



**Submission to the Ontario Growth Secretariat,  
Ministry of Energy and Infrastructure  
regarding**

***Simcoe Area: A Strategic Vision for Growth***

**Residential and Civil Construction Alliance of Ontario**

**Mr. Andy Manahan, Executive Director  
25 North Rivermede Road, Unit 13  
Vaughan, Ontario  
L4K 5V4  
Telephone: 905-760-7777 and 1-866-531-1608  
Fax: 905-760-7718**

**September 1, 2009**

On behalf of its members and stakeholders in the wider construction and infrastructure sector, the Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to make a submission to the Ontario Growth Secretariat of the Ministry of Energy and Infrastructure regarding the Discussion Paper *Simcoe Area: A Strategic Vision for Growth*.

The Residential and Civil Construction Alliance of Ontario (RCCAO) was formed in 2005 as an alliance composed of management and labour groups that represent all facets of the construction industry. Our members include companies and workers who build both low-rise and high-rise homes as well as roads, sewers and water mains, bridges and other infrastructure.

The RCCAO consults with governments, the private sector and the construction industry to devise solutions to issues related to public infrastructure and advocate for adequate investment in public transit, roads and highway, water and sewer systems and other public infrastructure essential to economic growth and quality of life. We provide research and reports, and make recommendations on how to realistically ensure adequate infrastructure for the province.

The RCCAO members are:

- Joint Residential Construction Council
- Heavy Construction Association of Toronto
- Greater Toronto Sewer and Watermain Contractors Association
- LIUNA Local 183
- Residential Carpentry Contractors Association
- Carpenters' Union
- Toronto and Area Road Builders Association
- International Union of Operating Engineers, Local 793
- International Union of Painters & Allied Trades, District Council 46

As mentioned in a previous submission to the Minister of the Environment Regarding Bill 99: The Lake Simcoe Protection Act, 2008, RCCAO supports the principle of planning for sustainable growth in the Simcoe area. In order for the strategy to have weight, however, it must be congruent with and support the principles stated in *Places to Grow: Growth Plan for the Greater Golden Horseshoe* (2006).

RCCAO, its members and stakeholders in the construction and infrastructure sector believe that the proposed objectives outlined in the discussion paper provide a good framework for a strategic growth plan. There is no doubt that proper growth planning for the Simcoe area will result in better communities and overall quality of life for those people living there in the future. To efficiently manage the growth in that area, however, the objectives and outlines for the plan need to be further clarified and enhanced so that building efforts and proper

infrastructural support and investment can be planned and executed in a focused way.

While the RCCAO supports the principles outlined in the Discussion Paper, its members and stakeholders suggest that, in clarifying boundaries and regulations, consultation amongst the various key planners and stakeholders who have a hand in developing the area is essential.

This submission responds to the Discussion Paper by directly addressing a number of the directions and guidelines laid out in each of the numbered substantive sections. In doing so, RCCAO has responded by identifying any potential concerns and providing recommendations for alternative approaches or modifications, where necessary.

## **Section 1: Introduction**

RCCAO recognizes and supports the special need for provincial intervention in Simcoe region planning for the reasons identified in the introduction. Clearly, the Barrie-Innisfil dispute had reached an impasse that was not going to be resolved locally. More broadly, the planning issues relating to Simcoe growth and the trade-offs around environmental concerns in the Lake Simcoe watershed required decisions well beyond the capacity of small and scattered local governments.

The Vision Paper reiterates Simcoe's total population allocation of 667,000 for the Single and Lower-Tier Municipalities in the Simcoe Area (2006-2031) while shifting allocations among component municipalities. The population allocation for the Area was scheduled for review in 2011. It is unclear, given the new detailed population allocations contained in the Vision Paper, whether the 2011 review is still required by the Province.

***Recommendation a)***: RCCAO recommends that this 2011 review proceed as a necessary check on the adequacy of growth forecasts and that it is completed on a timely basis.

## **Section 2: Guiding Principles**

RCCAO supports the five Principles described in this section. The challenge, of course, becomes how to weight different principles when they come in conflict with each other. In general, RCCAO is pleased with the net balance struck between additional growth for the region to 2031 and environmental protection, as well as the ratio of intensification to Greenfield development.

In particular, RCCAO strongly supports principle e), that “Decisions about growth planning and infrastructure investments must be coordinated and mutually reinforcing, so that growth pressures will not be created where they are not desirable.”

**Recommendation b):** There is a critical corollary to this which should be stated explicitly: That where growth is desired, infrastructure investments must be timely and sufficient to ensure that infrastructure enables and stimulates growth. While this is particularly true of Greenfield growth, where new services must be in place before development can proceed, it is equally valid in the case of infill development. Intensification depends on transportation access, sewer and water capacity to enable and attract residents and business to higher density neighbourhoods.

