



Sustainable Energy Solutions

***Comments on: Places to Grow: Draft Growth Plan for the
Greater Golden Horseshoe (February 2005)***

EBR Registry No: XA05E0006

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April 2005

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The Pembina Institute

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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), and *Towards Implementation? Building Sustainable Urban Communities in Ontario* (July 2004).

In addition, the Institute has provided detailed comments on the July 2004 draft Growth Plan, 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.

2. General Comments

The Institute notes that the February 2005 draft plan incorporates a number of significant changes relative to the July 2004 version.

The 40 per cent residential intensification target is retained in the new draft plan. The target will be applied, at least among municipalities inside the Greenbelt, on a municipality-by-municipality basis (i.e. no averaging including the City of Toronto's 100% rate). The intensification target is a key element of the plan. At the same time, research recently completed for the Ministry of Public Infrastructure Renewal suggests that an even higher target would be feasible, particularly in light of

experience in the Greater Vancouver Regional District (GVRD), the United Kingdom, Sydney, Australia and Auckland, New Zealand.¹

The February 2005 draft plan also takes a clearer approach to requiring higher density and better mixed-use design with good connectivity on presently undeveloped lands within the designated settlement area. The application of such requirements is critically important to ensure that the most efficient possible use is made of these lands, while providing for the establishment of attractive and livable communities.

Less positively, the three new "economic corridors" (i.e. highways) (Mid-Peninsula Highway, 407 east extension and GTA East-West (Brampton to Guelph) corridor) presented in the July 2004 draft plan, remain part of the plan. No additional justification is provided for these projects in the February 2005 draft. All three corridors have the potential to undermine the plan's goals regarding the containment of sprawl and the promotion of more sustainable development patterns, as well as contributing significantly to emissions of smog precursors and greenhouse gases (GHGs).

The extension of Highway 404 north to Ravenshoe Rd (i.e. Keswick) is included in the revised draft plan, as is a short northwards extension of 427. Both projects had been identified as not being "immediate priorities" in the July 2004 draft plan.² The 404 extension is especially problematic, as it is the key to the controversial Queensville development,³ and is likely to lead to sprawling development along its route to Lake Simcoe. Surprisingly, given the extent of the air quality problems in the GGH, and the contribution of road-based transportation sources to those problems, the plan's transportation policies make no reference to the need to design transportation systems to reduce emissions of smog precursors and greenhouse gases.

The draft plan takes a relatively weak approach to the issue of settlement area boundary extensions, particularly in comparison with the revised PPS which came into force on March 1, 2005, and even the July 2005 draft plan. The draft growth plan, for example, incorporates no clear tests for boundary extensions, except in the short term until "sub-area plans" are developed. Rather, the draft plan only references factors "to be considered" in boundary extension decisions.

Given the plan's overall stated goals of helping to contain urban sprawl, it should incorporate an approach to settlement area boundary expansions at least as stringent as the PPS. In fact, given the urbanization pressures in the GGH region, and extent of the lands already designated for urban

¹ Urban Strategies Inc., *Application of a Land-Use Intensification Target for the Great Golden Horseshoe* (Toronto: Ministry of Public Infrastructure Renewal, Winter 2005).

² Ministry of Public Infrastructure Renewal *Places to Grow (July 2004)*, pg.33.

³ See L.Birnbaum, L.Nicolet and Z.Taylor, *Simcoe County: The New Growth Frontier* (Toronto: Neptis Foundation, May 2004), pg.50.

development in the region,⁴ the plan should incorporate a stronger approach to settlement area boundary expansion issues than is generally applied in the province via the PPS.

The draft plan takes a relatively blunt approach to "intensification areas" (i.e. urban growth centres and intensification corridors), targeting them for high density (i.e. not less than 200 residents and jobs per ha). However the plan makes no references to issues of the scale and character of development, pedestrian friendliness and similar design details that would be essential to making such redevelopments acceptable and attractive to existing communities.

The approach taken in the plan to employment land issues is unimaginative, prohibiting redevelopment for non-employment uses, and barring "incompatible" land uses from the vicinity of employment areas and intermodal facilities. The implications of this approach for brownfields and greyfields redevelopment are unclear. The provisions would seem to have the potential to bar the creative mixed-use redevelopment of conventional business parks. Such redevelopments have gained considerable interest in the US in the context of the overall shift to a service and knowledge as opposed to industrial-based economy.⁵

The draft plan adds little to the PPS on natural heritage, agricultural land and source water protection issues, although key features are to be identified in the sub-regional plans to be developed under the growth plan. Settlement area boundary expansions into the natural heritage system will not be allowed. Importantly, in event of conflicts between the growth plan and the provisions of other provincial plans and policies related to the natural environment or human health, the plans or policies providing more protection to the environment and health are to prevail.

