

Provincial Policy Statement Review – Green Door Alliance Comments

A - The PPS review process suffers greatly from lack of information/dialogue

Discussion

The PPS review is of critical importance to Ontarians, and is closely linked to the smart growth initiative, to issues of provincial and municipal governance, to specific environmental issues like air and water quality, natural heritage and farmland protection etc etc. The complete lack of information provided by the Province, combined with a process that involves absolutely no public dialogue before submissions are due creates a situation where the input government receives will be very much less broad, informed, and helpful than it otherwise might have been. That is most unfortunate.

Government could address this concern, (and perhaps that is the intention), if they were to treat the current consultation as the first part of a two-stage process. In the second stage the Province could circulate draft changes to the PPS and invite further comment before finalization.

Recommendation 1

- As a second stage to the PPS review, circulate draft PPS changes for further public comment before finalization

B - The Provincial Policy Statement cannot be dealt with in isolation.

Discussion

The Ministry announcement of the 5-year review of the Provincial Policy Statement suggests that a number of questions be considered. Two of these are “Has the Provincial Policy statement been effective **in providing decision makers with direction** on provincial interests in land use planning matters,” and, “Are the policies **being implemented successfully** at the local level”. (Our highlighting)

We mention these questions only because they underline the fact that even the Ministry acknowledges that the PPS cannot be reviewed in isolation. One cannot evaluate the PPS without also evaluating whether the PPS has been as effective as it could be in appropriately guiding the **actual decisions** being made by local or regional governments, and in particular when guiding the dispute resolution process at the OMB.

For this reason the comments and recommendations that follow are centered around the PPS, but they also extend beyond the PPS in an attempt to answer the types of questions even the Ministry itself acknowledges are the key questions to consider.

As part of the second stage of the PPS review recommended above, and in order to provide a broader context for the public to evaluate PPS recommendations and comment more broadly, the Province should also initiate a dialogue and invite public comment on how the many key

initiatives which will shape growth particularly in high growth areas of the Province will be made. How will the recently announced growth management councils function? What will be their relationship with the Province, the municipalities, special interests and the public generally? Will they provide a positive framework to guide municipal level decisions; or will they be overly tied to special interests and inappropriately remove decision making from elected municipal bodies? Will they have any power to set policy or affect decision-making? If so how will these policies/plans tie into the PPS?

Of great importance also, particularly now that the GTSB has been disbanded - how will broad infrastructure decisions, decisions that will have an immense impact on growth patterns in the golden horseshoe and other areas be made? Will Regions have any influence or say in them; will the growth management councils? Will infrastructure decisions be informed by and support PPS policies and smart growth plans, or will they undermine them as government's recent focus on highway development and a third east-west expressway north of highway 407 would seem to do?

What about the Provincial, municipal and OMB role in planning; and possible changes to the planning act? How will all of these and other initiatives dovetail with changes to the PPS in addressing the fundamental questions of how to improve the land use planning process in the Province?

The bottom line is that it is nonsensical to comment on PPS reform in isolation. The Province must recognize this.

Recommendation 2

- In the second stage of the PPS review, broaden PPS proposals to encompass and invite comment on smart growth and related infrastructure and planning matters.

C Current policies do not effectively deal with urban sprawl –we have a serious problem.

Examine the thousands of acres of prime farmland natural areas and countryside being consumed. For example the Ontario Federation of Agriculture estimates that over the 10 year period 1986 – 1996 in the GTA alone lost some 60,000 acres of farmland. * Examine also the continuing **decreasing density** and the overall increases in the amount of developed land in the GTA **per GTA resident**, without even factoring in the additional increases due to population growth. Examine the increases in auto travel **per GTA resident**, along with the associated increases in congestion and pollution, and then factor in the increases due to Population growth. The economic costs of congestion alone have been estimated as costing the GTA economy some \$2 billion per year. The key performance indicators which should be used to evaluate progress on smart growth, almost all indicate the situation is worsening.

* As quoted by Professor Robert Wright, p28, The Evolving Physical condition of the Greater Toronto Area: Space, Form and Change Feb 2,000, with financial assistance from the neptis foundation. (Square km. translated into acres).

Then consult experts about the next 20 years. Unless we change current development patterns, they will tell you all these trends will continue. Then project another 20 and 40 years out into the future because land use decisions we made 50 years and more ago, are still with us today.

Anybody examining the above factors would conclude that at least in major growth areas of the Province these problems are very serious now and projected to get far worse in future unless action is taken.

