

Comments on: Shape the Future: The Report of the Central Ontario Smart Growth Panel

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1. Introduction

The Pembina Institute was pleased to have the opportunity to comment on the Central Ontario Region Smart Growth Panel's report *Shape the Future*, released February 21, 2003.

The Pembina Institute is a not-for-profit environmental policy research and education organization, with offices in Toronto, Ottawa, Calgary and Drayton Valley Alberta. The Institute regards smart growth policies as being central to addressing the severe air quality problems in southern Ontario and the fulfillment Canada's commitments under the Kyoto Protocol to reduce its greenhouse gas emissions. Smart growth policies are also essential the protection of prime agricultural lands, ecologically significant areas and source waters in the region. These points were outlined in the Institute's recently published study *Smart Growth in Ontario: The Promise vs. Provincial Performance*.

The Institute regards the publication of the Panel's February discussion paper as an important step in the smart growth process in Ontario.

2. General Comments

The Central Region Panel's report defines the problems related to urban growth and development in the region almost entirely in terms of gridlock and its impacts on air quality, commuting times, and increased taxes due to infrastructure costs (pg.4). In doing so, the report overlooks other key problems being created by current urban development patterns in central Ontario. These include the loss of prime agricultural lands, which are heavily concentrated in southern Ontario, threats to surface and ground water sources, the loss of ecologically significant areas, and the lack of affordable housing in the region.

The overall vision presented by the panel is disappointingly vague. While it outlines some promising directions, it generally fails to propose substantive implementation measures to support a smart growth vision for the region. The only element of the panel's vision expressed in specific terms is that related to transportation infrastructure. The panel places a strong emphasis on 'economic corridors' (i.e. highways) in this regard. In particular, the panel appears to propose a series of major extensions of highway capacity within the region, largely into areas that it would be expected that a smart growth strategy would protect from urbanization. These include:

- The extension of highway 427 across the Oak Ridges Moraine and north to Barrie;
- East-west corridors north and south of the Oak Ridges Moraine, with a northern corridor extending from Peterborough to Guelph and then connecting with Mid-penninsula highway to Fort Erie, and a southern corridor from highway 404 to Guelph.

The panel also proposes some transit projects in parallel with these highway developments.

The Panel references the importance of nodal development patterns in its report, (pg.8). However, there seems to be no plan to prevent urbanization along the proposed transportation corridors. In fact, there are references in the report to the preservation and development of employment lands along the major transportation corridors (pg.11).

This strategy, as presented, with the extension of transportation infrastructure in the form of both highways and transit services to unurbanized areas, seems more likely to promote additional sprawl and gridlock than halt it. It is also important to note that the Panel’s transportation infrastructure vision seems to closely parallel the highway construction program that is being undertaken by the province via the SuperBuild Corporation.

3. Comments on specific elements of the Panel’s report

1. Reshaping where and how we live.

The panel’s focus on mixed use nodes, linked by transportation corridors, is a welcome one, as are its proposals to “limit” of impacts on farmland and natural features. Similarly, the panel’s references to the promotion of growth within existing settlement areas, emphasis on compact development within those areas, brownfields development, and good transit services reflect elements that should be present in a smart growth vision for the region. However, the panel proposes no specific policies or measures to support these directions.

At the same time, the Panel makes references to “ensuring that infrastructure is in place to support growth before development happens.” This is a disturbing provision, in that it may imply of the extension of infrastructure to un-urbanized areas, a practice widely associated with the promotion of urban sprawl. The panel also seems to suggest growth outside of existing urban areas will be necessary, particularly in relation to affordable housing and employment lands, especially along transportation corridors. This would seem to imply continued development of the areas between the mixed-use nodes identified in the report, particularly along transportation corridors.

