

*Comments on Places to Grow: The Greater Golden Horseshoe  
Growth Management Plan*

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Prepared by:

Mark S. Winfield, Ph.D.  
Director, Environmental Governance

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**DRAYTON VALLEY (HEAD OFFICE)**  
Box 7558, Drayton Valley, AB T7A 1S7  
Tel: (780) 542-6272, Fax: (780) 542-6464

**CALGARY**  
Suite 520, 600 – 6<sup>th</sup> Avenue SW, Calgary, AB T2P 0S5  
Tel: (403) 269-3344, Fax: (403) 269-3377

**OTTAWA**  
Suite 601, 124 O'Connor Street, Ottawa, ON K1P 5M9  
Tel: (613) 235-6288, Fax: (613) 235-8118

**VANCOUVER**  
Suite 914, 207 West Hastings Street, Vancouver, BC V6B 1H7  
Tel: (604) 874-8558, Fax: (604) 874-8557



**Comments on the *Places to Grow: A Growth Plan for the  
Greater Golden Horseshoe***  
**The Pembina Institute**  
**September 2004**

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# Comments on the *Places to Grow: A Growth Plan for the Greater Golden Horseshoe*

The Pembina Institute

September 2004

## 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 Institute has taken a strong interest in issues related to the environmental, economic and social sustainability of urban communities in Ontario over the past year, publishing three major reports, *Smart Growth in Ontario: The Promise vs. Provincial Performance* (February 2003); *Building Sustainable Urban Communities in Ontario: Overcoming the Barriers* (December 2003), and *Towards Implementation? Building Sustainable Urban Communities in Ontario* (July 2004).

The province of Ontario released a draft growth management plan for the Golden Horseshoe Region in July 2004. The plan is intended to set the direction for land-use and infrastructure planning in the region for the next thirty years.

The Pembina Institute ([www.pembina.org](http://www.pembina.org)) welcomes the provincial government's Greater Golden Horseshoe Growth Management Plan initiative, and regards it as an important first step towards more sustainable urban development patterns in the region. *Places to Grow* highlights the potential consequences of the continuation of 'business as usual' development patterns in the region in terms of the loss of prime agricultural and natural heritage lands, increasing congestion, declining air quality, affordable housing availability, and infrastructure construction and maintenance costs.<sup>1</sup> These impacts are summarized in Table 1.

**Table 1: The Impact of Business-as-Usual Urban Sprawl in the Toronto-Related Region**

Issue	Impact
Population	<ul style="list-style-type: none"><li>The region's population will grow from 7.4 million in 2000 to 10.5 million in 2031, an increase of 43%.</li></ul>
Land use	<ul style="list-style-type: none"><li>In the region, 1,070 square kilometres of land will be urbanized. This is almost double the area of the City of Toronto and represents a 45%</li></ul>

<sup>1</sup> Ministry of Public Infrastructure Renewal, *Places to Grow: A Growth Plan for the Greater Golden Horseshoe* (Toronto: Queen's Printer, July 2004), pg.5. These projections reflect the findings in IBI Group in association with Dillon Consulting Limited *Toronto-Related Region Futures Study Interim Report: Implications of Business-as-Usual Development* (Toronto: Neptis Foundation, August 2002).

	<p>increase in the amount of urbanized land in the region.</p> <ul style="list-style-type: none"> <li>• Of the land on which this urban growth will occur, 92% will be Class 1, 2, or 3 agricultural lands as classified by the Canada Land Inventory; 69% will be Class 1 land.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• Automobile ownership in the region will increase by 50% to 19 million vehicles.</li> <li>• The cost of delays due to traffic congestion, principally in the 905 region surrounding Toronto, will increase from about \$1 billion per year to \$3.8 billion per year.</li> <li>• Daily vehicle kilometres of auto travel in the region will increase by 64%.</li> <li>• Costs associated with automobile accidents, reflecting this increase in auto travel, will rise from \$3.8 billion in 2000 to \$6.3 billion in 2031.</li> <li>• Reflecting the low levels of public transit use in the regions outside of the City of Toronto, where most of the growth will occur, the total public transit modal share will decrease by 11% (public transit modal share for Toronto: 28%; public transit modal share for surrounding area: 5.4%).</li> <li>• Emissions of transportation-related greenhouse gases (GHG) are projected to increase by 42%.</li> <li>• Reflecting reliance on the automobile for transportation, GHG emissions in new suburban areas are projected to increase 526% relative to their current levels.</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• Projections suggest that \$33 billion in new investments will be needed in water and wastewater treatment infrastructure.</li> <li>• Between 2000 and 2031, \$43.8 billion in investments in transportation infrastructure are projected. Of these investments, 68% are projected to be in roads and highways under business-as-usual scenarios.</li> </ul>

The Pembina Institute’s submission on *Places to Grow* should be read in conjunction with the submissions of the Pembina Institute, Canadian Environmental Law Association, Ontario Nature, the Conservation Council of Ontario and the Sierra Legal Defence Fund regarding the proposed revised *Planning Act* Provincial Policy Statement issued by the province in June 2004.

## 2. General Comments

The Pembina Institute welcomes the government’s greater golden horseshoe growth management plan initiative, and regards it as an important first step towards more sustainable urban development patterns in the region. *Places to Grow* highlights the potential consequences of the continuation of ‘business as usual’ development patterns in the region in terms of the loss of prime agricultural and natural heritage lands, increasing

congestion, declining air quality, the availability of affordable housing and infrastructure construction and maintenance costs.<sup>2</sup>

The Institute supports the *Places to Grow's* overall focus on accommodating future population and economic growth in the region through the intensification of existing urban areas, the promotion of more compact development forms, focusing growth in priority and emerging urban centres, and adopting a more rigorous approach to the expansion of urban boundaries. The plan also gives primacy to the role of public transit in moving people throughout the region.

The Institute's concerns regarding the plan are focused on two aspects of the plan. Notwithstanding its focus on containing urban sprawl, the plan proposes relatively weak tests regarding the need for expansions of the urban settlement area in the region. A much more rigorous approach to the issue of settlement area expansions is needed, particularly in light of recent research, referenced in *Places to Grow* itself,<sup>3</sup> that projected population growth in the region can be accommodated on the existing designed settlement area over the next fifteen to twenty-five years even at relatively low densities.<sup>4</sup>

Secondly, the plan includes proposals for a number of major new economic corridors (i.e. highways) in the region. These proposals have major implications for the integrity of key natural heritage features, including the Niagara Escarpment, Lake Iroquois shoreline and Oak Ridges Moraine, and may undermine efforts to contain urban sprawl in the region. The rationale and need for these undertakings needs to be examined carefully, as well as the potential to optimize the use of existing road and rail corridors.

