February 28, 2019

Cordelia Clarke Julien

Assistant Deputy Minister

Ontario Growth Secretariat (OGS)

Ministry of Municipal Affairs and Housing

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Toronto, ON M5G 2E5

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Re: Proposed Amendment to the Growth Plan, ERO 013-4504

Dear Ms. Clarke Julien,

The Ontario Greenbelt Alliance (OGA) supports the principles of the Growth Plan to curb expensive low-density development that drives up municipal taxes and debt, increases gridlock, degrades our water, paves over productive agricultural land and leaves us with a legacy of failing infrastructure, and transit starved cities across the Greater Golden Horseshoe (GGH). It is important that any changes to the Growth Plan support the ongoing shift in the regional growth model toward greater urban density and curbing of sprawl.

One of the key strengths of the Growth Plan is the requirement to use a Municipal Comprehensive Review (MCR) process to guide regional planning through an evidence-based framework that encourages efficient use of land. This provincial and regional guidance is key for smaller municipalities with few resources to enable them to move toward a consistent, public interest-based approach to growth management.

During the 2015 Growth Plan review it became clear that the MCR process had ensured that there is a sufficient supply of undeveloped greenfield land available to meet housing and employment needs as well as a supply of land within our urban areas to meet intensification targets. Proposed reductions to the designated greenfield targets (DGA) and allowing municipalities to ask for even lower targets is contrary to the goal of creating complete, compact communities. Gentle density and hard boundaries move us away from the wasteful low-density model of development.

In addition, holding the line on settlement area boundary expansions between MCR processes is key to creating complete communities, making expansions based on a complete package of evidence, maximizing infrastructure efficiency, limiting the loss of productive and precious farmland and maintaining our clean water resources.

On behalf of the Ontario Greenbelt Alliance I submit the following comments on Growth Plan Amendment one for your consideration.

Sincerely,

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On behalf of the Ontario Greenbelt Alliance

1. **Employment area conversions**

The existing MCR process may in some cases be too onerous and hinder the creation of mixed-use projects (e.g. the redevelopment of lands near the Kitchener ION). Employment uses are changing and work is becoming increasingly mobile. Economic development strategies are essential to understand local needs and employment trends and these strategies should inform any desired conversions.

Like all planning matters, conversions should be public and evidence based. Conversions should only occur if the employment lands are in excess of projected needs to 2041.

**Recommendation:**

The following conditions should apply to employment land conversions:

* 1. the proposed land designation conversion supports the objectives of the Growth Plan, in particular, the density targets for residents/jobs per ha are attained that support transit, 150 ppj/ha and 200 ppj/ha near subways and 80 ppj/ha for regular 10-15 minute bus service.
	2. the conversion is to mixed use, multi- storey buildings and prioritizes rental housing. Employment land is not converted to low-density single family housing.
	3. designated employment land within 500 m of a 400 series highway should be retained for employment uses and agriculture, not converted to housing or institutional uses due to health impacts from traffic pollution.
	4. conversions are evidence-based, a regional economic development strategy has been completed, the employment land retained by the municipality exceeds the need to 2041.
1. **Agricultural and Natural Heritage System Implementation**

**2.1 Natural Heritage System Implementation**

Mapping a natural heritage system provides clarity and reduces duplication between various levels of government. The current piecemeal approach to natural heritage protection is not working. Between 2000 and 2011, we lost 6152 hectares of wetlands in southern Ontario. Wetlands are valuable; they can reduce the financial costs of floods by up to 38 per cent and provide water and nutrient filtration services as well as critical wildlife habitat and recreational opportunities.

**Recommendation**:

We urge the province to use recently completed Ministry of the Natural Resources and Forestry mapping as a baseline and incorporate more refined conservation authority mapping if it is available and can be shown to more accurately characterize the mapped features or functions.

* 1. Expand the Greenbelt throughout the provincial agricultural areas and natural heritage systems.
	2. The province needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.
	3. Where there is a conflict in mapping the more restrictive mapping should apply or a NHS evaluation should take place.
	4. Natural Heritage mapping must be applied consistently across the Greater Golden Horseshoe, including whitebelt lands.

