July X, 2020

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The Honourable Steve Clark

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Honourable Minister Jeff Yurek
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Dear Ministers Clark and Yurek and team:

 **Re: A Place to Grow 2020 – Updated growth forecasts (ERO 019-1680)**

We, the undersigned organizations, are writing to express our strong opposition to proposed Amendment 1 to the Growth Plan extending the population and employment forecasts to 2051 while also allowing municipalities to exceed these forecasts. There is no need to extend the forecast period at this time as the 2017 Growth Plan Review revealed there was vast amounts of land already approved for urbanization while also showing that it was being urbanized at half the rate initially anticipated meaning it will accommodate growth for a much longer period of time. Further, attempting to plan 30 years out is fraught with uncertainty given the rate of change, while reliance on the flawed population and housing forecasts underpinning Amendment 1 will lock us and future generations into a continued pattern of environmentally and economically unsustainable urbanization.

Coupled with last year’s severe reduction in the intensification and greenfield density targets and allowance for all municipalities to seek reductions to those targets, the current proposal to allow municipal exceedance of the forecasts means the two key pillars of the Growth Plan (intensification/ density targets and population allocations) have been effectively abandoned. Proposed Amendment 1 will result in the loss of many tens of thousands of hectares of our precious farmland to low density, car dependent sprawl which can never support transit, while leading to further loss and degradation of our water, forests and wildlife and a worsening of greenhouse gas emissions.

Following are more detailed comments:

*Reliance on Flawed Municipal Allocation of Population*

1. While the total Growth Plan forecast for the Greater Golden Horseshoe is reflective of actual growth and the Ministry of Finance forecast, the actual population growth allocations for municipalities in the Growth Plan have dramatically differed from reality. Actual population growth has been substantially less (20-40%) than the Growth Plan forecast in the major regions and the primary cities in the outer ring – while significantly higher than the forecast in Toronto and Peel. The proposed extension of the forecasts to 2051 using virtually the same allocation pattern ignores this fact and is directing 1 million more people to suburban/exurban locations than the Ministry of Finance’s own 2019 forecast.

It is irresponsible and inappropriate to rely on a consultant based forecast which is completely out of step with actual census data and that of the most senior of ministries – the Ministry of Finance - as the basis to extend the Growth Plan horizon by 33%. Given any potential development arising from Amendment 1 would be 20-30 years away the amendment will have no role in the Government’s Housing Action Plan and thus there is absolutely no reason to proceed at this time as well as no reason to require municipalities to implement these new forecasts by the year 2022 – a further flawed proposal.

**Recommendation:** Potential extension of the timeframe and new forecasts should absolutely await the results of the 2021 Census – the results of which will be available within a couple of years. Direct the Ministry of Finance to be the lead on developing any new forecasts.

*Reliance on Flawed Housing Mix Assumptions*

1. A key basis for the flawed municipal allocation is the fact the consultant forecast assumes that ground related housing is going to increase to 64% of all housing starts in the GGH by the year 2051 despite such starts only comprising 54% of all new units for almost the last 10 years. As a corollary, this assumes that new apartment units will decrease from comprising 45% of all new units over the last 10 years to only 35%. Both assumptions are directly contrary to the actual housing start data over the last 10-15 years which shows new single detached units have decreased by almost 50% while apartments have increased by upwards of 300%. This trend is region wide but particularly evident in Toronto and Peel where the presence of existing and planned rapid transit and massive job creation have attracted much more growth than the Growth Plan forecast and why the Ministry of Finance predicts this to continue into the future. Indeed, if one excludes Toronto, the consultant assumes 75% of all housing in the GGH for the next 30 years will be ground related. Using these flawed housing mix assumptions underpins the allocation of more growth to suburban and exurban locations/municipalities – the vast majority of which will involve the conversion of farmland for ground related, car dependent housing.

**Recommendation:** Reject the housing mix assumptions underlying the proposed forecasts and revisit them in conjunction with the review based on the 2021 Census - again with the Ministry of Finance as lead.

*Flawed Range of Forecast*

The proposed Amendment contains 3 forecasts: “Reference” – 1.3 million more people between 2041 and 2051, “High” – 2.03 million more and “Low” 730,000 more. This is a vast range with the High being 50% higher than the “Reference” and 178% higher than the “Low”, while the “Reference” is 90% higher than the “Low”. Given the higher the forecast the larger the amount of farmland to be converted, this variation for a ten year period is unacceptable as a basis for proceeding.

**Recommendation:** As part of the review based on the 2021 Census develop a more pragmatic and rationale range of forecasts.

*Flawed Proposal to Allow Municipalities to Exceed Forecasts*

Allowing municipalities to exceed the forecasts completely undermines the fundamental pillar behind the Growth Plan which was to ensure a reasonable, total region wide forecast. This was to prevent individual municipal forecasts from exceeding any reasonable regional total and avoid unrealistic municipal infrastructure planning/budgeting and overtures to the province to build provincial and/or fund such local infrastructure based on these unrealistic municipal forecasts. There is also absolutely no need to allow exceedances since the Growth Plan forecasts are long term and regularly reviewed.

**Recommendation:** Do not proceed with allowing municipalities to exceed the forecasts.

*Flaw in absence of Fundamental Background Information*

The background analysis for Amendment 1 contains absolutely no analysis of household income and housing affordability, no documentation of the vast supply of existing ground related homes owned by boomers and pre-boomers (parents of the boomers) which will all come to market during the Plan horizon period, and no information on the impact on farmland or environmental conditions – particularly water supply and assimilative capacity of lakes and rivers to receive more sewage for inland communities (please refer to the detailed comments on this issue by Ecojustice in their comments concerning the proposed changes toClass Environmental Assessments (ERO 019-1712) – Municipal Wastewater Class EAs) .

**Recommendation:** Compile the appropriate information and analysis on these topics as part of the future review of the forecasts based on the 2021 Census. Going forward, amend the Growth Plan to specifically require that municipalities undertake affordability analyses and analyses of housing stock owned by older households (55+) as part of a municipal comprehensive review and reiterate this in the Land Needs Assessment guidance.

In conclusion, the proposed changes to the Growth Plan population growth forecasts and the provision to allow municipal exceedances of these targets is ungrounded in robust data and analysis and will result in increased sprawl, loss of farmland, impacts on water quality and upward pressure on municipal costs and taxation rates. It is important that these proposed changes be withdrawn in the interests of the public of Ontario.

Tim Gray

Executive Director

Environmental Defence