On the whole the February 2005 draft plan leaves a great deal of specific detail to the sub-area plans to be developed for the following areas: the GTA and Hamilton; North of the Greenbelt; West of the Greenbelt; the Niagara Peninsula; and East of Durham.

⁴ See, Ontario Growth Secretariat, *A Current Assessment of Gross Land Supply in the Greater Golden Horseshoe* (Toronto: Ministry of Public Infrastructure Renewal, Winter 2005).

⁵ See, for example, G.Booth, B.Leonard and M.Pawlukiewicz, *Ten Principles for Reinventing America's Suburban Business Districts* (Washington: Urban Land Institute, 2002).

3. Specific Comments on the Draft Growth Plan

Part 1: Introduction

Section.1.3.2. Guiding Principles

A guiding principle should be added that transportation systems should be designed to minimize air pollution and GHG emissions. This is particularly important given the major contributions to smog and GHG emissions from transportation sources in southern Ontario.

Part 2: Where and How to Grow

Section 2.2. Population, Household and Employment Growth Forecasts

Municipal plans are to be based on population, household and employment forecasts provided by province⁶, and refined projections provided in sub-area growth strategies.⁷ The plan needs to incorporate considerations of the environmental sustainability of its population growth and distribution projections.

Section 2.3. Intensification and Compact Development Policies

Section 2.3.2. Residential Intensification Targets

The Pembina Institute supports the application of an annual residential intensification target, on an individual municipality basis. The Institute believes that, based on experience in other jurisdictions, and research completed by MPIR itself,⁸ a higher target than 40 per cent may be achievable.

The 2015 timeframe for the achievement of the intensification target is excessive. The target date for the intensification target should be not later than 2010, with interim targets for intervening years.

The intensification target would be applied on a sub-area basis for outer ring municipalities. This approach may underestimate the opportunities for brownfield and greyfield redevelopment, and other intensification and redevelopment opportunities, in outer ring municipalities.

⁶ Ministry of Public Infrastructure Renewal, *Places to Grow (February 2005)*, Policy 2.2.2.1

⁷ *Places to Grow (February 2005)* Policy 2.2.2.4(b).

⁸ Urban Strategies Inc., *Application of a Land-Use Intensification Target for the Great Golden Horseshoe* (Toronto: Ministry of Public Infrastructure Renewal, Winter 2005).

Intensification Areas

The proposed plan indicates that intensification areas should be planned to achieve a density of not less than 200 residents and jobs per hectare. Surprisingly, however, the draft plan makes no references to issues of the scale and character of development, pedestrian friendliness and similar design details that would be essential to making such redevelopments acceptable and attractive to existing communities.⁹

Affordable Housing

The proposed policies to establish affordable housing targets within the sub-area plans, and to encourage secondary suites are strongly supported. Affordable housing needs to be defined at the level of 30 per cent of gross income of the lowest 30 per cent of regional income distribution, and with a target of 30 per cent of all new dwellings, as per the 1995 PPS.

Section 2.4. Urban Growth Centres and Intensification Corridors

The draft plan makes reference to urban growth centres and intensification corridors to attract significant mixed use development, serve as major employment centres, including activities of provincial, national or international significance. Growth centres are to serve as regional transit hubs and focal areas for cultural, institutional, recreational, entertainment and regional level infrastructure.

As with the policies regarding intensification areas, these policies fail to make reference to the character and design of development, including such things as pedestrian oriented streetscapes and mixes of housing options. These are factors that will be important to making these locations attractive and complete communities.

Section 2.5. Employment Areas

The proposed plan would only permit the conversion of employment areas to non-employment areas or major retail uses only through comprehensive reviews of their official plans. The implications of these provisions for the redevelopment of grayfields and brownfields, waterfront areas, and the creative mixed-use redevelopment of existing employment areas are unclear. The overall orientation of these proposed policies is towards an 'old' heavy manufacturing economy, and may not fully take into account the implications and opportunities offered by the shift, noted in the draft plan itself,¹⁰ in the region's economy towards service and knowledge industries.¹¹

⁹ See generally D.Porter, *Making Smart Growth Work* (Washington: Urban Land Institute, 2002), pp.19-20, 132.

