

July 29, 2020

ATTN:

Sandra Bickford
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****VIA EMAIL****

RE: Environmental Registry of Ontario Proposal 019-1680 & 019-1679 Comments

Please accept this letter as the City of Barrie response to Environmental Register of Ontario (ERO) Proposals 019-1680 & 019-1679 regarding Amendment 1 to *A Place to Grow: A Growth Plan for the Greater Golden Horseshoe* ('Growth Plan') and a revised Land Needs Assessment Methodology for the Growth Plan.

ERO Proposal 019-1680 – Growth Plan Amendment 1

Upon review of the proposed Amendment 1 to the Growth Plan staff offer the following comments.

Transition

The City of Barrie initiated a Municipal Comprehensive Review ('MCR') to prepare a new Official Plan in September 2018. As part of that comprehensive work, a Land Needs Assessment report was prepared using the in-effect Land Needs Assessment Methodology and the current Schedule 3 population and employment growth targets which have a 2041 horizon (for a full chronology of the growth management work completed to date, please see Appendix 'A'). Despite having been asked by Ministry staff during consultation meetings earlier this year to provide proposed draft wording for potential transition language, we are disappointed that the proposed amendment does not include any transition policies. Instead, the amendment requires conformity exercises to use the new planning horizon of 2051, new Schedule 3 population and employment growth forecasts, and a new Land Needs Assessment Methodology (LNAME), the details of which are not available for review and comment. Without any transition policies the City will be required to re-do work already completed as part of the MCR which will cause delays in getting an approved new official plan in place.

To address the above, it is recommended that the amendment include transition policies which permits municipalities that have completed and publicly reported – to their respective Council's and the public – a Land Needs Assessment Report prepared according to the in-effect LNAME, Schedule 3 horizon and associated population and employment growth targets, to defer planning for the 2041-2051 timeframe until the next MCR. Deferring detailed growth management work for the 2041-2051 timeframe will allow municipalities that have advanced their conformity exercises to implement Official Plans that will address and manage growth and development pressures while conforming to sound in-effect Provincial policy. This approach is appropriate for Barrie as the City has completed a significant amount of growth management work up to 2041, as per Appendix 'A'.

To assist in implementing this approach, staff recommend that the following language be included in the transition section of Growth Plan Amendment 1:

"In accordance with Growth Plan policy 5.2.4.7, should the Minister revise Schedule 3, Growth Plan policy 5.2.4.2 will continue to refer to the Schedule 3 forecasts as of the day before the most recent revision of same, for those upper – and single-tier municipalities that have fully advanced their municipal comprehensive review to a

point at which the Land Needs Assessment report, prepared in accordance with the land needs assessment methodology in effect a day prior to the amendment of the Growth Plan, has been provided to Ministry staff for review and has been reported to the municipal Council for growth management direction.”

Schedule 3 Growth Targets

The Growth Plan amendment proposal seeks input on three population and employment growth scenarios for Schedule 3. Staff generally welcome language proposed for policy 2.2.1.1. regarding the growth and employment targets in Schedule 3 being minimums, with the possibility of higher population and growth targets being established by municipalities through an MCR. However, staff are of the opinion that any departure from the Schedule 3 Reference Scenario targets be supported by a thorough financial and infrastructure impact assessment, one which demonstrates a municipality’s ability to pay for and service the higher growth forecast. Doing so will require high-growth municipalities to plan for and accommodate growth in a comprehensive manner and will enable municipalities to deal with development pressures more effectively. While such an assessment is required as part of a Settlement Area Boundary Expansion in Section 2.2.8 of the Growth Plan, it should be referenced in a policy following the proposed language in policy 2.2.1.1.

Further to the above, staff are concerned about the possibility of some municipalities going beyond their Schedule 3 forecasts and what impact that may have on another municipality’s forecasts. How will the Province balance the entire growth across the broader region if individual municipalities have this degree of flexibility? The purpose of the Growth Plan was to manage growth across the Greater Golden Horseshoe regional area and this flexibility might undermine that approach.

ERO Proposal 019-1679 – Revised Land Needs Assessment Methodology

Upon review of the material provided regarding the revised Land Needs Assessment Methodology staff were disappointed to see that no actual revised methodology was released. Rather, only a summary of changes was made available for comment, with the underlying message being that the new methodology is meant to be ‘outcome-based’. While staff would welcome some changes to the current methodology, particularly the over-dependence on the numbers to plan communities, we are concerned about the lack of any true methodology being made available for comment.

With only guidelines and no clear definitions being provided, references to municipalities making adjustments based on ‘market contingencies’ is worrisome and could be misused if not given some further guidance. Further, without a methodology available staff are unable to determine if the revised approach will effectively address the issues municipalities are experiencing. Specifically, the prescriptive formulas and steps involved in the current methodology leave little room for municipalities to address local context or feedback from the public on issues such as built form. In the case of Barrie, an increase to the intensification target – from 47% to 50% – resulted in a decrease to the DGA density target for new DGA lands.

