



RE: Clean Air Council Member Feedback to the Province of Ontario’s Land Use Planning Review/Our Region/Our Community/Our Home Discussion Paper and EBR Registry # 012-3256

The Province of Ontario has enacted four provincial land use plans that work together in order to:

- maximize the use and value of existing infrastructure and assets,
- manage growth and reduce traffic congestion, air pollution and greenhouse gas emissions,
- protect the natural environment and agricultural lands; and
- support the Regions’ economic development and financial sustainability.

The four Plans are the:

- Growth Plan for the Greater Golden Horseshoe (GGH)
- Niagara Escarpment Plan
- Oak Ridges Moraine Conservation Plan
- Greenbelt Plan

As these four Plans are presently under review, the Clean Air Council has undertaken a consultation process within its membership representation to provide feedback and input into how the above Plans (and other associated land use planning mechanisms, such as the Provincial Policy Statement and ministerial mandates including climate change and regional transportation planning) can improve the implementation and achievement of the policy objectives identified above¹.

The Clean Air Council (CAC) is a network of 26 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area². CAC members work collaboratively on

¹ Municipal staff representatives on the Clean Air Council (CAC) were consulted in the preparation of this submission to reflect the priorities and directions of the member municipalities, but direct endorsement of this document by Municipal Councils was not sought due to the limited time frame of consultations. Many municipalities are also preparing their own independent submissions. CAC representatives are the municipal change agents within leading climate change action municipalities and have been working collaboratively across the region for the last 15 years to support and enable progress on clean air and climate change actions. The consultations were facilitated by the Clean Air Partnership, a charitable environmental organization that serves as the secretariat for the Clean Air Council.

² CAC Municipal and Public Health Unit members include: Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, East Gwillimbury, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Peel Region, Pickering, Richmond Hill, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Whitby, Windsor, York Region.

the development and implementation of clean air and climate change mitigation and adaptation actions.

CAC members commend the Province of Ontario for the leadership it has displayed in developing the various Plans under present review and for protecting southern Ontario's natural capital, advancing policies aimed at supporting the building of more sustainable and efficient communities and its commitment to reducing greenhouse gas emissions. It's important to recognize the tremendous effort that has taken place over the last few years as local and regional municipalities amended and defended their Official Plans in order to bring them into conformity with these Plans. The CAC members encourage the Province to stay on course with the Plan's direction and commend the Province for undertaking a review and consultation process in order to identify opportunities for possible Plan implementation improvements.

One of the key priorities identified in the consultation was the need for increasing inter-ministerial coordination and collaboration in order to identify conflicts between provincial ministerial plans, mandates and actions and opportunities to enhance the complementariness of various provincial ministerial plans, goals and policies to achieve increased synergies. Increased coordination and collaboration between Ministry of Municipal Affairs and Housing, Ministry of Environment and Climate Change, Ministry of Health and Long Term Care, Ministry of Transportation, and Ministry of Energy is of particular importance. In addition, increased collaboration between municipalities and the various provincial ministries will need to be significantly increased in order to ensure the above goals are achieved and that we have the best opportunity to meet our climate change opportunities and goals and create the livable, healthy, resilient and competitive communities Ontarians desire.

Clean Air Council (CAC) members have a strong desire to work in greater partnership with the Province of Ontario and in particular with the above mentioned Ministries in order to further our ongoing collaboration and ensure that the synergistic policy goals between these ministries and CAC member jurisdictions are realized.

What follows is a summary of the feedback and input where consensus amongst CAC member representatives was achieved.

Q#1: How can the plans better support the long-term protection of agricultural lands, water and natural areas?

- Increase the ability of the Plans to ensure consideration of the natural environment in planning decisions so that requirements aimed at protecting, expanding and integrating natural heritage systems are applied and given equal weight to other planning considerations.
- Plans should provide greater impetus for the development of municipal and regional Natural Heritage System Plans and the integration of those regional and municipal

Natural Heritage Plans with provincial Plans.

