

July 31, 2020

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Public Works

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Re: **Proposed Amendment #1 to A Place to Grow - Growth Plan for the Greater Golden Horseshoe (EBO 019-1680) and Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe (EBO 019-1679)**

Ms. Bickford:

Thank you for the opportunity to comment on Proposed Amendment #1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the proposed Land Needs Assessment Methodology.

Regional staff support the Province in its review and update of the Schedule 3 forecasts, to reflect the best information available and support long term planning in accordance with the Provincial Policy Statement, 2020.

We encourage the Ministry to move forward quickly with a final Amendment and Land Needs Assessment Methodology to provide certainty as municipalities advance their respective comprehensive reviews.

Regional staff have the following comments and recommendations for consideration. Additional detailed comments can be found in Appendix 'I' attached.

Please note that at this time we are providing staff level comments. A report will be taken to Regional Council in September for endorsement. Regional Council may have additional comments for consideration at that time.

Comments and Requested Revisions

With respect to **Proposed Amendment #1 to A Place to Grow - Growth Plan for the Greater Golden Horseshoe (EBO 019-1680)**, please see the following comments from the Region of Peel:

- **Minimum Schedule 3 forecast**

We have concerns associated with the Schedule 3 forecast set as a minimum, this policy approach has the potential for municipalities to see great pressure to make non-evidence-based decision making about planning for long term growth.

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The policies as proposed provide too much flexibility and may have the unintended consequence of undermining the guiding principle of managing growth across the Greater Golden Horseshoe.

We suggest the following policy reference be added if flexibility beyond Schedule 3 is desired:

“Section 5.2.4 – Growth Forecasts

Municipalities may undertake a Land Needs Assessment through a Municipal Comprehensive Review to demonstrate the need for additional growth above the Schedule 3 forecasts but not exceeding the high scenario”

The provision would permit municipalities to undertake a comprehensive and evidenced based approach linked to a consistent LNA methodology to determine if additional growth needs are required beyond the Schedule 3 reference scenario, but not exceeding the high scenario. In addition, given higher growth and a longer planning horizon, we also encourage the Province to consider strengthening municipal authority to impose strong staging and sequencing requirements through the planning and development process, in order to carefully manage growth that delivers complete communities and financial sustainability.

- **Growth Scenario Outlooks**

The proposed amendment provides three growth outlooks for consideration (low, reference, and high). Based on the Technical Background document to support the 2051 Forecasts, the analysis supports the reference scenario as the most likely outlook utilizing the best information available that is consistent with long term comprehensive planning for potential outcomes. Restricting municipalities to just the low scenario is not supported, because it could result in actual growth outpacing planning for growth and infrastructure since the reference forecast is seen as the more likely outcome.

For the Region of Peel to accommodate the growth forecast provided by the Province, the timely investment and delivery of key transportation infrastructure such as the GTA West Transportation Corridor, as well as provincial and regional transit initiatives will be required to support planning for employment and complete communities.

We support the reference scenario – Mock B as the recommended forecast, with additional policy direction from the Province to support municipal authority to manage the staging and sequencing of new growth in a financially sustainable manner that ensures the development of complete communities.

- **Provincially Significant Employment Zones and Major Transit Station Areas**

Planning for Major Transit Station Areas and Employment Areas in a two-tier governance structure requires co-ordination between the upper tier delineations and

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the subsequent lower-tier implementation planning. The proposed policy will allow potential conversions to be supported by detailed planning including consideration for land use compatibility and the introduction of sensitive uses.

We support the increased flexibility proposed for planning Major Transit Station Areas and Provincially Significant Employment Zones.

- **New Planning Horizon**

We support the extension of the planning horizon to 2051 to accommodate the long-term planning and management of growth in accordance with the provisions of Policy 1.1.2 of the Provincial Policy Statement, 2020.

- **Transition to 2051**

Proposed Amendment #1 does not include any transition for incorporating the new 2051 planning horizon and updated Schedule 3 forecasts, as a part of the current municipal comprehensive review, which has a conformity deadline of July 1, 2022.

If no transition is provided, it is recommended that the Province expedite the release of the final Amendment #1 to A Place to Growth and Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon.

- **Mineral Aggregate and Resources**

The Region recognizes the role of the Endangered Species Act and the Species at Risk Act as the primary pieces of legislation to protect habitat of endangered and threatened species.

The Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the Endangered Species Act, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.

- **Indigenous Communities Engagement**

The proposed amendments strengthen policies around Indigenous engagement (from "encouraged" to "shall") in terms of coordinating planning matters with Indigenous communities. Other proposed change aligns with previous recommendations to remove First Nations and Metis to capture the broader and more consistent reference of Indigenous communities.

It is recommended the Province provide guidance materials on what is considered an appropriate level of engagement to assist municipalities in facilitating engagement and share best practices on how to engage indigenous communities with municipalities.

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Comments and Requested Revisions

With respect to **Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe (EBR 019-1679)**, please see the following comments from the Region of Peel:

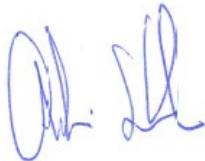
The Region of Peel supports the Province in its efforts to deliver a consistent and transparent approach to determining the Land Needs Assessment in accordance with the Growth Plan, 2019.

