

**Comments on Places to Grow – A Growth Plan for the Greater Golden Horseshoe**  
**By: Brian Buckles – September 22 2004**

The GDA applauds the broad concerted effort the Province is making to deal with land use issues in the Province and in the area we are most concerned with the Greater Golden Horseshoe. The Government's Greenbelt legislation and Plan; and the Plan Reform initiatives dealing with changes to the planning framework, both being spearheaded by MMA, and the Golden Horseshoe Growth Plan initiative under the Ministry of Public Infrastructure Renewal are all necessary in order to address the problem of urban sprawl.

As your Discussion Paper recognizes, implementing a new approach to growth management and land use planning in the Greater Golden Horseshoe must by its very nature orchestrate these and other initiatives and partnerships and cut across many boundaries. Our comments too then will cut across many boundaries.

The GDA has recently made formal submissions on the Greenbelt Strategy and on Plan Reform and our comments will reference these documents. These and other Reports including detailed comments submitted during the 2001 smart growth and PPS consultation process are available on our website [www.greendooralliance.ca](http://www.greendooralliance.ca) .

Following are our views on the most critical issues facing the Province in coming up with a Growth Plan for the Greater Golden Horseshoe.

**Ensuring intensification takes place and Urban Growth Boundaries remain firm**

The Growth Plan indicates that various studies have indicated that even if sprawl were to continue there is sufficient land available within the currently designated urban envelope to accommodate the majority of growth over the next 15-25 years.

Indeed in Durham, Regional Planners produced a discussion paper last year which indicate that Durham had enough land within existing urban area boundaries to handle growth till sometime between 2026 -2031 and stated further and I quote, "If the Region were to develop at a higher density of 24.7 uph (10upa) **consistent with a more mature urban state**, it would not need additional land to accommodate forecasted residential growth for approximately 35 years. (i.e. approximately 2036), - highlight added.

By far the most important place to begin then in curbing urban sprawl is to require Regions/municipalities to prepare intensification plans for review and approval by the Province; and not approve settlement boundary extensions unless/until such plans indicate there is no reasonable alternative to urban boundary extension.

Implementing such change will involve changes across a variety of planning fronts including changes to the OMB. Urban growth boundaries should not be able to be expanded as a result of developer appeals to the OMB. We have had too many of these in recent years.

If the Province does not enforce a regime which supports firm urban growth boundaries and requires municipalities to develop intensification plans, after working closely with them to establish standards, little or nothing will in the end be accomplished.

That's why although we support enthusiastically most of what you deal with in your discussion paper, we have problems with some of the maps in which you designate a very significant amount of land outside existing urban boundaries as what you call **“future growth area – conceptual”**.

In large parts of Durham this area extends virtually up to the Moraine even though as just alluded to Regional Planners tell us that with some intensification Durham has enough land for **more than** 30 years. I suspect the same is true in most if not all other Regions.

Perhaps if you call your map a conceptual plan for the next half century and more you may be right – no one knows. However if the purpose here is to focus on what needs to be done starting now and over the next few decades to confront sprawl your map raises many concerns. It sends out the wrong message and seems to imply that urban growth boundaries will continue to be eaten away.

In fairness to your report it states you will only consider expansion into the five designated future growth areas - one of the five being GTA areas south of the Moraine and outside the proposed Greenbelt - if among other things:

- There is less than a 15 year supply of land available,
- The municipality has planned to accommodate a minimum of 40% of the projected growth through intensification
- Municipalities have a plan to ensure that the costs of new development are borne fairly by the beneficiaries of new development

We believe that if you remain firm on issues such as this, and if the 15 year supply was itself based on a higher standard of density, that the need to consider expanding existing urban boundaries in the GTA could be pushed off for many decades to come. Urban boundary extension should also be viewed from a Regional perspective. Boundaries should not be expanded to meet a 'need' in one municipality if the 'need' could reasonably be met in another.

We stress again how critical it is for the Province to work closely with lower tiers to clearly define appropriate intensification standards that must be met before expansion would be considered. A recent Durham Region Discussion Paper states that during the period 1991- 2,000, on average 40% of new residential development occurred within the built up urban area, yet some two thirds of this 'intensification' took place within plans of subdivision, most of it in the early 1990's, and only about a third was attributable to infill and redevelopment within established urban areas. If the Province calculates the 40% intensification target suggested in 'A Growth Plan' in a similar manner it may be reasonable in some municipalities but in many others should be set considerably higher.

