



September 24th, 2004

A Growth Plan for the Greater Golden Horseshoe
Ministry of Public Infrastructure Renewal
Smart Growth Secretariat
777 Bay Street, 16th Floor
Toronto ON M5G 2E5
Email: placestogrow@pir.gov.on.ca

Re: Comments on the *Places to Grow: A Growth Plan for the Greater Golden Horseshoe*

Comment Period: Closing September 24, 2004

Dear Representatives of the Ministry of Public Infrastructure Renewal,

Pollution Probe supports the Ontario Government's efforts to develop and implement a long-term plan for growth in the Greater Golden Horseshoe. We also support the Ontario Government's role in consulting with the public on the growth plan, in addition to other complementary initiatives such as source-water protection, planning reform and transportation planning.

Attached please find Pollution Probe's comments, concerns and recommendations on the proposed Growth Plan. While we have addressed some of the questions posted on your online survey, our recommendations focus on the areas in which we have knowledge and expertise. We intend that they will be constructive and will help the Ontario Government develop a sustainable growth plan for the Greater Golden Horseshoe.

We appreciate this opportunity to comment on the proposed growth plan and we encourage the Ministry to revisit the issues addressed in our submission. We would be happy to discuss our recommendations further with you.

Sincerely,

Ken Ogilvie
Executive Director, Pollution Probe

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BACKGROUND ON POLLUTION PROBE

Pollution Probe is a non-profit charitable organization that works with all sectors of society to protect health by promoting clean air and clean water. Established in 1969, Pollution Probe is supported by an active donor base of approximately 6,000 donors. Our mandate is to define environmental problems through research; promote understanding through education; and press for practical solutions through advocacy. Working in partnership with industry, governments and communities, Pollution Probe offers innovative and practical policy-oriented solutions to air and water pollution issues and we seek to support measures that will assist in providing a clean, safe and healthy environment.

Pollution Probe's programme areas include: Water; Air, which includes strategies for Transportation Demand Management; Climate Change; Energy; Mercury; Environmental Policy Development; and Environmental Health, which includes Indoor Environments and Children's Health. For more information, see: www.pollutionprobe.org.

As part of Pollution Probe's mandate to work in partnership with other stakeholders to develop practical policies that affect the environment, Pollution Probe reviews and comments on various policies, acts and regulations proposed by the Ontario and Canadian Governments. Most recently, Pollution Probe has provided suggestions to the Ontario Government on Planning Act Reform and Implementation Tools, draft policies of the Provincial Policy Statement, Ontario Municipal Board Reform, the Drinking Water Source Protection Act, the Water Taking and Transfer Regulation, the Electricity Restructuring Act and the Industry Emissions Reduction Plan Proposals for a Nitrogen Oxides and Sulphur Dioxide Regulation.

Pollution Probe also prepared a report for the Central Ontario Smart Growth Strategy Sub-Panel that provided recommendations to guide future planning in Ontario and which forms the basis for our comments on the proposed growth plan. This report is available on our website: <http://www.pollutionprobe.org/Reports/smartgrowth.pdf>. We would also like to bring to your attention other reports that support our comments, specifically:

- the net gain principle: <http://www.pollutionprobe.org/Reports/netgain.pdf> and the attached paper *Toronto's Environment: A Discussion on Urban Sprawl and Atmospheric Impacts*;
- climate change impacts and human health in the Toronto-Niagara Region: <http://www.pollutionprobe.org/Reports/adaptation.pdf>;
- and the report on the 2003 national conference on Transportation, Air Issues and Human Health *Moving Together: Towards a Healthier and More Sustainable Future*, which should be available on our website in early October.

GENERAL COMMENTS

Pollution Probe welcomes the government's growth plan initiative for the Greater Golden Horseshoe, and regards it as an important step forward towards achieving more sustainable development patterns in the region. Accommodating future population and economic growth in the region, while protecting the environment and enhancing the quality of life is a daunting challenge. However, it is apparent that the continuation of "business as usual" development patterns is not sustainable, in terms of the loss of prime agricultural and natural heritage lands, increasing congestion, declining air and water quality, and growing implications for human health.

In general, Pollution Probe supports the discussion paper's overall strategy of shaping growth through the intensification of existing urban areas, the promotion of more compact development forms, focusing growth in priority and emerging urban centres, and adopting a more rigorous approach to the expansion of urban boundaries. The proposed new approach to infrastructure planning and investment is also an important step forward, especially the development of an integrated regional transportation network that makes public transit a priority.

Planning for growth will inevitably involve making choices, as demands for the expansion of transportation corridors, development pressures on prime agricultural lands, the opportunity for redeveloping brownfield sites, etc. could make the decision-making process a challenging task. While the discussion paper provides a broad vision to help make planning decisions, it lacks a framework from which to measure or evaluate future progress. Pollution Probe encourages the Ministry of Public Infrastructure Renewal to adopt "net gain" as the overarching principle against which future urban form and growth management will be assessed. The basic concept is that growth cannot be "smart" or represent a "better choice" unless it results in a net environmental benefit.

Furthermore, the Ministry of Public Infrastructure Renewal should set an aggressive target of, for example, a 25 per cent net gain (relative to established baselines) in specific environmental indicators, which might be applied at the provincial level for certain indicators and linked to regional/upper-tier municipal plans. Flexibility should be allowed for specific developments, but the net gain principle would ensure that environmental quality indicators improve with urban and transportation developments in the Greater Golden Horseshoe.

SPECIFIC COMMENTS

1. Integrated Regional Transportation Network. Pollution Probe supports the creation of a Greater Toronto Transportation Authority, which must have the financial and regulatory power to be effective. Transportation Demand Management should be encouraged as a key component of an integrated network. The development of HOV lanes is a step forward, but there may be other roles that the provincial government can take to support and enhance TDM delivery at the municipal level. For example,

development charges for residential and commercial properties should reflect the full costs of providing infrastructure, and in the latter case could also mandate compulsory TDM policies at the company level.

2. Intensification and compact development: The development of brownfields represents an untapped opportunity to revitalize older neighbourhoods and generate wealth for communities. Their development could also alleviate pressure on greenfield development, and as an example of intensification help reduce transportation-related emissions of air pollutants and greenhouse gases contributing to smog and climate change.
3. Climate change: In planning for urban growth in the Greater Golden Horseshoe, it is important to take into account climate change, and how urban areas can generate greenhouse gases, and are also impacted by climate change. Growth strategies should support initiatives that help mitigate and adapt to climate change, such as more sustainable water resources management, energy efficiency and energy from renewables, landforms that improve the adaptive capacity of communities and health care infrastructure, etc.