



Sustainable Energy Solutions

**Comments on
Places to Grow: Better Choices, Brighter Future
Proposed Growth Plan for the Greater Golden Horseshoe
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Comments on *Places to Grow: Better Choices, Brighter Future* November 2005

1. Introduction

The Pembina Institute for Appropriate Development (PIAD) is a national, independent not-for-profit environmental research and education organization, with offices in Ottawa, Toronto, Edmonton, Calgary, Vancouver and Drayton Valley, Alberta.

The Pembina Institute has taken a strong interest in issues related to the environmental, economic and social sustainability of urban communities in Ontario over the past three years. The Institute has published several major reports on the subject including: *Smart Growth in Ontario: The Promise vs. Provincial Performance* (February 2003); *Building Sustainable Urban Communities in Ontario: Overcoming the Barriers* (December 2003); *Towards Implementation? Building Sustainable Urban Communities in Ontario* (July 2004); *Building Sustainable Urban Communities in Ontario: A Provincial Progress Report* (June 2005) and *Local Implementation of Smart Growth Policies in Ontario: Three Case Studies* (July 2005).

In addition, the Institute has provided detailed comments on the July 2004 and February 2005 draft Growth Plans, as well as Bill 136, the proposed *Places to Grow Act*, Bill 26 - *The Strong Communities Act*, Bill 135 – *The Greenbelt Act*, the Greenbelt Plan, and the revised Provincial Policy Statement.

The Institute has followed the provincial government's Greater Golden Horseshoe Growth Management Plan initiative from its origins with the Central Ontario Smart Growth Panel. The Institute regards the plan as an important element of the government's overall efforts to promote more sustainable urban development patterns in the region. The Pembina Institute has the following general and specific comments and recommendations on the November 2005 Draft Plan.

2. General Comments and Observations on *Places to Grow*, November 2005

The Pembina Institute highlights the following aspects of the proposed Growth Plan as being particularly noteworthy.

- The emphasis on “complete communities”¹ in both intensification areas (Policy 2.2.3.7) and greenfield developments (Policy 2.2.7.3), including consideration of such factors as connectivity, mixed uses, transit viability, site and urban design and transitions to adjacent areas.
- The retention of 40 per cent intensification target for upper and lower tier municipalities by 2015 (Policy 2.2.3.1.). However, experience in other jurisdictions with areas subject to intense urbanization pressures, including the Australia, the United Kingdom, and British Columbia suggests that the intensification target could be substantially higher.²
- The direction to ministers and municipalities to use infrastructure investments and other implementation tools to facilitate intensification (Policy 2.2.3.8) and the provision that infrastructure investments in support of the plan are to be priorities (Policy 3.2.1.2.) The integration of infrastructure investments with the plan’s overall directions is essential to its successful implementation.
- The incorporation of a mixed-use target for outer ring municipalities (Policy 2.2.8.3.(g)). Such a policy is essential to prevent these municipalities from becoming ‘bedroom’ communities associated with long-distance commuting patterns.
- The direction of new multiple lot and unit residential development away from rural areas (policy 2.2.9.2.) and the prohibition on the establishment of new settlement areas (i.e. “instant towns”) in the GGH. The Institute also welcomes the decision not to establish additional Urban Growth Centres, particularly in Simcoe County, where there are intense pressures for the urbanization of agricultural lands in locations where the establishment of “complete communities” would be virtually impossible and long-distance automobile based commuting patterns inevitable.
- The identification of public transit as the first priority for moving people (policy 3.2.3.1.).
- The incorporation of a full cost recovery requirement for water and waste water systems, including source water protection (policy 3.2.5.1). The Institute also notes the requirements that:
 - Water be returned to the watersheds from which it is withdrawn (policy 3.2.5.3)

¹ *Places to Grow* (November 2005) pgs.8, 11, Policy 2.2.1.(h)

² See Generally Urban Strategies Inc., *Application of a Land-Use Intensification Target for the Greater Golden Horseshoe* (Toronto: Ontario Growth Secretariat, Winter 2005).