This counterintuitive outcome was the result of moving nearly all the high-density housing units originally forecasted for the DGA into the Built-Up Area, effectively reducing the number of people in the DGA and decreasing the minimum density target for new DGA lands. Due to the prescriptive nature of the methodology, staff had no tools through which to increase the density target and plan for a more balanced, transit supportive, complete community on new DGA lands. Without a revised methodology for comment, staff cannot determine if this issue will be addressed. The City would recommend that the Province provide examples of the types of acceptable data sources that municipalities can use for such local market adjustments to ensure consistency in approach and the ability to defend the approach if challenged. The combination of a more flexible land needs assessment combined with the Schedule 3 forecasts being treated as minimums has the potential to present municipalities with challenges in dealing with development pressures that may not be aligned with policy and challenge the basis of the analysis.

As such we request more clarity around the ‘outcomes-based’ approach as this might mean that municipalities have greater ability to use good planning principles to plan their communities, rather than adhere to a strict numbers-based approach. However, without some further understanding of what the Province may or may not support, it is recommended that the Ministry release a full draft of the revised methodology for review and comment or provide further information on what outcomes and data sources will be deemed acceptable as part of an LNA exercise.

Thank you for the opportunity to provide comments on the proposed Growth Plan Amendment and revised LNAM. As mentioned, the City of Barrie is well advanced in its work on preparing a new Official Plan having completed the MCR and Land Needs Assessment work and obtained direction from City Council. We request full consideration of the concerns raised above as they directly impact the City's ability to advance this important strategic policy framework to manage growth effectively in the coming years.

Should you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,



Michelle Banfield, RPP
Director of Development Services

cc Andrea Miller, RPP, General Manager, Infrastructure and Growth Management

APPENDIX 'A'

This appendix is a chronology of growth management work completed as part of Municipal Comprehensive Review being undertaken by the City of Barrie in the preparation of a new Official Plan.

- **October 8, 2019:** The results of Land Needs Assessment Report, prepared by Watson and Associates in accordance with in-effect Land Needs Assessment Methodology and 2041 Schedule 3 population and employment growth targets, are presented to the City Building Committee (see [October 8th, 2019 City Building Committee Agenda](#) item No. 6.1). A motion is passed by the City Building Committee to direct Staff to proceed preparing a new Official Plan based on an Employment Area land-only Settlement Area boundary expansion and a 50% intensification target.
 - Land Needs Assessment Report and supplementary memo is provided to MMAH staff to demonstrate conformity to in-effect Land Needs Assessment Methodology.
- **October 28, 2019:** The October 8th, 2019 City Building Committee report, motion, as well as additional information on the proposed housing mix and definitions on housing types, proceeds to General Committee for approval (see 5.3, subheading '*GROWTH OPTIONS AND LAND-USE POLICY DIRECTIONS REPORT*' under the October 28th, 2019 [General Committee Agenda](#)). A motion is passed by the General Committee to revise the original motion passed by the City Building Committee on October 8th. The motion, detailed in 'Section F' of the General Committee [meeting minutes](#), directed staff to prepare a new Official Plan based on a 50% intensification target, a Settlement Area expansion for both Employment and Community Area lands, as well as the consideration of Employment Area land conversions. This revised motion proceeded to City Council for approval on November 4th, 2019.
- **November 4th, 2019:** City Council approves the October 28th motion passed by the General Committee (see 'Section F' of the November 4th City Council [minutes](#)). In addition to a revised growth scenario, staff are directed proceed with initiating a process for exploring Employment Area land conversions as well as initiate a process to assess the financial and infrastructure impact of the preferred growth scenario.
- **November 11th, 2019:** The City launched a public process for the consideration of Employment Area land conversions. The process is guided by a conversion criteria which were developed based on in-effect Official Plan and Growth Plan policy. Property owners seeking to convert employment area lands to permit non-employment uses are asked to submit conversion proposals by December 29th, 2019. The conversion criteria, conversion proposal requirements, and additional information is posted for public review on [BuildingBarrie.ca](#), the City's digital public engagement platform.
- **May 25th, 2020:** A [memo](#) is submitted to City Council summarizing the recommended Employment Area land conversions. The recommendations are based on a thorough review of all conversion proposals as well as consultation with industry stakeholders and property owners. City Council referred the memo to Planning Committee for discussion.
- **June 1st, 2020:** The Employment Area land conversion memo is discussed by the Planning Committee. Following deliberation the Committee accepted the staff recommended Employment Area conversions (see 'Section D' of the [June 1st, 2020 Planning Committee Minutes](#)).
- **June 15th, 2020 (1 of 3):** City Council passed a motion to approve the June 1, 2020 Planning Committee report and associated staff recommended Employment Area land conversions (see [June 15th, 2020 City Council minutes](#) item 'Section D').

- **June 15th, 2020 (2 of 3):** An addendum to the original Land Needs Assessment Report is presented City Council via [memo](#). The memo provides a summary of the revisions made to the original Land Needs Assessment Report to reflect Council's preferred growth option as well as revise the City's land needs to address the Employment Area land conversions. The Addendum, written by Watson and Associates, is attached to the memo. The memo and associated addendum are accepted by City Council.
- **June 15th, 2020 (3 of 3):** The first complete draft of the new Official Plan and city-wide Urban Design Guidelines is delivered by Dillon Consulting for staff review. This milestone marks the City's first step to implementing a new and comprehensive land use policy framework for the City of Barrie and represents over one and a half years of intense collaboration between city staff and the consulting team.
- **June 18th, 2020:** The Employment Area land conversion memo and the Land Needs Assessment Addendum memo memos are provided to MMAH staff for information. All material is posted on the city's public engagement website, [BuildingBarrie.ca](#), to keep the public, industry, and stakeholders informed.