Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

Clean Air Partnership (CAP) is a charitable organization that works with Ontario municipalities to advance their livability and competiveness through actions that:

- reduce energy costs, air pollution and greenhouse gas emissions;
- increase our resilience to extreme weather impacts; and
- advance Ontario's low carbon economy.

CAP was launched when the City of Toronto, the Province of Ontario and the Government of Canada came together to address the health impacts of air pollution in June 2000. CAP now serves as the secretariat for 28 Ontario Clean Air Council member municipalities as well as another 58 Ontario municipal members participating in the Federation of Canadian Municipalities' Partners for Climate Protection program. Membership in these networks accounts for almost 80% of Ontario's population. Thank you for the opportunity to provide input from Clean Air Partnership on the Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 (ERO # 013-4504).

While it is recognized that there are at present different land use archetypes and densities across the proposed three groups of municipalities/regions. It also has to be recognized that reducing the density targets for the groups will result in an undermining of the principals and the goals of the Growth Plan (namely an increase in infrastructure costs, energy use and congestion). Especially since the targets set in the 2017 Ontario's Growth Plan were set with the recognition that a minimum density is a prerequisite for ensuring the economic availability of public transit opportunities. By reducing the targets in Group B and C it is likely that those municipalities will find themselves in a position where public transit opportunities are not economically viable. This will require residents to rely heavily on their personal vehicles as their primary mode of transportation, thereby not providing the enabling factors that will result in reduced use of single occupancy vehicles and will not reduce congestion in these communities.

In addition, density is a key factor in addressing infrastructure costs and Ontario's infrastructure deficit. Numerous studies at the academic as well as municipal level have been undertaken to explore the financial implications of less dense growth patterns on infrastructure costs to meet the needs of new growth. For example:

- A Florida study conducted by (Duncan, 1989) found that compact development reduced capital costs by 60%, schools by 7% and utilities by 40%.
- (Burchellet al, 1998) found that compact growth results in a public/private capital and operating costs savings of between 12-26% for local roads and between 7-14% for water and sewer infrastructure costs.

- Champaign, IL, found that a smart growth approach to future city development could cut the upfront cost of infrastructure from $123 million to $71 million—a savings of $52 million, or 42 percent over 20 years and would cut service costs by 23 percent, or $19 million, over those 20 years (TischlerBise, 2010).
- A study of the Toronto area of growth alternatives undertaken by (Blais, 2013) found savings of between 18-29% on capital and operating costs for transportation and utilities depending on how compact the growth.
- The City of Edmonton estimated that, for 17 of the 40 new developments underway or planned in Edmonton, the net costs for the City will exceed revenues by nearly $4 billion over a 60-year period (Sustainable Prosperity, 2013).
- The City of Calgary found that a more dense urban form, would use 25% less land, cost 33% less to build, and save the City more than $11 billion in capital costs alone (Sustainable Cities, 2012).

Many of the above studies have focused on the upfront capital costs of providing infrastructure for new growth. As a result, there are gaps in the research on the economics of urban form. Increased knowledge of the implications of urban form on operations and rehabilitation costs of infrastructure and revenue would be of great value. These scenarios would better enable municipalities to understand the correlation between urban form and municipal costs and revenue on a longer term basis; especially when considering how best to ensure that the needed revenue is available to cover the costs for rehabilitation of infrastructure a few decades after installation.

Smart land use planning ensures land use is efficient and productive: that is, that the activity taking place on that city's land is creating enough wealth to support the infrastructure and services needed for that place to continue to exist and thrive. The challenge is most municipalities don’t perform these analyses, and when they do, they focus on the upfront capital costs of growth and not on the costs of servicing that growth (or even its future rehabilitation). When municipalities do undertake these economic analyses, they often average their costs over the whole jurisdiction rather than allocating them to the various specific land use archetypes. This results in more compact growth subsidizing less dense growth areas.

RECOMMENDATIONS:

- It is recognized that density targets will be a larger challenge in Group B and C municipalities, but rather than reducing targets and allowing for exemptions from density targets for all municipalities, it may be more worthwhile for the Province and Municipalities to work together over time to address the issues and circumstances that limit the achievement of density targets so that improvements can me made over time and that Ontario’s infrastructure deficit does not continue to increase and result in even more financial challenges within Ontario communities.

- There is the need for the Province to adhere to the Growth Plan just like municipalities are required to. The Province is in charge of making infrastructure decisions that have the ability to support or undermine implementation of the Growth Plan. This would increase alignment between municipal and provincial investments (siting and timing of hospitals, public institutions and infrastructure investments such as 400 series highway & GO transit). These decisions are likely to have a significant impact on the ability or inability of municipalities to achieve the Growth Plan targets.

- The implementation of the Growth Plan would greatly benefit from **increased coordination and collaboration between provincial ministries and local and regional governments to** identify and addresses the challenges related to implementing the Growth Plan, The Big Move, and Ontario's Environment Plan. There needs to be more opportunity for collaboration across the region, sharing best practices and identifying emerging issues and addressing implementation challenges. Advancing complete communities, climate change mitigation and adaptation opportunities and transitioning to a low carbon future will require innovative policy decisions, broader input into what these policies might look like, as well as testing out of policies within jurisdictions, and sharing of lessons learnt from implementation in order to improve and advance implementation policies and actions across the Region and beyond.

- Municipalities need real data to support municipal land use planning innovation that addresses the energy and carbon challenge. Data sharing protocols should be established between municipalities (upper and lower tier), local distribution companies and the province in order to ensure data sharing and coordination across planning and mapping initiatives. The Growth Plan should provide more direction to municipalities and provincial ministries to ensure that the data and direction advances the ability of municipalities to apply an energy lens to their land use plans and decisions.

- The Growth Plan would benefit from increased direction regarding resilience to extreme weather events (for example vulnerability assessments could be required for requests for infrastructure and other grants of provincial money) but clear direction of how those vulnerability assessments should be undertaken would be essential.

- Integration between the Growth Plan and Ontario's Environment Plan would be strengthened if requirements and guidance were provided to municipalities for how to incorporate a climate change mitigation and adaptation lens into land use and infrastructure decision making. This would also increase the likelihood that possible trade-offs between mitigation and adaptation are identified and considered by municipalities (ex. intensification and permeable surfaces and green space). At the same time the use of a lens that considers climate change mitigation and adaptation will also identify synergistic action between mitigation and adaptation (ex. community energy that reduces greenhouse gases and increases community energy resilience).

Clean Air Partnership would be very pleased to organize a consultation between the Ministry of Municipal Affairs and Housing and Clean Air Council municipalities to further explore the above feedback as well as opportunities to increase collaboration and coordination between the Province and municipalities within the Growth Plan Regions.

Sincerely,

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