

## **CEAC Report 2006-02**

Report to: Mayor and Members of Council

From: John Abbott, Chair, Caledon Environmental Advisory Committee (CEAC)

By: Town of Caledon Growth Evaluation Sub-group: John Abbott, Katie Altoft, Graham Bryan, Debbe Crandall, Steve McElroy, Bill Wilson, Bryon Wilson.

Date: April 18, 2006

Re: **A Sustainable Growth Option for the Town of Caledon**

### **RECOMMENDATIONS**

The Caledon Environmental Advisory Committee (CEAC) recommends to the Corporation of the Town of Caledon:

1. That Council receive CEAC Report 2006-02
2. That Council, before choosing any of the four growth options under consideration, insist on a quantifiable basis for the staff/consultant's recommendation including consideration of economic, environmental and social factors.
3. That Council establish criteria by which the impact of growth will be evaluated and, in addition, set out a timetable by which such an evaluation will take place.
4. That Council, once satisfied that a quantifiable basis for the staff/consultant analysis of the four growth options as noted above exists, give serious consideration to the adoption of a provisional low growth option for the period 2021 – 2031 with built in review periods.
5. That Council consider an immediate commitment to initiate, together with its many partners, a Town-wide impact-of-growth monitoring programme.
6. That Council consider the development of an adaptive management framework that would allow the Town to adjust the growth forecast chosen based on targets and sustainability-focused performance measures, and

7. That Council issue a public challenge to the Province to revisit the methodologies and assumptions used in the proposed Growth Plan for the Greater Golden Horseshoe, and in addition recommend to the Province that the Proposed Growth Plan be temporarily halted and subjected to a more robust public and agency analysis and consultation.

## **INTRODUCTION**

The Town of Caledon is facing unprecedented population growth pressures driven by provincial legislation and by the need for regional governments such as the Region of Peel to allocate future population growth to its component municipalities. As a rural municipality, the Town of Caledon is facing additional pressures associated with the preservation of the prime agricultural land found within its borders while, at the same time, developing communities that are socially, economically and environmentally sustainable.

As noted by the Federation of Canadian Municipalities in their Theme Report #3, *Growth, the Economy and the Urban Environment*, “---- although a growing economy and increasing population contribute to communities, they also have significant environmental consequences that must be managed and require a coordinated response by all orders of government”. CEAC is concerned that both the rate and amount of growth potentially facing the Town may not be manageable in a way that will maintain or increase the current quality of life within the Town. Furthermore, there is concern that Council may find itself in the untenable position of having to take a decision regarding future growth for the period 2021 to 2031 based on assumptions associated with past growth performance and without the means to monitor the actual impact of the growth option chosen.

CEAC has attempted to address these concerns in this preliminary report to Council that deals with the four growth options facing the Town, the evaluation criteria that might be considered in selecting the most sustainable growth option, and the development of a monitoring system that would lead to an adaptive management approach regarding population growth.

## **BACKGROUND**

CEAC’s involvement with the population growth issue started with CEAC members participating in two public meetings; one held on June 27, 2005 (South Albion – Bolton Community Plan Update), and the other held on September 19, 2005 (Town-wide Population Forecasts and Distribution to 2031). CEAC members have also met with Town staff regarding town-wide population forecasts on a number of occasions, including a delegation by Senior Planner Kathie Kurtz to the CEAC November 2005 meeting. Additionally, Mayor Morrison attended the October CEAC meeting to provide a

background to Town-wide environmental issues including the population growth forecasts.

On January 27<sup>th</sup>, CEAC members met with Town staff and the Town's consultants to specifically discuss possible growth evaluation criteria and to obtain feed-back from the consultants regarding their approach to growth option evaluation. Subsequent to that meeting and at the suggestion of the Mayor, CEAC chaired an informal Council workshop on February 27, 2006 whereby the issue of town-wide growth projections was discussed within the framework of CEAC's draft for discussion paper. Later that same day, members of CEAC were invited to attend a Council workshop where staff and consultants provided an update on the timing and further information on the current population forecasts and distribution options.

CEAC is continuing to work with Town Planning staff in addressing the population growth issue and is submitting this report as input to Council on this issue and as timely input to the report to Council that will be submitted by Town Planning staff in April.

## **REPORT OBJECTIVES**

The principal objectives of this report are as follows:

1. To provide a qualitative assessment of the impact of a high growth option compared to the low growth option for the Town of Caledon;
2. To highlight the adverse environmental impacts associated with a high growth option including an assessment of the Region to provide the necessary supporting infrastructure and services;
3. To provide a perspective on the problems inherent in top-down growth forecasting and the current limitations for moving towards sustainability;
4. To suggest growth evaluation criteria that will enable the Town to not only assess the impact of a high growth option on quality of life within the Town of Caledon, but also to assess the on-going impact of the growth option chosen by Council;
5. To consider the establishment of a system that will allow Town staff to monitor the impact of growth and to move towards an adaptive management regime; and
6. To provide Council with a basis for challenging the GGH population forecast allocated to the Region of Peel by the Province.