¹⁰ *Draft Growth Plan (February 2005)* (Toronto: Ministry of Public Infrastructure Renewal, 2005), pg.5.

Section 2.6. Designated Growth Areas – Greenfields

The proposed plan would incorporate minimum density requirements for the development of designated growth areas, requirements for street configurations to facilitate transit service, and encourage easy access to local stores and services by non-motorized transportation. These provisions of the plan should be expanded to more fully articulate widely accepted ‘smart growth’ planning and design principles, including the integration of non-industrial employment opportunities, and a mix of housing types.¹² Consideration should be given to higher gross density targets for outer ring municipalities, to avoid providing incentives for lower density outer ring development.

Section 2.7. Urban Boundaries

The plan takes a relatively weak approach to the issue of settlement area boundary extensions, particularly in comparison with the revised PPS which came into force on March 1, 2005, and even the July 2005 draft plan. The draft growth plan, for example, incorporates no clear tests for boundary extensions, except in the short term until "sub-area plans" are developed. Rather, the draft plan only references factors "to be considered" in boundary extension decisions.¹³

The July 2004 draft plan, by comparison, included tests regarding the achievement of the 40 per cent intensification target, planning and protection of natural heritage systems and resources, and the demonstration of the capacity of the environment to support projected growth, particularly in terms of the sustainability of the required water-takings.¹⁴ The PPS, for its part, requires that it be demonstrated that intensification, redevelopment and the use of designated growth areas cannot accommodate projected needs over the identified planning horizon, before settlement area boundary expansions can proceed,¹⁵ and only permits such expansions at the time of a comprehensive review of an official plan.¹⁶

Given the plan’s overall stated goals of helping to contain urban sprawl, it should incorporate an approach to settlement area boundary expansions at least as stringent as the PPS. In fact, given the urbanization pressures in the GGH region, and extent of the lands already designated for urban development in the region,¹⁷ the plan should incorporate a stronger approach to settlement boundary

¹¹ For a brief overview of these trends see: M.Winfield and C.Brunton, *Great Lakes Environmental Policy Scan 2004* (Ottawa: Pembina Institute, January 2004) pp.11-13.

¹² See, for example, T.Litmann, *An Economic Evaluation of Smart Growth and TDM* (Victoria: Victoria Transport Policy Institute, 2000) pg.6.

¹³ *Places to Grow (February 2005)*, s.2.7.2.2.

¹⁴ *Places to Grow (July 2004)* (Toronto: MPIR, 2004), pg.21.

¹⁵ *2005 Provincial Policy Statement*, s.1.1.3.9.

¹⁶ *2005 Provincial Policy Statement*, 1.1.3.9.

¹⁷ See, Ontario Growth Secretariat, *A Current Assessment of Gross Land Supply in the Greater Golden Horseshoe* (Toronto: Ministry of Public Infrastructure Renewal, Winter 2005).

expansion issues than is generally applied in the province via the PPS, as well as the specific tests, including the environmental capacity test, contained in the July 2004 draft plan.

Section 2.8. Small Cities and Towns

Settlement area expansions of small cities and towns would be conditional on the achievement of a ratio of one job per three residents via the expansion, or movement towards that goal. Although intended to reduce the risk of bedroom/commuter type developments, particularly in the outer ring, the proposed approach may have the perverse effect of promoting employment land sprawl. A policy should be added emphasizing redevelopment in existing downtowns and commercial areas in outer ring communities, rather than greenfield employment land development.

Part 3: Infrastructure to Support Growth

Section 3.2. Transportation

The plan's general policies make no references to the reduction of transportation-related emissions of smog precursors and greenhouse gases as goals of the transportation system. This is despite the GGH region's severe air quality problems, and the major contributions of road-transportation sources to these problems. Transportation related sources account for 63 per cent of the province's total nitrogen oxide emissions¹⁸ and 29 per cent of its carbon dioxide emissions.¹⁹ The transportation sector is also where the largest growth in greenhouse gas emissions and smog precursors is projected for Ontario in the future.²⁰

The policies make reference to ensuring the design of highways and interchanges is consistent with the goals of focusing growth in settlement areas. Unfortunately, even if this approach is implemented, it is likely to be extremely difficult to resist the pressures for additional interchanges once corridors are in place, with the resulting implications for future development. More generally, recent terms of reference the environmental assessment for highway expansion projects in the GGH

¹⁸ See <http://www.ene.gov.on.ca/envision/news/102401fs.htm>.