### **Preserving farmland and supporting Farm viability within the Growth Plan Area**

We are pleased that the Report reinforces that agricultural lands in the greater Golden Horseshoe are considered to be some of the best in the world; that farms in this Region generate some \$3.5 billion in total gross farm receipts; and that prime agricultural lands are a very small percentage of Ontario's and Canada's land base.

Far and away the most important step the Province can take to protect farmland is to take the steps already outlined and maintain firm urban growth boundaries. By taking this step one goes beyond just preserving farmland. If it is clear that land on the urban fringe will remain as unfragmented and undeveloped countryside for at the very least many decades into the future, with specialty areas like the Niagara fruit lands and the Holland Marsh receiving permanent protection, then changes in the ownership structure of such land; the increased willingness of owners to invest in its continuing use as farmland; and the increased willingness to invest in farm support services will have a very positive impact on the viability of the farm economy.

We do not suggest this in itself is enough to deal with the problems of the farm economy but it is an essential element in any solution. The Province has already acted on the Green belt Task Force recommendation and has appointed an Agricultural Advisory Team to more broadly examine the issues of farm viability and how to deal with them.

One idea that appeals to us in urban fringe areas would be to offer specific financial support for farm investment to farmers who were prepared to place conservation easements on their property as witness to a commitment to conservation.

Since this brief is not the place to get into any detail outlining thoughts on how best to support farm viability the only other area we would like to emphasise the importance of senior levels of Government leading by example on land which the public has an ownership interest in, either through direct ownership, or retention of an interest in the land through the use of easements. These lands include the Duffin Rouge Agricultural Preserve and the Federal Airport lands.

## **The Duffin Rouge Agricultural Preserve**

We are delighted that 'A Growth Plan' firmly states the provincial commitment to protecting the 8,000 acre Duffin Rouge Agricultural Preserve. As you may be aware the Green Door Alliance was instrumental in getting easements placed on the Pickering portion of these lands and this area is near and dear to us. We note your map accurately shows it both on the Pickering and Markham side yet the narrative talks about it in Pickering only. We very much hope this is a mistake and the commitment is to the entire Preserve.

## **Federal lands in excess of future Airport Requirements**

Directly north of the Agricultural preserve is the Federal land holding of over 18,000 acres. Even after committing to maintain 7200 acres of the more than 18,000 acre holding as green space in perpetuity 11 -12,000 acres remain. Pearson is 4400 acres. Why doesn't 'A Growth Plan' show these 7200 acres as part of the greenbelt as it has done with the Duffin Rouge Agricultural Preserve?

And even if a Regional airport is justified in future, it is difficult to see why this should require any more than a few thousand acres, particularly when the land surrounding it would continue to be controlled by the Federal Government.

We see no reason then why the Federal Government could not commit to preserve an additional 8,000 - 10,000 acres of Federal land in permanent greens pace most of it CLI class 1 land. This land along with the existing 7200 acre Federal green space lands and the Duffin Rouge Agricultural Preserve would create a 23,000 - 25,000 acre corridor and urban separator extending from the Moraine almost to Lake Ontario.

We urge the Province to work closely with the Federal Government to ensure this becomes a reality. Such a land holding should all be part of the Greenbelt and would contain a larger amount of largely class 1 than exists anywhere else in Canada to the east of Toronto! This could be a tremendous asset for the Greater Golden Horseshoe Area. It could also be an area that could be used to try out approaches towards supporting / encouraging the development of more viable approaches to near urban agriculture.

## **Seaton**

GDA members have also been very closely involved over the past 30 years in Seaton – some of us have sat on different Provincial Advisory Committees for all 3 Provincial parties. We believe Seaton can also provide an important model that the Province can use to implement a more compact mixed use transit supportable kind of community, while at the same time preserving natural and cultural heritage values, and the adjacent rural agricultural community. Seaton can act as a model in many other ways including energy conservation, waste disposal etc. The Province must not let this opportunity go by And again the more than half of the Seaton lands that the Province is committed to permanently protect should also form part of the protected greenbelt.

## **The Greenbelt Legislation and Plan**

The Greenbelt legislation and Plan will cover much of the Greater Golden Horseshoe Growth Plan area. Ideally the Greenbelt would cover the entire Golden Horseshoe Growth Plan area. This would give the Province another more area specific framework beneath the overall Provincial Planning and PPS framework in which to create an environment that will be supportive of the vision expressed in the Growth Plan.

We are fans of the Moraine Legislation and Plan and hope a similar approach is used for the greenbelt. In essence this approach would classify and map the lands within the greenbelt, (e.g. core, linkage, prime agricultural area, countryside, settlement area) and within each classification designate appropriate uses. Like the Moraine Plan we hope this Plan would be approved by the Province; remain in place for extended periods of time; and not be appealable to the OMB. And within such a framework Regions/municipalities would remain accountable for more detailed planning / implementation.