- System expansions support the plan's density and intensification targets (policy 3.2.5.4.4).
- Rural area system extensions be limited to those required to address health issues, and service *legally established existing uses* and that such expansions cannot be used to support new development (policy 3.2.5.4.5.)
- The quality and quantity of shared inland water sources or waterbodies be maintained and enhanced on watershed basis for shared *inland water sources*(policy 3.2.5.4.7). However, similar requirements should be applied to municipalities using Great Lakes waters, particularly in the context of the recent Great Lakes Basin Sustainable Water Resources Agreement and Great Lakes Basin Water Resources Compact.³

The Pembina Institute highlights the following areas of major concern with respect to the proposed plan.

A lack of rationale and examination of the impacts of the proposed economic 'corridors' on overall plan goals.

- The proposed Niagara to GTA Corridor, GTA East-West Corridor and 407 East extension remain part of plan (Schedule 6). As the Pembina Institute has noted in its previous submissions on the proposed growth plan, the rationale provided in the proposed plan for these projects is wholly inadequate. The plan fails to provide a meaningful discussion of the potential impacts of these projects on the achievement of the plan's goals with respect to limiting urban sprawl and reducing automobile dependency. The Institute also notes that the individual project environmental assessments for these projects have, to date, failed to consider these factors as well, despite the existence of a well-developed literature describing the relationship between highway expansion and urban development patterns.⁴ The Institute is particularly concerned about the increasing references to the draft Growth Plan as a justification of the need for these projects in individual project environmental assessments⁵ in the absence of a meaningful discussion of their rationale and potential impacts in the development of the Growth Plan.

³ See EBR Registry Number: PB04E6018.

⁴ See generally R.Tomalty, *Submission to the Ontario Ministry of the Environment*

Regarding the draft Environmental Assessment Terms of Reference for the Niagara to GTA Corridor, (Toronto: The Pembina Institute, December 2005).

⁵ See, for example, the Terms of Reference for the 407 East Environmental Assessment and Draft Terms of Reference for the Niagara to GTA corridor.

The Highway 404 northwards extension

- The extension of Highway 404 to Ravenshoe Rd (i.e. effectively Lake Simcoe) also remains part of the plan (Schedule 6). The Highway 404 extension proposal is particularly problematic, as it would provide infrastructure essential to a series of proposed low-density developments in York Region north of the Oak Ridges Moraine, particularly in the Queensville, Sharon, and Holland Landing areas. Such developments would be fundamentally at odds with the overall direction of provincial government policy with respect to development in the Greater Toronto Area, which has attempted to focus urban development in areas south of the Oak Ridges Moraine. Recent amendments to York Region's own official plan⁶ have emphasized the concentration of future urban development in the area south of the moraine where, consistent with the overall directions of the growth plan, the establishment of higher density, transit serviced and mixed used development is more feasible.⁷

The extension would also encourage further inappropriate development in the Bradford area and result in additional pressures for the completion of the Bradford By-Pass. The latter would lay the groundwork for the urbanization of the lands between Bradford and Highway 400 with little opportunity for the development of "complete communities" and embedding long-distance automobile based commuting patterns.

The Pembina Institute also notes that the route of the proposed extension is almost entirely through the newly established GGH Greenbelt, and would invite further extensions through Greenbelt lands along the south shore of Lake Simcoe as far east as Highway 12.

The reduced density targets for 'Outer Ring' municipal Centres

- The November 2005 draft plan proposes of lower density targets for 'outer ring' urban growth centers (e.g. Barrie, Brantford, Guelph, Peterborough, and St. Catharines) compared to the February 2005 draft. The February 2005 draft proposed densities for these locations of 200 jobs and residents per hectare, while the November 2005 draft reduces the target to 150 jobs and residents (policy 2.2.4.5.(c)).

⁶ OPA 43 – the Centres and Corridors Strategy, adopted December 2004.

⁷ See generally M. Winfield and C. Brunt, *Local Implementation of Smart Growth Policies in Ontario: Three Case Studies* (Toronto: The Pembina Institute, 2005).