## DISCUSSION

### 1.0 Basis for CEAC's Concern and Involvement:

The basis for the town-wide population forecasts for the time horizon of 2021- 2031 has largely been driven by provincial legislation (Places to Grow and Greenbelt) whereby regional governments have been required through provincial legislation to allocate new population numbers among their constituent area municipalities. The Region of Peel has been allocated a 2031 population of 1,640,000. According to staff, between Mississauga and Brampton's forecasts there is a 60,000-population allocation shortfall for the period 2021 – 2031. This appears to be exerting tremendous pressures on staff and Council based on concern that the shortfall may be allocated, at least in part, to Caledon unless Caledon's population forecast allocations are well planned and soundly based. That, coupled with uncertainty about the stability of regional governance, has from CEAC's perspective, created concerns about how decisions made now will impact the future of the Town of Caledon.

In the absence of scientifically accepted mechanisms to quantify the ability of the natural environment to deal with the affects of urbanization, decision-makers tend to rely on narrow but easily quantitative fiscal analyses. Because there is minimal quantifiable environmental or social data to rely on, general quality of life indicators are chosen to guide the evaluation of options of growth, with the result that solid scientifically-rigorous assessments of positive or negative socio-ecological impacts of a growth strategy are not undertaken. As a result, socio-ecological analyses are not included as part of the evaluation process at the front-end of the population forecasting exercise. Instead, population forecasts are chosen and costly attempts are then made to mitigate the socio-ecological impacts of these forecasts through site-specific studies and strategies.

The historic disregard of socio-ecological monitoring has resulted in a lack of defensible quantitative data that are needed to track socio-ecological progress. This is ironic given that most government documents explicitly include policies for monitoring and for the establishment of benchmarks of environmental performance. For instance, section 6.5.1 of the Caledon Official Plan states that development within the Town will be monitored on a regular basis to ensure that the Principles, Strategic Direction, Goals, Objectives and Policies are being achieved including such matters as ecosystems and ecosystem integrity and water resources, etc. Furthermore, section 3.1.5.10.2 of the Official Plan specifically addresses a prohibition on new development in the event of harm, alteration, disruption and destruction of fish habitat in core fishery resource areas and a requirement that new development must not harm, alter, disrupt or destroy fish habitat in other fishery resource areas (section 3.1.5.10.3).

In light of the above observations, CEAC would like to draw attention to a number of relevant documents that have been recently released.

The first is a report prepared by the Federation of Canadian Municipalities, entitled *Growth, the Economy and the Urban Environment, Quality of Life in Canadian Communities, 2005*. Selected

indicators were used to track key changes in six ‘quality of life’ factors in 20 municipalities over the period 1991 – 2001 as follows:

1. Develop and maintain a vibrant local economy
2. Protect and enhance the natural and built environment
3. Offer opportunities for the attainment of personal goals, hopes and aspirations
4. Promote a fair and equitable sharing of common resources
5. Enable residents to meet their basic needs
6. Support rich social interactions and the inclusion of all residents in community life

Overall the report found that the quality of life within this framework was at risk and had deteriorated for a significant number of people between 1991 and 2001. The value of this exercise is that it allows for a more explicit discussion and examination of the links between growth trends and the state of the environment.

The report shows that “although a growing economy and increasing population contribute to communities, they also have significant environmental consequences” (President’s message FCM). In general, there was a direct correlation between economic growth (i.e., growth in real value of building permits) and a number of negative trends in the following indicators: ecological footprint, household growth, lower density housing starts, solid waste generated and disposed, commuters using public transit, walking/cycling, water consumption and air quality.

The second report is the *Humber Watershed Report Card* first issued in 2000, which classified fish habitat and macro invertebrates (benthic organisms) of the Humber River as vulnerable and in need of close scrutiny. Preliminary data from the *2005 Watershed Report Card* indicates a worsening of the situation with a trend emerging that the health of the Humber River is in decline. In short, the data shows that the Humber River is a river system under stress due to urbanization.

The Credit Valley Conservation’s *How Healthy is the Credit River Watershed (2005)* drew similar conclusions regarding the impacts of urbanization on the Credit River with the following quote:

"The watershed is relatively healthy in most areas. However, those areas that have intense human activities (e.g. development, farming, sewage treatment plants) show declining trends in overall health. If growth continues and human impacts are not managed well, further declines in the health of the ecosystem are expected."

The significance of these three documents is the emergence of quantitative environmental data that can be used in conjunction with economic data to assist municipal governments in making better and more informed decisions about how much growth their municipality can handle.

## **2.0 Application to Caledon:**

Town staff, in concert with consultants, have developed four population growth scenarios for the period 2021 – 2031. While the town-wide forecasting study is being undertaken as a stand-alone study, it appears to be framed within the context of two other planning initiatives that are happening simultaneously – the Mayfield West Community Plan and the South Albion/Bolton Growth and Land Use Planning exercise. Staff is also proposing possible reallocations of the 2021 population numbers to reflect more accurately the reality of how growth has occurred to date within the tri-nodal approach.

