



## **Preliminary Comments Regarding Rural, Natural Heritage, and Environmental Sustainability Policy Directions**

**December 2016**

Based on a review of the “Rural and Natural Heritage Policy Directions” presentation made to the Policy and Development Sub-Committee by Don Campbell on November 7, 2016 and discussion during the presentation with Don Campbell and Leah Smith; Draft Rural, Natural Heritage, and Environmental Sustainability Policy Directions received November 11, 2016; review of Sustainability Policy Brief with Policy and Development Sub-Committee with Leah Smith on February 4, 2016; and review of the Sustainable Building and Development Guidelines with Leah Smith on May 6, 2016, the Burlington Sustainable Development Committee (SDC) would like to provide our comments on these Policy Directions; and Strategic Initiatives and Advocacy for Change to Provincial and Regional Policies.

The Burlington Sustainable Development Committee generally supports the proposed Policy Directions and looks forward to working with City Staff in developing them in further detail. The committee would like to see a continually evolving policy framework based on emerging research which would allow change to specific policies as required. The City of Burlington should work in collaboration with Halton Region and Conservation Halton to ensure our geographic region will maintain a fluid Natural & Cultural Heritage System.

We offer the following comments and recommendations as they pertain to SDC Principles and Objectives (Appendix A)

## Detailed Comments on Policy Directions

### **Policy Direction A – Rural Community – Establish the protection and strengthening of the rural community as the policy framework guiding planning and development in the rural area:**

- i. Maintaining rural community
  - The proposed Land Use Vision must consider the economic viability of farming. Without it we will not be able to maintain the rural community.
  - Emphasis should be on productive agriculture that benefits particularly the growing & selling of food.
  - Deemphasize other uses such as equestrian facilities.
  - Rehabilitate and maintain deteriorated natural heritage features such as creeks.
  - Discourage non-compatible activities such as ATVs, or off road motorsports.
  - Consider using this objective in the Land Use Vision - Promote policies that improve the long term sustainability of local agriculture and the rural community. Increase the supply of local, affordable and nutritious food. Protect agricultural land from loss and fragmentation.
- iii. Directing Non-Farm Development to Settlement Areas
  - Develop policy to encourage migration of farm residences into settlement areas.
  - Move beyond restricting lot creation outside Rural Settlement Areas towards full prohibition.
- iv. Infrastructure
  - It is unclear what is considered a **major** infrastructure project.
  - It is important that the criteria used for evaluating infrastructure projects are appropriate and well defined in order for us to demonstrate our conclusions are correct, particularly in the case that we object to projects which are outside our scope of approval.
- v. Community Improvement Plan (CIP) – Are we going to develop mechanisms for re-capturing the funds we provide particularly if the farmer starts to make a profit from our investment?
- vi. Water and Wastewater Services – Need to develop a policy how to handle the situations where there is not enough water or water is removed (such as bottled water).

### **Policy Direction B – Provincial Land Use Plans – Incorporate mapping identifying the boundaries and land use Provincial Plans in effect in Burlington.**

- No comment.

### **Policy Direction C – The Agricultural System – Identify the Agricultural System and include mapping and policies to protect the Agricultural Land Base and support the long term viability of the Agricultural System and fare operations.**

- iii. Protecting Agricultural Land
  - Consider the use of taxation tool outside the Official Plan such as taxing grass around large homes as residential instead of agricultural.
  - Instead of limiting creation of new lots, consider not allowing them at all.
  - Clarify the rationale for limiting the size of new lots not greater than 0.8 hectares instead of something smaller such as 0.4 hectares
- v. Compatibility between Agricultural and Non-Agricultural Uses – Consider limiting non-Agricultural uses to non-prime land.
- vii. Horticultural uses – emphasize local, indigenous, non-invasive

**Policy Direction D – The Natural Heritage System- Designate the Natural Heritage System and adopt policies to protect and enhance the Natural Heritage System (NHS) and the Key Natural Heritage Feature within it.**