**2.2 Agricultural System Implementation**

Between 2011 and 2016 Ontario lost 319,700 acres of productive agricultural land (175 acres per day). Not only is this loss unsustainable from a food security perspective but it symptomatic of an unaffordable pattern of urban growth. Allowing boundary expansions of towns and cities paves over productive farmland.

**Recommendation:**

1. Support the provincial Agricultural System to consistently protect farmland across the Greater Golden Horseshoe. Farming is a business and the agri- food sector is a key economic sector in Ontario.
2. Maintain fixed urban boundaries for existing urban and rural settlement areas throughout the GGH. Create permanent growth boundaries where mapping shows a healthy agricultural system or natural heritage feature.
3. Ensure municipal zoning of prime agricultural land is consistent with Provincial agricultural system mapping.
4. Land swaps of Greenbelt land are not acceptable. The Greenbelt permanently protects land. Opening lands in the Greenbelt for development would signal the end of the Greenbelt Plan to millions of Ontarians.
5. **Major Transit Station Areas**

Transit and growth should be integrated to support transit that connects urban growth centres. This will relieve congestion for citizens and goods moving throughout the Greater Golden Horseshoe and within urban growth centres. A 2014 Ministry of Health study estimated that 154 premature deaths and health benefits valued at $1 billion per year could be achieved by implementing the Big Move regional transit plan.

**Recommendation:**

Ensure density and transit are complementary and integrated (subways, 200 pp/ha., light rail transit 160 pp/ha., Go trains 150 pp/ha, 80pj/ha buses 10-15 minutes). Lower densities of 50 pp/ha make regular transit unsustainable.

1. Maintain existing density targets for mobility hubs within urban growth centres.
2. Rezone lands around existing mobility hubs (Metrolinx Plan) to support transit oriented development while reducing congestion (include a mix of more affordable housing including rental, mid-rise and low- rise).
3. Existing policies already have flexibility i.e. Municipalities can shift density along transit corridor with existing policies.
4. Avoid using transit to direct growth to greenfield areas or the edge of settlement areas, instead use transit to revitalize downtowns and support complete communities.
5. **Settlement Boundary Expansions**

Data produced to date indicates that there is more than enough land already allocated to accommodate expected population growth in the Greater Golden Horseshoe within existing urban boundaries to 2031. In some regions there is an excess of land, for example, York Region has a 23 year supply of land for housing and an excess supply of employment land.[[1]](#endnote-1)[[2]](#footnote-1) If we build more missing middle housing we can reduce land consumption.

For example, a recent study by Ryerson City Building Institute indicates that Mississauga can accommodate 174,000 mid-rise housing units within its existing urban footprint, 85% of Peel Region’s allocated growth.[[3]](#footnote-2) Missing middle family housing provides affordable housing where urban services exist reducing municipal costs and retaining precious farmland.

If urban boundary expansions proceed when there is excess land then land use is not maximized resulting in inefficiencies, such as lost revenue for municipalities from vacant land and costs for infrastructure expansions resulting in higher taxes.

**Recommendation:**

1. Clarity is required to understand 1) who can make a request for a boundary expansion and 2) the number of boundary expansions that can be requested outside of an MCR process.
2. Hold the line on urban boundary expansions to support intensification to prevent sprawl, farmland loss and maximize the efficiency of existing infrastructure.
3. Keep the MCR process, essential for evidence-based planning.
4. No rounding out to rural settlement boundaries or the boundaries of towns and villages or hamlets in the Greenbelt Plan.
5. Do not proceed with allowing settlement boundary expansions of up to 40 hectares (the size of Yorkdale) or multiple expansions.
6. **Density and Intensification Targets**

There is an excess of land for housing in many communities due to the use of the 2006 Growth Plan market-based land assessment during MCR preparation. During the 2017 Growth Plan review there was consensus reached among the multi-sector stakeholder panel to move to a target of 80 pj/ha. At the time industry concerns about the stock of single-family homes was found to be unsubstantiated as municipalities had planned for 800,000 ground related housing units providing for 80% of the expected population growth. Changes were made to calculating density targets by excluding employment areas, freeways, railways, pipelines, hydrolines, and cemeteries. Those exemptions and the new lower targets proposed further reduce densities in some areas below 2006 levels to 1990 densities. (See Appendix 2, Envisioning Brant County study).