All of these communities have been focal points for low-density sprawl in recent years, and have also emerged as centres for long-distance commuting patterns. Given that they are intended to serve as focal points for transit services, higher density targets would be appropriate for these locations.

An overly restrictive approach to 'employment lands'

- The general approach to employment lands (policy 2.2.6.) is very unimaginative. The proposed plan would limit conversions of such lands to other uses to the time of comprehensive Official Plan reviews (policy 2.2.6.4.), and would set a series of tests that have to be met for such conversions to take place. These tests include a 'necessariness' test with respect to the achievement of other provincial priorities re: community health and safety (policy 2.2.6.4.(f) and of the environmental sustainability of the community infrastructure needed for conversion (policy 2.2.6.4.(c)). The conversion of "prime industrial lands," a term which is not defined in the plan, to other uses would be prohibited in all circumstances (policy 2.2.6.4.(d)).

In the Pembina Institute's view, these policies may have significant adverse implications for brownfield and greyfield redevelopment that will be essential to meeting the Growth Plan's overall targets with respect to intensification, and by implication reducing the need for additional greenfield development. In addition, the Institute notes that these policies have the potential to block the creative mixed-use redevelopment of existing business areas in ways that retain employment uses, while moving these areas towards being more complete communities.⁸

More generally, the Growth Plan's proposed approach seems premised on an assumption that employment lands will host industrial uses that need to be separated from other land uses, particularly housing, for health, safety and environmental reasons.

It is well established that heavy industry and manufacturing have been in decline in southern Ontario since the mid-1970s for a variety of structural reasons unrelated to land supply or the compatibility of surrounding land uses.⁹ As the draft plan itself admits, employment growth in the region is now strongly concentrated in the service and knowledge sectors.¹⁰ The separation of uses in relation to these types of

⁸ See generally G.Booth, B.Leonard and M.Pawlukiewicz, *Ten Principles for Reinventing America's Suburban Business Districts* (Washington, D.C.: Urban Land Institute, 2002).

⁹ See generally for example, T.Courchene and C.R. Telmer, *From Heartland to North American Regional State: The Social Fiscal and Federal Evolution of Ontario* (Toronto: University of Toronto, 1998)

¹⁰ *Places to Grow*, November 2005 Draft, pg.5.

employment far less essential than it is with heavy industry. In fact, there is a growing literature highlighting the linkages between the types of 'smart growth' urban forms emphasized in the draft plan and the attraction of knowledge and service sector investment and workers.¹¹

More generally the draft plan sets extensive rules for development location, density, and intensification for residential uses, but fails take the same approach on employment lands. This is despite the consideration that employment land sprawl has emerged as a significant problem in the GGH. Poorly designed or located employment land areas that are difficult to service with public transit can embed automobile based commuting and automobile dependence even for short trips.

The greenfield density targets are inadequate to support transit and provide the basis for 'complete communities'

- The plan proposes a greenfield density target of 50 residents and jobs combined, with natural heritage features netted out of the land base (policy 2.2.7.1). At best this will result in business as usual densities, perhaps even less when natural heritage features and areas are taken out of the land base on which density is calculated. A density of 50 residents and jobs per hectare is only sufficient to support minimal transit service. The target is inconsistent with the plan's overall transit first orientation in this sense.

The settlement area boundary expansion rules are ambiguous and potentially weaker than those provided via the PPS

- The proposed approach to settlement area boundary expansions is at best more ambiguous, and potentially weaker, than that taken in the recently revised Provincial Policy Statement (PPS). Under the proposed plan, the Ministry of Public Infrastructure Renewal is to determine greenfield area needed by each municipality (policy 2.2.8.2). The relationship between this provision and the provisions of the PPS requiring that municipalities maintain 3 and 10-year land-supplies (PPS Policy 1.4.1.), subject to requirements to fully exploit opportunities for redevelopment and intensification, before considering settlement area boundary expansions, is unclear.