Recommendation 3

- Acknowledge that urban sprawl is a serious problem, and treat it as such in the action taken and the approach to public consultation.

D Comments/Recommendations related primarily to ‘smart growth’ (part 1 of the PPS)

Discussion

- The PPS doesn't really need to be followed. Authorities including the OMB just need to “have regard for” it. Coupled with this the Policies are sometimes general and potentially conflicting enough that they in many situations don't provide much of a guide for land use decisions anyway.

- One reason the PPS is so general is that it has been designed to cover all of Ontario. Yet Policies aimed at ensuring “Smart Growth” in a fast growing region like the GTA, may have to differ from policies covering areas of the Province with little or even negative growth.

Indeed, the Minister recognized this issue in his September 27th letter where he indicates that five or six separate smart growth councils will be set up in different regions of the province to we are told “develop integrated smart growth management plans” to “reflect the unique circumstances of the different parts of the province.”

Of these Regions, the extended golden horseshoe region is the area our comments are primarily directed towards. Within the moraine portion of this area the Province is contemplating legislation where land use decisions will have to “comply with” a Moraine Plan in addition to the PPS.

The same thing must happen with growth management. Specific Growth management policies/plans for this extended golden horseshoe area as well as other areas, need to be developed,

And similar to Moraine legislation, in order to actually influence decision making, the Province must make it clear that Official Plans, and land use decisions within such areas need to comply with such overarching plans/policies. This will involve reviewing Official plans and where necessary modifying them.

Furthermore if one is serious about smart growth a serious effort to maintain existing settlement boundaries needs to be made. That doesn't mean in a fast growing area like the GTA they can **never** be expanded. It does mean however that they should only be able to be expanded after intensification, brownfield, and other goals to reduce land consumption have been set and met – the municipality has in place a smart growth plan, and all reasonable alternatives have been carefully studied and implemented such as redevelopment, intensification, bylaw reform and density targets have been met.

In addition, if one is serious about urban growth boundaries, we believe strongly that any expansion should not be developer driven and should only be able to be initiated by municipalities. As far as plan appeal and dispute resolution are concerned we favor the approach being recommended by the moraine panel for settlement area expansion on the Moraine. The Minister would approve changes recommended by the municipality in their official plan, that are significant enough to warrant change to the broader multi region wide growth plan. And all requests to develop greenfields should fall into this category, as should municipal population forecasts. Of course before making such a decision the Minister might choose to modify it, delegate certain matters to an appropriate panel for their recommendation, etc., but there would be no further right of appeal.

We see no particular downside to this approach. Municipal official plans would have to accommodate an appropriate portion of the projected growth in the region. The Province as well as the municipalities, before buying into the Plan, would have to assure themselves that municipalities in a broad region were providing sufficient opportunities to grow, and to provide an appropriately rich range of housing, employment and other requirements.

Municipalities would not have to respond at other than plan review time to arguments that particular narrow greenfield consuming market niches were not being met. On the other hand at regular planning intervals the municipality would need to address the issue of the range of housing that did need to be provided and do so in a fashion that was consistent with Provincial Policy, and growth management plans. And if at any time, the municipality felt plans needed updating or a particular previously unthought of development opportunity should be pursued, there would be nothing stopping them from initiating a plan review in a particular area.

The dispute settling mechanism is currently overly sensitive to narrow market based arguments. For example to demonstrate need the developer pursues a “ If I build it they will come” argument. If this is the way the problem is phrased it doesn't matter for example that a municipality can argue that there is a wide variety of housing choice available within existing settlement areas, and as a result a new greenfield development isn't necessary. The developer says yes, but my niche is people who want a house in the countryside next to a golf course, and close enough to commute to the city. In order to give buyers freedom you have to provide this.

Municipalities should be able to consider individual development applications as part of a broader planning exercise, and not be forced by developers to initiate a process outside of this. In the two frozen OMB cases in our Region of Durham, - Gan Eden and Coppins Corners, developers didn't argue Durham didn't have enough land to accommodate planned growth. To the contrary Durham was not meeting its growth objectives. What they argued is the demand in

their market niche – homes not within an existing urban or hamlet area, or a new subdivision - but in a country setting, close enough to commute to urban areas - was not being met. The extent to which this kind of market is something that should be met near major urban areas is something that should be considered broadly at plan review time, and at the broader ‘golden horseshoe’ level not from a narrow perspective on a development by development basis.