In addition, despite, as noted in *Places to Grow*,<sup>5</sup> the concentration of Canada's prime agricultural lands in the greater golden horseshoe region, the protection of these lands from urban development under the plan would be limited specialty crop lands. Permanent protection for the prime agricultural lands in the region should be provided through the plan. The plan should also incorporate a stronger focus on the completion of an ecologically viable permanent greenbelt and greenways network in the region.

The plan highlights the importance of steps to reduce demand for mineral aggregate, and to balance aggregate extraction with other competing land uses, such as natural heritage protection, but does not articulate specific strategies to achieve these goals. The plan needs to include, for example, specific measures to reduce demand for newly extracted aggregate.

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<sup>2</sup> Ministry of Public Infrastructure Renewal, *Places to Grow: A Growth Plan for the Greater Golden Horseshoe* (Toronto: Queen's Printer, July 2004), pg.5. These projections reflect the findings in IBI Group in association with Dillon Consulting Limited *Toronto-Related Region Futures Study Interim Report: Implications of Business-as-Usual Development* (Toronto: Neptis Foundation, August 2002).

<sup>3</sup> *Places to Grow*, pg.9.

<sup>4</sup> See IBI Group and Dillon Consulting Ltd, *Toronto-Related Region Futures Study: Interim Report* pp.E-17-E19.

<sup>5</sup> *Places to Grow*, pg.43.

The provincial government has highlighted in recent months the importance of the development of renewable energy sources, and a ‘culture of conservation’ in Ontario. Surprisingly, however, *Places to Grow* makes no reference to these themes. The plan should be supportive of the incorporation of energy efficiency into community design, and the provision of opportunities for the generation and use of renewable energy sources.

*Places to Grow* is premised on the province taking a much more directive role in land-use planning in the region, through both legislative and fiscal measures. This directive role needs to be more strongly complemented with specific guidance and support to municipalities in making and implementing planning and infrastructure decisions regarding future development in the region. A commitment to the provision of such support is prominently absent from *Places to Grow*.

### **3. Specific Comments on *Places to Grow***

#### **3.1. Where and How to Grow**

*Places to Grow* emphasizes the maximization of existing opportunities to accommodate growth before looking to new growth areas. The plan highlights the potential for intensification and compact development to promote the efficient use of land and infrastructure within existing urban areas, seeks to focus growth in priority urban areas and emerging urban centres, located within existing and approved urban areas, and proposes a “more strategic” approach to expansions of urban boundaries. The plan also highlights the importance of promoting economic competitiveness and vitality, and the need to address growth pressures in small towns and rural communities.<sup>6</sup>

Each of these elements is an important component of a growth management strategy. The Pembina Institute’s comments on the specific strategies proposed under these headings are as follows.

##### **3.1.1. Intensification and Compact Development Strategies**

###### **3.1.1.1. Development Charges Act Reform**

The Pembina Institute and others have highlighted the importance development charges reform.<sup>7</sup> Development charges should reflect the full costs of providing the full range of infrastructure, including transit, sewer and water, social, cultural, recreational and educational facilities, needed to support new development, and should be applied on an actual site cost basis.

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<sup>6</sup> *Places to Grow*, ,pg.10.

<sup>7</sup> See, for example, E.Slack, *Municipal Finance and the Pattern of Urban Growth* (Toronto: C.D. Howe Institute, February 2002).



### 3.1.1.2. Brownfields and Greyfields Redevelopment

Brownfields redevelopment is an important component of a strategy for the redevelopment of existing urban areas. An orphan site remediation fund needs to be established to address the situation of contaminated lands where no responsible party can be identified, and the remediation costs of the property are likely to exceed its market value for redevelopment.

Greyfields redevelopment (i.e. redevelopment of suburban strip malls, parking lots, and other low density land uses) offers significant potential for the intensification of existing urban areas, and the creation of more attractive community settings than currently exist in these locations. Incentives should be provided to encourage better use of these underutilized urban lands.

### 3.1.1.3. Development Standards

Standards for new development (both redevelopment and greenfields) should reflect smart growth principles of pedestrian friendliness, mixed use, minimum densities sufficient to make public transit service viable, high levels of connectivity, allowing direct travel by both motorized and non-motorized means, and ensuring the connectivity of green spaces, as shown in the table below. Standards for community design and enhancement should be incorporated into both the growth management plan and the Provincial Policy Statement (PPS) made under the *Planning Act*.<sup>8</sup>

#### Smart Growth Development Principles<sup>9</sup>

Feature	Smart Growth Principles
Land-use density	Higher density, clustered.
Development location	Infill (brownfields and greyfields).
Land-use mix	Well mixed.
Scale	Human scale. Smaller buildings, blocks, and roads. Attention to detail as people experience landscape up close, as pedestrians.
Public services	Local, distributed, smaller. Accommodates walking access.
Transportation	Multi-modal—supports walking, cycling, and public transit.
Connectivity	Highly connected roads, sidewalks, and paths, allowing direct travel by motorized and non-motorized modes.
Streets	Designed to accommodate a variety of activities—traffic calming.
Planning process	Planned—coordinated between jurisdictions and stakeholders.
Public space	Emphasis on the public realm (streetscapes, pedestrian areas, public

<sup>8</sup> See Pembina Institute and Conservation Council of Ontario Submissions regarding the proposed PPS.

<sup>9</sup> Adapted from, T.Litmann, *An Economic Evaluation of Smart Growth and TDM* (Victoria: Victoria Transport Policy Institute, 2000), pg.6.

Development standards regarding things like minimum road widths and turning radii, utility separation distances, stormwater and sewage management may limit the potential density of new developments.<sup>10</sup> The province should actively support the employment of alternative development standards in support of intensification and redevelopment, and in new development.

#### 3.1.1.4. Employment Lands

*Places to Grow* emphasizes the need for a supply of “employment lands” several times.<sup>11</sup>

Employment land sprawl, characterized by single use, low density, big blocks (a.k.a. “superblocks”), large low-rise commercial and warehouse/light industrial buildings, with extensive surface parking and poor transit service has become increasingly prevalent throughout Ontario.<sup>12</sup> Such development patterns present the same sorts of challenges in terms of the loss of agricultural, natural heritage and source water lands, transportation congestion, air quality and infrastructure costs as residential sprawl.

In fact, while there is evidence of changes in the form of new residential development in urbanizing areas of the province over the past few years, there is little or no evidence of change in the design of employment land areas to reflect smart growth principles. Low density employment land development patterns have also emerged in commercial brownfield and greyfield infill projects in existing urban areas.<sup>13</sup>

In light of these considerations, the growth plan should also set a minimum standard for new non-heavy industrial employment land development along the lines of the “compact suburban business district” as defined by the Urban Land Institute in the table reproduced below.<sup>14</sup> The redevelopment and intensification of existing low-density business districts along these lines should also be promoted, including the incorporation of mixed uses, creation of pedestrian friendly places, and transit serviceable densities.