- The province should support municipalities in ensuring that ecosystem fragmentation is adequately considered in land use planning decisions and that provincial interest in protecting natural heritage and functioning forest ecosystems is safeguarded.
- Natural heritage policies within the various Plans should be made consistent with the strongest levels of protection being provided. This increased consistency would eliminate confusion and complexity associated with interpreting multiple Plans with differing protections and policies and how they apply to lands in close proximity.
- The province has significant landholdings adjacent to the Greenbelt Area. Since these are already public lands, a review of these should be undertaken to evaluate the potential to include them as protected areas, corridor linkage areas, ground and surface water protection, as well as buffer areas for key natural heritage features.
- While private land is already eligible to be included in a municipal request to expand the Greenbelt provided it meets the Growing the Greenbelt criteria, the expansion of programs such as TRCA's Greenlands Acquisition Project and other such conservation land securement programs should be expanded in order to provide increased incentive and encouragement to designate priority private natural heritage lands under greenbelt protection.
- The Greenbelt Plan should require Official Plan's to recognize urban river valleys (URVs) and the important ecological and hydrological functions that they provide to the Greenbelt; and to strengthen the external connection policies to address the importance of the URV and adjacent lands to the long term health of the Greenbelt.
- The province should speed up the process of wetland identification and evaluation and ensure that Provincially Significant Wetlands are incorporated into municipal official plans.
- The Plans should prohibit new infrastructure such as highways, transit lines, airports, railways, gas and oil pipelines, sewage, power transmission and telecommunication lines in Provincially Significant Wetlands, open spaces, natural core areas, natural heritage and hydro-geologically sensitive areas unless there are no reasonable alternatives and it has been demonstrated that there will be no negative impacts on their ecological functions.
- The Plans (especially the Growth Plan) should explicitly use and increase references to the language of ecosystem services and/or natural capital.
- Develop stronger asset understanding, governance and market parameters for natural capital. For example, assist municipalities in developing asset management plans for their green infrastructure assets, and integrate natural capital assets into land use

development decision making and carbon market mechanisms. A further example is by promoting the use of cost-benefit analysis tools that quantify the risks and benefits associated with various land use options. Please refer to the following Case Study: [Town of Aurora's: The Economic Value of Natural Capital Assets](#).

- More action and progress needs to be made on the Growth Plan commitment that states that the provincial government will work with municipalities, producers of aggregates and other stakeholders to: increase transparency on supply and demand assumptions and projections; identify significant mineral aggregate resources for the Greater Golden Horseshoe (GGH); develop a long-term strategy for wise use and conservation; give municipalities more say in the siting of pits and quarries; develop a new mechanism to quickly screen out inappropriate proposals that should not proceed; and identify opportunities for recycling and coordinated approaches to rehabilitation.

Q#2: How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?

- All infrastructure projects should also be required to meet the same requirements as other forms of development in terms of identifying its compliance with the Growth Plans policies and goals. The Plans should require a sustainable planning lens and direction to issues related to public infrastructure and transportation planning. It should be a requirement that ecosystem service impacts, heritage system protection and greenhouse gas emissions are considered and factored into the infrastructure decision making processes.
- To better integrate infrastructure funding, smart growth and climate change goals, the following initiatives and policy changes should be considered:
 - Develop a “green screen” on major infrastructure investments and loans based on criteria such as consistency with growth plan objectives, integration with land use and other planning objectives, and delivery of reductions in GHG emissions.
 - Encourage smart infrastructure loans and investment by ensuring that provincial infrastructure loans support projects that reduce GHG emissions and/or advance the Province’s stated objectives on land use planning or transit
 - Prioritize provincial infrastructure loans to support the construction of municipal energy efficiency and renewable energy systems.
 - Include consideration of relative GHG emission impacts of major projects and alternatives to these impacts within the terms of reference of major infrastructure projects’ environmental assessments.
 - Consider changes to the Development Charges Act to require funding for Transportation Demand Management measures in all development applications
 - Integrate health equity into infrastructure funding applications in order to prioritize infrastructure investment to meet the needs of our most vulnerable populations.