- Even from a hard cost perspective sprawl is subsidized. And when one takes into account automobile externalities (accidents, health and environmental impacts of air pollution, the economic costs of congestion etc.), the costs are enormous. These costs are not factored into land use decisions, particularly at the dispute resolution stage. Planning Reports almost universally buy into the impact of such costs to society, but planners and lawyers shudder at the thought of introducing such elements at OMB hearings. Part of this relates to the very complex, multi assumption nature of the evidence that would need to be presented and the cost of doing so, combined with the fact that the issue of precedent seems to have little weight at the OMB and it is difficult to show impact from one development alone or prove cumulative impacts. Hence broad ‘smart growth’ principles as reflected in the PPS aren’t as helpful as they could be in resolving disputes at the individual level.

It is most important to note that **far far** more people will die annually in Ontario from air pollution related to automobiles than will die from bad water, or from other Public Health and Safety Hazards alluded to in section 3 of the PPS. Yet the PPS makes absolutely no mention of the need to consider any of the additional auto impacts associated with sprawl.

In developing the growth management strategy in the first place, and in reflecting this in Regional and Local Official Plans, the overall costs of different urban forms should be taken into account and these costs should include auto externalities.

Furthermore the economic arguments developers use for their development not only do not reflect the overall costs mentioned above, they greatly overstate the positive economic impact their development might have by comparing the situation if their development is approved with the situation if it were not approved. The future GTA population for example is not likely to be less because a particular residential development is not approved. If the GTA economy creates jobs, housing will follow. The only time the broad economic argument should be of concern to the Province is when growth might be diverted to another province or country as a result of planning decisions.

- The PPS states (1.3.1.1 b) that “communal services are the preferred means of servicing multiple lots/units in areas where full municipal sewage and water services are not or cannot be provided.... “

As a number of recent very large scale (up to 1,000 homes), development proposals in Durham have demonstrated, communal servicing allows massive development in the countryside, that would otherwise not be technically feasible. This could encourage massive urban sprawl. These developers point to the section of the PPS quoted above to justify their proposals.

The Region has recently passed an amendment to the Official plan which only allows Regionally owned and operated communal services in existing rural settlements to address health or environmental problems, but a number of developers have appealed this amendment to the OMB. The PPS should be modified to reflect this concern.

Recommendation

4 - Section 3 of the Planning Act should be changed to require authorities to act in a manner “consistent with” the PPS, rather than merely requiring them to “have regard for” it.

5 - Specific Growth management policies/plans for the extended golden horseshoe area need to be developed. (And other areas probably too, but this is the area we are concerned with).

Among other things such plans should only provide for new settlement area expansion in any area, if such expansion is considered to be the most reasonable alternative within the overall context of the growth management plan, and the provincial policy framework.

The Province must make it clear that Official Plans, and land use decisions within such areas need to comply with such overarching plans/policies.

Where disputes arise over land use changes that are significant enough to require change to the broader ‘golden horseshoe level’ plan, and these would include municipal population forecasts and expansion onto greenfields, these disputes should be resolved by the Minister after public consultation and not directly resolved by the OMB.

6 – Part 1 of the PPS should be changed along the following lines: These revisions could be Ontario wide or possibly only apply to certain areas of the Province dealing with high growth and urban sprawl.

- A new section at or near the beginning of section 1 of the PPS should contain the following:

“Where broad area wide Growth Management Plans/policies have been developed and approved by the Province, municipal official plans in such areas must be modified where necessary to include and be consistent with such plans.”

7 – The first paragraph of section 1.1.1 c of the PPS, should be changed as follows:

1.1.1 c) Urban areas and rural settlement areas will only be expanded, or new settlement areas including estate residential created, at the initiation of the municipality, as part of an official plan review, or secondary planning process, and only where existing designated areas in the municipality do not have sufficient land supply to accommodate the growth that was projected by the municipality in Official plans and approved by the province. Furthermore in jurisdictions where a provincially approved growth management plan/policy framework is in place, expansion will only be allowed where there are no reasonable alternatives within the framework of that plan.

8 - A section should be added in part 1 stating:

“ In comparing the cost effectiveness of different development patterns, the overall costs related to additional auto use including human health and accident impacts, environmental impacts, and congestion and land use impacts must be considered, and appropriately reflected in official plans and land use decisions”.

9 - The first part of section 1.3.1.1 b) should be amended to read,

“ Communal services are the preferred means of servicing multiple lots/units in areas where full municipal sewage and water systems are not and cannot be provided; *where the development to be supported by this type of servicing is consistent with municipal growth management plans; and does not result in countryside fragmentation and urban sprawl*, and where site conditions are suitable in the long term: and” (Part added is in italics).