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<sup>10</sup> See, for example, R.Tomalty and F.Paul, *Human Settlements: Sustainable Land-Use and Transportation* (Toronto: Canadian Institute for Environmental Law and Policy, 1999).

<sup>11</sup> See for example, *Places to Grow*, pg.13.

<sup>12</sup> Defined by the characteristics of “fragmented” and “disbursed” suburban business districts in the table below adopted from G.Booth, B.Leonard and M.Pawlukiewicz, *Ten Principles for Reinventing American’s Suburban Business Districts* (Washington, D.C.: Urban Land Institute, 2002).

<sup>13</sup> The recent industrial land redevelopments into big box store malls in Leaside and Scarborough (GM Lands) are examples of this.

<sup>14</sup> See Booth, Leonard and Pawlukiewicz, *Ten Principles for Reinventing American’s Suburban Business Districts*.

<b>Attributes of Existing Business District Types</b>				
<b>Attributes</b>	<b>Central Business District</b>	<b>Compact Suburban Business District</b>	<b>Fragmented Suburban Business District</b>	<b>Dispersed Suburban Business District</b>
Development density	High	Medium	Low	Very low
Floor/area ratio	5.0 and above	2.5 and above	0.5 to 2.5	Up to 0.5
Building coverage	75 percent or more of lot area	50 percent or more of lot area	25 to 50 percent of lot area	Up to 25 percent of lot area
Lot area	Less than one acre	Less than one acre	Greater than one acre	Generally exceeds ten acres
Street layout	Grid	Grid	Superblock	Superblock
Land value	Very High	High	Medium	Low
Spatial separation between buildings	Very low	Low	High	Very high
Buildings dominate space?	Yes, buildings built to street alignment	Yes, buildings built to street alignment	No, buildings set back from road and separated by surface parking lots	No, buildings set back from road; often one to two stories in height in campus/park setting
Parking cost	Subject to charge	Subject to charge	Free	Free
Dominant parking type	Garages (restricted access)	Garages (restricted access)	Surface parking (restricted access)	Surface parking (unrestricted access)
Quality of transit service	Citywide, frequent	District-centric, less frequent	Local, infrequent	Local, very infrequent
Pedestrian orientation and quality of public domain	Very strong, encourages pedestrian activity	Strong, encourages pedestrian activity	Weak, often no pedestrian linkages; encourages patrons to drive to adjoining developments	Very weak, developments far apart and not within walking distance
Dependence on cars for access	Low	Moderate	High	Very high
Choice in mode of transit	Very good	Good	Poor	Very poor
Examples	Downtown, Washington, D.C.	Rosslyn, Arlington County, Virginia	Tysons Corner, Fairfax County, Virginia	College Boulevard–Overland Park, Kansas City, Kansas

**Source:** Geoffrey Booth, Urban Land Institute, 2001.

### 3.1.1.5. Affordable Housing

The province should set a specific target for the development of affordable housing. The target should be set at a target of 30 per cent of new dwellings in the area covered by each upper tier official plan, with affordable housing defined as housing that is affordable at the level of 30 per cent of gross income of the lowest 30 per cent of regional income distribution.<sup>15</sup>

### 3.1.1.6. Land Transfer Tax Reform

The provincial land transfer tax rebate program, introduced in 1996, has been widely criticized as providing strong incentives for urban sprawl.<sup>16</sup>

The land transfer tax rebate program should be reformed to support resale housing and redevelopment for housing in existing urban areas.

### 3.1.1.7. Location Efficient Mortgages

<sup>15</sup> This would reflect the approach taken in Policy C 2, of the 1995 *Comprehensive Set of Policy Statements* made under the *Planning Act*.

<sup>16</sup> See, for example, National Round Table on Environment and Economy, *Environmental Quality in Canadian Cities: The Federal Role* (Ottawa: NRTEE, 2003) pg.25.

A location efficient mortgage pilot program should be initiated. The province should explore the use of other innovative fiscal tools to reduce automobile use and commuting, such as ‘pay as you go’ automobile insurance.<sup>17</sup>

#### 3.1.1.8. Infill and Redevelopment.

One of the issues not addressed in the growth management plan is the need for infill and redevelopment projects to be sensitive to the scale and character of existing communities. This will be important in addressing potential local concerns that intensification and redevelopment may mean inappropriate development.<sup>18</sup> This would not exclude development that is more dense than the surrounding neighbourhood, but would imply that highrise re-development may not be appropriate in a neighbourhood consisting primarily of single family or semi-detached housing, while townhouse, or low-rise apartments and condominiums, may be accepted.

#### 3.1.2. Strategies for Priority Urban Centres

The rationale for the identification of priority urban centres, and emerging urban centres is basically sound.

##### 3.1.2.1. Airports

Airports can have significant environmental, social and development impacts.

The province should not take a passive approach, as seems to be suggested in *Places to Grow*,<sup>19</sup> to the issue of the North Pickering Airport given its implications for the protection of ecologically significant and prime agricultural lands. The province should press for a rigorous justification of the need for such a facility, and a full understanding of its implications for development in the region.

Development in the region of the Hamilton airport may also have significant implications for natural heritage areas and prime agricultural land. The viability of economic development proposals related to the airport should be examined carefully before being endorsed by the province.

##### 3.1.2.2. Infrastructure Investments.

As is proposed in *Places to Grow*, provincial infrastructure investments should be based on whether investments are consistent with the growth plan’s objectives, and provincial investments should be aligned with the growth plan’s priorities. The location of provincial institutions and facilities in urban years will also be an important strategy for the revitalization of downtowns and mainstreets.

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<sup>17</sup> On these types of instruments see generally Victoria Transport Policy Institute, *Online TDM Encyclopedia*, [www.vtpi.org/tdm](http://www.vtpi.org/tdm).

<sup>18</sup> D.Porter, *Making Smart Growth Work* (Washington, D.C.: Urban Land Institute, 2002) pp.19-20, 132.

<sup>19</sup> *Places to Grow*, pg.17.

Provincial funding formulas for educational and health facilities should be reviewed to ensure that they do not provide incentives for the location of new facilities in greenfields locations.

Planning, approvals, and financing of large infrastructure projects with significant development implications for the region, such as major sewer and water projects,<sup>20</sup> and highway extensions, should be placed in abeyance pending completion of the Growth Management Plan initiative.

#### 3.1.2.3. Golden Horseshoe Greenbelt.

See discussion under 3.3.3.