Therefore, there are a number of related themes under the overarching issue of future growth for which CEAC has a number of recommendations. They are:

1. The consideration of the four growth options proposed for 2021-2031;
2. The lack of a quantitative assessment of the impact of growth on socio-ecological issues, and;
3. The establishment of a monitoring plan based on quality of life indicators.

In addition, the basis of the Province’s population forecast and regional allocations of population growth for the GGH is suspect and has had a significant impact on the Town of Caledon’s approach to the population growth issue. This subject is addressed in section 3.0 in some detail.

### **2.1 A Qualitative Assessment of the Growth Forecast for 2021 - 2031 Is Informative**

CEAC has two fundamental concerns with the growth options as presented by the Town. The first is the assumption that growth can be sustained at the historical rate of growth; and the second, a lack of rationale behind the four growth options presented.

As part of its public consultation process, the Town presented four growth options and the public was asked to state their preference. No rationale was provided at that time to support any of the four options, nor were the implications that these options might be expected to have for such critical factors as waste management, transportation, employment, etc. outlined. Fundamentally, the exercise seemed to put the cart before the horse. Instead of looking at what the community can be expected to support from a population perspective and establishing growth options within this limit – the consultants proposed a series of seemingly arbitrary options, based on “low-med-high” in relation to what has been experienced in the past, without regard for capacity.

CEAC is concerned that this approach will ignore the socio-ecological impact of growth and that the staff/consultant population growth recommendation will ultimately be based on the one factor which has been quantified to date, the economic impact. To highlight those factors, which may very well be ignored in defining the impact of growth, CEAC has attempted to qualitatively define the potential differences between a low growth and high growth scenario.

The following table is a qualitative comparison of expected conditions under a Low Growth Scenario and a High Growth Scenario based upon the literature sources cited here and the experiences and events witnessed by CEAC members in the GTA and in Caledon over the last few years. The distribution of population growth, specifically between Mayfield West and Bolton (South Albion) has not been directly addressed as part of this analysis, but is referred to as a factor impacted by growth under the title Town of Caledon Role.

The comparison tends to emphasize the negative aspects of a high growth scenario. However CEAC does recognize that short-term economic benefits do exist with the high growth scenario.

<b>CRITERIA</b>	<b>LOW GROWTH SCENARIO</b>	<b>HIGH GROWTH SCENARIO</b>
<b>AGRICULTURE</b>	Allows time for agriculture to seek new markets and diversify	Reduces possibility of retaining a viable agricultural industry
	Less rapidly destroys prime Class One agricultural land	More rapidly destroys prime Class One agricultural land
<b>NATURAL ENVIRONMENT</b>	Allows time for best management practices for storm water management to be improved to prevent current degradation being caused by urbanization.	Continued rapid urbanization under current best management practices would accelerate degradation to streams and rivers caused by storm water run off.
	Allows time for a monitoring and adaptive management program to be funded and established.	Allows little time for a monitoring program to be established, let alone detect and prevent degradation.
<b>PEEL REGION ROLE</b>	Can better accommodate servicing lag time for sewer water and transportation infrastructure and waste services.	Increases possibility that supply of services does not happen in a timely manner.
	Servicing plans could be more easily scaled back in the event of a dissolution of Peel Region as threatened by on-going separation disputes between Peel	Larger scale servicing plans may be more costly to scale back in event of Peel dissolution.

<b>CRITERIA</b>	<b>LOW GROWTH SCENARIO</b>	<b>HIGH GROWTH SCENARIO</b>
TOWN OF CALEDON ROLE	<p>member municipalities.</p> <p>Allows time for Town to more effectively improve its performance in its lead role of enforcing and providing superior storm water management practices.</p> <p>Would not necessitate creation of new stand-alone communities such as North or South Albion requiring local sub-community commercial/social centres. Mayfield West would require a local centre creation in any case.</p> <p>Allows more time for the Town To make adequate front-end Financing arrangements with Land owners for servicing.</p>	<p>Allows less time for Town to apply more aggressive and innovative approaches to storm water management.</p> <p>Would more likely require creation of local sub-community commercial /social centres to accommodate greater population in the case of North or South Albion - in addition to the Mayfield West centre.</p> <p>Allows less time for the Town to make front-end Financing arrangements With land owners for Servicing.</p>
FISCAL (Desired target for a more Live-Work type of Community)	<p>Is expected to achieve the target activity rate of 45% (Caledon-based employment divided by Caledon population – refer C. N. Watson p. 2-1)<sup>1</sup></p>	<p>Is not expected to achieve any better activity rate than the Low Growth Scenario ( refer C. N. Watson, p.2-2)</p>
SCHOOLS	<p>School Boards can better accommodate growing pupil numbers.</p>	<p>School Boards less able to accommodate growing pupil numbers as evidenced by lack of Separate School space in Bolton due to previous rapid growth.</p>
HEALTH CARE	<p>Wide range of essential health care doctors, specialists and clinics can better keep pace with growth.</p>	<p>Readily accessible health care more difficult in high growth periods.</p>
SOCIAL	<p>Social and quality of life services</p>	<p>High growth may</p>

<sup>1</sup> Proposed Official Plan growth targets and Preliminary Economic Analysis Thereof, dated February 27, 2006, C.N. Watson and Associates Ltd.