¹¹ For a summary discussion of these relationships see D.Alexander, R.Tomalto and M.Anielski, *The BC Sprawl Report 2004 : Economic Vitality and Livable Communities* (Vancouver: Smart Growth BC, 2004), pp.1-5. See also Richard Florida, *Cities and the Creative Class* (New York: Routledge, 2005).

The lack of protection of prime agricultural lands

- The plan allows for the urbanization of prime agricultural lands except specialty crop lands (policy 2.2.8.3.d). These provision are inconsistent with the goal of protecting of prime agricultural lands from urbanization, and are particularly problematic given that the majority of the prime agricultural lands under threat of urbanization in the GGH are Class 1 lands.¹²

The reduced protection for natural heritage areas

- The November 2005 draft plan removes the prohibition on the urbanization of natural heritage areas and other lands constituting the natural system contained in the February 2005 draft plan.¹³

Key details are deferred to sub-area assessments

- The proposed plan defers a great deal of specific detail to sub-area assessments to be completed in the future. The deferred issues include the determination of built boundaries, designated greenfield area requirements, the identification of prime agricultural and natural heritage areas, and specific details of transportation and water infrastructure.

The sustainability question

- The Environmental Commissioner of Ontario, in his 2005 Annual Report highlighted the lack of attention given to the question of the overall environmental sustainability of the outcomes that would be achieved if the growth plan is fully implemented, including its projections regarding population growth.

The overall approach taken by the plan to the issue of sustainability is very weak. The plan, for the most part, takes its population growth projections as givens and then directs municipalities to provide land supply (policy 2.2.8.2.) and water services (policy 3.3.5.6.) to accommodate the projected growth. The plan does not consider the possibility that it may not be possible to accommodate the projected growth sustainability throughout the region, or within specific municipalities.

¹² The Neptis Foundation has projected that 69% of the lands that would be urbanized by 2031 under business as usual scenarios in the Toronto Centred Region would be Class 1 lands. See IBI Group and Dillon Consulting Ltd. Toronto-Related Region Futures Study: Interim Report (Toronto: Neptis Foundation, 2002), pg.51.

¹³ *Places to Grow*, February 2005 Draft, Policy 4.2.2.10.

At a minimum the plan needs to identify the major variables that would affect its population projections and the region's environmental carrying capacity and establish mechanisms to consider their impact on the assumptions underlying the plan over time. In fact, the Institute notes that the population growth projections contained in the plan have already been challenged as overestimating the level of growth likely to occur.¹⁴

The factors to be considered should include the regional impacts of global climate change, short term economic conditions, structural changes in the regional economy, energy costs, and shifts in demographic, immigration and migration patterns.

A suite of sustainability indicators should be established as part of the overall monitoring and assessment system for the plan. The Pembina Institute will be publishing a set of indicators related to the environmental sustainability, economic vitality and urban form of a sample of Ontario municipalities early in 2006.

3. Specific Comments on the November 2005 Draft Growth Plan

1. Introduction

1.2.2. Guiding Principles

- The focus on “complete communities” is strongly supported
- An overall goal statement is needed emphasizing environmental sustainability, social well-being and economic prosperity as the desired end points.
- Environmental, social and economic sustainability needs to be identified as a guiding principle for the plan.

2. Where and How to Grow

2.1. Context

- As noted earlier, the focus on industrial uses re: employment areas is odd given the structural changes in the economy noted on pg.5 (i.e. the decline in manufacturing and concentration of growth in the service and knowledge sectors).

¹⁴ See Will Dunning Inc., *Economic Influences on Population Growth and Housing Demand in the Greater Golden Horseshoe* (Toronto: Neptis Foundation, January 2006).

- The vision for 'complete communities' is strongly supported.
- The vision for vision for communities with transit-supportive densities and forms, and mix of land uses is strongly supported.

2.2. Policies for where and how to grow

2.2.1. Growth Forecasts

- As noted earlier, MPIR needs to be clear about the assumptions behind the forecasts and identify and monitor the key variables that might alter the forecasts, Indicators regarding the sustainability of the outcomes being achieved need to be developed.