#### 3.1.2.4. Incentives and financial tools

Innovative zoning and financial tools should be made available to support the redevelopment of existing urban areas. The provincial property tax rebate on vacant buildings should be removed to encourage reutilization. Incentives should be provided for higher value uses of vacant land and buildings, and underused urban lands, such as surface parking lots.<sup>21</sup>

Consideration should also be given to the separation of the building and land components of property taxes, to remove disincentives to higher-density developments.<sup>22</sup>

#### 3.1.2.5. Standards and Performance Measures

Provincial infrastructure funding should be tied to the ability of investments to help meet targets for transit ridership, density, and affordable housing, as suggested by the National Round Table on the Environment and Economy.<sup>23</sup>

#### 3.1.2.6. Employment Lands

As discussed under 3.1.1.4, there is significant potential for the redevelopment of existing employment lands into higher density mixed use, transit serviceable development forms. Such efforts should be strongly supported with infrastructure funding and supportive property tax regimes and zoning

#### 3.1.2.7. Environmental Assessment

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<sup>20</sup> The York-Durham Sewer System would be an example of such a project.

<sup>21</sup> See, for example, Metopole Consultants, *The Current State of Play and Possible New Fiscal Measures: A Summary of Fiscal Policies Influencing Urban Environmental Quality, and Possible New Measures*.

<sup>22</sup> See, for example, VTPI, “*On-Line TDM Encyclopedia: Smart Growth Policy Reforms*,” [www.vtpi.org/tm/tm95.htm](http://www.vtpi.org/tm/tm95.htm).

<sup>23</sup> NRTEE, *Environmental Quality in Canadian Cities*, recommendation 6.

*Places to Grow* proposes to streamline the environmental assessment process as it relates to critical infrastructure and transit projects in priority and emerging urban centres.

The term “critical infrastructure” is not defined and could encompass a wide range of activities, including highway construction. It is important that the need for infrastructure projects be considered carefully, along with the availability of alternatives. This is critical to decision-making regarding the best available investments of infrastructure funds.

Consideration also needs to be given to the context within which projects are proposed, whether they form part of a larger long-term project, and what the cumulative and synergistic effects of projects, and other new development and infrastructure, will be. Recent environmental assessments of sewer and water infrastructure extensions and highway expansions have failed to consider these wider impacts.<sup>24</sup>

As a consequence, all significant infrastructure projects should be subject to environmental assessment, including consideration of the need for projects, and alternatives to projects. A class environmental assessment should be developed for transit projects within existing settlement areas.

### 3.1.3. Future Growth Areas

Despite its focus on the contaminant of urban expansion, *Places to Grow* appears to assume that additional extensions of settlement areas in the region will be necessary over the next five years.<sup>25</sup> This assumption is despite the consideration that, as the paper notes, available analyses suggest that projected growth can be accommodated within the existing designated settlement area at relatively low densities for the next fifteen to twenty-five years, and that this time period may be extended if development occurs at higher than ‘business as usual’ densities.<sup>26</sup>

*Places to Grow* identifies five potential areas for expansion of the golden horseshoe settlement area in the next five years. These areas include:

#### 3.1.3.1. “Areas of the GTA south of the Oak Ridges Moraine and outside of the proposed greenbelt”

This area could encompass an extremely large amount of land, most of it prime agricultural lands and including a number of ecologically significant lands and corridors. Given the extent of the undeveloped lands already identified within existing official plans in this area,<sup>27</sup> it is difficult to justify the need for additional expansion, particularly within

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<sup>24</sup> The handling of the recent expansion of the York Durham Sewer system to King City via the class environmental assessment process has been a good example of this problem.

<sup>25</sup> *Places to Grow*, pg.21.

<sup>26</sup> *Places to Grow*, pg.18. On this issue, see also, P.Blais, *Inching Towards Sustainability: The Evolving Urban Structure of the GTA* (Toronto, Neptis Foundation, March 2000).

<sup>27</sup> See Blais *Inching Towards Sustainability: The Evolving Urban Structure of the GTA*.

such a short time frame. In fact, such expansion should be interpreted an indication that the growth management plan has failed.

3.1.3.2. “Hamilton, south of the Niagara escarpment.”

This area also encompasses ecologically significant areas and prime agricultural lands. The proposal for expansion is surprising given the need and potential for redevelopment and infill within the existing urban area of Hamilton.

3.1.3.3. “Barrie”

The recent expansion of Barrie has been overwhelming in the form of low-density residential sprawl, with little accompanying employment growth. This development pattern has had the effect of embedding long-distance commuting patterns form Barrie to the central GTA, with their associated adverse social and environmental impacts.

Barrie should be pressed for better designed, mix-use new development, reflecting smart growth principles, and towards a greater focus on the development of employment opportunities. Additional expansion could be tied to the achievement of a specific target for employment growth.

3.1.3.4. “Kitchener-Waterloo”

The inclusion of Kitchener-Waterloo in the list of potential expansion areas is surprising, give that, as noted in *Places to Grow*,<sup>28</sup> Waterloo Region’s *Growth Management Strategy* incorporates a firm urban containment boundary.<sup>29</sup>

3.1.3.5. “Niagara-Fort Erie”

*Places to Grow* notes that this region has not been subject to the same growth pressures as other regions.

Careful consideration needs to be given to what forms of development may emerge in this region. The most likely development form to occur as a result of proximity to the boarder would be low-density warehouses and distribution centres. New industrial activity is extremely unlikely given the overall structural changes occurring in the North American economy.

Low-density warehouse development is likely to be accompanied by large increases in heavy truck traffic within the region. More broadly, developments of this type may threaten important natural heritage, cultural and agricultural features of the region, which

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<sup>28</sup> *Places to Grow*, pg.3.

<sup>29</sup> See Regional of Waterloo, *Planning Our Future: Regional Growth Management Strategy*, pg.15.

are important economic assets as well. The expansion of the urban area in the Niagara-Fort Erie area would also threaten some of Canada's best remaining Carolinian forests.

In general it is premature to identify areas where settlement area expansions may be needed in the future. Decisions of this nature can only be considered following the completion of development capacity assessments as recommended in the following section of this submission, and the completion of watershed water budgets and source water protection plans in the region.

#### 3.1.4. Approaches to Permitting Urban Boundary Expansions.

In light of the available information regarding the ability of the existing designated settlement area in the golden horseshoe region to accommodate projected housing and employment needs over the next fifteen to twenty years, *Places to Grow* should incorporate a rigorous approach to the issue of settlement area expansions.

Following the directions laid out by the Pembina Institute in its submission of the proposed revisions to the PPS, the growth management plan should incorporate a clear hierarchy of priorities for the provision of employment opportunities and housing of:

- First, maximizing the potential for redevelopment of existing urban areas through brownfields and greyfields redevelopment, infill, and intensification.
- Second, if sufficient development capacity cannot be provided in this way, then permit development of undeveloped designated growth areas within settlement areas; and
- Third, consideration of expansions of settlement areas.