- Increased efforts, tools and monitoring is needed to promote alignment between land use and transportation planning that focuses on high activity nodes/corridors in order to ensure that the densities able to support cost effective transit are achieved. The Provincial report “Performance Indicators For the Growth Plan for the Greater Gold Horseshoe” found that 43% of major transit station areas that could be measured had densities below the recommended 50 people and jobs per hectare needed to support transit. More than half of measured areas had existing stations, and the other half had planned stations.³
- Promote sustainable transit through higher, transit supportive, density targets for greenfield development, as per recommendations presented in the “Improving Health by Design in the Greater Toronto-Hamilton Area” by Medical Officers of Health in the area. Specifically, the report discussed that: “The Growth Plan identifies that a potential majority, up to 60%, of new developments may be greenfield developments, which are to achieve a minimum density target of 50 people and jobs per hectare. According to the Transit Supportive Guidelines, this density can typically only support basic transit service with a bus every 20 to 30 minutes, yet these Guidelines state that there is a need to “plan for a level of transit coverage and service which is competitive with average automobile commuting times, including time walking to and from transit service. Essentially, there needs to be enough people living in an area to support the efficient placement of services that can be reasonably reached by walking or cycling.”
- Maintain direction for planned intensification and better tie the Growth Plan to transit funding mechanisms by creating a better transit funding formula/dedicated funding source to build the transit envisioned in Metrolinx’s *The Big Move* by implementing any number of the tools outlined in Metrolinx’s *Investing in our Region*. This would enable the transit infrastructure to catch up with the transit-oriented planning that now exists from the Growth Plan on down to municipal OPs.
- Encourage public and private sectors to have mandatory Transportation Demand Management (TDM) plans and encourage employers to consider formal telework and carpooling policies and work with organizations to implement TDM practices (i.e.: Smart Commute).
- Provide incentives to municipalities to plan walkable and transit supportive communities.
- Ensure planning for bicycle networks is coordinated across and within the Province. Regional and local municipalities, conservation authorities and other levels of government need to coordinate planning to ensure existing and planned infrastructure

³ Ministry of Municipal Affairs and Housing. (2015). Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006. Queen’s Printer of Ontario. Pages 10-11. Retrieved from <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10849>

to support bicycle networks is efficient and well connected. A variety of cycling facilities and traffic calming measures is needed to encourage cyclists of all ages and abilities. Facilities should be context sensitive and work to create a comprehensive cycling network that meets both recreational and utilitarian needs. In order to increase cycling mode share and reduce injuries dedicated and separated facilities are encouraged where possible.

- Require integrated watershed management plans that integrate municipal water management and stormwater management plans with conservation authority plans. These Plans should be developed, implemented, monitored and updated through a cyclical process and a multi-stakeholder approach that is kept up to date and is responsive to local needs.
- Invest in applied research and development to test and implement innovative green infrastructure solutions. The potential of green infrastructure to deliver cost-effective solutions can be multiplied by developing appropriate technology and processes, particularly in relation to transportation, energy, agriculture, the design and functioning of our cities, and boosting the bio-economy.
- Integrate green infrastructure into provincial policy to ensure the support of green infrastructure projects by updating policies, standards and guidelines that factor in performance results achieved from green infrastructure and Low Impact Development (LID) interventions and foster and enable successful measures via relevant funding mechanisms, licensing and approvals.
- Policies 3.2.5 (8) of the Growth Plan notes that, “municipalities are encouraged to implement and support innovative stormwater management actions as part of redevelopment and intensification”. This should be expanded to include Greenfield developments.
- Require financial planning that supports the full cost recovery of water, wastewater and stormwater infrastructure, considers the life-cycle cost of the infrastructure, incorporates climate change considerations, and plans for the long-term.
- Encourage businesses to employ a comprehensive economic and environmental footprint analysis to assess and compare green versus gray infrastructure and the co-benefits of green infrastructure solutions.
- Provide incentives to encourage the adoption of green infrastructure in greenfield, infill and redevelopment projects.
- The province should support and enable municipal efforts to more accurately calculate and account for growth costs. Development costs should be better aligned and associated with different land uses and growth areas within a municipality rather than

averaged across a municipality.

