



Urban Development Institute / Ontario  
Halton Chapter

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Fax / Regular Mail

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RECEIVED  
FEB - 9 2003  
HALTON REGION  
PLANNING AND  
PUBLIC WORKS DEPT.

Dear Mr. Wong:

**Re: Region of Halton Official Plan Review**

Thank you for providing the Urban Development Institute/Ontario – Halton Chapter (UDI-Halton) with the opportunity to comment on the ongoing Official Plan Review. We would also like to thank Regional Planning staff for attending the UDI Halton Chapter meeting on November 21, 2002 to discuss the Official Plan Review.

UDI-Halton has reviewed the Directions Report and the Draft Technical Background Reports. While we appreciate that the Region must endeavor to balance the viewpoints of various stakeholders UDI-Halton has significant concerns with respect to many of the directions/approaches being contemplated. Our concerns are generally concentrated in the following areas: Smart Growth, Woodlands, Wetlands, and Community Health Assessment/Transit Service Plans.

**A. Smart Growth**

**1. Background**

UDI-Ontario recently released a study entitled “Investing for Tomorrow: Moving Forward with Smart Growth in Central Ontario”. This study is available on UDI Ontario’s website ([www.udiontario.com](http://www.udiontario.com)). I believe that this report is a reasoned and invaluable addition to the often uninformed commentary on, and inappropriate use of, the term Smart Growth.

As discussed in UDI-Ontario’s report the GTA has enjoyed the benefits of unprecedented economic growth in recent years. This economic prosperity has led to significant population growth throughout the GTA, including Halton Region. I believe that it is the pace of this growth, and not its form, which has given rise to the inaccurate and inappropriate use of the term “urban sprawl”.

As highlighted in “Investing in Tomorrow” the GTA is one of the most compact and dense urban areas in North America. Net residential densities in new communities compare favorably to those in many older neighbourhoods. It is the requirement for increased public lands - including those that enhance the environment, such as storm water management ponds, which lowers gross residential densities. The design of today’s subdivisions represents the efficient use of a very valuable resource – urban land.

This is not to suggest that the pace of growth does not have challenges. As highlighted in UDI-Ontario's Moving Forward report there are challenges related to the movement of people and goods. However these challenges are not created by the form of new development – but by shortfalls in the transportation infrastructure (both roads and transit) required to support growth. UDI-Ontario has been consistent and persistent in its message that both the Provincial and Federal government need to invest in the GTA's transportation infrastructure to ensure this vital region's continued prosperity.

The findings and recommendations of the UDI-Ontario report are too extensive to summarize in this letter. I would strongly advise that Regional staff read "Investing for Tomorrow: Moving Forward with Smart Growth in Central Ontario" and consider its findings and recommendations in the context of finalizing the Region's Official Plan Review.

## **2. Smart Growth in Halton**

As I have indicated to you on a number of occasions I feel that development in Halton Region is a prime example of the application of Smart Growth principles. Through the creation of defined urban areas in the Halton Urban Structure Plan, the control of development through the phased release of water/waste water capacity allocation, and requirements for developer pre-payment of water/waste water D/C's Halton has "grown smart" in the past. I believe it is a great disservice to past and current members of Regional Council, Regional staff, residents of Halton, and the development industry to suggest or infer otherwise.

UDI-Halton supports the principles of Smart Growth (as properly defined) and the inclusion of Smart Growth objectives into the Region of Halton Official Plan to which development plans shall have regard.

## **3. Smart Growth Index**

UDI-Halton, however, has serious concerns with the "Smart Growth Index", as set out in Draft Technical Background Paper #2, and the inclusion of such an index in the Official Plan, even if it is only introduced as a "monitoring tool".

To measure development against an arbitrary, subjective index that does not account for market need/demand and a diversity of individual communities, and has no criteria with respect to appropriateness and/or compatibility of development, is inappropriate. To infer that such a Smart Growth Index is "an explicit quantification of good planning" is overstated, untested, and unfounded. Consideration of individual development applications and/or the planning of communities cannot be judged on a mathematical index containing very subjective criteria without fully understanding and appreciating the context of development and the needs and desires of individual communities.

UDI-Halton strongly recommends that the proposed Smart Growth Index not be included in the revised Official Plan.

## **B. Woodlands**

Draft Technical Background Paper #6 (Rationale and Methodology for Determining Significant Woodlands in the Regional Municipality of Halton) is premised on Region staff's interpretation that the Provincial Policy Statement (PPS) requires the identification of significant woodlots in the

Official Plan. It is noted that the identification of significant woodlands has been undertaken in draft Technical Background Paper #6 without consideration of other priorities of the PPS (such as urban growth, resource development etc.)

