

The Honourable Chris Hodgson,
Minister of Municipal Affairs and Housing

Smart Growth Thoughts/Recommendations

June 23, 2001

Dear Minister;

I am writing on behalf of the Green Door Alliance Inc, (GDA). The GDA is a registered charity. Its main objective is farmland/natural area preservation with particular emphasis on the publicly owned provincial and federal lands and nearby lands in the North East GTA. The GDA originated as an alliance of conservation and community groups. Since the main threat to natural areas/foodland in the GTA is urban growth, over the years the GDA has taken an increasing interest in urban form and growth management issues in the GTA and have prepared a number of reports on the subject.

The first part of this paper states some of the key assumptions/conclusions we made which underlie and led to our subsequent recommendations. The second section deals with recommendations. I have structured the paper in this way because we feel that for the most part at least the assumptions/conclusions we arrive at are not terribly controversial. Bringing them together and stating them as concisely as possible, makes the rationale for our recommendations more obvious. These two sections including this covering letter are only five pages in length and can be treated as a separate Report.

In addition however, I have included a lengthy appendix which deals more fully with costing the impacts from auto travel in the GTA. This is a subject we have studied and written on extensively. We feel that the social, economic and environmental costs of congestion, accidents, air pollution and its health and environmental impacts, and the land impacts of auto travel, have not been given nearly the prominence they should receive in the smart growth debate. As a result we have included this appendix to support some of the conclusions derived from our research. I apologize for the length of this appendix However I wanted to provide you with enough information to assess the merits of the argument we are making, and to interest you in investigating this area thoroughly.

We applaud this initiative, and appreciate the opportunity to have attended one of your recent smart growth consultations and to submit our thoughts. We trust that there will be further opportunity to comment and be involved at other stages in the process.

Sincerely,

Brian Buckles, (phone 905 649 3331, fax 905 649 5598, e-mail buckles@total.net)

Assumptions/Conclusions underlying subsequent Recommendations

- The GTA will continue to grow rapidly. We accept for planning purposes the 20-year projection of approximately 2 million new residents.

- The GTA is an interconnected economic region. One can discuss whether even these boundaries need to be extended a bit to include Barrie in the north, and the remainder of the golden horseshoe to the west. However it is the broader region – the GTA and ‘GTA plus’ that supports the network of business and industrial clusters that successful economies are based on, and which enable one to compete on the world stage, not smaller entities like Toronto or York or Durham. And if parts of this broader region are weak, particularly the core, the whole Region will suffer. The economic capability/potential of the whole region including the farm economy is interconnected and needs to be fostered. Given GDP in the GTA is about one quarter of the GDP in the country, maintaining the economic health of the GTA Region is absolutely critical to Ontario and Canada.

- Increasingly in order to compete economically, the quality of life this area provides its citizens will be the key determinant in the region’s success. Capital and talent are increasingly mobile. Quality of life includes many things from the quality of educational and cultural opportunities, the livability of our cities, towns and hamlets, the beauty and diversity of our countryside and the quality of our air and water etc.

- Environmental and social issues also need to be considered from the Regional perspective and sometimes even more broadly than that. Environmental issues need to be studied on a broad bio region and watershed basis, and air pollution impacts are felt even more broadly. And it is in this broader region as well that individuals and families operate in, living in one part of the Region, with different family members working, obtaining services, and playing in other parts of the region. Furthermore, new immigrants, the poor, and those with disabilities and special needs, settle disproportionately in major city centers.

- While there may be disagreements on extent and method, most expert studies agree that accommodating growth in the Region, in a more compact, mixed use, less auto dependent and more pedestrian and transit friendly fashion, where individuals are closer to employment and amenities, and to current/planned transportation and service infrastructure would positively impact the economic, social, and environmental health of the Region. This approach would also recycle and use existing urban lands including brownfields in a more efficient fashion, and use significantly less new land particularly farmland, and environmentally valuable land.

- The overall societal costs of growth alternatives should be factored into growth management decisions. For example, the costs of development alternatives which result in additional pollution damaging health and the environment, congestion, accidents and use greater amounts of farmland/greenfields should be reflected when evaluating such alternatives.

We estimate such impacts are extremely significant resulting in costs per vehicle km. of 20 –25 cents. We also project that if sprawl continues for the next 20 years, this will result in some 6.7 billion additional vehicle km. traveled, by GTA residents annually by the year 2021, and cost society approximately \$ 1.3 - 1.7 billion more annually, than a more nodal alternative for accommodating growth. The attached appendix explains how these estimates are derived, and how they compare with other estimates for the GTA and other jurisdictions. And this does not even include the added ‘hard’ costs (roads sewers etc), associated with sprawl, nor user auto and parking costs and time spent commuting.

Additional ‘hard’ costs of sprawl are estimated at up to \$1 billion annually by the year 2021.

Furthermore sprawl will cost GTA residents an additional \$2 - \$ 3.8 billion annually on auto and parking expenses. (Again see appendix for justification).

- We agree that a balance of new roads and transit are required in the GTA. We note however that of the 3 GTA development patterns studied in 1990, and revisited in 1995 by the GTA task force, **only the sprawl option assumed a new east west freeway north of highway 407**. We are concerned that a number of recent government communications mentioning this new freeway implies government may be equating smart growth with this sprawl alternative.

- Continued auto oriented urban sprawl development in the GTA is insupportable in the medium/longer term **even if** one discounts environmental and transportation impacts. Some new roads need to be built in the GTA, but transportation planners indicate if further trends continue, congestion will get worse even if one builds new roads. As an American transportation planner has said, “adding roads to cure congestion is like loosening one’s belt to cure obesity.”