## **Section 3: Directions for Growth**

### **3.1 Strong and Vibrant Urban Nodes**

The Vision Paper proposes to focus population and employment growth in five nodes consisting of Barrie, Collingwood, Orillia, Alliston and Bradford, with Barrie serving as the anchor urban node.

RCCAO supports the hierarchy of settlement areas and believes that Barrie will serve as a prime investment location for the development of infrastructure to support the projected population growth as well as contribute to employment growth in the area.

**Recommendation c):** There is no doubt that the majority of the growth plan will need to be focused in the urban nodes. However, attention should also be paid to how supporting infrastructure is developed in the smaller, less urban nodes. While the paper suggests enough development to support limited growth in accordance with their current scale function, lands in those areas should be allocated to support planning for future growth as well.

**Recommendation d):** RCCAO also suggests that the Midland/Penetanguishene area be designated as an important priority among the lesser nodes. Because of its location, harbours, historical sites and other amenities, this area serves an important recreational function and has the potential to grow further as the urban nodes become even more concentrated.

**Recommendation e):** RCCAO suggests that the node boundaries be defined through a consultation process with local government, related agencies, the public and industry in conjunction with the province. This will ensure that local business and community interests are properly represented.

### 3.2: Focused Growth Allocations

**Recommendation f):** RCCAO requests that the Province provide more detail regarding the timelines for finalizing Official Plan Amendments and Regional Official Plan Amendments in conformity with this Vision Paper.

### 3.3: High Quality Job Opportunities

RCCAO supports the *proposed strategic employment areas*, located on Highway 400 (Innisfil Heights and Highway 88) and the Highway 11 Economic District in the Simcoe Official Plan (not approved) which includes the Barrie/Orillia/Oro Airport north of Barrie & Highway 12/Rama Road (County Road 44).

**Recommendation g):** Parallel to our suggestions and concerns for the urban nodes, RCCAO recommends that the *proposed strategic employment areas* boundaries be defined through a consultation process with local government, related agencies, the public and industry in conjunction with the province, particularly to address the limits of each proposed *strategic employment area*. The consultations should also address how the Province will provide transition regulations for these areas.

**Recommendation h):** RCCAO suggests that the Province allow for a broad range of land uses within the proposed *strategic employment areas* including some mix of live/work opportunities (e.g., intensified housing close to workplaces), recreational uses and complementary developments.

**Recommendation i):** Public concern over “sprawl” in Simcoe Region and the potential expansion of employment lands has been fuelled to a certain degree by the growth of commercial/industrial development along the southern Barrie border. Since much of the Highway 400 corridor has a parkway feel as it proceeds through rural landscapes, the visual impact of a sudden band of warehouse and big-box developments adjacent to the highway strikes many people as particularly jarring. Given the clear need to establish essential employment opportunities in the sites identified by the province, it is in the public interest to do so in ways that best preserve the rural parkway feel of Hwy. 400 and maximize public acceptance. RCCAO proposes that the Province, in consultation with all stakeholders, develop site standards for the highway margins and adjacent employment lands (including arboreal screening, berming, building and yard orientation, signage, etc.) that will cost-effectively “streetscape” the 400 corridor through the employment lands.

**Recommendation j):** RCCAO also requests that when any of the above noted information is established for the proposed *strategic employment areas*, it is released to the environmental registry for public comment.

### **3.4: Compact and Complete Communities**

The creation of *complete communities* will require long-term, staged planning.

**Recommendation k):** RCCAO recommends regulating the planning in accordance with expected growth rates in those areas. If development areas in the urban nodes are properly mapped out in accordance with expected employment and population growth rates, then long-term staged planning will provide efficient and expedient infrastructure support for those areas.

### **3.5: Preserving Rural Assets and Reducing Sprawl &**

### **3.6: Healthy Lake Simcoe, Nottawasaga River and Severn Watersheds**

While noting the importance of recreational seasonal or second homes to the Simcoe Region, the Vision Paper suggest that such new developments would be limited to areas “where full municipal or communal services are available, and where there will be no negative impacts of the natural environment and agricultural lands.”

Yet elsewhere in the Paper, the Province calls for consideration of “innovative green infrastructure solutions.” Such solutions often will not rely on municipal servicing but may have project-specific storm and waste water treatment that are managed on site, to higher standards than if discharged through a municipal water treatment system. Relative to some agricultural uses, with very high phosphorus run off, housing developments of this type may provide a net reduction in phosphorus load, soil run off and other environmental impacts versus current use.

**Recommendation l):** The standards for evaluating new development should look at the reliability, environmental impact and sustainability of the project versus current uses and evaluate such alternatives on their merits.