Clear tests need to be established for each step in this hierarchy. The overall approach should emphasize the availability of capacity to accommodate new development, rather than the simple availability of land for development within a given time frame. The land availability approach, incorporated into the current PPS issued under the *Planning Act*, has been widely criticized as encouraging and perpetuating urban sprawl.<sup>30</sup>

Before the development of unurbanized designated growth areas of settlement areas can proceed the municipality should be required to demonstrate consideration of the full potential for intensification, redevelopment, including brownfields, greyfields and transit corridors within the municipality. This would include:

- The completion and incorporation into estimates of available development capacity of an urban capacity study as per the United Kingdom to investigate the potential for redevelopment in the existing urban area for housing and employment uses.<sup>31</sup>

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<sup>30</sup> See for example, L.Pim and J.Ornoy, *A Smart Future for Ontario: How to Protect Nature and Curb Urban Sprawl in Your Community* (Toronto: Federation of Ontario Naturalists, October 2002) pg.29.

<sup>31</sup> See Office of the Deputy Prime Minister, *Sustainable Communities, Building for the Future* (London: ODP, February 2001), pp.38-40.



- The incorporation into estimates of development capacity of an infill/redevelopment target established by the province. The redevelopment target should be 60 to 70 per cent of new development, as is the case in the Sydney Metropolitan Strategy<sup>32</sup> and in the United Kingdom,<sup>33</sup> as opposed to the 40 per cent target proposed in *Places to Grow*.<sup>34</sup> The development capacity estimate should also include provincially established density targets for transit corridors
- The impact on development capacity of a minimum density requirement as per the United Kingdom (e.g. 30 dwellings per ha)<sup>35</sup> for expansions beyond the existing urban area and for transit corridors. This will help to ensure the efficient use of land, support the viability of transit services, and the provision of public services and commercial establishments within walking distance of residences in new developments.
- The demonstration of the environmental capacity to support the projected growth, particularly in terms of the sustainability of required water takings and accommodation with in the relevant watershed based source water protection plan.<sup>36</sup>
- Consideration of the development capacity available via redevelopment within the regional market area, not just the individual municipality proposing development.

Proposals for expansions of the settlement area should only be permitted at the time of a review/revision of the relevant Official Plan initiated under s.26 of the *Planning Act*.<sup>37</sup> Proposals for the expansion of the settlement area should be required to demonstrate that future employment and housing needs cannot be met, considering urban capacity for redevelopment, development of designated growth areas, including the potential for development beyond the minimum densities established by the province, and available development capacity, including redevelopment potential, on a regional (as opposed to regional market area) basis.

Proposals for settlement area expansions should be subject to an external, independent review to ensure full consideration of alternative options. A specific application should be required to the province, and a hearing conducted before the Ontario Municipal Board prior to the granting of settlement area expansions.

Expansions into designated growth areas should not be permitted to occur until<sup>38</sup>

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<sup>32</sup> Note that the Golden Horseshoe Growth Plan suggests a 40% intensification target as the test for expansion. *Places to Grow*, pg.21.

<sup>33</sup> Office of the Deputy Prime Minister, *Sustainable Communities; building the Future*, February 2001, pg.38.

<sup>34</sup> *Places to Grow*, pg.21.

<sup>35</sup> Office of the Deputy Prime Minister, *Sustainable Communities; building the Future*, February 2001, pg.40.

<sup>36</sup> These tests are drawn from *Places to Grow*, pg.21.

<sup>37</sup> S.26 of the Planning Act currently only requires that a review be considered every five years, but does not require that a review take place, or set a minimum time period between reviews.

<sup>38</sup> These tests are drawn from *Places to Grow*, pg.21.

- the necessary infrastructure is approved under the *Environmental Assessment Act* and other relevant legislation, and a plan for staging, financing and provision of infrastructure is in place.<sup>39</sup>
- A transportation infrastructure and demand management plan is in place to reduce the need for motorized journeys
- Planning and protection of natural heritage systems and resources is in place.

In all cases, specialty croplands and prime agricultural areas<sup>40</sup> should be protected from urban development and inclusion in settlement areas, as well as inappropriate rural development, and unremediable aggregate or mineral development.

The framework for consideration of the need for settlement area expansions should be defined in terms of utilization of capacity to accommodate additional development, rather than the land and time based horizon suggested in *Places to Grow*.<sup>41</sup> Reviews of the need to settlement area expansions should not be permitted until a municipality has utilized 80 per cent of its available development capacity, as identified in its official plan, via assessments of urban redevelopment capacity, and the use of designated undeveloped lands within the current settlement area. Longer term planning should emphasize the capacity of communities to accommodate housing needs, in a long-term planning context that emphasizes economic, social and environmental sustainability and well-being, rather than simply “growth.”

As is suggested in *Places to Grow*,<sup>42</sup> upper-tier and single tier municipalities should be required to prepare plans for future community sustainability and well-being that are consistent with the province’s overall growth management plan for the region. At the same time, consistent with the direction of Bill 26,<sup>43</sup> municipalities should not be required to expand their settlement areas or establish new urban settlement areas, against their wishes.

### 3.1.5. Economic Strength Strategies

See comments above re: employment lands.

### 3.1.6. Small Towns and Rural Communities

*Places to Grow* proposes to encourage population and employment growth within existing rural settlement areas to support and promote local economies and community services, support the redevelopment of downtown and waterfront areas, and support development and use of multi-purpose trails for biking and walking.

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<sup>39</sup> From 1995 *Comprehensive Policy Statement*, Policy B.8.c)iii).

<sup>40</sup> See discussion in section 3.3.4 of this submission.

<sup>41</sup> *Places to Grow* pg.21. Note also that the timeframe for land needs to justify settlement expansion proposed in *Places to Grow* is longer than that in the proposed revised PPS (15 years vs. 10 years).

<sup>42</sup> *Places to Grow*, pg.22.

<sup>43</sup> Bill 26, *The Strong Communities Act*, 2003, s.7.

These directions are consistent with smart growth principles, and the overall emphasis on strengthening existing communities and settlements.

### 3.1.7. Alternative Energy and Energy Conservation

The provincial government has highlighted in recent months the importance of the development of renewable energy sources, and a ‘culture of conservation’ in Ontario. Surprisingly, *Places to Grow* makes no reference to these themes.

Energy efficiency and conservation should be an integral component of building and community design. This should be reflected in the province’s growth management plan, and an area targeted for infrastructure investment in the plan.

Similarly, the plan should incorporate references to the provision of opportunities for the generation and use of alternative energy systems, and support the completion of land-use planning guidelines for the establishment of such facilities.

## 3.2. Infrastructure to Support Smart Growth

### 3.2.1. Overall Approach to Infrastructure Investments.

*Places to Grow* proposes an overall approach of focusing provincial infrastructure investments in priority urban centres and emerging urban centres.<sup>44</sup> Such an approach is essential to the successful implementation of the growth management plan.