- i. Defining and Mapping the Natural Heritage System – It is important to maintain an interconnected and resilient system of natural areas. We should use a strategy similar to the Terrestrial Natural Heritage System Strategy (<https://trca.ca/conservation/greenspace-management/terrestrial-natural-heritage/>) used by the Toronto and Region Conservation Authority to target areas to add to the NHS and improve the connectivity of the Natural Heritage System.
- ii. Regulating Development in the NHS and in Key Natural Heritage Features
  - Greenbelt NHS Policies in the Halton Official Plan need to be clarified before being into the City’s Official Plan (City of Burlington’s interpretation of the Halton OP policies needs to be clear to us before incorporating or elaborating in the our OP).
  - Consider using this objective in the policies being developed. – Protect and enhance Burlington’s natural features to ensure that shorelines, natural water courses, wetlands, flood plains, woodlands and forestry tracts, as well as notable landmarks such as the Niagara Escarpment, are preserved for future generations. Improve the connectivity of natural features to enhance the natural heritage system. Preserve habitat to maintain and increase biodiversity and protect species at risk.
- v. Land Securement - Encourage donation of hazardous land by disallowing other uses.

**Policy Direction E – Mineral Aggregates – Establish a policy framework to ensure that the City’s interests are satisfactorily addressed in applications for new or expanded aggregate operations and during and after extraction operations and also adopt policies and mapping to protect known mineral aggregate resource deposits and existing mineral aggregate operations to comply with Provincial requirements.**

- ii. Protection of Existing Mineral Aggregate Operations and Potential Mineral Aggregate Resource Areas

- Consider using the following Objective in the policies being developed. - Sustainably manage and protect natural resources such as water, minerals and fertile lands. Reverse degradation of natural resources when feasible.
- Based on Appendix H the policy needs to be clarified with respect to the development west of Lowville, north & west of Kilbride and north & west of Mount Nemo; will these impact Potential Mineral Aggregate Resource Areas?
- v. Rehabilitation and After-Use – It is important for the City not have to maintain site in the After-Use phase. For example at Nelson Quarry, the City may have to maintain pumping station to supply water to the Camisle Golf Course.

**Policy Direction F – Cultural Heritage Landscapes – Adopt policies requiring that the conservation of cultural heritage landscapes is addressed when major development is proposed in the Rural Area and attached associated mapping**

- Please define what is considered a major development.
- The identification stage needs to be early enough in the process so the map of Cultural Heritage areas is complete, well defined and understood e.g. Mount Nemo.

**Policy Direction G – Golf Courses – Incorporate policies respecting golf courses.**

- Need to make it more difficult to convert golf courses to residential to minimize the impact on growth plan for urban area from redesignation.
- If redevelopment is to take place consider prioritizing recreational land-use / park space.
- Need to ensure rural area golf courses go back to their original use like NHS, or agriculture use.

**Policy Direction H – Environmental Sustainability – Establish city-wide policies on environmental sustainability.**

- General – Prefer to have all relevant policies listed in the current official plan that will be incorporated in this area. Ensure prospects for future waste disposal options (ie. waste generated electricity) and brownfield rehabilitation are included.
- i. Sustainable Design
  - We are in general agreement with the approach being proposed of separating Required from Voluntary given the current authority of the City. We look forward to working with City staff in the further development of the approach and guidelines. Note this approach is going to need a lot of training and development of not only for City Staff but Developers as well.
  - With Land Reform Planning Changes taking place we strongly urge the City to lobby the Provincial government to obtain the same authority as the City of Toronto for Tier 1 Green Standards

(<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=f85552cc66061410VgnVM10000071d60f89RCRD>) particularly as it relates to Climate Change and Energy.

Developers in many instances are not meeting standards needed for us to achieve our Strategic Plan goals (ie. carbon neutrality, balanced transportation system).