Housing trends and demographic shifts indicate a broader mix of housing is needed beyond tall condos and low density housing. A report by Ryerson’s City Building Institute indicates that most of our housing needs can be met through mid-rise (4-10 stories) missing middle development.[[4]](#footnote-3) And transit supportive densities reduce congestion estimated by the Toronto Board of Trade to be costing our economy up to $15 billion per year by 2031. Beyond economic costs, increased traffic congestion has many implications for commuters including health costs and a loss of family time. A recent study by CMHC indicates a longer commute also reduces the affordability advantage provided by lower housing costs on the edge of the GGH.[[5]](#footnote-4)

Density makes housing, schools, road and servicing infrastructure more affordable and sets the land-use stage for providing the diversity of housing that people want. In the Greater Toronto Area 81% of respondents to a home-buyers survey prefer a smaller house or condo in a walkable transit friendly neighbourhood over a large house and a long commute.

Regional and County governments can and do account for variations and infrastructure capability of lower tiers when allocating growth. Also 75% of the forecasted growth is in greenfield areas that are contiguous to urban areas and most areas are supported by the regional transportation plan. Allowing all municipalities to lower growth targets is contrary to the principals of compact transit supportive growth in the Growth Plan and will make it difficult to ever be able to provide appropriate levels of transit to low density areas in both the inner and outer ring.

**Recommendations:**

1. Keep the 2017 Growth Plan density and intensification targets and make them mandatory, there is already flexibility with expansion criteria through MCR process. Hold the line on density targets to develop the type of housing supply needed.
2. Clarity and transparency is needed to improve monitoring and reporting on implementation to better understand problems and find the best solution.
3. Update growth projections based on the census and Ministry of Finance projections.

**6. Recommendations to reduce red tape:**

1. Address housing affordability by getting rid of the right red tape (Section 37). Section 37 is a negotiation process that takes time and resources away from planning, reduces transparency in the planning process and inspires NIMBY’s.
2. Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.
3. **Other recommendations:**
4. Raise the profile of Indigenous interests, treaty rights, consultation, and planning approaches and priorities.
5. Increase support for land securement as a tool for growth management and natural/agricultural/cultural heritage protection, including enabling severances/land subdivision for conservation purposes and associated incentives.
6. Retain a long-term sustainable approach to growth management that focuses on more than the number of houses built but the vibrancy and resiliency of our communities.
1. **Appendix 1 – Excerpt from Housing submission, Environmental Defence Canada**

Increasing Housing Supply in Ontario, ERO #013-4190

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	3. **There is enough land**.There is 310,000 acres or 125, 560 hectares of unbuilt land within existing urban boundaries. This is sufficient supply for housing needs from now until 2031. If Growth Plan density targets are followed the land set aside to 2031 can last to 2041. Opening up the whitebelt for development will only add unnecessarily to developable land supply and do nothing to change the housing supply mix or alleviate housing prices.

	1. **Is there a housing supply issue?**The Provincial Policy Statement, 2014 (PPS) requires municipalities to maintain a three year supply of registered and draft approved housing, as well as a 10 year supply of lands designated for residential development. Municipalities are planning for 2041 now. Increasing the supply of land beyond 2041 will do nothing to increase the supply of housing today even if constrained land supply was a current limiting factor, which it is not.