*Places to Grow* also proposes to set criteria for the evaluation of infrastructure proposals.<sup>45</sup> Consistent with the approach recommended by the National Round Table on Environment and Economy,<sup>46</sup> the criteria should be supportive of projects that actually improve environmental quality (e.g. air quality) or enhance the protection of natural heritage or source water lands, rather than simply requiring the mitigation of adverse impacts.

### 3.2.2. Strategies for Moving People

*Places to Grow* places a strong focus on transit as the main priority for moving people in urban areas of the region, and to support development in priority and emerging urban centres.<sup>47</sup> In support of this direction, the criteria used to evaluate transit investments need to follow those proposed by the National Round Table on Environment and

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<sup>44</sup> *Places to Grow*, pg.27.

<sup>45</sup> *Places to Grow*, pg.27.

<sup>46</sup> See National Round Table on Environment and Economy, *State of the Debate: Environmental Quality in Canadian Cities* Recommendation 6.

<sup>47</sup> *Places to Grow*, pg.29.

Economy,<sup>48</sup> to ensure that investments are economically viable, will actually increase transit's modal share and improve air quality and reduce GHG emissions, and occur in the context of a supportive land-use planning framework.

The dedication of a portion of gasoline taxes to public transit in the government's May 2004 budget is an important step towards implementation of a greater focus on public transit. Funding from the gasoline tax should be targeted for operating and capital maintenance costs. The funds should be distributed primarily on the basis of ridership, as a ridership based approach will reward success and provide incentives to increase transit use. A ridership-based approach will also provide assurance to municipalities that ongoing operating and maintenance support will be available for successful transit expansion projects.

Public transit system expansion should be the focus of the proposed Greater Toronto Transportation Authority (GTTA). Proposals from the GTTA for provincial capital funding should be subject to review by the province on the basis of criteria intended to ensure that proposed projects will actually increase ridership and public transit modal share, be economically viable, improve air quality, and be linked to the adoption of transportation demand management and supportive land-use plans.<sup>49</sup>

### 3.2.3. Strategies for Moving Goods

*Places to Grow's* discussion of future strategies for moving goods is focused almost exclusively on the use of highways for goods movement, especially with respect to the establishment of new infrastructure. *Places to Grow* places a strong emphasis on the importance of trade-related east-west corridors.

Consistent with this east-west focus, *Places to Grow* indicates a decision to de-prioritize the northwards extensions of Highways 427 and 404. The decision to de-prioritize these projects is a welcome one, as both projects were encouraging and facilitating leapfrog development north of the Oak Ridges Moraine, particularly in Simcoe County.<sup>50</sup> As a consequence, planning, design and approvals for the 404 and 427 extension projects should be halted, and the resources and effort reallocated to other higher priority transportation projects.

At the same time, three new economic corridors are proposed in *Places to Grow*. All have significant implications for future development patterns and the protection of key natural heritage features, particularly the Niagara Escarpment and Oak Ridges Moraine, in the region.

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<sup>48</sup> See National Round Table on Environment and Economy, *State of the Debate: Environmental Quality in Canadian Cities* Recommendation 4.

<sup>49</sup> See National Round Table on Environment and Economy, *State of the Debate: Environmental Quality in Canadian Cities* Recommendation 4.

<sup>50</sup> See for example, L.Birnbaum, L.Nicolet and Z.Taylor, *Simcoe County: The New Growth Frontier* (Toronto: Neptis Foundation, May 2004).

The three corridors proposed in *Places to Grow* and the specific issues that they raise including the following:

#### 3.2.3.1. 407 eastwards extension to Highways 35 and 115

The current proposals for the eastwards extension of Highway 407 are encouraging urban sprawl onto prime agricultural lands, sensitive watersheds and significant wetlands on the north side of Ajax, Whitby, Oshawa and Clarington. The further extension of the Highway would reinforce these problems, and increase development pressures on the Oak Ridges Moraine.

It is difficult to justify the eastwards expansion of highway 407 to highways 35 and 115 on the basis of goods traffic. Highway 401 east of Oshawa is not subject to significant congestion problems, and there are two major transcontinental rail lines (CN and CP) connecting the GTA with the east.

#### 3.2.3.2. GTA East-West Corridor

This project would have major implications for the protection of the Niagara Escarpment and local efforts to contain urban sprawl in the Kitchener-Waterloo-Guelph area. The project would also be a completely new corridor crossing the proposed golden horseshoe greenbelt.

The Windsor and Sarnia boarding crossings to GTA routes are also well served by underutilized rail corridors.

#### 3.2.3.3. Mid-Peninsula Highway

This project has major implications for the integrity of the Niagara Escarpment and proposed greenbelt, and has the potential to prompt major development above the escarpment. It is unclear if full use is being made of existing rail corridors and if optimization of the existing road corridor (i.e. the QEW) would necessarily threaten tender fruit lands if appropriate protections for specialty crop and prime agricultural lands are in place.

Specific detailed rationales for each of these corridors are not presented in *Places to Grow*. On the whole the proposals seem to be based on assumptions that east-west trade-related goods traffic will continue to grow at the same rate as it has over the past few years.

The assumption that trade related goods traffic will continue to expand rapidly may be open to challenge in the long term for a number of reasons. These reasons include:

- The possibility that the structural changes in the North American economy related to the 1988 CUSTA and 1994 NAFTA may have largely played themselves out,

- with the result that it may not be appropriate to assume continued rapid growth in goods traffic movement in North America.
- The decline of manufacturing activity in North America is continuing, and is even beginning to affect the maquiladoras in Mexico. These trends may also have significant implications for the future of North American goods movement needs.
  - Policy changes related to transportation may affect the role of practices like ‘just in time’ delivery. A number of countries within the European Union, for example are making use of individual truck GPS tracking to impose tolls on road freight traffic, with the intention of internalizing the road maintenance costs associated with freight traffic. This may lead to significant changes in goods movement and manufacturing practices.<sup>51</sup>

Consideration must be given to the potential for collateral impacts of highway projects intended to address goods movement needs. *Places to Grow* acknowledges the potential for highway projects at the urban periphery, regardless of their principle purpose, to facilitate and encourage urban sprawl, and suggests that access and interchanges for new highways may be limited, with the intention of addressing this problem.<sup>52</sup>

Unfortunately, even if this approach is implemented, it may be extremely difficult to resist the pressures for additional interchanges once corridors are in place. In fact, *Places to Grow’s* emphasis on development along intraregional corridors<sup>53</sup> reinforces concerns regarding the types of development that may occur in relation to these corridors. This emphasis on development along corridors contradicts the document’s overall focus on nodal development in existing and emerging urban centres.

Given the scale of the investments needed to implement these proposals, and their potential impacts on development patterns, air quality and natural heritage features, the justification for the new highway corridors must be subject to a thorough public examination before the projects proceed. The province should pursue the maximization of the potential use of existing corridors (road and rail), prior to considering the creation of new corridors. The establishment of new corridors within or across the proposed golden horseshoe greenbelt should be subject to particularly rigorous examination, in terms of the establishment of need and non-availability of alternatives.