2.2.2. Managing Growth

- (f) seems premised on continuing the strong separation of employment and other uses. See discussion above. Generally future needs should be defined in terms of available development capacity, rather than simply 'land.'

2.2.3. General Intensification

- 1. The retention of the 40 per cent intensification target is supported, although experience in other jurisdictions (e.g. Sydney Australia, England, Vancouver)¹⁵ experiencing high growth rates suggest that a higher target (i.e. 60%) should be possible and achieved on an accelerated basis (i.e. 2010 rather than 2015).
- 7. The attention to site design and urban design is strongly supported as it is important to gaining public support for intensification.
- 8. The commitment to the use of infrastructure investment to support intensification is a crucial element of the plan and should be given higher profile. Municipal access to provincial infrastructure funding should be tied to the achievement of the density, intensification and other targets outlined in the plan.

2.2.4. Urban Growth Areas

- 5. Density targets for *urban growth centers*. The density targets for the 2nd tier urban growth centers (Hamilton, Mississauga etc) are very low (200 residents and jobs per ha), given that these areas are already urbanized, and intended to function

¹⁵ Urban Strategies, *Application of a Land-Use Intensification Target for the Greater Golden Horseshoe*.

as transit and mixed use development hubs and centres. The density targets for these locations should be increased.

- The density targets for the 'outer ring' cities (Barrie, Brantford, Guelph, Peterborough, and St. Catherines) have been reduced relative to the February 2005 draft (from 200 jobs and residents to 150 per ha). Given that these communities are intended to function as regional transit hubs, and that a number of them have been subject to significant outwards low density sprawl at their peripheries, a higher density target should be adopted for these locations.

2.2.5. Major Transit Station Area

- As with the general intensification policies, the plan needs to require that attention be given to site and area design to ensure the acceptability of developments at these locations to existing communities.

2.2.6. Employment Lands

- As noted earlier the proposed approach to employment lands is unimaginative and potentially counterproductive. The provisions related to the conversion of employment lands are overly restrictive (4), and provide little incentive to encourage more compact and attractive employment areas for which alternative transportation modes to the automobile are viable.
- The reference (8) to the facilitation of compact development and minimization of surface parking is supported, but the plan should go much further regarding the location and form of employment land development to ensure that it supports the plan's overall goals regarding transportation, urban form and the protection of agricultural and natural heritage lands.
- The provisions should permit conversion and redevelopment proposals outside of *municipal comprehensive reviews*. However, such proposals must be municipally initiated, and required to meet the sustainability test outlined in 4(c). The other tests provided in section 4 should be removed.
- The provisions regarding the *Gateway economic zone* (2.2.6.5) need to recognize the significant natural and cultural heritage, agricultural and energy assets in the area.

2.2.7. Designated Greenfield Areas

- 1. Density target. It is unclear if the proposed density target of 50 residents and jobs per hectare is a significant improvement over current business as usual development patterns, particularly when the removal of natural heritage features and

areas from the land base on which density is to be calculated is considered. The latter provisions may result in actual densities that are even lower than the 50 residents and jobs per ha target and therefore not transit viable, and therefore inconsistent with the overall goals of the plan.

With respect to the 'netting out' of natural heritage areas from the land base on which the density target is to be achieved, the Institute notes that even if some locations have a high portion of natural heritage lands, the achievement of the density target is to be measured on over the entire greenfield area not a per individual ha basis. This means that lower densities can be provided in some locations, provided they can be balanced by higher density in others.

- 3. The emphasis on the creation of complete communities, urban form, mixing of land uses and attention to public spaces and urban design in greenfield areas is strongly supported. Attention to these aspects of form and design is essential to overcoming the problem of 'wasted' density at greenfield sites.

