

Environment Hamilton: Comment on the Provincial Plans' 2015 Review

PROVINCIAL PLANS REVIEW: REPORT RECOMMENDS MORE PROTECTION FOR PRECIOUS AGRICULTURE AND NATURAL HERITAGE LANDS.

A panel led by David Crombie reviewed Ontario's four plans: Greenbelt Plan, Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan. These plans work together to provide a framework to accommodate population and employment growth in a sustainable manner, curbing sprawl and protecting productive farmland, water resources and natural heritage.

COMPLETE COMMUNITIES

Environment Hamilton is pleased to read the Panel's final recommendations for higher, more aggressive intensification targets.

We welcome the recommendation for a provincial oversight body to monitor and report on these intensification targets, as currently no one is doing so.

PROTECTING AND GROWING THE GREENBELT

Given the City of Hamilton's recent proposals to the province to remove Greenbelt land (precious, micro-climatic fruitland in lower Stoney Creek and parcels in upper Stoney Creek as well), we are very pleased that the report stresses further protection to priceless agricultural lands and specialty croplands in particular.

We are pleased with the recommendation to see policy directed towards the consistent identification, mapping and protection of an integrated agricultural system across the GGH (28).

Missing in the report however is a recommendation to uphold and protect **the permanency** of the Greenbelt. This needs to be clearly stated so that municipalities do not make proposals to the province to remove Greenbelt lands, nor do they suggest "no net lose" scenarios.

We urge the panel to go even further and recommend mandating **FIRM URBAN BOUNDARIES** so that scenarios we have recently faced in Hamilton (where the majority of councilors voted to remove lands without any justification and no Municipal Comprehensive Review) never occur again.

SUPPORTING AGRICULTURE

We greatly approve of recommendations to support local food strategies, and opportunities for urban and near urban agriculture (32). Given that our economy depends largely on the agricultural sector (the report says that the GGH comprises only 3.5% of Ontario's land area but contains 42% of its best agricultural land), we applaud the recommendations to increase support for food growers. However the kind of support mentioned in the report does not appear in the recommendations (that is access to land, infrastructure and equipment, training skills, mentoring).

CLIMATE CHANGE

The spotlight on climate change in the report encourages us. Using a climate change lens in which to view ALL planning for Ontario's future is appropriate and makes clear to the province, the urgent need to enhance, grow and protect precious resources.

PROTECTING NATURAL AND CULTURAL HERITAGE

We applaud the recommendation that proposes using an integrated watershed management approach to ensure a resilient network of watersheds. As well, we welcome the recommendation for more green infrastructure and to grow the Greenbelt by including source waters and urban river valleys.

INFRASTRUCTURE

We are very pleased with the recommendation (54) that provides policy direction to undertake municipal climate change vulnerability risk assessments to guide the design of resilient infrastructure that has the capacity to cope with climate change impacts in order to enhance resilience and reduce flood damage.

We are pleased with recommendations (55) to update the Growth Plan and Greenbelt Plan to require comprehensive, sub-watershed based stormwater master plans for greenfield areas prior to any new major development, and urban growth centres where stormwater plans have not been prepared.

We are happy with recommendations for long term planning around identifying and co-locating infrastructure corridors (to minimize environmental impacts when building new infrastructure across regions).

We would like to see stronger recommendations for infrastructure restrictions around oil pipelines, highways on Greenbelt lands.

IMPLEMENTING THE PLANS

While the report recommends (85) a secretariat with the capacity and resources to ensure effective coordination of actions by provincial ministries, the Niagara Escarpment Commission, municipalities, conservation authorities, and other local bodies that will facilitate implementation of the four plans and address the recommendations in the report, with **Environmental Defence, we would welcome that oversight body also work to ensure consistent implementation of the Greenbelt and Growth Plans across all municipalities.