When we project housing allocation it is important to consider existing housing. An estimated 700,000 resale homes are coming on the market in the Greater Toronto Area over the next 20 years as baby boomers move on. Most of this housing is single family homes. Assuming 2.9 people per home these houses could accommodate over 2 million people. Allowing secondary units in existing housing or allowing conversions of large homes to multiplexes increases our ability to provide needed housing. When forecasting our future housing needs it is important to consider how to make better use of our existing housing stock.

We need policies that encourage developers to build the type of housing we need, more rental housing for seniors and young people and smaller homes that allow seniors to downsize.

**2.1 Housing Supply Case Study - York Region**

A 2016 Housing report from the Region of York identified a good supply of housing with 15,930 registered and 26,980 draft approved units by structure type in the Region as of mid-year 2016. Together, the Region’s registered and draft approved supply is an estimated 42,910 units. The forecast demand is (9,000 units/year) indicating a five year supply of housing ready to be built.

York Region has regional water and wastewater capacity for 227,700 people or 82,600 units. Given that the Region’s 42,910 units of registered and draft approved supply account for only 52% of this total, there is sufficient servicing capacity at the regional level to accommodate more than the five years of registered and draft approved units for future growth. Housing supply today is clearly not an issue in York Region.

There is enough housing in the supply pipeline but the housing is being built slowly to keep demand and prices high.

**2.2 The Type of Housing we need**

At a recent Board of Trade meeting in Bradford a real estate firm stated there is an oversupply of high end housing and not enough affordable housing. He claimed the 2017 market surge was due to a demand issue that lasted about 3 months. Housing issues today he blamed on developers holding onto supply waiting for prices to rise and sellers expecting 2017 prices on resale homes. His solution, let the market correct itself.

The median household income in the GGH is about $78,000. Given the household income distribution in the region, based on income alone (i.e. not including other equity), less than 50% of households could afford (or obtain a mortgage for) a house costing $350,000 without spending more than 30% of their gross income (assuming 25% down payment, at 5% interest over a 25 year period). Clearly, the shift in the type of housing completions in the region from single-detached to multi-residential housing forms and apartments which began in 2001 is a trend directly related to the ability of the population to pay for housing.

The type of housing built needs to meet the housing need. In York Region alone there is an inventory of 17,870 singles, 1480 semi’s, 8270 row houses and 15,290 condos and apartments. Rental housing is in demand and supply has been decreasing. A land needs assessment and subsequent housing strategy can identify what type of housing is needed.

According to CMHC, improving economic conditions in the GTA including employment growth and a low unemployment rate are drawing immigrants and temporary workers to the area and therefore increasing rental demand. Purpose built rental and low income housing needs to be created with functional and affordable access to public transportation options.

**Recommendation:** Find ways to support development of purpose built rental housing near transit stations in urban areas. Encourage a mix of affordable housing types.

**2.3 If we designate more land for housing will it reduce housing prices?**

The rules for calculating of land needs within a MCR process that were specified by the 2006 Growth Plan used a methodology that based predictions of future growth on past housing trends rather than requiring an inventory of the land, including vacant land then developing a municipal housing strategy. As a result there was an excess of land designated for housing and employment uses. Despite having over 125,000 hectares of excess land designated for housing, house prices rose significantly over the last 5 years.

During a 2011 Waterloo OMB hearing planners in municipalities and at the province realized the market based projection methodology for determining land needs was problematic. Subsequently, during the 2015 review of the Growth Plan the planners at the province in consultation with stakeholders developed a new Land Needs Assessment methodology. This methodology provides a more reliable and valid method for forecasting housing and land needs.

**Recommendation**: Continue using a land needs assessment rather than a market-based approach methodology. Don’t allocate more land for housing until it is needed and not before an assessment of the success of the recently revised LNA approach at the next 10 year review of the Growth Plan.

	1. **It takes too long to bring housing to market**As noted in section 2.0 above there is enough land and housing to meet needs until at least 2031 and it could last to 2041. Many changes were made in the last 5 years to streamline the housing process. Perhaps the most effective was changing the OMB.