<b>CRITERIA</b>	<b>LOW GROWTH SCENARIO</b>	<b>HIGH GROWTH SCENARIO</b>
SERVICES	can better keep pace with growth	necessitate more car travel time to obtain and participate in desired range of social services.
RETAIL/ COMMERCIAL SERVICES	Retail/commercial services can better keep pace with a slower growing community.	High growth may necessitate more car travel time to obtain these services.

Of most importance is the recognition that while low growth population forecasts can be increased with little reaction from the general public or developers, higher growth forecasts cannot be lowered without legal challenge in the event of the Town’s inability to sustain such growth.

**2.2 The Quantitative Assessment of Growth Is Severely Limited**

The quantitative assessment of the impact of population growth which has been carried out to date is based solely on an economic analysis as prepared and presented by C. N. Watson and Associates Ltd.<sup>1</sup>. In that report, consideration is given to activity rate, housing absorption rate, and the overall fiscal impact. Interestingly, the report presents a number of factors in its discussion of the fiscal impact which will make the “no fiscal impact” objective for growth more difficult to achieve (refer to page 2-4). These include adding significant amounts of medium-high density or small lot single-detached housing, i.e. higher density housing than the historical experience; expanding into new areas such as South Albion that might require significant facilities locally; and significantly increasing operating service levels, e.g. a permanent fire fighting force in new areas.

The report also suggests that a low growth option might be “fiscally challenging” in terms of: “funding the replacement of older infrastructure, sustaining a complete municipal operation, and addressing substandard servicing situations” (refer to page 2-5 of the C. N. Watson report).

Understandably, no quantifiable data is presented in the C. N. Watson report of February 27, 2006 in assessing the economic risks associated with either the low growth or higher growth options. Furthermore, that report is essentially an economic report and makes no attempt to quantify socio-ecological factors.

Of real concern is the complete lack of quantitative data presented to date that deals with the socio-ecological impact of growth. The lack of baseline data for the Town makes the quantification of the socio-ecological impact of growth very difficult, if not impossible to achieve at this stage. However, warnings of the adverse consequences of high growth

have been issued by the Federation of Canadian Municipalities (FCM), the Toronto Region Conservation Authority (TRCA) and the Credit Valley Conservation Authority (CVC), as noted earlier, and would suggest that the adoption of a precautionary approach to growth within the Town of Caledon would be highly advisable.

### **2.3 A Credible Evaluation Methodology Is Lacking**

The approach taken by the Province to generate population numbers for 2021- 2031 is outmoded and is little more than a best guess estimate of the number of people and jobs that in 20 years time may be moving into the Greater Golden Horseshoe. These numbers are then allocated downwards to be assimilated by upper-tier municipalities, which in turn look to the local municipalities to forecast and plan for growth.

As discussed in detail in section 3.0, the provincial forecast for the period 2021 – 2031 has been challenged by a highly credible organization, based on the assumptions used by the Province to project forward 20 years. The challenge suggests that an equally possible scenario would see 1.1 million fewer people coming to live and work in the GGH. It goes without saying that a discrepancy of this magnitude has huge implications for Caledon.

Of even greater concern is the top-down imposition of growth projections onto municipalities, conservation authorities and the public, who are collectively charged with the stewardship of the socio-ecological environment. Furthermore, the seemingly complex calculations based in part upon historic immigration rates, economic trends and cycles is disturbingly shallow and contains virtually no consideration of the ecological capacity of the natural environment or the capacity of our social structures to deal with the impacts of growth on the air, the water, the need for more infrastructure such as landfills, roads, highways, water and sewer systems.

When considering this scenario, municipalities find themselves in a no-win situation. The public demands that local governments use a sustainability-based approach to growth forecasting whereby all aspects of society are protected – the natural, social and economic environments. However, they have ‘inherited’ a fundamentally unsustainable provincial scenario. In essence, planning for sustainability under the *Places to Grow* is a mission impossible.

CEAC is not unsympathetic to the dilemma of staff and the consultants in the task of providing the best advice to Council. It is not surprising that the evaluation methodology comprises a narrow projection of the Town’s fiscal picture in 2021 based upon historic trends in, for instance, the numbers of building permits issued. This is more an indictment of the provincial-municipal governance imbalance than it is of the Town’s intentions. However the increased costs of providing Regional services, the costs of remediation of degraded water systems, the costs of implementing and enforcing enhanced environmental protection policies, the costs of providing recreational facilities and policing, in essence the costs of ‘catch-up planning’, must all be factored in to give a real picture of the true financial costs of growth. This has not been done and as such any decisions based on this flawed evaluation will leave a worsening legacy for Caledon’s future.