- Given the importance and interconnected nature of the GTA Region, the property tax structure alone is not sufficient to support the capital and operating needs of the broader Region given the services it has to provide. The American city regions, that the GTA is competing with have far greater access to funds than this. They can not only raise funds from other tax sources themselves; they get significant support from state and federal governments particularly for roads and public transit.

-This economic, social, and environmental interconnectedness in the GTA Region and the surrounding commutershed, requires accountable leadership, planning, and policy direction, that spans the GTA. Such leadership cannot be provided by competing sub-regions trying to maximize their own property tax base; a GTSB with little power and accountability; and with little carefully planned and consistent support from higher levels of government.

- Top down leadership, vision and policy direction are required to implement positive changes in the GTA Region. However in addition, the power of the free enterprise system must be brought to bear through the modification/introduction of levers which support the overall policy direction. These include tax incentives and user pay approaches; changes to development charges which encourage density and brownfield development, and ensure green field development is fully costed; stop the subsidization of commuting; remove inequitable taxation of rental housing; and remove anomalies and tax differences across GTA sub regional borders

which often encourage patterns of growth that are harmful from a broader GTA and provincial perspective.

If over time many of these tax levers and incentives are not put in place the power of the free enterprise system will overwhelm efforts at top down planning. With such levers however, the creativity and energy of the of the free enterprise system would be used to support the overall policy direction not eviscerate it.

- The implications of past development patterns are with us for a very long time. Our urban, town, and rural streetscapes and vistas, are enriched by buildings more than a hundred years old. We are currently spending great amounts of money cleaning up brownfield sites 50 years old. The movement away from the more mixed use, grid layout of streets in older urban areas to single use suburban approaches and street layouts, will have implications for many many decades to come, on the ability of these areas to evolve and support future requirements. And once farmland and natural areas are paved over there is no going back.

Yet our Official plans look forward 20 years at most, and the changes to those official plans, and the OMB interventions to resolve disputes adopt a far narrower approach than that. In such a forum looking at the broader implications and precedent setting impacts seem to be verboten, and issues of short-term market demand even in narrow market niches deemed somehow more relevant.

- In order to maintain a livable high quality of life, GTA residents should be free to choose between a rich choice of housing alternatives. However just as my freedom to swing my arm must fall short of somebody else's face, certain housing choices have to be more limited. This is particularly true as long as certain choices are subsidized and do not have to pick up the full costs to society. And above and beyond that we do live in a democracy. Land owner's rights are subject to zoning. On critical land use issues, the interests of the broader community must trump individual interest, or the interest of a minority who might want to have the opportunity to live in a certain way.

In particular we feel it is not in the public interest to meet niche demands for housing choice by allowing discontinuous peace meal auto intensive urban style development, and single use countryside life style communities in the GTA countryside, outside hamlets, on or in close proximity to prime farmland and natural areas.

Recommendations for action

i) An elected body – the GTSB or something like it - needs to be made accountable for providing overall growth management direction in the GTA. This body needs to be given the necessary power by the Province to carry out and enforce this direction, and both higher levels of government – the Province and the federal government need to provide regular ongoing financial support in areas of transportation, particularly public transit, affordable housing and support for new immigrants to Canada some 40% of whom settle in the GTA.

In short how can one ever tackle a problem without assigning accountability, and providing the accountable entity with the power and the tools necessary to accomplish it.

And as the further recommendations indicate, even given a GTSB with accountability, power and financing, federal and particularly provincial leadership will continue to be required to ensure that all the elements appropriate to promoting the livability and competitiveness of the Region - education, affordable housing, cultural excellence, appropriate private sector tax structures, incentives etc., are all addressed.

In addition the Province must ensure that the GTA commutershed and its impacts need to be managed beyond GTA borders. Protecting countryside in the GTA and forcing the development of bedroom suburbs beyond GTA borders and even further from employment is not smart growth.

ii) The Province needs to amend the Planning act and Provincial policy statement, and the OMB process to support firmer adherence to the growth management strategies developed. Such changes would include the following:

- requiring planning authorities to ensure consistency with the provincial policy statement not merely “have regard to “ the statement.
- Giving planning authorities the right to defer certain requests for change until such times as Official Plans are being reviewed and planning implications being looked at broadly.
- requiring that land use proposals in urban fringe areas take into account the full costs associated with greenfield development including transportation impacts and associated externalities, and the impact of land lost, particularly prime farmland and significant natural areas and associated buffers.
- A particular set of policy statements addressing an Oak Ridges moraine centered greenway, and associated watersheds, particularly those watersheds subject to urban pressure connecting the moraine to Lake Ontario.

iii) The province in partnership with municipal authorities should recommend and implement an action plan to eliminate harmful property tax disparities and inequities within and between municipalities and put in place a series of incentives (user pay, density bonusing, development charge variations etc.) to encourage the private sector, and the public generally to develop strategies which support the GTSB’s/Regions/municipalities growth management plans including brownfield development, and discourage action which will run counter to it.

iv) The province should review the role of the OMB with the purpose of ensuring that the OMB leaves a greater number of decisions in the hands of elected officials, and ensuring that when the OMB is involved with significant land use decisions that their approach be broadened to evaluate the longer term implications approval/rejection might have.

v)The province in partnership with the federal government should fund further study research on the full societal costs; and other social, economic and environmental impacts and sustainability of different alternatives within the GTA for accommodating growth. Given the vital importance of this question to the Region, the lack of research in this area is nothing short of appalling.