- ii. Water Resources
  - Consider climate change - mitigation and adaptation when developing policies. Protect ground water for water supply sustainability; and identify threats of contamination and extraction.
  - Consider use of this objective when developing policies. - Protect water courses in their natural state and encourage the restoration of water courses that have been degraded. Encourage low impact development design and use of best practices to improve storm water quality and reduce the quantity of storm water sent to traditional storm water infrastructure.
- iii. Urban Forestry
  - Ensure rural forestry (woodlot management) is compatible with (does not mean same) and supportive of urban forestry policy (and vice versa).
  - Consider use of this objective when developing your policies - Promote the preservation, management and planting of trees and other vegetation on private and public property within the City. Encourage the use of native, non-invasive and diverse species.
- iv. Climate Change and Energy – Consider this objective when developing these policies. - Promote net zero carbon energy generation and usage. Increase energy conservation through efficient land use planning and building design. Encourage sustainable local thermal and electrical energy generation and the supporting distribution network. Adopt low emission forms of transportation. Take all opportunities to switch from fossil fuel to renewable and electricity-based technologies.
- v. Urban Agriculture and Local Food
  - Consider implementing some of the strategies employed by the London Urban Agriculture Strategy (<https://www.london.ca/business/Planning-Development/current-topics/Pages/Urban-Ag-Strategy.aspx>) specifically with respect to facilitating new projects, removing barriers, improving generational connections and focusing on improving resilience.
  - Facilitate partnerships between urban and rural residents to provide additional opportunities for community gardens in the rural area on underutilized land.

**Detailed Comments on Strategic Initiatives and Advocacy for Changes to Provincial and Regional Policies**

**General** – Please provide further detail regarding the Strategic Initiatives for Environmental Sustainability.

- 1. A Rural Community Improvement Plan (CIP)** – It is important for us to benchmark and learn from others who have successfully carried this out before us.
- 3. Balancing Agriculture and Natural Heritage Conservation** – Needs to be done with care.
- 4. Streamlining Development Approval Process** – Agree with concept of streamlining but do not want to lose the elements that control the types of development we don't want.
- 5. Developing Rural Infrastructure** – Need to define the type of infrastructure required.

Sincerely,

Members of the Burlington Sustainable Development Committee

## Appendix A

The following represent a subset of SDC Principles and Objectives most relevant to the proposed Urban Structure and Intensification Policy Directions.

### Sustainable Development Committee Principles:

**Support Responsible Development** that promotes efficiency and enhances the quality of life.

**Protect the Environment** in both a proactive and remedial manner, with emphasis on anticipation and prevention.

**Make Decisions** that recognize recognize the interdependence of humans and nature in a common ecosystem.

**Promote Responsible Stewardship** to ensure equitable use of natural and environmental resources in order to meet essential needs and both present and future generations.

### Sustainable Development Committee - Objectives:

<b>Protection of Natural Resources:</b> Preserve and extend accessible green spaces, shorelines, natural water courses and the Niagara Escarpment for future generations.
<b>Reforestation of the City:</b> Promote the replanting and management of vegetation on private and public property within the city.
<b>Full Public Participation in Development Decisions.</b> The public should be part of all planning decisions. Economic, environmental and social impacts of proposed developments should be considered.
<b>Actively Promote Sustainable Development:</b> Advocate changes at the senior levels of government, as well as in the city, in order to evolve towards sustainability.
<b>Best Use of Land.</b> Promote the best use of land based upon an ecosystem approach to ensure environment integrity and diversity. To include but not limited to promoting environmentally sensitive lands and fertile soil for agriculture throughout the municipality.
<b>Protection and Enhancement of Natural Features:</b> Protect and enhance Burlington's natural features by ensuring that the physical features of shorelines, agriculture lands, flood plains, forestry tracts and notable landmarks such as the Niagara Escarpment are preserved for future generations.
<b>Natural Storm Water Management:</b> Protect water courses in their natural state and for those water courses that have been significantly altered, restoration to a more natural state will be encouraged as opportunities arise.
<b>Balanced Development.</b> Provide a community plan and an economic strategy aimed at creating sustainable and appropriate forms of development that reflect human scale and a sense of community as well as representing a balance between urban development and natural surroundings.
<b>Minimal Discharge of Toxic Pesticides and Other Toxic Chemicals:</b> Promote the elimination of private and public use of toxic pesticides and other chemicals that have negative effects on the environment, particularly those known to be persistent.
<b>Responsible Use of Natural Resources:</b> Encourage conservation of natural resources; the city should work towards ensuring that users are charged for the full local costs of their individual use of water,

electricity and sanitary sewers. There should also be educational programs to encourage conservation of natural resources.

**Integration of Natural Features and Green Space:** Integrate natural features and green space in all new developments and intensification projects.

**Energy Conservation.** Promote energy conservation through efficient land use planning and building design.