Therefore CEAC strongly recommends that Caledon Council take a very different approach, an approach that is pragmatic, fiscally conservative and yet innovative. CEAC cannot make a statement that the high or low growth option is either good or bad simply because there is not the hard quantitative evidence to support either scenario. However it can recommend that Council immediately begin the process of putting in place the mechanisms which will allow good decisions to be made.

These mechanisms, from CEAC's perspective, include:

- An immediate commitment by Council to initiate, together with its many partners, a Town-wide monitoring programme;
- The adoption of a provisional low growth option with built in review periods;
- The development of an adaptive management framework that would allow the Town to adjust this growth forecast based on targets and sustainability-focused performance measures; and
- A public challenge to the Province to revisit the methodologies and assumptions used in the proposed Growth Plan for the Greater Golden Horseshoe.

#### **2.4 Components of a Town-Wide Monitoring Programme: Socio –Ecological (Quality of Life) Indicators**

The core concern for CEAC from the outset has been the methodology used by the study team to evaluate the four growth scenarios. Staff has indicated that the study team will be employing similar approach to that used in the 1994 growth management study. In essence, this consists of a qualitative framework using the following criteria:

1. Environmental, Quality of Life and other Planning Matters
2. Public Service Levels
3. Commercial Service Levels
4. Local Job Availability
5. Property Tax Levels
6. Local Business and Property Owner Prosperity
7. Housing Choice and Affordability

As indicated above, these criteria are overly vague and qualitative in nature – two impediments to providing the necessary hard evidence needed for trend analyses.

As a result, CEAC has approached this issue using, where possible, the same headings or themes from the 1994 growth evaluation study. However, in response to the unavailability of progress indicators and hence the inability of the Town to track actual progress, CEAC is recommending that the evaluation criteria be more specific and quantifiable, and be accompanied by a monitoring plan to track progress. CEAC recommends that all forecast scenarios be evaluated, monitored and adapted on the basis of town-wide criteria that have been developed collaboratively with the Town's many partners, including the public. CEAC has taken the initiative of suggesting a number of quality of life evaluation criteria as follows:

Environment:

- Maintain or reduce the current level of residential and ICI solid waste disposal
- Maintain or increase Town-wide forest cover
- Maintain or improve the quality of stormwater at point of entry to natural surface or ground water systems
- Maintain or reduce the Town's overall ecological footprint
- Maintain or reduce the annual average ozone concentrations
- Maintain or improve general air quality within the Town, e.g. monitor smog alerts

Housing Choice, Affordability, Density:

- Maintain or reduce household growth to population growth ratios
- Maintain or increase the higher density housing to new housing start ratios
- Maintain or increase the numbers of affordable housing choices for a diversity of age, income levels, occupations, etc.

Public Service Levels:

- Maintain or increase the library, school and recreational services to resident ratios
- Maintain or reduce per capita residential consumption of water
- Maintain or reduce average vehicle kilometres traveled (VKTs) by local residents
- Maintain or increase the urban index of the Town as a whole (defined as the walkability and cyclability of the Town)

Local Economy & Property Tax Levels:

- Maintain or increase net local economic prosperity
- Maintain or reduce current property tax rates
- Maintain or increase local employment to resident ratios
- Maintain or reduce the number of local business bankruptcies

Each scenario should equally be assessed on its ability to withstand a change in the current regional municipal governance structure.

We're aware that baseline information may not be available and that extensive modeling for a number of the criteria precludes definitive answers at this time. However, this should not deter the town from proceeding in a precautionary manner. "In fact, the very absence of solid data reinforces the need to proceed with extreme caution"<sup>2</sup>.

A more detailed elaboration of the principles and content of a variety of environmental and quality of life indicators is included as Appendix 1.

### **3.0 Challenging the Population Growth Numbers Allocated to the Region of Peel**

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<sup>2</sup> Federation of Canadian Municipalities, *Growth, the Economy and the Urban Environment*, Quality of Life in Canadian Communities, Theme Report # 3, 2005

While Caledon struggles to determine an appropriate level of growth, the spectre of provincial growth allocations threatens our ability to limit growth to an acceptable level. The Proposed Growth Plan for the Greater Golden Horseshoe will require the Region of Peel to accept close to 600,000 people by 2031, with nearly half this number to be accommodated within the next five years. CEAC believes these numbers should be challenged. The numbers that Caledon may be expected to accept are likely to run against the growth objectives of our municipality and the stated goals of the provincial government. The evidence also suggests that the numbers used to justify these allocations should be questioned.

The stated goals of the Province related to growth including increased intensification, transit-supportive densities, and limits to expansion into natural areas and prime agricultural lands are commendable. The difficulty stems from the fact that the requirements do not apply at the provincial level or even at the Greater Golden Horseshoe level, but at the local level, with the result that the implementation of the Growth Plan may compel municipalities to plan for growth numbers that doom the laudable goals to failure. There are several reasons for Caledon to be concerned about the potential impacts of the Proposed Growth Plan for the Greater Golden Horseshoe.

