to a “requirement” as there is little evidence of implementation of this policy since 2002.</li> <li>○ <b>Section 41 ORMCP:</b> Require clear direction on Transportation, Infrastructure, and Utilities policies (see Theme 1 for details).</li> </ul> </li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
		<ul style="list-style-type: none"> <li>○ <b>Section 3.2.2.3 GBP:</b> This policy regarding new development or site alteration in the Natural Heritage System does not adequately reflect the ecological importance of natural areas where two habitat types meet (i.e., such as wetlands with a treed area around it) and support a diversity of species. The GBP should be strengthened through the provision of guidance such as that outlined in the ORMCP Technical Papers for areas where natural features abut each other.</li> <li>○ <b>Section 3.2.2.6 GBP:</b> This policy directing municipalities to refine the Natural Heritage System boundaries for official plan conformity should be strengthened to require appropriate studies which take into account site scale as well as landscape scale ecological factors.</li> <li>○ While the ORMCP has transitional policies that protect the Key Natural Heritage Features from development impacts, the GBP does not. Significant woodlands on sites with very old planning approvals have not been protected in the GBP area despite being identified as key parts of the Natural Heritage System. The GBP should be brought into line with the ORMCP in this respect.</li> <li>● <b>There are inconsistencies in the technical papers</b> that have been produced to support implementation of the ORMCP and GBP. The technical papers should also be reviewed to ensure they incorporate the latest science. Some examples include:             <ul style="list-style-type: none"> <li>○ The GBP measures the boundary of significant woodlands from the drip line of trees while the ORMCP measures it from the base of the outermost tree trunks. Using the drip line as the feature limit for woodlands provides better protection for the edge trees and is easier to define in the field. This should be harmonized to use the drip line in both plans/guidelines.</li> <li>○ The <i>ORMCP Technical Paper 7 – Identification and Protection of Significant Woodlands</i> has a paragraph titled “Effect of Tree Removal on the Status of Significant Woodlands.” This paragraph clearly states that the land occupied by significant woodlands that are removed without the proper approvals is still considered a Key Natural Heritage Feature and cannot be developed. The GBP Technical Definitions paper would benefit from the inclusion of this same paragraph to promote the protection of significant woodlands and the land base that they occupy in perpetuity.</li> </ul> </li> <li>● <b>Section 10 (10) of the ORMCA, preventing appeals of the Minister’s decision on the conformity amendments, should be maintained (and indeed, extended to conformity amendments of other provincially-required plans).</b></li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
		<ul style="list-style-type: none"> <li>• <b>The Province needs to prescribe a greater range of tools which can support the implementation of the Plan objectives.</b> While implementation of the ORMCP and GBP through <i>Planning Act</i> applications is generally satisfactory to maintain existing conditions, it is not sufficient on its own to achieve the Plans’ other goals and objectives to restore and enhance the environmental health and integrity of these environmentally significant lands. <b>Other tools are needed as outlined in Theme 1 (c).</b></li> <li>• <b>The Province should consider providing training workshops or webinars on interpretation of the Plans’ policies to help achieve consistent interpretation.</b> It is also recommended that the Province establish a website with a listing of the relevant policy interpretations that meet the provincial intent of the Plans, to be updated on a regular basis, based on guidance provided by provincial staff or OMB decisions.</li> <li>• <b>There is a lack of comprehensive environmental field monitoring to determine the effectiveness of the policies of the Plans in achieving their respective visions and objectives.</b> Enhanced monitoring and indicators for all of the Plans would provide accountability in their implementation and help to assess cumulative impacts from land use activities and a changing climate. The Province needs to engage more in this or provide resources to Conservation Authorities to do so.</li> </ul>
	<p>6 (a) Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?</p>	<ul style="list-style-type: none"> <li>• <b>The ORMCP, NEP and Growth Plan should be harmonized to include wording similar to that of sections 5.4 and 3.2.2.7 of the GBP with respect to section 28 of the <i>Conservation Authorities Act</i></b> which states, “Where there are regulations or standards that are more restrictive than those contained in these plans, the more restrictive provision prevails.” These statements should be explicitly stated at the front of all four Plans as arguments are often made by proponents of development that the intensification requirements of the Growth Plan trumps all other policies, which leads to protracted hearings and expenditures of significant public funds to defend natural heritage and natural hazard policies at the Ontario Municipal Board. Additionally, Conservation Authorities should be recognized for their role as a land manager as the owners of the largest blocks of significant environmental and recreational lands in the Greenbelt.</li> <li>• Section 1.4 of the Growth Plan states that in any conflict among the PPS or provincial plans, the plan policies that prevail are the ones that give the greatest protection to the environment and human health and safety. This is currently in introductory text and should be a policy in all Plans, and/or incorporated into legislative authority for all Plans.</li> </ul>

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THEME	DISCUSSION QUESTIONS	COMMENTS
		<ul style="list-style-type: none"> <li>• <b>Develop policies related to Renewable Energy Projects (e.g., wind and solar farms) that conform to key features protection requirements and evaluates impacts, including cumulative impacts, on the hydrological functions (both surface and ground water) of the ORM.</b> There should also be standards for conducting the Water Assessment report(s) component of the REA application that include specific requirements for detailed hydrogeological assessments.</li> <li>• <b>Sections 28, 29 and 42 ORMCP should be revised to align with the specific requirements of approved Source Water Protection Plans,</b> or to make a general reference to the requirements of those plans once approved.</li> <li>• There is a need for a provincially coordinated approach to Low Impact Development to ensure best practices in integrated watershed management.</li> <li>• The GBP needs clarity on federal land holdings in the Greenbelt (particularly Parks Canada and Transport Canada in York Region and Durham Region) and how the federal government would be best engaged to support the GBP objectives.</li> </ul>
	<p>6 (b) What policies of the plans do you think have been successful and should be retained?</p>	<ul style="list-style-type: none"> <li>• <b>The ORMCP and GBP have been largely effective in achieving their respective purposes of landform, landscape protection and Key Natural Heritage/Hydrologic Features protection.</b></li> <li>• <b>Strongly support the ORMCP’s emphasis on watershed planning as an appropriate scale to inform decision-making.</b> It is recommended that in future iterations of the GBP, NEP and Growth Plan, that there be a similar emphasis/requirement for watershed planning, especially when urban growth boundaries are being expanded.</li> </ul>