- Require increased transparency related to subsidization of specific land uses within the development fee structure.

Q#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?

- The Plans should strengthen their support and requirements for expanding local food production in urban and suburban areas as a means to address climate change mitigation, climate change adaptation and other public health issues, as well as economic development. Local food production will help reduce the impact of climate change on Ontario's food supply, reduce emissions from the transportation of food to processing plants and markets, create local jobs, enhance access to a dependable and affordable supply of nutritious food and improve the overall resilience of our cities. Urban agriculture is an important component of the province's growth, health, climate change and economic development strategies.
- Support Public Health Ontario and other agencies to undertake research on a province-wide environmental health tracking system that collects and analyzes indicators of environment and human health. Such a system can help identify linkages and support policies to protect human health and inform land use planning. Examples of indicators include; levels of active transportation, neighbourhood level air pollution and public transit usage.
- The requirement for health impact assessments should be introduced in plans, as well as in the Planning Act.
- Factor public health into cost-benefit analysis of public and active transportation.
- Increase support for affordable housing through increasing availability of interconnected, mixed use communities with a range of housing options, as well as integrated and sustainable public transit. Currently, Places to Grow directs municipalities to establish and implement minimum affordable housing targets in accordance with Policy 1.4.3 of the Provincial Policy Statement and to develop a municipal housing strategy. However, there is evidence to suggest that housing affordability and high real estate costs are pushing people to live further than their ideal location. Consider also strengthening municipal planning tools such as inclusionary zoning, legal secondary suites and incentives to develop good quality affordable rental units. Furthermore, consider the extent to which better data and indicators on housing affordability can be developed in a way that could be directly linked to the policy targets.
- Ensure that Growth Plan density and intensification targets align with Ontario Ministry of Transportation Transit-Supportive Guidelines that minimum density thresholds for

areas within a 5-10 minute walk of transit support different types of transit service

- While the Plans contain broad statements about incorporating walking and cycling into land use and transportation planning, measurable action can be improved by providing municipalities with clearer direction and specific benchmarks.
- Incorporate Complete Streets policy language within the Plans and strong, direct language to ensure that municipalities plan streets for walking and cycling.
- Ontario's Cycling Strategy should be implemented with aggressive targets and funding envelopes.
- In coordination with municipalities, the province should develop a consistent process and program to collect data on pedestrians and cyclists.
- Enable and ensure mechanisms that provide stable capital and operating funding for public and active transportation.
- Enable open source transportation trip data to be more widely accessible in order to identify opportunities to improve transportation opportunities.
- There is the need for a marked increase in support for electric vehicle/low carbon infrastructure and other green technologies (especially within the transportation sector and thermal energy needs) to enable these technologies to have the ability to reduce environmental impacts. A multi-stakeholder and regional approach to addressing these infrastructure challenges is recommended.
- Adopt regulation and programs to retire old diesel heavy duty vehicles and engines.
- Ensure that the goals of the four plans align with the goals/implementation plan of Ontario's Trails Strategy.
- Encourage innovation and technological research in urban goods movement delivery (e.g. transportation information systems, last minute goods delivery vehicles, transit links for goods movement).
- Enable policies, funding and/or incentives for the establishment of an eco-roof program in municipalities to support and encourage the installation of green and cool roofs; especially in urban areas where the urban heat island effect is a concern.
- Increase the recognition and authority of municipal governments to adopt and implement mandatory green development standards that would enable them to increase the adoption of actions aimed at increasing building energy efficiency and community sustainability actions within new developments. This can be achieved by incorporating green development standards in Provincial Plan documents, the Planning

Act and/or in support of the Planning Act (i.e.: in support of Section 41) through a guideline document.