The proposed Land Needs Assessment methodology (LNA) has a more streamlined approach and provides flexibility to account for local conditions. However, the new LNA lacks the definitive direction required in a consistent methodology to be applied across the Greater Golden Horseshoe as originally intended.

We recommend a structured and documented approach to the LNA that outlines the required steps, inputs, and data sources to be utilized for each required component.

If you have any comments or require clarification, please do not hesitate to contact duran.wedderburn@peelregion.ca or bihui.fang@peelregion.ca.

Sincerely,



Adrian Smith, RPP, MCIP
Acting Director and Chief Planner,
Regional Planning and Growth Management
Public Works

Appendix I – Detailed Comments

Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG)

Track Changes Review Guide

The text below is copied from the proposed amendment 1 to APTG, 2020 and was reviewed against APTG, 2019. Changes have been tracked in the following manner:

- ~~Pink strikethrough~~ = Proposed 2020 deleted text
- Purple = Proposed 2020 added text

APTG	Policies	Provincial Submission Comments & Recommendations (Solutions)
2.2.1 Managing Growth	1. Population and employment forecasts contained in Schedule 3 or such higher forecasts as established by the applicable upper- or single-tier municipality through its municipal comprehensive review will be used for planning and managing growth in the GGH to the horizon of this Plan in accordance with the policies in subsection 5.2.4.	See comments in Sec.5.2.4.
2.2.5 Employment	10. Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would: <ul style="list-style-type: none"> a) satisfy the requirements of policy 2.2.5.9 a), d) and e); b) maintain a significant number of jobs on those lands through the establishment of development criteria; and c) not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4. 	Staff support the recommendation to permit the conversion of Provincially Significant Employment Zones within delineated Major Transit Station Areas outside of a Municipal Comprehensive Review. The proposed policy is consistent with draft policies proposed by the Region of Peel.
4.2.8 Mineral Aggregate Resources	2. Notwithstanding the policies in subsections 4.2.1, 4.2.2, 4.2.3 and 4.2.4, within the Natural Heritage System for the Growth Plan, mineral aggregate operations and wayside pits and quarries are subject to the following: <ul style="list-style-type: none"> a) no new mineral aggregate operation and no new wayside pits and quarries, or any ancillary or accessory use thereto, will be permitted in the following key natural heritage features and key hydrologic features: <ul style="list-style-type: none"> i. significant wetlands; and ii. habitat of endangered species and threatened species; and iii ii. significant woodlands unless the woodland is occupied by young plantation or early successional habitat, as defined by the Province, in which case, the application must demonstrate that policies 4.2.8.4 b) and c) and 4.2.8.5 c) have been addressed and that they will be met by the operation; 	The Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the Endangered Species Act, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.
5.2.3 Coordination	3. Municipalities are encouraged to engage the public, First Nations and Métis communities , and stakeholders in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of local citizens. <p>4. Municipalities shall engage Indigenous communities in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of these communities.</p> <p>4-5 5. In cases where lower-tier official plans are not updated to implement this Plan in a timely or appropriate manner, upper-tier municipalities are encouraged to act in accordance with subsection 27(2) of the Planning Act.</p> <p>5 6. Single-tier municipalities in the outer ring and adjacent municipalities should ensure a co-ordinated approach to implement the policies of this Plan.</p>	Staff recommend the Province provide guidance materials on what is considered an appropriate level of engagement with indigenous communities and share best practices on how to engage indigenous communities.

