

February 28, 2019

Cordelia Clarke Julien
Assistant Deputy Minister
Ontario Growth Secretariat (OGS)
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 2304, 23rd Floor
Toronto, ON M5G 2E5
growthplanning@ontario.ca

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

Dear Ms. Clarke Julien,

The Oak Ridges Moraine Land Trust was formed in 2000 by volunteers involved in the advocacy for the creation of the Oak Ridges Moraine Conservation Plan (ORMCP) under the Harris government with the support of MPP Steve Gilchrist. Steve Gilchrist is a valued past Board member of the Oak Ridges Moraine Land Trust from 2001-2011. Since 2000, the Oak Ridges Moraine Land Trust has worked with many levels of government to work within the land conservation framework and land-use planning in Ontario.

We incorporated a Natural Heritage mapping strategy to assist us in protecting lands across the ORM, Greenbelt and Simcoe County. The use of the Federal Ecological Gift Program has allowed us to protect both agricultural and environmental lands. We recommend that the Province 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.

The Oak Ridges Moraine Land Trust (ORMLT) 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.

Clean and abundant water is critical to both human and nature survival. Opening areas that have been protected for the safety of our drinking water to development threatens our environmental health, increases flooding, erosion and drought. Flooding and erosion events have caused significant increases in insurance claims resulting in hike in insurance fees.

Protected farmland supplies local food and enhances food security at a time when prices are rising and supplies from other countries are being threatened. Farming and our local food production are economically important and provide jobs to thousands. Urban sprawl into farmland destroys farm businesses and farming communities. The Land Trust protects both farmland and environmental lands across the ORM and Greenbelt and in the Lake Simcoe protection area.

Allowing the development of employment and residential lands in the countryside, requires the expansion of infrastructure, roads, water and sewer servicing and will lead to higher property taxes for the people of impacted communities and all of Ontario. Provincial and municipal data show there is enough land already available in our towns and cities for our housing needs up to 2041. There is also a surplus of land for new businesses and we should be encouraging investment in these areas with strategic marketing not urban sprawl. By building within existing towns and cities throughout the Greater Golden Horseshoe, we can increase the supply of affordable housing and jobs in existing serviced communities while holding urban boundaries firm.

Sincerely,

A handwritten signature in blue ink that reads "Susan".

Susan Walmer, CPA, CMA
Executive Director, Oak Ridges Moraine Land Trust
18462 Bathurst St, Newmarket, Ontario
Charitable #873208920RR0001

As a member of the OGA, we support the following recommendations:

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:

- a)** 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.
- b)** the conversion is to mixed use, multi- storey buildings and prioritizes rental housing. Employment land is not converted to low-density single family housing.
- c)** 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.
- d)** conversions are evidence-based, a regional economic development strategy has been completed, the employment land retained by the municipality exceeds the need to 2041.

2. 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.¹ 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:

¹ https://ontarionature.org/wp-content/uploads/2016/11/GLWCAP_Highlights_2005-2010_EN.pdf

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.

- a)** Expand the Greenbelt to incorporate the provincial agricultural areas and natural heritage systems.
- b)** The province needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.
- c)** Where there is a conflict in mapping the more restrictive mapping should apply or an NHS comparison/evaluation process (as described in b above) should take place. Further, the proposed policies (5.2.2.3 and 4.2.2.5 and 4.2.6.9) which allow municipalities to seek technical changes to and refine the provincial NHS should be modified to include and expand on the same proviso as contained in the NHS refinement policy of the Greenbelt Plan (policy 3.2.2.5) which reads “may be refined, with greater precision, in a manner that is consistent with this Plan ...(in this case the Growth Plan) and the GGH Natural Heritage system map”. This language is important to ensure that local refinements or technical changes are not merely a way to revert to a smaller locally identified NHS.
- d)** 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).² Not only is this loss unsustainable from a food security perspective but it symptomatic of an unaffordable pattern of urban growth.

Recommendation:

- a)** 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.
- b)** 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/system.
- c)** Ensure municipal official plan mapping and zoning of prime agricultural land is consistent with Provincial agricultural system mapping.