10 - There are a whole variety of other changes that could be suggested to section 1 to ensure that this section really does promote smart growth principles. The further encouragement of brownfield development, of compact, mixed use pedestrian and transit friendly urban and community form that makes maximum use of existing infrastructure; are all critical. However regardless of whether the PPS is more extensively revised or whether instead of further revising the PPS, Growth Management plans are developed in some areas of the Province to supplement smart growth policies in the PPS, it is critical that the influence on decision making should be the same.

E Comments / Recommendations related to Natural Area/Farmland preservation

Discussion

- Significant natural heritage areas as identified in section 2.3.1 b should be afforded the same protection as those in section a and no development should be allowed.

Furthermore even in areas that are less significant from an environmental perspective, if municipal plans attempt to direct development away from broad areas they want to protect, be it natural heritage areas, areas where corridors could be extended in future, or just plain

countryside, development applicants should not be able to proceed just because it can be demonstrated to quote the PPS that “ there will be no negative impact on the natural features and functions”.

To overturn a municipal plan whose aim is to protect countryside generally the development proponent should also have to demonstrate that there are no reasonable alternatives. Surely if a municipal plan has been thoughtfully and not arbitrarily put together with public involvement, areas they designate as important to protect should be protected, as long as there are reasonable alternatives.

This is particularly true in areas close to fast growing urban centers. In areas where little of the land base has been developed, it makes sense to have policies that protect only the more significant areas. In more developed areas, it is important to save as much countryside as possible from development, and almost any development, even if it is sensitively engineered still fragments countryside.

- With respect to farmland protection, as statistics on ever continuing year to year loss of prime farmland near urban areas show, past farmland protection policy just has not worked. We recognize that in many GTA areas there is a genuine and difficult tradeoff between expanding urban areas onto some of the best agricultural land in Canada, or onto the moraine, or creating bedroom suburbs north of the moraine with residents involved in even longer commutes.

None of these alternatives is appetizing. Some agricultural land will have to be urbanized. However the amount of new farmland that would have to be urbanized to allow urban areas to expand can and should be cut down very greatly by increasing densities and better using existing underutilized areas and brown fields within existing urban areas. There is absolutely no need or excuse for the rate at which major urban areas are encroaching on farmland.

The PPS states there will be no settlement area expansion onto prime agricultural areas unless “there are no reasonable alternatives”. Clearly this phrase needs to be interpreted far more firmly in future. Efforts to create firmer growth boundaries will not work unless there is a requirement to very seriously explore alternatives before allowing settlement area expansion to proceed.

Even worse however – because there is no excuse at all for it – is the way in which farmland **beyond urban area boundaries** has been fragmented for a whole variety of reasons. We are most familiar with Durham, and Durham has been more sensitive to land use issues than many Regions. However even here there have been disastrous incursion into prime farmland. To give just a few examples, Brooklyn was greatly expanded over the past decade creating a leapfrogging of urban growth tied to the big pipe, miles north of then existing urban boundaries and against the recommendation of the Region but approved after appeal to the OMB. New golf courses and golf course expansions have been approved in the agricultural preserve, and we are currently involved in an OMB appeal to place more than 100 homes around a golf course again part of which is in the agricultural preserve, (here again upper and lower tier municipalities unanimously oppose it, but the developer is taking it to the OMB). And on a lesser

scale, but still harmful, frequent new farm severances are being approved, and commuters are moving in.

The arguments in many of these situations is similar. Pockets of land are analyzed and their quality as agricultural land discounted. Reference is made to the fact that farming activities in the immediate area are diminishing (since developers own more and more of the land), so there is no real point in protecting it. And on and on. We must define prime agricultural areas more broadly so as not to fragment the agricultural economy. This economy by the way is very significant in the GTA and is far more significant than many of the land uses like golf courses and estate residential development that have fragmented it.

Recommendation

11- The significant natural heritage areas identified in section 2.3.1 b which indicates development “may be permitted” if it has been demonstrated there will be no negative impacts, should be included in section a which unqualifiedly states development and site alteration will not be allowed.

12 - A new section 2.3.1b should be created which reads as follows:

“ Development and site alteration will not be permitted in areas municipal official plans have designated for protection unless there are no reasonable alternatives, and unless there will be no negative impacts on the natural features or the ecological functions for which the area is identified”.

13 – The definition of the term “prime agricultural area” should be broadened to read, “means an area where prime agricultural land *and adjacent land which is or could be an important part of the farm economy predominates* “ (items in italics added).