Q#4: How can the plans better support the development of communities that attract workers and the businesses that employ them?

- Involve the Ministry of Environment and Climate Change to ensure that industrial development balances the economic and business needs of our communities with ensuring that incompatible uses do not negatively impact sensitive populations in terms of air quality, noise and other environmental issues.
- For communities to be complete and support health, density needs to coexist with land use mix, employment areas, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work and school, can be conveniently reached by walking, cycling or public transit, the car will remain the default mode of travel.
- Redevelopment of urban areas and retrofitting existing building stock can contribute to ongoing increases in green jobs and local economic development while also aligning with the intended direction of the Growth Plan to build complete communities, lower green house gas emissions, improve mobility, promote the cost-effective use of infrastructure and improve overall energy efficiency of the built form.

Q#5: How can the plans help address climate change?

- Greenhouse gas (GHG) emissions need to be factored into infrastructure development decisions. Require transportation and infrastructure options to factor in GHG impacts and opportunities to minimize GHG emissions. The GHG emissions calculations should factor in lost carbon storage capacity.
- Infrastructure and development proponents should be required to offset GHG impacts through enhancements to the greenbelt forest and/or other ecological enhancements (e.g. tree planting). Additional opportunities may be presented as the province implements its carbon cap and trade system.
- Support for enhanced protection and planting of urban forests and green space is an essential component of a climate change strategy. Ontario's urban forests and green spaces are a unique tool equipped to address both emission reduction and climate change adaptation. Urban trees and green spaces help mitigate climate change by directly sequestering carbon and reducing energy use and its associated carbon emissions. They support climate change adaptation by providing the backbone of our cities green infrastructure that reduces flooding and moderates urban temperature, thereby further reducing energy use.

- The majority of lands suitable for new trees are privately owned, therefore increasing support for planting urban trees by funding programs that help homeowners and community groups plant more trees and forests would contribute significantly to community livability, resilience and competitiveness as well as air pollution and greenhouse gas reductions.
- The province should develop a coordinated urban forest strategy to protect urban and heritage trees, working together with municipalities, ENGOs and local agencies.
- Implement mandatory urban tree canopy targets for municipalities.
- Develop a rigorous assessment of the likely impact of the implementation of recent planning initiatives, including updates to the land use Plans under review at present as well as revisions to the Planning Act and PPS, on future GHG emissions relative to business-as-usual scenarios.
- Density targets and land allocations should be reviewed and updated to reflect their necessary contribution to supporting the achievement of the province's GHG reduction targets.
- Identify additional policies and planning initiatives to achieve the reductions in GHG emissions needed to meet the Province's GHG emission reduction target. The need to address building energy use in existing building stock and transportation are of the utmost priority.
- Develop tax shifting policies that reward smart growth planning and climate change goals, and discourage unsustainable planning and development.
- Conduct a review of existing infrastructure funding arrangements (e.g., development charges, land transfer tax rebates, funding formulas for schools and hospitals, and so on) and the incentives they provide with respect to the location of future development, and the appropriateness of those incentives given the goals contained in provincial growth and climate change plans.
- Explore opportunities to use Ontario's Building Code to stimulate and increase innovation towards the goal of achieving net-zero new construction, increasing energy efficiency, reducing GHG emissions and improving outdoor and indoor air quality.
- The plans should increase momentum for the creation of holistic and integrated long term community energy plans that integrate and recognize opportunities to build a more cost effective and resilient energy system by better integrating community electricity and thermal energy into the overall land use planning process. The Growth Plan can include direction to require community energy plans, including the assessment of district energy for large-scale development and/or Secondary Plans.