## **Infrastructure**

**a) Expressways** - With respect to roads we recommend a moratorium on 400 series highways until the growth Plan, the Greenbelt Plan and the revamped Planning framework is in place.

Take the 407 eastward extension to highway 35. Regardless of what position one takes on whether or not it should be built, it would be hard for anyone to disagree that under the current planning regime at least, it won't greatly encourage further sprawl.

However under a new planning regime, if indeed intensification plans within existing urban areas became a requirement; growth were directed to 'Priority Urban Centres'; settlement area boundaries were fixed for extended periods of time throughout the greater golden horseshoe area; and other incentives were put in place which removed current sprawl subsidies and encouraged intensification, and transit supportive nodal development, it might indeed then be possible to consider such highway extension. However to do so before such a regime is in place, and without careful consideration to the growth management implications would undermine efforts to contain sprawl.

Another critical reason not to extend 400 series highways in advance of more detailed growth planning is that even if a highway were necessary other important planning elements could be given short shrift if decisions are taken prematurely. For example such corridors should be located and implemented so that they also work well for rapid transit and other smart growth priorities. This won't happen until planning has proceeded further and until the mindset of many transportation decision makers begins to change. The 407 through its pricing policies has eliminated most truck traffic so doesn't even satisfy the goods movement objectives initially planned for it let alone broader public transit and smart growth objectives.

We continue to believe that as mindsets change in support of containing sprawl, that Government may conclude it makes sense to extend 407 to connect the Priority Urban Centre of Oshawa but not to extend it further, at least in the short to medium term.

### **b) The ‘Big Pipe’ / Large Communal Systems**

Clearly big pipe extensions encourage growth. Great care should go into future planning. Such decisions should not result from successful OMB challenges by developers of municipal decisions. Such plans should not be decided at the OMB but be subject to careful review and approval by the Province.

Comments in the Plan are sufficiently general that it is hard to disagree with them. However we know in York for example extension is taking place in a manner that is creating tremendous dewatering and other problems and in a manner that appears to stress overcapacity not conservation, and is not dealing effectively with watershed based source water protection one of the initiatives you mention as a key component of your Strong Communities strategy. This does not give the public the sense that the Province is exercising effective oversight in such an important area.

Apart from the big pipe, in recent years the technology supporting communal systems has improved greatly. While these can be a real assist in same area, they can greatly increase sprawl. In Uxbridge the original Gan Eden proposal called for 750 homes next to the Town on communal, and the Coppins Corner proposal a few miles down the road called for up to the same amount. Once again such proposals should require municipal and provincial approval. Growth management won't be effectively dealt with in the greater golden horseshoe if the Province abdicates such infrastructure decisions and lets them be developer driven and OMB decided.

### **c) Public Transit**

We will have little to say here that casts any new light on this critical issue. Public Transit can only work effectively in a particular type of urban environment with a certain density, mix of uses, and well thought out nodes and transportation corridors; as well as with strong financial and other support from senior levels of government. One thing for sure though it can't work effectively with sprawl.

Our big concern is that Federal and Provincial governments will not in the end provide the level of financial support where it is most required within the Greater Golden Horseshoe Growth area. The major cities and city areas have unique needs yet in both Ottawa and Queen's Park there appears a political tendency to lump small and large municipal needs together. We strongly support rewarding performance by allocating financial support on a ridership basis. Governments may rationally know that the Greater Golden Horseshoe is the economic engine of Ontario and of Canada, but supporting this Toronto focused engine does not seem to garner much political appeal at senior government levels.

#### **d) The Pickering Airport**

The growth Plan also references the Pickering Airport another subject we have been highly involved with for more than 30 years. Indeed a number of us were involved in making presentations to the Provincial Cabinet, and later to Premier Davis in opposition to the airport, in the months before the Province withdrew infrastructure support and effectively killed the federal airport plans in the 1970's.

The GTAA will be coming out with a draft Airport Master Plan in the fall and will then go through a multi year federal environmental assessment. Perhaps a small Regional airport will be justified at this point in time to replace Buttonville and Oshawa.

However we would hope that as in the 1970's the Province will scrutinize this proposal carefully. From what we have seen to date of the GTAA approach we feel that it is likely that the only way such a project can be financially justified is through subsidization from Pearson and the air travelling Toronto area public, through the airport improvement fee at Pearson.