The Minister of Public Infrastructure Renewal’s committed to “full environmental assessments” of each of the proposed corridor projects at the July 28, 2004 public consultation meeting in Toronto. Such assessments should include examination of the need for (including assumptions about future traffic) and the availability of alternatives (modal and locational) to new corridors. Unfortunately, in the absence of intervenor funding and a reformed Environmental Review Tribunal, even broadly scoped assessments may only provide a limited opportunity to examine the issues related to the

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<sup>51</sup> See *Economist*, June 20, 2004.

<sup>52</sup> *Places to Grow*, pg.33.

<sup>53</sup> *Places to Grow*, pg.35-36.

need for these projects.<sup>54</sup> An alternative public forum is needed to facilitate a wider examination of the assumptions regarding likely future goods movement patterns and needs underlying the corridors proposed in *Places to Grow*.

#### 3.2.4. Sustainable Water and Waste Water Services

*Places to Grow* emphasizes maintaining and upgrading existing water and wastewater systems. This will be important in supporting redevelopment and intensification in existing communities. *Places to grow* also highlights the importance of local water conservation strategies, including metering, pricing and efficient technologies and references consideration of water budgets in both the assimilative capacity of water bodies, and their ability to sustain water takings.<sup>55</sup>

The protection of source waters and source water lands should be considered an integral part of providing sustainable water and wastewater services. The province's overall growth management plan for the region should be consistent with the relevant source water protection plans developed under the proposed *Source Water Protection Act*. The water takings needed to support urban development must be demonstrated to be sustainable in the long-term for such development to be permitted to proceed.

New developments in settlement areas should be required to be serviced by municipal sewer and water services.

### 3.3. Protecting What is Valuable

#### 3.3.1. Water Resources

*Places to Grow* highlights the importance of integrated and coordinated approaches to growth, source water protection and infrastructure planning. Specifically, *Places to Grow* proposes that municipalities be required to take into consideration long-term impacts of growth and infrastructure needs when developing watershed-based source water protection plans, that development be directed away from sensitive areas identified in source protection plans, and that there be regular assessments of the impacts of land-use changes on water quality, water quantity and related hydrological functions.<sup>56</sup>

The integration of land-use and infrastructure planning and source water planning should be strengthened. Development and infrastructure planning should be required to be consistent with the relevant source water protection plans, and able to be accommodated within the relevant watershed-based water budgets. Development that will negatively impact groundwater recharge areas, head-waters and aquifers that have been identified as sensitive, and in significant ravine, valley river and stream corridors should not be

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<sup>54</sup> On weaknesses in current environmental assessment practice in Ontario see A.Levy, "Review of Environmental Assessment in Ontario," *Journal of Environmental Law and Practice*, 11 J.E.L.P., June 2002.

<sup>55</sup> *Places to Grow*, pg.37.

<sup>56</sup> *Places to Grow*, pg.39.

permitted. Similarly, development identified as constituting a “water risk” as defined in the proposed *Source Water Protection Act*, should not be permitted.

### 3.3.2. Natural Heritage and Greenspace

The protection of natural heritage and greenspace systems should be an integral component of the government’s overall growth management planning for the region.

Planning for the region should ensure the protection of significant natural heritage areas, including wetlands, woodlands, kettle lakes, the habitat of rare, threatened or endangered species, ravines, valley river and stream corridors, as well as the Niagara Escarpment, Oak Ridges Moraine and Lake Ontario waterfront. Completion of the Southern Ontario Greenways Strategy, as proposed by Ontario Nature, should be an integral component of the overall growth management plan.<sup>57</sup>

### 3.3.3. Establishing a Golden Horseshoe Greenbelt

Reflecting the principles articulated by the Ontario Greenbelt Alliance,<sup>58</sup> the proposed golden horseshoe greenbelt should incorporate, core natural areas (Oak Ridges Moraine, Niagara Escarpment, Trent-Severn system, and linkages that connect them to one another and Lake Ontario, Lake Simcoe and Georgian Bay), individually significant natural heritage areas, source water lands, and prime agricultural areas within the greater golden horseshoe. The Greenbelt should contain an adequate amount of land to support a robust greenbelt ecosystem

Greenbelt should be permanent, and operate within a clearly established legislative and regulatory framework. Incompatible (i.e. non-conservation and agricultural) land uses should be excluded from core areas of the greenbelt. Such uses would include urban development, new transportation corridors, and aggregate extraction operations. Municipal official plans, zoning by-laws and infrastructure plans should be required to be amended to bring them into conformance with the greenbelt plan. Future official plans, official plan amendments and other planning and infrastructure decisions should be required to conform with the greenbelt plan as well.

The construction of new infrastructure corridors across the greenbelt, particularly for transportation purposes, should be avoided, given the potential impacts of such corridors on the integrity of the greenbelt, and their implications for urban development beyond the greenbelt. The establishment of new corridors should only be permitted as an option of last resort, where there is demonstrated need, and the use of all existing modal corridors and alternatives has been maximized.

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<sup>57</sup> See *Southern Ontario Greenway Strategy: A Cooperative Approach to protect natural cores and corridors* (Toronto: Ontario Nature, March 2004).

<sup>58</sup> See Ontario Greenbelt Alliance, *Response of the Ontario Greenbelt Alliance to: Toward a Golden Horseshoe Greenbelt – Greenbelt Task Force Discussion Paper* (Toronto: June 2004).



Planning and other measures need to be in place to ensure that ‘leapfrog’ development does not take place beyond the boundaries of the greenbelt. Such development has already emerged as a significant problem in Simcoe County.<sup>59</sup>

An expert adjudicative tribunal should be established to uphold the integrity of the greenbelt plan and legislation. A permanent fund should be established support the maintenance and improvement of the greenbelt, including the purchase of additional land easements. An advisory body or council, supported by an independent provincial agency should be established and provided with adequate resources to review and report to the public annually on the implementation of the greenbelt plan and the ecological health and integrity of the greenbelt area. The advisory body should also be authorized to make recommendations to the province and local governments and agencies regarding the maintenance and enhancement of the greenbelt, including comments on planning and infrastructure proposals that may affect the greenbelt.

#### 3.3.4. Agricultural Resources

*Places to Grow* references the importance of the protection of prime agricultural areas, but indicates that only specialty croplands will be fully protected from settlement area expansions.<sup>60</sup>

Canada’s prime agricultural lands are heavily concentrated in the area covered by the proposed growth management plan, and the overwhelming bulk of the projected urban growth in the region would occur on such lands.<sup>61</sup>

Given the provincial and national importance and value of the region’s prime agricultural lands, the growth management plan should incorporate protection from urban development for all prime agricultural areas within the greater golden horseshoe region.