¹⁹ Bramley and Robertson, *Provincial Government Performance on Climate Change: 2001*, pg.33.

²⁰ Analysis and Modeling Group, *Canada's Emissions Outlook: An Update* (Ottawa: National Climate Change Process, December 1999), table Ont-17. Transportation sector emissions are projected to rise by a factor of 1.3 (57 megatonnes CO₂ equivalent to 75 megatonnes, 2000–2020). Projected increases from the power generation sector, the sector with the next nearest growth over the same period are 1.15 times (27 megatonnes CO₂ equivalent to 31 megatonnes, 2000–2020). The importance of action transportation based emissions has been further enhanced by the province's commitments to convert Ontario Power Generation's coal fired generating plants to natural gas by 2015, which will result in significant reductions in emissions of smog precursors and greenhouse gases from those sectors.

have failed to consider impacts on future development patterns in their assessments of transportation alternatives.²¹

Protection for ‘corridors’ should only be incorporated into planning processes once corridors have been approved through the environmental assessment process.

Section 3.2.3. Moving People

The July 2004 draft placed a strong emphasis on transit as the primary means of moving people in the region, with an additional reference to HOV lanes, referencing the need “for people to get out of their cars and make the move to transit.”²² The February 2005 draft by contrast, assumes roads and highways will still be the ‘backbone’ of the transportation network for goods movement, tourism, and travel needs outside of intensification areas and that ‘strategic investments’ in the expansion of the road and highway network are needed to provide for the varied travel needs of people.

The shift in emphasis is disappointing, and contradicts the overall directions of the plan towards development patterns for which non-automobile based transportation are viable and attractive alternatives. It also contradicts the direction of a number of key municipalities in the region, such as the Region of Waterloo²³ and York Region²⁴ to move away from automobile-based and towards transit-lead development patterns. The province’s strategic transportation investments should support these directions.

The February 2005 draft plan places an important emphasis on focusing transit investments on increasing ridership, reducing commuting times and supporting intensification and transit-supportive residential and employment densities. The criteria for senior government transit investments recommended by the National Round Table on Environment and Economy²⁵ should be incorporated into the plan in support of these directions.

The establishment of criteria to guide the province’s transit capital investments is particularly important given that many municipalities in the GGH are proposing major transit expansion projects. The total requirements for these projects are likely to outstrip the province’s capacity to provide support in the short term. The situation implies that the province will need to establish a mechanism to prioritize among competing municipal proposals.

²¹ See, for example, Transportation Planning Branch, *407 East Environmental Assessment Terms of Reference* (Toronto: MTO, January 2005).

²² *Places to Grow (July 2005)*, pp.29-30.

²³ See, the Central Transportation Corridor proposal.

²⁴ See for example York Official Plan Amendment 43, the Centres and Corridors Strategy.

²⁵ See *Environmental Quality in Canadian Cities: The Federal Role* (Ottawa: National Round Table on Environment and Economy, March 2003), recommendation 4.

Section 3.2.4. Moving Goods

The February 2005 draft plan continues to emphasize the role of highways in goods movement, and the proposals the three new "economic corridors" (i.e. highways) (the Mid-Peninsula Highway, 407 east extension and the GTA East-West (Brampton to Guelph) corridor) presented in the July 2004 draft plan remain part of the plan. No additional justification is provided for these projects in the plan. All three would cut through the newly established GGH greenbelt and longer standing protected areas of the Niagara Escarpment and Oak Ridges Moraine. All have the potential to undermine the plan's goals regarding the containment of sprawl and promotion of more sustainable development patterns.

In addition, the extension of Highway 404 north to Ravenshoe Rd (i.e. Keswick) is included in the revised draft plan, as is a short northwards extension of 427. Both projects had been identified as not being "immediate priorities" in the July 2004 draft plan.²⁶ The Highway 404 extension is especially problematic, as it is the key to the controversial Queensville development,²⁷ and is likely to lead to sprawling development along its route to Lake Simcoe.

There are no references to air quality or the reduction of greenhouse gas emissions in the plan's discussion of criteria for the goods movement system. Rather, the plan simply seeks to provide access to the "least expensive and most effective means to move goods."

As noted in the Pembina Institute's submission on the July 2004 draft plan, the rationale presented for the new corridors in the plan is inadequate. The assumption that trade related goods traffic will continue to expand rapidly, for example, 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

²⁶ Ministry of Public Infrastructure Renewal, *Places to Grow (July 2004)* pg.33.