#### 1. The Loss of Prime Agricultural Land

Growth onto prime agricultural land is not permitted where alternatives exist according to the Growth Plan, but opportunities for intensification in Caledon are extremely limited and much of our land is already protected under Oak Ridges Moraine and Niagara Escarpment legislation. By default, Caledon will be forced to place most of its development onto prime agricultural land. Opportunities for intensification do exist in Brampton and Mississauga, yet there is concern that these areas will be built out quickly. This could cause tremendous difficulty for Caledon, particularly in light of the uncertainty over the nature of future municipal governance in Peel.

#### 2. Postponement of the Intensification Target

A related concern is the postponement of the 40% intensification target to 2015. This may actually spur greenfield development in the short term. If the long term growth numbers have been overestimated, it may be too late to make changes. Once commitments are made we can expect tremendous pressure to carry them through. How Caledon would maintain its tri-nodal growth concept and achieve transit-supportive densities remains open to question. Creating viable green communities in keeping with municipal and provincial goals takes time and careful planning. There is considerable risk that forcing high numbers quickly will create public resistance to density (despite the clear benefits). This could cause the goal of transit-supportive communities to fall at the altar of political expediency and result in the unchecked suburban sprawl that the growth plan was designed to avoid.

### 3. Lack of a Defensible Rationale for Growth

Caledon is currently evaluating a variety of growth scenarios, but it seems clear that there is little support for high growth and a high value placed on preserving the rural character of the Town. At the same time there are communities trying to attract growth on more suitable land. In their submission on the Draft GGH Growth Plan, Ontario Nature<sup>3</sup> notes the example of Brantford as a community with good transportation infrastructure that might welcome growth. It seems unclear whether there has been much effort to determine growth allocations that consider the local economic and environmental needs of Ontario's communities. It is also unclear how much investigation there has been into finding locations for new communities in Ontario that are well positioned from an economic and transportation viewpoint, but not on land of high environmental or agricultural value. Growth planning that carefully weighs these considerations and provides the incentives and infrastructure necessary to make it happen is needed.

### 4. Food Production in Ontario

With the loss of each farm in Caledon the world permanently loses more of the tiny percentage of the Earth's surface that will continue to feed our growing planet and all future generations. The ability to feed cities with local food is well recognized as a cornerstone to reducing the ecological footprint of our citizens. Local food security could become vitally important in an uncertain future. It is worth remembering that southern Ontario is doubly blessed with excellent agricultural land and the huge water supply needed to sustain it. The declining state of aquifers at the global level threatens much of the world's agricultural land. While this underlines the importance of protecting our agricultural resources for future generations, the reality is that agricultural areas will be under increased development pressure unless a viable agricultural industry can be maintained in this generation. Caledon is well positioned to provide food for the GGH, but must remain farm friendly if Caledon's agricultural heritage is to continue. Using this land to grow houses before seriously addressing the needs of the agricultural community would be a tragic mistake.

### 5. The Adverse Impacts on Watersheds

The growth allocations do not consider the impacts of growth on watersheds. As noted previously, our conservation authorities are warning us that the health of the Humber and the Credit are under threat from the effects of urbanization. In order to maintain biodiversity and the quality of our drinking water the province should take a proactive approach to protection through careful growth planning as opposed to expecting municipalities and conservation authorities to attempt to mitigate damage after poor decisions are made. Conservation authorities and experts in various government ministries and NGOs should have a greater role in the planning process.

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<sup>3</sup> Ontario Nature, Submissions on Draft Greater Golden Horseshoe Growth Plan, April 2005, January 2006, selected excerpts

## 6. Population Growth Forecast Discrepancies

A variety of respected organizations have raised serious concerns regarding growth planning in Ontario:

The Environmental Commissioner of Ontario notes in his *2004-2005 Annual Report* that the “growth plans are binding and municipalities may not appeal them.” He questions the degree to which growth is sustainable and recommends that the government “undertake public consultation on the government’s population growth modeling and projections in order to provide a transparent context for land use planning decisions.”

Ontario Nature notes the lack of reference to the natural environment’s assimilative capacity in the development of the provincial population projections in its April 2005 submission on the Draft GGH Growth Plan. Ontario Nature states that it does not challenge “the fact that the Ontario population will grow; rather we question whether the GGH - or at least some portions of it - can ecologically sustain the projected growth.”

The recent Neptis *Commentary on the Ontario Government’s Proposed Growth Plan for the Greater Golden Horseshoe* (March 2006) states that the Growth Plan as it now stands is unlikely to achieve its own objectives. Revealing problems with the effectiveness of intensification measures and density targets, its research shows “that the Plan needs to be revised and strengthened by other, more effective and precisely targeted measures – if it is to fulfill its goals.” It also notes the “lack of integrated land use and transportation analysis” and suggests that the province “should commit to a phased program of investment into specific infrastructure projects.” The need for viable transportation alternatives to the automobile is particularly strong in Caledon and vital to creating successful compact communities.