2.2.8. Settlement Area Boundary Expansions

- 2 and 3a) The relationship between the PIR designated greenfield area and the land supply provisions of the PPS (PPS Policy 1.4.1.) is unclear.
 - The provisions of the growth plan generally place less emphasis on the hierarchy of intensification and redevelopment before greenfield development that is evident in the March 2005 PPS. The PPS theme of requiring the exploitation of opportunities for intensification and redevelopment before consideration of settlement area boundary expansions should be reflected in the provisions of the growth plan.
 - More generally these issues should be examined through the perspective of development capacity within a given municipality, as opposed to simply land area. Development capacity issues should be considered on a regional market area, rather than individual municipality, basis to ensure that boundary expansions are not permitted in a municipality while a neighboring municipality has available capacity within its existing settlement area boundary.
- 3(c) Establishes an environmental sustainability test for *community infrastructure* needed to support greenfield development. This policy is strongly supported, although the features of a sustainability test need to be articulated.

- 3(d) Limits the protection of prime agricultural land to specialty crop areas. Given the provincial and national importance of these lands further settlement area boundary expansions onto prime agricultural lands should be not permitted.
- 3(g) The minimum job to resident ratio for outer ring cities and towns is strongly supported as a counterbalance to tendency towards developments in these locations to be 'bedroom' communities as opposed to 'complete' communities.
- The growth plan should provide that settlement area boundary expansions can only be considered when a municipality has achieved the intensification and density targets established by the plan.
- The expansion of settlement area boundaries into the natural system (i.e. natural heritage features and areas) should not be permitted, as per policy 4.2.2.10 of the February 2005 draft plan.

2.2.9. Rural Areas

- 2. New multiple lots and units for residential development should be prohibited (rather than directed away from) outside of settlement areas.

3.1. Infrastructure to Support Growth

3.2. Policies for Infrastructure to Support Growth

3.2.1. Infrastructure Planning

- The prioritization of investments by the province to support the implementation of the plan is key to the plan's success. However, much of the detail regarding infrastructure is deferred to sub-area assessments, and no decision-making mechanism or criteria regarding infrastructure investments is identified.

3.2.2. Transportation – General

- The emphasis on a multi-modal approach to transportation is supported.
- 1(c) defines sustainability in terms of financial and environmental 'appropriateness' for trip making. Sustainability should be defined in terms of the minimization of energy consumption, and associated emissions of greenhouse gases and criteria and hazardous air pollutants.

3.2.3. Moving People

- 1. The identification of public transit as the first priority for transportation infrastructure and major transportation investments is strongly supported.
- 2. Begins to introduce criteria for transit investments, although these should be articulated in more detail as per the NRTEE recommendations.¹⁶
- The plan should establish targets for transit modal share at the sub-area assessment level, and targets for the reduction of the portion of trips taken by automobile. Targets of reducing travel by private automobile to 60% or less of all daily trips in the GTA and Hamilton and other urban centres, and to 75% or less in other areas.

3.2.4. Moving Goods

- 1. The rationale provided for the proposed economic ‘corridors’ (i.e. highways) is efficient goods movement linking intermodal facilities, international gateways and communities in GGH.
 - It is unclear how some of the corridors proposed in Schedule 6 meet these criteria. The 404 north extension, for example, would play no role in linking intermodal facilities, international gateways and existing communities. The role of the 407 east extension in the achievement of these goals is also open to serious question.
- 3. This provision attempts to limit development in and adjacent to highway corridors outside of settlement areas. Policy 3.2.4.4. requires that corridors be planned to discourage development outside of settlement areas.
 - These policies recognize the potential for highway corridors to have a significant impact on future development patterns. It is again, however, unclear how some of the proposed corridors contained in Schedule 6 of the plan, if completed, can avoid these types of impacts. As noted above, the northwards extension of highway 404, for example, would almost certainly prompt extensive development outside of existing settlement areas.

3.2.5. Water and Wastewater Systems

- 1. Requires full cost recovery, including source water protection (consistent with Water and Sewerage Services Improvement Act)
- 3. Requires water to be returned to watersheds.

¹⁶ See National Round Table on Environment and Economy, *State of the Debate: Environmental Quality in Canadian Cities* (Ottawa: NRTEE, 2003), Recommendations 4 and 6.