MMAH data shows that delays in bringing housing to market we caused more by developers than by governments. This occurred because developers challenged Regional Official Plans and approvals at the OMB. The result was an average delay of 3 years/5 Months across the GGH. These appeals were all aimed at seeking more land for ground related housing (single family homes) and all were dismissed by the OMB given data that confirmed abundant existing land supply.

The OMB appeals in turn delayed all the lower tier conformity exercises within these upper tiers – which were in turn further delayed by even more industry appeals to the OMB. The overall cost to municipalities was in the tens of millions of dollars in legal and planning costs. (See Appendix I attached)

It is these industry driven delays which directly led to the recent OMB/LPAT streamlining reforms prohibiting industry appeals of Growth Plan conformity amendments, provincial plan conformity amendments and new/revised official plans where the Province has issued an approval. These reforms also provide a two year restriction on appeals of new secondary plans (unless supported by a municipal council) and a 5 year restriction on Community Planning Permit System by-laws as it was clear that industry was launching appeals before new municipal policies and by-laws were adopted.

Almost all 110 municipalities in the GGH have amended their official plans to conform with the Growth Plan. As the chart below shows, the six largest upper tiers

in the region and the City of Hamilton approved their conformity exercises within provincial timeframes while the Ministry of Municipal Affairs and Housing issued approvals within an average of 1 year and 5 months.

Reducing “red tape” by seeking efficiencies in land use planning approval and permitting processes is a valid and worthy goal. It is important to continue such efforts while keeping in mind that land use planning should be a transparent and accountable public process and serve the public interest

**Recommendation:** Keep policies that prohibit industry appeals of Growth Plan conformity amendments, provincial plan conformity amendments and new/revised official plans where the Province has issued an approval, secondary plans and a five year restriction on Community Planning Permit System by-laws. Keep the Local Planning Appeals Tribunal (LPAT) as it is a quicker, less expensive dispute resolution process compared to the Ontario Municipal Board (OMB).

	1. **Employment area conversions**We agree the existing process may in some cases be too onerous and hinder good projects (e.g. the redevelopment of mixed uses near the Kitchener ION). To move forward, employment area strategies to calculate employment land needs should be completed and made publicly available before any conversion process commences.

It is also clear there is an excess of employment land. Ontario is enjoying a period of stable employment. The unemployment rate has remained below 6% since 2017. In the recent Neptis Foundation report, Planning the next GGH, a slowing trend in employment growth in the 905 is revealed. With stable employment, a slowdown in employment growth and an aging population employment land needs are decreasing. It is unclear what projections the province is using to propose allowing employment land growth anywhere in Ontario. At the same time as the province is consulting on Bill 66, the [Growth Plan Consultation](https://ero.ontario.ca/notice/013-4504) was released which identifies provincially significant employment areas.

The Municipalities are currently undertaking studies as part of the Growth Plan requirements to determine land needs for employment uses. This data is essential for responsible planning. Many areas in the Greater Golden Horseshoe such as Simcoe County have completed the calculations to determine they have an excess of employment land.