2. Unlocking gridlock.

The panel states that transit should be the first priority for all transportation investments in urban areas. This again is a welcome direction. However, the panel also emphasizes the need for investments in highways, particularly as international trade corridors. This latter component is problematic, as it implies the extension of highways, as outlined by the panel, well beyond existing urban areas. In combination with the panel's emphasis on development along transportation corridors, this seems likely to be a formula for additional urban sprawl.

3. Waste management

The panel's discussion regarding waste management includes a number of very mixed messages. On the one hand, there are references to the desirability of recycling and source reduction, but also on energy from waste, "thermal treatment" (undefined) new waste management (i.e. disposal) technologies. It is difficult to reconcile this focus on disposal technologies with economic efficiency, environmental sustainability or smart growth.

Energy from waste projects, for example, are associated with serious air quality problems in an urban context. The Institute notes the recent shut down of the SWARU energy-from-waste operation in Hamilton due to the facility's inability to meet the Canada-Wide Standards for Dioxin and Furan emissions recently adopted by the Canadian Council of Ministers of the Environment. Energy from waste operations also tend to compete with recycling efforts for the components of the waste stream with the highest energy content, such as paper, cardboard, and certain types of non-chlorinated plastics.

In general the panel should place greater emphasis on the development and implementation of policies to achieve waste diversion through source reduction, reuse, recycling and composting, rather than the establishment of additional disposal capacity.

It is unclear what the panel means by "improved access to private landfill."

4. Optimization of other infrastructure

These elements of the panel's report generally outline welcome directions in terms of the strengthening of social and educational infrastructure, access to broadband technologies and the role of alternative energy sources. However, no specific implementation measures are proposed by the panel to support these directions.

As noted in the in the panel's, investments in sewer and water systems need to focus on the upgrading and renewal of existing systems, not their extension to un-urbanized areas. The same direction should be followed with respect to other types of infrastructure as well.

4. Protecting our natural environment

This section of the panel's report contains a mixture of good, bad, ambiguous and sometimes contradictory recommendations. It is unclear what is meant, for example, by the references to "the protection of rural areas for sustainable resource use." Similarly it is unclear what "appropriate uses" would be identified in relation to unique and irreplaceable features or how "protection" would be implemented for these features or for key resources, natural heritage areas and water sources.

The panel's references to the protection of green infrastructure, and source water protection and watershed planning, are welcome, but again the specifics of implementation are absent.

Mineral aggregates should not be treated in same category as renewable resources, such as prime agricultural lands, ecologically significant areas and source water protection areas. More generally, aggregate resources should not be given overriding priority in land-use decisions. Such an approach would be inappropriate given overall integrative purposes of a smart growth strategy. Indeed, one of the key goals of such a strategy should be to reduce demand for newly extracted aggregate.

4. Overall conclusions

The Central Ontario Smart Growth Panel's report should have marked an important stage in the development of the province's smart growth strategy. Unfortunately, the panel's report is disappointingly vague. It does not articulate a vision for the region in sufficient detail to provide a meaningful assessment of its implications.

The report does contain some important elements, particularly with respect to the need for compact, mixed use, and nodal development, giving priority to transit in existing urban areas, and the need to focus on the renewal and upgrading of existing infrastructure. However, its overall thrust seems more likely to promote than contain urban sprawl.

The central element of the vision presented by the panel is construction of transportation infrastructure, particularly highways to areas outside of existing urban centres. The panel presents no rationale for this approach, and no real strategy to contain growth along these corridors, or more generally within the region. Specific measures to protect ecologically significant areas, prime farmland, and source waters are noticeably absent from the panel's report.

The central region panel needs to revisit its overall approach, particularly the priority it is giving to the construction of transportation infrastructure outside of existing urban areas. If it fails to do so, the panel risks facilitating and encouraging future development patterns that not only lead to worsened air quality, increased greenhouse gas emissions, losses of prime agricultural lands, conservation lands, and source waters, reduced economic efficiency, and increased congestion and infrastructure construction and maintenance costs. Such an outcome would not provide an environmentally, socially or economically sustainable future for residents of the province's central region.