² <https://www.statcan.gc.ca/eng/ca2016>

- d)** 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.

3. 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 could be avoided 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). Densities lower than 50 pp/ha make regular transit unsustainable.

- a)** Maintain existing density targets for mobility hubs within urban growth centres.
- b)** 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).
- c)** Existing policies already have flexibility i.e. Municipalities can shift density along transit corridor with existing policies.
- d)** 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.

4. 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 2031.³ 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.⁴ Simcoe County has a surplus of 53,596 units beyond what it needs to the year 2031 and yet its 2031-41 population growth is only 80,000 people.⁵

³ <http://www.neptis.org/publications/update-total-land-supply-even-more-land-available-homes-and-jobs-greater-golden>

⁴ <https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES>

⁵ <https://www.simcoe.ca/dpt/pln/growth>

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.⁶ 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. Of additional note is that exempting 40 hectare settlement boundary expansions from an MCR is a recipe for many smaller, unserviced settlements to expand incrementally and a signal for the development industry to speculate on farmland around these small settlements given this exemption.

Neptis Foundation has estimated there are over 25,000 ha of undeveloped greenfield land in these unserviced settlements and this proposal will simply escalate this situation given the Growth Plan appropriately directs the vast majority of growth to serviced settlements. At minimum, lower tier municipalities should not be allowed to pursue this type of settlement expansion if its upper tier takes the position that all settlement expansions should be part of its MCR.

Recommendation:

- a)** Clarity is required to understand 1) who can make a request for a boundary expansion, 2) the number of boundary expansions that can be requested outside of an MCR process and 3) how can there be an adjustment to a settlement boundary if there is to be no net increase in land within the settlement area?
- b)** Hold the line on urban boundary expansions to support intensification to prevent sprawl, farmland loss and maximize the efficiency of existing infrastructure.
- c)** No rounding out to rural settlement boundaries or the boundaries of towns and villages or hamlets in the Greenbelt Plan.
- d)** Do not proceed with allowing settlement boundary expansions of up to 40 hectares (the size of Yorkdale) or multiple expansions.

5. 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

⁶ <https://www.citybuildinginstitute.ca/portfolio/missing-middle/>

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, hydro lines, 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 Brantford 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.⁷ 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.⁸ As well, the Ministry's own research shows that as of 2006 there were 700,000+ ground related units owned by older people – virtually all of which will come to market by 2041 as the youngest of these homeowners will 91 years old. Combined with the 800,000+ ground related units planned by municipalities already, these 1.5+ million units could accommodate at least 4.5 million people (using a conservative 3 persons per unit assumption). Excluding Toronto, this exceeds the forecast growth for entire GGH to 2041.

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.

The Growth Plans (2006 and 2017) have always allowed Regional and County governments to account for variations and infrastructure capability of lower tiers when allocating growth – and all have utilized this ability. 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. This particularly true for Durham and Halton Regions. While we support maintenance of the existing targets – should the Government proceed, Durham and Halton should have a density target of 60 pjh so that the entire GTHA

⁷ <https://www.citybuildinginstitute.ca/portfolio/missing-middle/>

⁸ <https://www.cmhc-schl.gc.ca/en/housing-observer-online/2018-housing-observer/drive-until-you-qualify-is-commute-worth-it>

has the same target – and a better opportunity to support our \$50 billion regional transportation plan.

Recommendations:

- a)** 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.
- b)** Do not allow alternative density or intensification targets for any municipalities within the inner ring or in municipalities with UGCs in the outer ring (ie. maintain the existing policy framework).
- c)** Provide clearer policies for outer ring municipalities that may seek an alternative target and require an increase for the 2031-41 period than they were permitted in the first round of Growth Plan conformity to 2031.
- d)** Clarity and transparency is needed to improve monitoring and reporting on implementation to better understand problems and find the best solution.
- e)** Update growth projections based on the census and Ministry of Finance projections.

6. Recommendations to reduce red tape:

- a)** 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.
- b)** Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.

7. Other Recommendations:

- a)** Raise the profile of Indigenous interests, treaty rights, consultation, and planning approaches and priorities.
 - b)** 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.
 - c)** 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.
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