²⁷ See L.Birnbaum, L.Nicolet and Z.Taylor, *Simcoe County: The New Growth Frontier* (Toronto: Neptis Foundation, May 2004), pg.50.

internalizing the road maintenance costs associated with freight traffic. This may lead to significant changes in goods movement and manufacturing practices.²⁸

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 environmental assessment terms of reference for the projects that have reached the environmental assessment stage have failed to address the crucial issues of the impacts of different alternatives on future urban development patterns or their cumulative impacts on air quality and climate change.²⁹ A thorough, open, and independent assessment of the rationale for the regional highway expansion program, the potential alternatives, and their likely impacts on land-use and the environment is needed before these projects proceed.

On the whole, the transportation, and particularly goods movement, aspects of the growth plan seem poorly integrated with its overall directions.

Section 3.3. Water and Wastewater Systems

Sustainable water and waste water systems should be defined as systems that do not negatively impact natural systems, the quality and quantity of ground and surface water or stream baseflows.

The direction regarding the expansion of water and wastewater system to accommodate future population, household and employment growth, should be qualified regarding the capacity of the environment to support the projected growth, particularly sustainable water taking.

Part 4: Protecting what is Valuable

Section 4.2. The Natural System

The proposed land's provisions regarding natural heritage and drinking water protection follow the directions set out in the March 2005 PPS. The mapping and incorporation of natural systems into the sub-area plans is an important component of the proposed plan, as is the requirement that sub-area

²⁸ See *Economist*, June 20, 2004.

²⁹ Transportation Planning Branch, *407 East Environmental Assessment Terms of Reference* (Toronto: Ministry of Transportation, as approved January 17, 2005).

plan provisions cannot be less protective of the natural system than the policies of the PPS,³⁰ and that settlement areas cannot expand onto natural system areas.³¹

The natural system should include (rather than merely *recognize*) the linkages between and among natural heritage, ground and surface water features necessary to maintain biological diversity, natural functions, viable populations and ecosystem structure and function. The completion of the mapping and protection of natural heritage features and ground and surface water features should be the first step in the development of sub-area plans.

Section 4.3. Agricultural Lands

The draft Plan provides no additional protection for prime agricultural lands beyond those contained in the PPS. Given the concentration of prime agricultural lands in the GGH, the plan should prohibit settlement area boundary expansions onto prime agricultural lands, as identified through mapping by the province.

The plan's support for drainage and irrigation infrastructure³² should be qualified significantly, given the potential negative implications for source water protection and natural heritage areas (e.g. wetlands) of drainage projects.

Section 4.5. Mineral Aggregates

The draft plan recognizes the need to balance demand for mineral aggregates with the social and environmental impacts of extraction activities, and includes a commitment to develop a long-term strategy for mineral resource management in the GGH, including the examination of alternatives and innovative ways to both conserve and extract mineral aggregate resources.

The strategy should include the examination of the potential for changes in urban and infrastructure design to reduce demand for mineral aggregates, and the potential to use secondary materials as substitutes for newly extracted aggregates.³³

Section 4.6. Conservation Policies

The plan's conservation policies merely "encourage" municipalities to develop water and energy demand management initiatives, sustainable energy and air quality management plans, and

³⁰ *Places to Grow (February 2005)*, Policy 4.2.2.7.

³¹ *Places to Grow (February 2005)*, Policy 4.2.2.10.

³² *Places to Grow (February 2005)*, Policy 4.3.2.6.

³³ On options for aggregates demand reduction and substitution see M. Winfield and A. Taylor, *Rebalancing the Load: The Need for an Aggregates Conservation Strategy for Ontario* (Ottawa: Pembina Institute, January 2005).

transportation demand management plans. The development of such plans should be required as integral components of the growth plan.

In addition to promoting energy conservation strategies for municipally owned buildings,³⁴ the conservation policies should include provisions requiring the design of communities, buildings and infrastructure to maximize energy efficiency.

The plan should provide clear rules on siting of renewable energy sources. Low-impact renewable energy generation facilities (e.g. wind, run of the river hydro and biogas recovery) should be permitted within the rural, agricultural and settlement areas of the GGH, but excluded from key natural heritage features, and the escarpment natural and protected areas of the Niagara Escarpment and the core natural areas of the Oak Ridges Moraine.