- By establishing an energy benchmarking and disclosure requirement for large commercial and multi-residential buildings, the province, utilities, municipalities and other stakeholders will have the capacity to design smart policies and programs and monitor their effectiveness. It will also encourage a culture of conservation in the building sector, market pressure for performance improvement, while providing consumer and investor protection. The existing provision in the Green Energy Act requiring energy disclosure at time of sale should also be for single-family homes.
- Expand the Energy Conservation Leadership Act, to further municipal development of community energy plans. Updates to the Act should also be used to remove barriers to Combined Heat and Power (CHP), renewable energy development and conservation measures.
- Consider providing standardized climate change vulnerability assessment tools to municipalities and key sectors to determine risks and areas of opportunity. The Ministry of Health and Long Term Care has developed a Climate Change Health Vulnerability Assessment and Adaptation Guideline for health units across Ontario. The Ministry of Environment and Climate Change is developing climate and health models to support the health vulnerability assessment. These examples highlight the value of cross-sectoral collaboration in the development of tools to assess climate change impacts, and in the implementation of action plans to build resiliency.

Q#6: How can the implementation of the plans be improved?

- Providing increased recognition that matters of local urban structure are un-appealable would enable improved implementation of the Growth Plan. This could be achieved by modifying Policy 2.2.2(1) of the Growth Plan to give added weight to local OPs and/or modifying proposed Section 17(24.5) of Bill 73 [un-appealable matters] to provide increased recognition that matters of local urban structure are un-appealable.
- The inclusion of Policy 4.2.4 of the Growth Plan, A Culture of Conservation, provides specific direction to municipalities to incorporate policies in their official plans to support sustainable principles and strategies. This policy should be continued and expanded to include climate change so as to encourage municipalities to incorporate these issues in their land use planning.
- It is important that the various provincial ministries work in coordination to integrate various provincial plans and identify synergies and conflicts between the various, plans, policies and actions. The Big Move and the Climate Change Action Plan need to be aligned with these plans. In addition, the Great Lakes Protection Act and Invasive Species Act are upcoming pieces of legislation that should be considered in the context of the Growth Plan and Greenbelt policies. The Ontario Biodiversity Strategy is also

currently being updated and should also be integrated.

- Section 5.3.4 of the Growth plan indicates that sub area assessments for the identification of natural systems will be completed by the Ministry of Infrastructure (now Ministry of Economic Development, Employment and Infrastructure) together with municipalities and other stakeholders. If these assessments have not yet been completed, they should be prioritized in order to align with the new 2014 PPS requirement that municipalities define natural heritage systems (not solely features).
- The Plans should increase their transparency regarding growth projections and assumptions used, land budgeting, implementation progress, and alignment between provincial, regional and municipal Plans.
- Demographic details, to the extent possible, should be provided in conjunction with population projections in order to allow municipalities to better calculate future services and land requirements. For instance, a shift from younger families to seniors may lead to different requirements in housing types.
- Improving the collection and reporting of key performance indicators such as location efficiency to transit, housing diversity and proximity of dwellings to amenities among others, would provide greater clarity on the progress of Plans towards the policy goals of using existing assets, managing growth, supporting human health, protecting natural heritage and agricultural lands, as well as mitigating and adapting to the changing climate. While the key performance indicators should be developed in consultation with municipalities and other key stakeholders, it should be made clear who is ultimately responsible for the collection, tracking and reporting of selected key performance indicators. For example the Ministry of Municipal Affairs and Housing developed a draft performance monitoring framework with indicators to measure performance of the Greenbelt Plan. This performance monitoring framework could be expanded to align with relevant plans including The Big Move.
- Reinvest carbon fee revenue into community efforts that achieve the identified land use policy goals while investing in cost effective greenhouse gas reduction actions.
- Expand the municipal revenue base beyond property taxes, development charges and user fees, and provide municipalities with greater flexibility to experiment with structural reforms of their development charges and property tax systems to promote redevelopment, infill and other sustainable urban development patterns.
- Increase the gas tax contribution to municipalities by the Federal and Provincial governments or allocate other sources of stable revenue to support the operating costs of new and existing transit services.