The problem that concerns us then is that other levels of government won't be terribly concerned with the financial viability if they aren't the ones doing the subsidising. This to us demonstrates some of the current dysfunction between levels of government. We believe that if the Federal Government were to ask the Province and the Regional Municipalities in the Toronto area which they would rather have, a few extra hundred million to support rapid transit or affordable housing, or instead to use that money to support the premature opening of Pickering, they would choose the former. However unfortunately that isn't the choice they will be given.

We have also already raised the issue of the size of any future airport at Pickering. We urge your infrastructure Ministry as well as the Province generally to assess the GTAA proposal from the economic and green space perspective and take all necessary steps to ensure that infrastructure funds are directed at what the Province and lower tiers feel are the highest priorities, and that Green space objectives are promoted.

#### **Withdrawing subsidization of sprawl / encouraging smart growth.**

Top down plans tend to erode if steps aren't taken to better ensure that the cost of the decisions taken by individuals - where they live; how far from work; whether they take public transit etc reflect the costs borne by society. As long as sprawl continues to be subsidized, and until many large and small changes are made to encourage intensification, top down policies alone will not work.

Sprawl continues to be subsidized in many ways, through our approach to development charges and property taxation, by not factoring in the cost to society of 'externalities' such as air pollution and its related health and environmental impacts; accidents congestion; consumption of land, - one could go on and on.

And to move away from sprawl one needs to go beyond removal of subsidization and actually build in incentives for individuals and businesses to make land use decisions that are supportive of government policies aimed at a more sustainable future.

These initiatives would include changes to development charges, property taxes, land transfer taxes, property tax rebate approaches as well as other incentives which promote not discourage residential intensification, discourage employment land sprawl and underutilization of land and buildings, encourage development in locations that can best be supported by public transit, and encourage brownfield and greyfield development.

A further aspect of promoting smart growth is to introduce more flexibility and reduce certain rules/ regulations. Mixed uses should be allowed unless they conflict with standards related to scale, traffic generation, noise, pollution etc. In house apartment units should be given more encouragement. Alternate design standards which support intensification should be promoted etc. etc. This is the kind of nitty gritty that needs to be implemented for smart growth to succeed.

The Growth Plan recognizes these issues; and lists many elements that need to be investigated, and areas where incentives are required. There is also a recognition of the importance of dealing with them. You indicate for example “the Plan will set out a set of tools to encourage and support development within existing urban Boundaries”, and give some examples of the general areas you want to address. You talk of an implementation strategy that will include among other things

- a governance mechanism that might include a provincial facilitator and a blue ribbon panel.
- Development of an appropriate mix of regulatory and fiscal tools to assist ministries, municipalities and other stakeholders to implement the Plan.
- Reviewing all activities and policies of the Ontario Government to identify any inconsistencies with the goals of the plan.
- Implementation of the Plan through Municipal official Plans

All this is very good. However it has been 3 years since the Province has asked for our comments on this Smart Growth process. Many of our comments then are similar to the comments we would make today. We very much want to get to another level of detail. As we have said earlier that’s where the devil is. And unless/until the Province lays out in much more detail what it is contemplating doing to address subsidisation, create incentives to intensify, introduce more flexibility, change and in some instances reduce regulation, etc. we are left with little to respond to as far as this critical aspect of promoting ‘smart growth’ is concerned.

## **Conclusion**

The Plan Reform initiatives will hopefully create much of the ‘top down’ policy framework necessary to support the Growth Plan. Although we had some further suggestions, we are impressed by the way Government is approaching the issue.

With respect to the Greenbelt initiative, while we remain very enthusiastic, our enthusiasm has been dampened slightly by the August Green Space Report which seems rather short on details and leaves one unsure about how the process will unfold and what will actually end up being protected.

And as far as ‘A Growth Plan’ is concerned, apart from your mapping and discussion of ‘future growth areas’ which fall outside existing urban areas, we agree strongly with much of what is said.

However beneath the ‘top down’ policy framework and the overall vision of the Plan, all would agree there are a large and complex array of critical changes required to create the necessary playing field and incentives that are necessary to ensure a true shift will occur in where and how we grow.

We will remain uneasy on this score until a more detailed plan is created. Indeed ‘A Growth Plan’ was not clear on when a plan containing this detail will be prepared and what sort of public communication process will take place before it is finalised.

Our unease is increased by our understanding of the complexity of the task the Province is tackling, and the entrenched interests, money, lobbying, and just overall inertia that exists in support of the status quo. And of course all of this is happening in an environment where Government is facing many other complex and important priorities.

None the less we remain very appreciative and supportive of your efforts to deal with this critical problem. We wish to remain as close as possible to the effort and if there is further information you can share as more detailed approaches are being considered, or if we can do anything further to support the process please do not hesitate to contact us.

Sincerely,

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