To determine the significance of woodlands, as contained in draft Technical Background Paper #6, it is our understanding that a “desk-top” analysis was conducted to map woodlands throughout the Region. These woodlands were then measured against seven (7) criteria having equal weight to assess their potential significance. If the identified woodland met at least one (1) of the seven (7) criteria, the woodland would be considered significant at a Regional scale. Of the woodlands mapped, 97% were considered “candidate” significant woodlands. It is important to note that site-specific study and/or fieldwork was not undertaken at this stage to assess the significance of these woodlands. It is proposed that the “candidate” significant woodlands be designated as Greenlands B in the Regional Plan.

UDI-Halton has serious concerns with the proposed significant woodlands approach. In the absence of proper field work and/or subwatershed studies, it is extremely difficult to determine the significance of woodlands. The approach of identifying “candidate” significant woodlands and designating these as Greenlands B would place landowners in a very difficult situation. They would be placed in the untenable position of having to justify the removal of a Greenlands B designation and prove “no negative impact” by means of a further Environmental Impact Study (EIS). If the further EIS determines that the woodland or part thereof is not significant (or never was) one has to question the validity of, and rationale for, its original Greenlands B designation. In addition, UDI-Halton believes that a re-examination of the criteria and/or application of the criteria are warranted. It is difficult to accept that 97% of the woodlands in Halton are considered significant based on a “desk-top” analysis. It is also difficult to believe that the proposed approach to determining significant woodlands would survive further scrutiny.

UDI-Halton requests that Region staff reassess the proposed approach to significant woodlands in light of other priorities of the PPS. We believe that the proposed approach constitutes an unbalanced application of the PPS.

### **C. Wetlands**

UDI-Halton’s concerns with Draft Technical Background Paper #8 (Update of Significant Wetlands in the Region of Halton) are similar to those regarding the approach proposed to determine significant woodlands.

It is our understanding that the Region proposes to designate regionally significant wetlands as Greenlands B in the Regional Plan, while provincially significant wetlands would be designated Greenlands A. Without conducting detailed field work and analysis (e.g. subwatershed study), it is difficult to conclude the significance of a wetland. The relative significance of wetlands (provincially or regionally significant) and the how these contribute to the ecological function must be scientifically proven/tested. To designate regionally significant wetlands as Greenlands B without a full understanding of their ecological significance is inappropriate.

### **D. Community Health Assessment/Transit Service Plan**

As clearly stated in many studies and initiatives UDI-Ontario supports the principles of healthy communities and efficient and effective transit (including both roads and public transit). As

mentioned earlier UDI-Ontario has delivered a clear message to senior levels of government that additional transportation investment is critical to the continued prosperity of the GTA. UDI-Ontario, along with the Regional Chairs, was instrumental in the Province's November 2001 decision to take back operating responsibility and provide significant additional capital funding for GO Transit. This decision allowed GTA municipalities to apply their former GO Transit operating contributions to investments in their own transit systems. The development industry is also a significant financial supporter of GO Transit through the payment of GO Transit D/C levies.

UDI-Halton, however, has specific concerns with respect to the proposed requirement in the Directions Report for a Community Health Assessment and Transit Service Plan without fully understanding the parameters, intent and purpose and timing of such studies. UDI-Halton is seeking assurance from Regional staff that such studies are not intended to prejudice built-form or prevent development. UDI-Halton would appreciate the opportunity to work closely with Regional Planning staff to address the above noted concerns.

Regarding timing, UDI-Halton strongly recommends that Community Health Assessments and Transit Service Plans be required at a higher order planning stage (i.e. Official Plan/Secondary Plan) as opposed to imposing such requirements on area specific development applications. To impose this condition at the level suggested in the Directions Report (development applications representing 1,000 people or jobs) is inappropriate. The general framework should be set at the broader community planning level.

In closing, UDI-Halton would welcome further dialogue with Regional staff regarding the Official Plan Review. We anticipate providing additional comments once the final Directions Report is available and Regional staff releases the proposed policy amendments to the Official Plan. Once again, we would like to thank you for the opportunity to participate in the Regional Official Plan Review process, and we look forward to the Region's consideration of UDI-Halton's concerns.

Yours very truly



Will Young  
Chair – Halton Chapter  
UDI Ontario

cc.

Ms. Joyce Savoline, Regional Chairman  
Councillor Rick Bonnette, Chairman, Planning and Public Works Committee  
Mr. Patrick Murphy, Commissioner of Planning and Public Works  
Ms. Jane Clohecy, Director of Planning and Transportation  
Mr. Neil Rodgers – President UDI Ontario