Part 5: Sub-Area Growth Strategies

A great deal of the specific details and direction of the growth plan will be expressed via sub-area plans, including the distribution of population, household and employment growth, identification of intensification areas and targets, delineations of built boundaries, affordable housing targets, and the identification and delineation of natural and agricultural systems.

The need for settlement area boundary expansions is also to be determined via the sub-area plans. These designations should be based on criteria no less stringent than those established by the 2005 PPS, and include environmental sustainability criteria as per the July 2004 draft plan.

Part 6: Implementation

Section 6.3. Status and Effect of Growth Plans

As noted in the draft plan, the growth plan would prevail over official plans, zoning by-laws and the PPS, with the exception of conflicts with provincial plans or policies on matters relating to the natural environment or human health. In such cases the more protective plan or policy would prevail. This provision should be expanded to make clear that plans or policies relating to the natural environment or human health include source water protection plans made under the proposed *Source Water Protection Act*.

Given that one of the core goals of the growth plan is the coordination and integration of provincial infrastructure investments, provincially initiated or funded undertakings, as well as decisions under the *Planning Act* and *Condominium Act*, should be required to conform with growth plans.

³⁴ *Places to Grow (February 2005)* Policy 4.6.2.2.

Section 6.7. Implementation Tools

The draft plan refers to the *Development Charges Act* as an implementation tool already in place (pg.47). In practice, municipalities have found that the current act presents significant barriers to the use of development charges to provide incentives for intensification and redevelopment,³⁵ as well as failing to provide for the full internalization of the infrastructure costs of new development.

The need for *Development Charges Act* reform and the reform of the land transfer tax rebate program was recognized in the July 2005 draft plan.³⁶

Part 7: Provincial Multi-Year Infrastructure Strategy

As noted in earlier submissions to the Ministry of Public Infrastructure, the Pembina Institute believes that in addition to supporting plans made under Bill 136, the province's infrastructure investments should be guided by sustainability criteria, along the lines of those articulated by the National Round Table on Environment and Economy.³⁷

The plan needs to provide mechanisms for the prioritization of provincial investments in infrastructure to support redevelopment and intensification. Such a mechanism would help to ensure that provincial investments are directed to locations where they will have, for example, the largest impact on increasing transit ridership and modal share, reducing the need for automobile based travel and improving air quality and reducing greenhouse gas emissions.

3. Conclusions

The February 2005 draft growth management plan adds a number of important details to the July 2005 draft, particularly regarding the role of sub-area plans. The new draft also maintains some key aspects of the July 2004 draft, particularly the 40 per cent residential intensification target and the priority given to plans and policies related to the protection of human health and the environment.

Unfortunately, at the same time, the February 2005 draft steps backward from July 2004 draft in a number of important areas. These include the incorporation of a less stringent approach to settlement area boundary expansions, the removal of references to the need for reforms to the *Development Charges Act* and Land Transfer Tax Rebate Program, the weakening of the focus on transit and other non-automobile based transportation modes for moving people, and the re-appearance of

³⁵ See C.Brunt and M.Winfield, *Local Implementation of Smart Growth Policies in Ontario: Three Case Studies* (Ottawa: Pembina Institute, Forthcoming) Ottawa Appendix, s.2.1.4.

³⁶ *Places to Grow (July 2004)*, pg.51.

³⁷ NRTEE, *Environmental Quality in Canadian Cities*, Recommendation 6.

highway projects that were identified as not being ‘immediate priorities’ in the July 2004 draft, particularly the northwards expansion of highway 404.

There is a continuing lack of adequate justification for the highway corridor projects. This is especially problematic given the potential costs of these projects and their likely impacts on air quality, the integrity of the GGH greenbelt, the overall growth management goals of the growth plan, and municipal efforts to move towards more transit-centred development patterns. More broadly, the transportation related aspects of the plan fail to address key transportation issues, particularly the need to reduce transportation related emissions of smog precursors and greenhouse gases, and the potential impacts of transportation infrastructure on future development patterns. It is crucially important that the goods movement transportation aspects of the draft plan be better integrated with its overall goals, within a much stronger overall sustainability framework.

Finally, the plan needs to be binding on the province’s own infrastructure development activities and investments. Clear criteria need to be articulated within the plan to guide and prioritize future provincial investments. The need for criteria is particularly acute with respect to transit capital investments, given that the requests for support from municipalities are likely to exceed the province’s fiscal capacity to respond in the near future.

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