The Neptis Foundation’s *Economic Influences on Population Growth and Housing Demand in the Greater Golden Horseshoe* (Dunning, 2006) demonstrates that the growth outlook numbers provided to the province by Hemson Consulting may seriously overestimate the projected population of Ontario. Dunning “cautions against assuming that the rate and form of housing market growth associated with the recent economic boom will continue indefinitely” (see Appendix 2: Report Highlights). Using different assumptions, Dunning’s projections show over one million less people in the GGH in 2031 than Hemson. This difference could seriously decrease the need for greenfields in meeting growth targets.

## 7. The Impact of Policy Changes on Growth Projections

The growth projections used by Hemson and adopted by the Province do not consider the impact of policy changes. The Province should be creating allocations reflecting the influence of sound policy decisions and consultation instead of projections based on economic forecasts. Failure to do so seriously undermines efforts to consider the social and environmental impacts of growth across Ontario. Dunning also states that he does

not attempt to reflect the effects of policy changes. In these uncontrolled conditions, Dunning actually predicts higher numbers for Peel than Hemson. While these forecasts have their place in planning research, they should not form the basis of binding requirements on municipalities.

**The level of uncertainty related to the population allocation numbers provided by the Province leads CEAC to recommend that the numbers currently allocated to the Region of Peel be challenged.** A range of credible organizations have raised serious concerns related to the validity of the numbers and the effects of their implementation. The stated goals of the Province in the Proposed Growth Plan are admirable, but their prospects for success, particularly when applied at the local Caledon level, remain seriously suspect. The implementation of the Proposed Growth Plan should be temporarily halted until these concerns have been examined and addressed.

## CONCLUSION

Population forecasting provides the basis for all municipal planning. There is no other planning department function which can have wider repercussions in a community than establishing future plans for growth, including limits to growth.

For this reason, CEAC wishes to assist the Council of the Town of Caledon to make this key decision based on the clearest possible rationale - a rationale supported by explicit assumptions and a range of criteria encompassing not just environmental factors, but social and economic factors as well. The Town has suggested certain criteria used in the past. CEAC has suggested other criteria that are broader in scope. It remains for the Town to choose its criteria and to carry out a comprehensive evaluation of the various growth options on that basis. Council has an onerous responsibility to safeguard the future of the Town of Caledon and must take decisions based on quantifiable information encompassing social, environmental and economic factors.

The Town Planning team has suggested that there already exists a range of policies which potentially could safeguard quality of life and the environment as urban development takes place. CEAC agrees that these policies are part of the necessary system to preserve a high quality environment. This system currently is based upon an assumption of five-year Official Plan reviews. CEAC believes that unless these policies are more actively and more frequently applied in a Town-wide monitoring system to assess actual conditions, socio-ecological quality of life will suffer.

CEAC notes that the Neptis Foundation population projections are lower than the Greater Golden Horseshoe projections which are now driving population allocations in Peel Region. CEAC believes that the Neptis set of assumptions and projections are worthy of consideration particularly as they suggest much less rural land may be required and that a slower rate of growth may be all that is necessary to accommodate future urban development.

**CEAC believes that it is premature for Council to choose a fixed population growth number that will apply 25 years hence. It simply does not have enough credible, solidly based information on which to take such a decision. If there is general agreement on this premise, then Council's best course of action would seem to be to adopt the slowest growth option deemed practical, and to monitor and manage growth on an incremental basis over the next 25 years based on observation and measured results.**

**Background Documentation and Other Sources:**

- Local Growth Overview, Executive Summary, 1994
- Staff handout entitled *Town-Wide Population Forecasts and Distribution Community Meeting*, September 19, 2005
- Federation of Canadian Municipalities, *Growth, the Economy and the Urban Environment*, Quality of Life in Canadian Communities, Theme Report # 3, 2005
- Sustainable Seattle (web source), *Indicators of Sustainable Community 1998*, <http://plonenw.onenw.org/SustainableSeattle/Programs/RegionalIndicators>
- Ontario Nature, Submissions on Draft Greater Golden Horseshoe Growth Plan, April 2005, January 2006, selected excerpts
- C.N. Watson and Associates Ltd., *Proposed Official Plan Growth Targets and Preliminary Economic Analysis Thereof*, handout prepared for Council Workshop, February 27, 2006
- Neptis Papers on Growth in the Metropolitan Toronto Region, (March 2006), *Commentary on the Ontario Government's Proposed Growth Plan for the Greater Golden Horseshoe*
- Dunning, W. Inc., (January 2006) *Economic influences on Population Growth and Housing Demand in the Greater Golden Horseshoe*, Neptis Studies on the Metropolitan Toronto Region
- Environmental Commissioner of Ontario, *2004-2005 Annual Report*
- *2000 Humber Watershed Report Card*
- *2005 CVC Report Card*

## Appendix 1

### **Environmental and Quality of Life Indicators for Growth**

Principles:

- Indicators are absolutes drawn from a baseline condition or thresholds. This helps avoid cumulative impacts.

i.e. X% forest cover shall be maintained within a set area. Not, forest cover shall not decline by more than X% per year, nor forest cover shall be maintained at X% across non-urban portion of municipality.