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| **Employment Land by Regional Municipalities in the GGH (2015-2017)** |
| **Region (hectares)** | **Total Vacant Emp. Lands**  | **Total # Emp. Lands** | **% Total Emp. Lands**  |
| York | 2588 | 7759 | 33% |
| Halton | 2800 | 6099 | 46% |
| Peel (exl. Caledon) | 2070 | 10772\* | 19% |
| Durham | 3147 | 5611 | 56% |
| City of Hamilton | 918 | 4554 | 20% |
| Simcoe | 2919 | 6527 | 45% |
| Niagara  | 2300 | 6895\* | 33% |
| **Total hectares** | **16742** | **48217** | **35%** |
| York = [https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar+22+vacant+ex.pdf?MOD=AJPERES](https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar%2B22%2Bvacant%2Bex.pdf?MOD=AJPERES)Halton = <http://beta.halton.ca/repository/Halton-Competitiveness-Study-2016>Peel = <http://www5.mississauga.ca/research_catalogue/N_12_2016_VacantLands_Profile.pdf>(Mississauga)<http://www.brampton.ca/EN/City-Hall/meetings-agendas/PDD%20Committee%202010/20151207pis_Full%20Agenda.pdf> (Brampton) Durham= <https://www.durham.ca/en/living-here/resources/Documents/EnvironmentalStability/EAServicing_Durham.pdf> |
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| Hamilton = <https://www.hamilton.ca/mapping-business-reporting/activity-reports/employment-area-inventory>Simcoe= [https://www.simcoe.ca/Planning/Documents/SimcoeCountyLandBudget\_DataCollectionandAnalysis\_PhaseEmployment\_HemsonConsulting\_June17.pdf](https://www.simcoe.ca/Planning/Documents/Simcoe%20County%20Land%20Budget_Data%20Collection%20and%20Analysis_Phase%202%20Employment_Hemson%20Consulting_20%20June%2017.pdf) Niagara = <https://niagararegion.ca/council/Council%20Documents/ICP%208-2014.pdf>\*Indicates total employment land measured on Neptis Geoweb |
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Peel Region had an excess of employment land as evidenced through the recent plan review (MCR process) which converted three employment land areas in Mississauga and 13 in Brampton to residential. Experience indicates if too much employment land is designated it puts pressure on municipalities to convert those lands to residential.

Some municipalities such as York Region (which has 2588 ha of vacant employment land), have identified surplus lands for new employment uses but it is important that these excess lands not be automatically converted to residential uses. Typically these same communities with excess employment lands also have an excess of residential lands. A land needs assessment, as part of a Municipal Comprehensive Review, allows municipalities to identify and allocate the appropriate quantity of lands based on projected needs. It is essential that municipalities use the data obtained through a land needs assessment to understand whether there is a need to expand settlement boundaries.

In cities like Kitchener and Hamilton where factories have shut down there may be an excess of serviced employment land in the inner city near existing and proposed transit lines where conversion to mixed use residential and live work spaces may be appropriate.

In some newer greenfield communities developers own unserviced employment lands they want to build subdivisions on. Conversion of greenfield employment lands to housing requires extension of expensive infrastructure which will be costly, take time and not address immediate housing needs. In the Bradford area, farmland costs $50,000 an acre, whereas development land is $400,000 an acre. There is a $350,000 incentive per acre to allow conversion of farmland for development.

Converting employment land to housing and then opening up settlement area boundaries for employment uses will result in farmland loss. There is no need to open up the countryside to employment uses. Municipalities should use the surplus employment lands in towns and cities across the region for future job growth.

**Recommendation:** Employment area conversions would be appropriate if:

**a)** if the proposed land designation conversion supports the objectives of the Growth Plan, in particular, the density targets for residents/jobs per ha. and the creation of complete communities that are mixed-use and transit-supportive.

**b)** if the changes are evidence-based, and a regional employment lands strategy has been completed.

**TO BE ADDED- Planning analysis that identifies due to takeouts densities are even lower in the new Growth Plan**

**Appendix 2- Envisioning Brant Analysis for Langford Conservancy- Kevin Eby**

Envisioning Brantford - Municipal Comprehensive Review Part 1: Employment Strategy, Intensification Strategy, Housing Strategy and Land Needs

Review of the Conformity of the Recommended Alternative Density with Growth Plan for the Greater Golden Horseshoe Policy 2.2.7.6 (a) [↑](#endnote-ref-1)
2. [https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES](https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may%2B18%2Bhousing%2Bex.pdf?MOD=AJPERES) [↑](#footnote-ref-1)
3. <https://www.citybuildinginstitute.ca/portfolio/missing-middle/> [↑](#footnote-ref-2)
4. <https://www.citybuildinginstitute.ca/portfolio/missing-middle/> [↑](#footnote-ref-3)
5. <https://www.cmhc-schl.gc.ca/en/housing-observer-online/2018-housing-observer/drive-until-you-qualify-is-commute-worth-it> [↑](#footnote-ref-4)