## **Section 4: Supporting the Vision**

### **4.1: Simcoe Area Land Budget**

The process outlined in the Land Budget section suggests that current owners will face a long period of uncertainty before they know whether current zoning designations will be upheld. This presents a grave financial and planning limitation for land owners. RCCAO requires further information in order to recommend a preferred approach, but flags this issue as a serious concern in finalizing the plan.

## 4.2: Barrie-Innisfil Boundary Resolution

While RCCAO has never taken a position on the specific boundary issues, we are very pleased to see a potential resolution of this long-standing dispute in order for development, as allowed, to proceed.

**Recommendation m):** In evaluating public comments on the proposed settlement before implementing a final decision, RCCAO encourages the Province to give particular weight to options that maximize the value of infrastructure investments including the GO Transit station and existing Barrie transit and water/wastewater investments.

## 4.3 Water, Wastewater, and Stormwater Management

Adequate planning and infrastructure capacity to deal with water, wastewater and stormwater is critical to both growth and environmental protection. Certainly until the governance structure in the Region is re-evaluated (see 4.5, below) and likely even after any resulting changes, coordination of water issues across the diverse regions and watersheds would best be managed under a regional approach.

A servicing board that covers a larger area would be able to address more efficient servicing solutions unencumbered by political boundaries. Thus a project in a small municipality might be more efficiently serviced through expansion of the adjacent system from Barrie or Orillia, for example. A regional board would be better able to implement this expansion solution.

**Recommendation n):** RCCAO supports the introduction of a broadly-based, regional servicing board to govern and expand the capacity and integration of water/wastewater infrastructure. This will be particularly valuable in the Simcoe area which has a plethora of small municipal governments with limited planning and financing capacity.

RCCAO is very concerned with the targeting of phosphorus caps on the existing treatment plants relative to other sources of phosphorus.

As noted in our earlier response to the Draft Lake Simcoe Plan, according to the figures cited by the Government in its Discussion Paper for the Lake Simcoe Protection Plan, the main sources of phosphorus in Lake Simcoe are inflowing rivers (37%) and atmospheric deposition (34%). Phosphorus that enters the Lake as a result of waste water from sewage treatment plants accounts for a small percentage of the total amount (7%).

Although waste water is only the fourth largest source of phosphorus pollution affecting Lake Simcoe, we believe that several positive steps could be taken to reduce its impact on the Lake Simcoe watershed even further.

Section 3.2.5 of Places to Grow features provisions that will minimize the impact of environmental pollution on Lake Simcoe. These include:

- Municipalities should generate sufficient revenue to recover the full cost of providing municipal water and waste water systems;
- Municipalities that share an inland water source and/or receiving body of water should co-ordinate their planning for potable water, stormwater, and waste water systems to ensure that water quality and quantity is maintained or improved;
- Municipalities, in conjunction with conservation authorities, are encouraged to prepare Watershed plans and to use such plans to guide development decisions and water and waste water servicing decisions; and
- Municipalities are encouraged to implement and support innovative stormwater management actions as part of redevelopment and intensification.

**Recommendation o):** In addition to those listed above, further positive steps that could curb the inflow of phosphorus from residential, commercial and industrial uses or developments include passage of new legislation and regulations currently being developed by the Ministry of Energy and Infrastructure to replace the unproclaimed *Sustainable Water and Sewer System Act, 2002* to:

- Require full cost pricing for water;
- Establish mandatory metering to control how much water is used (and ultimately returned to the Lake); and
- Create dedicated reserves to ensure that water and waste water infrastructure is always adequately maintained and operating at peak efficiency.

#### **4.4: Transportation**

As noted in the Vision Paper, the Province will undertake an area transportation study that conforms to the Growth Plan. RCCAO strongly supports the merits of undertaking a transportation study, as the study would address infrastructural needs that are needed in the Simcoe area and allow for the province to identify necessary work which may not have been determined earlier.

#### **4.5: Coordinated Servicing**

Before long, the Province will need to come to grips with the governance issues in the Simcoe Region. Few observers believe that the existing municipalities have the size, planning capacity or will to deal with the complex growth issues they face.

**Recommendation p):** That the Province initiate a public consultation relating to options for amalgamating smaller municipal bodies in Simcoe region or



developing an effective regional structure, with an aim to implement changes within the next five years.

## **Section 5: Next Steps**

The Vision Paper notes that the Province will undertake a Simcoe area infrastructure plan, which includes but goes beyond a wastewater strategy. RCCAO is very supportive of this approach and would welcome the opportunity for input into such a plan.

***Recommendation q)***: The Province should provide further details for the Simcoe Infrastructure Study, including a clear statement of objectives, deadlines and the process for public input. This should be released to the environmental registry for public comment.

---

We appreciate the opportunity to provide comments on this Vision Paper. If you have any questions or comments regarding this paper, please do not hesitate to contact the undersigned. We look forward to an opportunity to discuss this paper with you in the near future.

Sincerely,

Andy Manahan,  
Executive Director