All indicators below assume a 2006/07 baseline condition. Indicators citing ‘no increase’ or ‘no net increase’ assume from an 06/07 baseline (06/07 is an ideal – baselines may have to be set over next few years as data is collected)

- There are two types of indicators – those that measure compliance with policies or programs and those that measure environmental or quality of life attributes.

i.e. indicators that the Oak Ridges Moraine Plan are being enforced are process indicators, indicators of the ecological health of the area covered by the ORM plan are actual environmental indicators.

- There are thresholds below which ecological services/ecosystem integrity are irreversibly degraded or lost.
- Caledon has 3 distinct bioregions: The Peel Plain, the Niagara Escarpment, The Oak Ridges Moraine and the moraine/sand-hills north and west of the ORM and Niagara Escarpment. Environmental Indicators should be sensitive to these features.
- Caledon is particularly valuable as a headwaters area and contains headwaters for the Humber, Credit and Etobicoke Creek. Population distribution should be sensitive to the varying characteristics of these headwaters/watersheds, such as cold water and warm water stream systems.

Possible environmental indicators:

*Objective:*

- Maintain water quality

*Indicator:*

- Imperviousness

*Threshold:*

- No more than 10% of any watershed shall be impervious (hard surfaced)

(based on work by: Booth 1997; Booth 2000; Knutson and Naef, 1997; Klien 1979; Booth and Jackson 1994; Snodgrass 1992; Schueler 1994; May *et al.*, 1997; Limburg and Schmidt, 1990; Taylor, 1993; Weaver, 1991)

*Objective:*

- Maintain water quality and wildlife (spawning)

*Indicator:*

- Particulate loads

*Threshold:*

- Where and when possible suspended sediment concentrations should be below 25 milligrams/litre or be consistent with Canadian Council of Ministers of the Environment (1999) guidelines. (Environment Canada 2004)

*Objective:*

- Maintain forest health and attendant ecological functions and services

*Indicator:*

- Maintain full suite of breeding forest birds within a watershed/landscape (forest birds are used as a surrogate indicator of forest health)

*Threshold:*

- Maintain or restore minimum 30% forest cover each on the Peel Plain, Niagara Escarpment, Oak Ridges Moraine and northern sand hills/moraine. ( Environment Canada 2004, of note: Freemark, 1988)

\*\*\* a variation\*\*\*\*

*Objective:*

- Maintain health of existing habitat

*Indicator:*

- No loss of ecological functions from adjacent land use change (There is literature to support that urban land use has a negative impact on ecological functions, such as forest breeding bird habitat, more so than most agricultural land use. See also, TRCA's terrestrial natural heritage strategy. Urban land use will in most cases likely cause a decline in adjacent habitat quality, for example established ESA's, wetlands, Niagara Escarpment natural and protected areas, significant woodlands, etc.. would decline with introduction of nearby urban land use (even if habitat itself was 'untouched'))

*Threshold:*

- Increase forest cover to 30% on Peel Plain or maintain current agricultural land use outside of settlement areas.

*Objective:*

- Maintain biodiversity and water quality and quantity

*Indicator:*

- Wetland land cover

*Threshold:*

- Maintain or restore pre-settlement percentage wetland cover on Peel Plain, Niagara Escarpment, Oak Ridges Moraine and northern sand hills/ moraine.

*Objective:*

- Water quality/aquatic biodiversity

*Indicator:*

- Natural stream-courses

*Threshold:*

- 'day-lighting' – No increase in buried streams other than necessary for roads/transportations/utilities

*Objective:*

- Water quality/aquatic biodiversity

*Indicator:*

- Natural stream-courses

*Threshold:*

- No increase in streams with constructed hard surfaces – nor conversion within storm water management structures

*Objective:*

- Maintain air quality

*Indicator:*

- Carbon emissions

*Threshold:*

- No increase in net carbon emissions within town (carbon neutral development)

NOTE: can combine with forest cover objectives. Can be tied to development in various ways – one detached single family residential unit can be assumed to have a certain carbon footprint (two cars, heating, electricity, etc..) – footprint must be offset elsewhere within Town.

*Objective:*

- Maintain air quality/reduce waste/sustainable use

*Indicator:*

- Residential and industrial solid waste disposal

*Threshold:*

- Maintain or reduce absolute level of waste disposal by residences and businesses within Town (no shipping it out Toronto style!)

*Objective:*

Lessen loss of rural and natural land uses

*Indicator:*

Conversion of land use on an area basis from rural/natural to urban

*Threshold:*

\*\*\* need formula for more intense urban use – say units per hectare –although something more subtle would be better – maybe better measured by transit – units within X distance of major trunk bus route, Go train or other form of mass transit.

**Appendix 2 – refer to next 3 pages – excerpt from Neptis Report**