- 4. Requires water demand management, and support for intensification and density targets for system expansions.
 - These policies are strongly supported

- 5. Rural areas – expansions are only to be permitted to address human health issues, *service existing uses legally established* prior to the date of the plan. They are not to be used to support new development.
 - Does *existing uses legally established* mean actually existing or legally established or both?

- 6. Requires that municipal water and wastewater capacity and requirements accommodate the growth forecasts in plan
 - This provision begs the question of what happens if the requirements need to service forecasts cannot be accommodated sustainably.

- 7. Water quality and quantity is to be maintained on a watershed basis where an *inland water source* relied on or there is a shared receiving water body.
 - The term *inland water source* is not defined. Does it include Lake Simcoe, for example?
 - Do these provisions apply to the Great Lakes? If not, what provisions are made to ensure their quality and sustainability when used for water supply? How will the Growth Plan contribute to the fulfilment of Ontario's obligations under the Great Lakes Basin Sustainable Water Resources Agreement and Great Lakes Basin Water Resources Compact?

4.2. Policies for Protecting What is Valuable

4.2.1. Natural System

- The identification of the natural system is deferred to the sub-area assessments, and its definition largely defers to the provisions of the Greenbelt Plan and PPS.
- The provisions (Policy 4.2.1.1.) provide for the identification of a natural system of the GGH, but not its protection.
- As noted earlier, the plan does not protect natural heritage areas/system from urbanization as per the February 2005 draft.
- As recommended by Ontario Nature in its comments on the November 2005 Draft Plan, the plan should require the identification and protection of a natural system of the GGH, and not permit the urbanization of the system.

4.2.2. Prime Agricultural Areas

- The identification of prime agricultural areas is deferred to sub-area assessments
- As with the natural heritage provisions, the plan provides for the identification of prime agricultural areas, but does not require their protection (Policy 4.2.2.1), with the exception of specialty crop lands via policy 2.2.8.
- The Growth Plan should protect prime agricultural areas from urbanization and other inappropriate forms of development.

- 3. Farm-related infrastructure
 - This policy needs to consider the environmental/natural heritage impacts of drainage, irrigation and other farm-related infrastructure.

4.2.3. Mineral Aggregates

The proposed mineral aggregates conservation strategy needs to consider means of reducing demand for primary aggregate, such as the adoption of more compact and less road dependent urban designs and the use of alternative development standards, in addition to resource recovery.¹⁷

4.2.4. Culture of Conservation

- 1b)ii. Should reference the identification of opportunities for “renewable” rather than “alternative” energy generation and distribution.
- 1b)iv. Should reference energy efficient communities as well as buildings.
- 1c) Should reference emissions from transportation and area sources as well as municipal and residential sources.

5. Implementation and Interpretation

5.1.2. Implementation Analysis

A considerable amount of key analyses for implementation deferred to the sub-area analyses. Does the Growth Secretariat have the capacity to complete these analyses in a timely fashion?

5.2. Implementation Policies

¹⁷ See generally M. Winfield and A. Taylor, *Rebalancing the Load: The Need for A Mineral Aggregates Conservation Strategy in Ontario* (Ottawa: Pembina Institute, 2005).

5.2.1. General Implementation and Interpretation

- 5 Establishes the policies and targets of the plan as minimum standards that planning authorities and decision-makers may exceed. This approach is strongly supported.
- Transitional policies need to be articulated in greater detail. In order to ensure that planning decisions are made on the basis of the current policies, the provisions of the plan should be applied to all decisions made on and after the date of its coming into force. Consideration should be given to the retroactive application of plan in some areas.

5.2.2. Monitoring/Performance Measures

Monitoring and performance measures should be established that measure actual outcomes related to the implementation of the plan (e.g. air quality, transportation related GHG emissions, transit modal share, density of new development, loss of farmland to urbanization), rather than simply policy outputs (e.g. the adoption of conformity amendments by municipalities).

More broadly, as indicated earlier, a system of sustainability indicators for the region should be established to assist in assessing the overall impact of the plan, and the identification of emerging needs and issues.

6. Definitions

Intermodal Facility. Should be defined via transfers between “modes” not “carriers.”

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