14 – In order to virtually eliminate discontinuous development in prime agricultural areas the PPS should clearly state in section 2.1 that, “ Apart from settlement area expansion no non-farm-related development will be allowed in prime agricultural areas. “

15 – In section 1.1.1 c which states there will be no expansion of urban and rural settlement areas into prime agricultural areas unless “there are no reasonable alternatives,” a stringent hurdle for describing how this phrase should be interpreted should be developed. “ A ‘smart growth’ definition of “No reasonable alternative” needs to be included in the PPS.

F Water Quality and Quantity

The PPS just devotes one small innocuous sentence (2.4.1), to this issue. Clearly in the aftermath of Walkerton this whole area needs to be treated very much more seriously. And quite apart from Walkerton and the issue of water quality, the issue of water quantity has also been given very short shrift.

The Moraine panel for example has recommended that on the moraine there be no net increase in water taking until a water budget for the moraine is developed, and a monitoring system put in place. If approved this recommendation will effectively freeze developments that use large amounts of water like golf courses at least until this work is completed.

This problem which may be being addressed on the moraine is just as serious an issue in many areas off the moraine. There are golf courses in our area that use millions of gallons annually that have never even received water taking permits; there are others that take water directly from streams when demand is highest and flow is least. Regulation and oversight has been abysmal, with little known about long-term sustainability. The PPS must be strengthened and other action taken to ensure this state of affairs does not continue.

Recommendation 16

- We have no specific recommendations for policy improvement with respect to section 2.4 dealing with water quantity and quality other than to point out the obvious. Current policies are completely inadequate and it is a matter of high priority to address this area.

G Conclusion / assumptions underlying the PPS/land use decision making process

Before concluding, we believe there are some broader philosophic issues underlying the land use planning discussions that should be frankly explored.

Some environmentalists believe there is a clash between some of the basic objectives of the PPS – in particular between economic development objectives and environmental objectives. While that may be true in a few specific instances for the most part we believe strongly that is not the case. As we and others have argued, the most efficient development patterns, are the ones that use less greenspace, require fewer lanes of highways and other infrastructure, reduce auto dependency and associated air pollution, accidents, and economic damage resulting from congestion etc.

Furthermore allowing more growth outside rather than inside existing urban areas, does nothing to aid the economy. And if the result of greater attention to planning urban growth, results in a higher quality of life in a broad region, that can only help us in this very competitive world.

The clash we feel is different. On the one hand there are those who believe that economic development is best promoted giving individual land owners more freedom to develop their land, and letting the free enterprise system play the key role in determining future land use patterns, within very general guidelines. On the other hand there are those who believe that while free enterprise is very important, that particularly in fast growing urban regions like the GTA, far more attention and planning needs to go into managing our future urban form, as well as all the other elements - social, environmental etc.- that will preserve and enhance the quality of life in the region and be so critical to the Region's future economic success.

We clearly tend to the latter camp at least in highly populated growing areas of the Province, where issues are very complex and the implications of different approaches great. As our recommendations suggest we believe that municipalities should be given more power to make land use decisions, but they should have to do so within a broader more directive planning/policy framework than presently exists.

Developers might argue that such an approach unfairly limits landowners rights to develop their lands; that it will reduce housing choice; or that more generally it will negatively impact economic activity.

With respect to landowners rights we feel this is a non-issue since no one is suggesting down zoning or arbitrary treatment. With respect to housing choice, it is important that there is a rich range of housing choice. However as Regions become more populous, some choices have to be reduced. More than 30 years ago now, those who owned 100-acre parcels in many regions were no longer allowed to sever them into 10-acre lots. One could argue that this change limited housing choice; however in order to control sprawl and countryside fragmentation it was rightly felt to be necessary.

Today with far greater population and less and less countryside close to urban areas left, it becomes even more important to protect and not fragment what remains. And if that results in limiting certain forms of development, which municipalities after careful study and consultation deem inappropriate so be it. Surely that is what democracy is all about.

Finally, with respect to the overall issue of economic impact, intensification and brown fields development is if anything more labor intensive than greenfield development and results in more jobs in the economy. And as noted earlier if the net effect is a more livable urban region the positive impact on the economy would far exceed the odd instance in which allowing more freedom would have provided a greater economic advantage.

It is for all these reasons then, economic as well as environmental, that we feel that future land use patterns around green field development should be less individually developer driven than has been the case in the past. Nor do we believe it appropriate that dispute resolution power on key issues such as settlement area expansion and green field development should reside with non-elected bodies.