Prime agricultural areas should be defined as areas where there are significant specialty crop areas, and significant concentrations of Canada Land Inventory class 1, 2 and 3 soils. The areas should be defined to include areas where there is significant potential for agriculture on class 1, 2 and 3 soils, rather than only those areas that are already in production. Similarly, specialty crop areas should be defined as where specialty crops may be grown, as opposed to where they are “predominantly” grown.

#### 3.3.5. Mineral Aggregates

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<sup>59</sup> See, for example, Birnbaum, Nicolet and Taylor, *Simcoe County: The New Growth Frontier*.

<sup>60</sup> *Places to Grow*, pg.45.

<sup>61</sup> Only 5% of Canada’s land is class 1 farmland and over half of this is in southern Ontario. All of the best two “agro-climatic land zones are in southern Ontario. See [www.uguelph.ca/~farmland/](http://www.uguelph.ca/~farmland/). The Neptis Foundation has concluded that 92% of the projected urban expansion in the golden horseshoe region over the next thirty years will be onto prime agricultural lands.

*Places to Grow* includes a welcome commitment to the management of demand for aggregate resource through an increased focus on the reuse and recycling of materials and by reducing demand through more compact urban forms and more efficient use of infrastructure. *Places to Grow* also highlights the need to achieve balance between mineral resource extraction and the protection of natural heritage features and functions.<sup>62</sup>

Unfortunately, *Places to Grow* fails to outline specific strategies to support these directions. Rather, it emphasizes ensuring access to high aggregate potential areas over other potential land uses.

New and expanded aggregate operations should be assessed relative to other potential land uses in terms of which land uses will best serve the long-term public interest.<sup>63</sup>

In addition, the province should develop a strategy to operationalize the directions outlined in *Places to Grow* to reduce demand for newly extracted aggregate. The strategy should include the promotion of reuse or recycling, including the use of municipal solid waste stream materials as replacements for aggregate (e.g. construction and demolition waste, glass, used tires), and the assessment of the impact of the adoption of more compact development forms and the use of alternative development standards on future aggregate demand. Ontario should also review initiatives in other jurisdictions to reduce demand for newly extracted aggregate, such as extraction taxes, and efforts to promote reuse and recycling.<sup>64</sup>

### **3.4. Implementation**

The implementation of the growth management plan will require that the province play both directive and supportive roles. The key implementation functions need to include:

- Ensuring that infrastructure funding to municipalities, and the province's own initiatives are consistent with the directions of the growth management plan.
- Ensuring that the policy direction provided by the province, particularly through the PPS, is consistent with the direction and goals of the plan. Specific provisions may need to be incorporated into the PPS regarding regions of the province, like the Greater Golden Horseshoe, that are subject to intense urbanization patterns.
- Ensuring that upper-tier and single tier official plans conform with the provincial plan.
- Ensuring that provincial fiscal and taxation policies are supportive of the directions articulated in the plan. As noted in *Places to Grow*, this would require the reform of the development charges system, land transfer tax rebate program, and property tax reform.

Given that the province is taking a more active role in planning, it needs to provide guidance and support to municipalities in addition to policy direction. Provincial support

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<sup>62</sup> *Places to Grow*, pg.46.

<sup>63</sup> Ministry of Municipal Affairs and Housing, June 2004 Draft PPS s.2.5.2.4.

<sup>64</sup> The Pembina Institute will be undertaking a detailed review of these issues in the fall of 2004.

and guidance is particularly needed in such areas as assessing urban capacity for redevelopment, projecting future housing needs and employment trends, identifying and protecting prime agricultural, source water and natural heritage lands, and the development and use of alternative development standards. A commitment to provide such advice is noticeably absent from *Places to Grow*.

As noted in *Places to Grow*, there is also a need to monitor and review the impact and effectiveness of the plan on a regular basis. Performance indicators should be focused on actual outcomes in terms of the livability and sustainability of communities in the region, rather than simply the implementation of commitments contained in the plan. The recent report on community sustainability by Smart Growth BC provides some suggestions of potential indicators that might be used for these purposes.<sup>65</sup>

#### **4. Conclusions**

*Places to Grow* represents an important effort to ensure the environmental, social and economic sustainability of urban development in the golden horseshoe region. The Pembina Institute supports the proposed plan's overall themes of the concentration of future growth in existing and emerging urban centres, emphasizing public transit as the primary means of moving people, the protection of natural heritage, agricultural and source water lands, and of tying infrastructure investments to the achievement of the goals of the plan.

However, in order actually change development patterns in the region, the proposed plan needs to incorporate a much more robust approach to the question of the expansion of urban settlement areas, in a manner similar to that being taken in the United Kingdom and Australia. Similarly, the plan needs to provide for the full protection of all of the remaining prime agricultural areas in the region, as is the case in British Columbia, and of the region's source water lands. The completion of the proposed golden horseshoe greenbelt and southern Ontario greenways systems should be integral components of the plan.

The new "economic corridors" (i.e. highways) proposed in the plan have major adverse implications for the protection of key natural heritage features in the region, notably the Niagara Escarpment and Oak Ridges Moraine. The proposed projects are also likely to undermine the plan's overall goals of containing urban sprawl. The rationale for these projects requires careful and thorough public review. The proposed projects raise questions that need to be addressed beyond the level of individual project environmental assessments.

The plan needs to incorporate measures to operationalize its direction towards reducing demand for mineral aggregate, and to achieve a better balance between aggregate

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<sup>65</sup> See D.Alexander, R.Tomalty, and M.Anielski, *BC Sprawl Report: Economic Vitality and Livable Communities* (Vancouver: SmartGrowth BC, 2004).

extraction and other important public policy goals, particularly the protection of natural heritage, prime agricultural and source water lands.

The proposed plan, along with the revised PPS released in June 2004, the greenbelt initiative and the proposed amendments to the *Planning Act* imply that the province will play a more directive role in land-use and infrastructure planning than it has in the recent past. This more directive role needs to be complemented with additional support and guidance to municipalities, particularly in such areas as the assessment of potential for redevelopment and infill, the projection of population and employment trends, the identification of natural heritage and source water lands and prime agricultural areas, and the use of alternative development standards.

Finally, the province needs to establish indicators to assess the impact and effectiveness of the plan. These indicators should focus on actual outcomes, in terms of such things as the rate of urbanization of agricultural lands, trends non-automobile based transportation modes, and the levels of transportation related emissions of greenhouse gases and air pollutants in the region, rather than simply recording the implementation of plan elements.

**For more information contact:**

Mark S. Winfield, Ph.D.  
Director, Environmental Governance  
Strategic Lead, Ontario Initiatives  
Tel: 416-978-5656  
Fax: 416-978-3884  
e-mail: [markw@pembina.org](mailto:markw@pembina.org)  
[www.pembina.org](http://www.pembina.org)