

March 21, 2003

Leslie Woo  
Smart Growth Secretariat  
777 Bay Street, 16th Floor  
Toronto, Ontario  
M5G 2E5

Dear Ms Woo:

**RE: Environmental Bill of Rights posting  
EBR Registry Number PF03E0001  
Public Consultation on the Central Ontario Smart Growth Panel's Draft  
Advice on a Smart Growth Strategy**

This letter serves as a commonly held position on the above-noted EBR posting by the following organizations:

Canadian Nature Federation  
Canadian Parks and Wilderness Society - Wildlands League  
Carolinian Canada Management Committee  
Centre for Land and Water Stewardship  
Coalition on the Niagara Escarpment  
Conservation Council of Ontario  
Don Watershed Regeneration Council  
Durham Region Field Naturalists  
Evergreen  
Federation of Ontario Naturalists  
Friends of the Don East  
Hamilton Naturalists' Club  
Ottawa Field Naturalists' Club  
Pembina Institute for Appropriate Development  
Soil and Water Conservation Society – Ontario Chapter  
Save the Oak Ridges Moraine (STORM) Coalition  
South Peel Naturalists' Club  
World Wildlife Fund Canada

It should be noted that many of the above-noted organizations are also expecting to make their own submissions on this EBR posting, in which these organizations will have an opportunity to expand upon their own areas of expertise and concern. In this submission, we are restricting our comments to the discussion paper *Shape the Future*, Central Ontario Smart Growth Panel, February - March 2003.

### **Positive Elements of the *Shaping the Future* Discussion Paper**

- The panel properly recommends that the Province and its partners "identify a natural heritage system of ecological core areas and corridors and guide growth in such a way that these areas are managed and protected for elements of a natural heritage system" (page 16). A province-wide greenway system of protected natural core areas and corridors is essential, and must be transformed into a format that is usable by municipalities in their official plan processes.
- The paper includes a number of environmentally positive elements, especially with respect to compact, mixed-use urban development, nodal development and transit priority over cars in existing urban areas.
- The paper is to be applauded for promoting the idea of containing urban growth in Central Ontario within existing urban boundaries – although we find troubling the panel's recognition that "some growth can occur outside areas that are currently designated as urban" (page 11). It is our position that all urban development in Central Ontario over the next 30 years must take place within existing and approved urban growth boundaries. Intensification, though, must not occur at the expense of sensitive natural areas that exist within urban areas.

### **Problematic Elements of the *Shape the Future* Discussion Paper**

- The paper is heavily growth-oriented. The signatories to this submission are disappointed by the panel's very conventional attitudes towards growth and development, and its failure to recognize the full range of environmental, economic and social costs associated with current growth patterns. The signatories are also concerned that urban and economic growth are the primary thrusts of the panel's work: "...We need this growth (page 1)... It's good that people want to live here and we must keep it that way (page 2)." Absent from the paper is any recognition that Central Ontario has already reached its ecological carrying capacity in some respects and is quickly approaching that capacity in other respects. The "What if there were no smart growth?" section (page 4) focuses primarily on non-environmental issues such as commuting times, economic competitiveness and tax burdens, when the significant environmental impacts of a "business-as-usual" approach to urban growth are far more wide-ranging – e.g., loss of woodlands and wetlands, loss of prime agricultural lands, lack of water source protection, lack of affordable housing, and lack of livable communities that are walkable, bikable and transit-accessible. There is no discussion of re-directing some of the anticipated growth to other parts of the province.

- The paper seems to encourage urban sprawl in some respects, for example, by stating that "we need to ensure that infrastructure is in place to support growth before development happens" (page 11). This sounds very much like planning by sewer pipe and planning by highway expansion.
- While the paper proposes positive moves to unlock traffic gridlock, there is still an inordinately heavy emphasis on building more highways, euphemistically called "economic corridors," when research points incontrovertibly to the fact that more highways just fuel sprawl. Transportation planning, with a strong emphasis on intra-city and inter-city/inter-regional public transit and inter-modal freight movement, must be fully integrated with urban planning, rather than precede it.
- The paper places an unacceptably heavy emphasis on protecting aggregate resource areas seemingly as an overriding priority over other rural land uses, when smart growth must both fairly balance sometimes conflicting rural land uses (farmlands, natural areas, aggregate resource areas) and actually reduce the demand for aggregates (through fewer new roads and highways, more compact homes and communities, etc.).
- The paper sends mixed messages on waste management. While references to source reduction, recycling and composting are welcome, the reference to "thermal treatment" suggests a revival of waste incineration, a treatment technology that is antithetical to waste reduction and would detract significantly from Ontario's need to meet the greenhouse gas reduction targets in the Kyoto Protocol.

### **Elements Missing from the *Shaping the Future* Paper**

- Key to the success of smart growth is a commitment to its implementation through provincial legislative and policy change, and dedication of the appropriate level of human and financial resources to the initiative. The paper fails to address implementation of smart growth or establish any timelines or benchmarks for success. For example, until and unless the Province re-orders its priorities for SuperBuild funds significantly towards public transit instead of new highway construction, we cannot possibly create smart communities in Central Ontario, or anywhere else in Ontario.
- A key feature of implementation must be a moratorium on planning and construction of new 400-series highways, highway widenings and highway extensions, and of municipal roads of equivalent scale. The moratorium period will allow time for integrated transportation and urban planning to take place, and for convenient and efficient public transit to get up and running.

- There is no process included or even suggested in the paper for community involvement at the municipal level to creating smarter communities. A central tenet of smart growth is open, transparent stakeholder involvement.

We trust that the foregoing comments are helpful to the province's smart growth initiative.

Yours sincerely,

Gregor Beck  
Director, Conservation and Science  
Federation of Ontario Naturalists

*On behalf of the signatory organizations*

c.c. Gord Miller, Environmental Commissioner of Ontario