The system we envisage would certainly involve more attention to land use planning. However in most ways, within a context like the GTA at least, it would be far less bureaucratic drawn out and expensive than the current system. Clearer provincial and multi regional plans and policies that must be reflected in local plans, combined with a far greater ability of local governments to call the shots within such a framework without being dragged through multi million dollar OMB disputes should simplify not complicate things. And it certainly would be more democratic

Thank you for your consideration,

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Green Door Alliance Summary of recommendations

Recommendations

1 - As a second stage to the PPS review, circulate draft PPS changes for further public comment before finalization

2 – In the second stage of the PPS review, broaden PPS proposals to encompass and invite comment on smart growth and related infrastructure and planning matters.

3 - Acknowledge that urban sprawl is a serious problem, and treat it as such in the action taken and the approach to public consultation.

4 - Part 3 of the Planning Act should be changed to require authorities to act in a manner “consistent with” the PPS, rather than merely requiring them to “have regard for” it.

5 - Specific Growth management policies/plans for the extended golden horseshoe area need to be developed. (And other areas probably too, but this is the area we are concerned with).

Among other things such plans should only provide for new settlement area expansion in any area, if such expansion is considered to be the most reasonable alternative within the overall context of the growth management plan, and the provincial policy framework.

The Province must make it clear that Official Plans, and land use decisions within such areas need to comply with such overarching plans/policies.

Where disputes arise over land use changes that are significant enough to require change to the broader ‘golden horseshoe level’ plan and these would include municipal population forecasts and expansion onto greenfields these disputes should be resolved by the Minister after public consultation and not directly resolved by the OMB.

6 – Part 1 of the PPS should be changed along the following lines: These revisions could be Ontario wide or possibly only apply to certain areas of the Province dealing with high growth and urban sprawl.

- A new section at or near the beginning of part1 of the PPS should contain the following:

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7 – The first paragraph of section 1.1.1 c of the PPS, should be changed as follows:

1.1.1 C) Urban areas and rural settlement areas will only be expanded, or new settlement areas including estate residential created, at the initiation of the municipality, as part of an official plan review, or secondary planning process, and only where existing designated areas in the municipality do not have sufficient land supply to accommodate the growth that was projected by the municipality in Official plans and approved by the province. Furthermore in jurisdictions where a provincially approved growth management plan/policy framework is in place, expansion will only be allowed where there are no reasonable alternatives within the framework of that plan.

8 - A section should be added in part 1 stating:

“ In comparing the cost effectiveness of different development patterns, the overall costs related to additional auto use including human health and accident impacts, environmental impacts, and congestion and land use impacts must be considered, and appropriately reflected in official plans and land use decisions”.

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10 - There are a whole variety of other changes that could be suggested to part 1 to ensure that it really does promote smart growth principles. The further encouragement of brownfield development, of compact, mixed use pedestrian and transit friendly urban and community form that makes maximum use of existing infrastructure; are all critical. However regardless of whether the PPS is more extensively revised or whether instead of further revising the PPS, Growth Management plans are developed in some areas of the Province to supplement smart growth policies in the PPS, it is critical that the influence on decision making should be the same.

11- The significant natural heritage areas identified in section 2.3.1 b which indicates development “may be permitted” if it has been demonstrated there will be no negative impacts, should be included in section a which unqualifiedly states development and site alteration will not be allowed.

12 - A new section 2.3.1b should be created which reads as follows:

“ Development and site alteration will not be permitted in areas municipal official plans have designated for protection unless there are no reasonable alternatives, and unless there will be no negative impacts on the natural features or the ecological functions for which the area is identified”.

13 – The definition of the term “prime agricultural area” should be broadened to read, “means an area where prime agricultural land *and adjacent land which is or could be an important part of the farm economy predominates* “ (items in italics added).

14 – In order to virtually eliminate discontinuous development in prime agricultural areas the PPS should clearly state that, in section 2.1 that, “ Apart from settlement area expansion no non-farm-related development will be allowed in prime agricultural areas. “

15 – In section 1.1.1 c which states there will be no expansion of urban and rural settlement areas into prime agricultural areas unless “there are no reasonable alternatives,” a stringent hurdle for describing how this phrase should be interpreted should be developed. “ A ‘smart growth’ definition of “No reasonable alternative” needs to be included in the PPS.

16 - We have no specific recommendations for policy improvement with respect to section 2.4 dealing with water quantity and quality other than to point out the obvious. Current policies are completely inadequate and it is a matter of high priority to address this area.