	<p>6. 7. Planning authorities are encouraged shall co-ordinate planning matters with First Nations and Métis-Indigenous communities throughout the planning process to ensure that appropriate engagement is undertaken. Municipalities are encouraged to build constructive, cooperative relationships with First Nations and Métis communities and to facilitate knowledge-sharing in growth management and land use planning processes.</p>	
<p>5.2.4 Growth Forecasts</p>	<p>1. All references to forecasted growth to the horizon of this Plan are references to the population and employment forecasts in Schedule 3 or such higher forecasts as are established by the applicable upper- or single-tier municipality through its municipal comprehensive review.</p> <p>2. All upper- and single-tier municipalities will, through a municipal comprehensive review, apply the forecasts in Schedule 3 for planning and managing growth to the horizon of this Plan or such higher forecasts as are established through the municipal comprehensive review.</p> <p>3. The population and employment forecasts and plan horizon contained in the applicable upper- or single-tier official plan that is approved and in effect as of July 1, 2017 [placeholder for effective date] will apply to all planning matters in that municipality, including lower-tier planning matters where applicable, until the upper- or single-tier municipality has applied the forecasts in Schedule 3 in accordance with policy 5.2.4.2 and those forecasts are approved and in effect in the upper- or single-tier official plan.</p> <p>6. Outside of a municipal comprehensive review, the forecasts in Schedule 3 and Schedule 7 cannot be applied on a site-specific scale as the basis for approving or refusing proposals for development that would otherwise conform with all the policies of this Plan.</p>	<p>The basis of the Growth Plan is to plan for where and how growth will be managed in the Greater Golden Horseshoe, this is underpinned by the forecasts and allocation as the key drivers for evidenced based planning. Amendment #1 proposes to change the purpose of the population and employment forecast from a 'an informed estimate' that creates an envelope to a minimum standard or open envelope.</p> <p>This is a fundamental shift to planning and managing growth by referring to the Schedule 3 Forecasts as minimums and allowing municipalities to plan for higher growth forecasts through their MCR. This approach removes valued consistency across the GGH that the forecasts provide for planning and managing growth. It may also have the unintended consequence of creating unbalance across the GGH as municipalities may choose to plan for higher growth as a mechanism to drive land supply availability at the expense of other municipalities.</p> <p>We have concerns associated with the Schedule 3 forecast set as a minimum, this policy approach has the potential for municipalities to see great pressure to make non-evidence-based decision making about planning for long term growth.</p> <p>Staff recommend that references to the Schedule 3 forecasts as minimums in Proposed Amendment #1 and the new Land Needs Assessment methodology be removed.</p> <p>Staff suggest the following policy reference be included if flexibility is desired in Section 5.2.4 – Growth Forecasts.</p> <p><i>“Municipalities may undertake a Land Needs Assessment through a Municipal Comprehensive Review to demonstrate the need for additional growth above the Schedule 3 forecasts but not exceeding the high scenario”</i></p> <p>The provision would permit municipalities to undertake a Land Needs Assessment to determine if additional growth needs are required, benchmarked against the Schedule 3 forecasts but not exceeding the high scenario.</p>
<p>1.2.3 Horizon of this Plan</p>	<p>While the PPS, 2014 2020 provides for a time horizon of up to 20 25 years for making sufficient land available to meet projected needs, policy 1.1.2 of the PPS, 2014 provides that a provincial plan may provide an alternate time horizon for specific areas of the province. Within the GGH, this Plan provides that the applicable time horizon for land use planning is 2044 2051. While certain policies have specific target dates, the goals and policies of this Plan are intended to be achieved within the horizon of this Plan.</p>	<p>Staff support the extension of the planning horizon to 2051 to support the planning and management of growth in accordance with the provisions of Policy 1.1.2 of the Provincial Policy Statement, 2020.</p>
<p>Effective Date and Transition</p>	<ul style="list-style-type: none"> To clarify how planning matters that are currently in process will be affected by the Amendment, if approved; and A possible timeframe, to be set by the Minister, for municipalities to bring official plans into conformity with APTG as revised by the Amendment, if approved. 	<p>The proposed Amendment #1 does not propose any transition to incorporating the new planning horizon and Schedule 3 forecasts.</p> <p>If no transition is provided, it is recommended that the Province expediate the release of the final Amendment #1 to A Place to Growth and the Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon. This includes updating technical background studies and master plans required to support the Municipal Comprehensive Review.</p>
<p>Growth Outlook</p>	<p>Schedule 3 is replaced by one of the following proposed Schedule 3 - under three growth outlooks: Reference Forecast, and High and Low Scenarios.</p>	<p>Staff support the Reference Scenario – Mock B provided as the most likely growth outlook for Peel based on the Technical Backgrounder for the forecast which represents the best information currently available.</p> <p>The rate of growth proposed in the reference forecast is generally reflective of the 20-year (1996-2016) historic growth rates in Peel. For the Region of Peel to accommodate the level of growth forecasted by the Province,</p>

		<p>key infrastructure investments in transportation and transit will be required from the Province to unlock employment lands and support mobility in mixed use communities planned for Major Transit Station Areas.</p> <p>Further, for the Region to support the Reference Scenario – Mock B, Provincial support for the ability of municipalities to stage and sequence growth in a logical and financially sustainable manner is required. This will reinforce the principles of the growth plan to plan and manage growth in an integrated manner that considers land use planning, infrastructure investment, and environmental protection as key outcomes to sustainably deliver complete communities.</p>
Land Needs Assessment (General)		<p>Staff support the intent of the Province to simplify the new Land Needs Assessment with a streamlined approach and flexibility to account for local conditions and growth assumptions. However, a balance must be maintained with respect to providing a free-standing document as a reference guide to how land need is determined consistently across the Greater Golden Horseshoe.</p> <p>Staff recommend that the Land Needs Assessment be provided in a structured document that defines the required ‘steps’ and analysis to be undertaken and the key data sources to be referenced as inputs for the key components.</p>
LNA Timeframes	<ul style="list-style-type: none"> • Municipalities must, at all times, have enough land with servicing capacity to provide at least a three-year supply of residential units available through lands suitably zoned in lower-tier municipalities. • Municipalities shall also plan to maintain the ability to accommodate residential growth for a minimum of 15 years. 	<p>The land supply requirements are consistent with the policies in the new Provincial Policy Statements, 2020.</p>
Purpose	<p>Recognizing that local needs are diverse, the proposed new Methodology aims to provide the key factors to be considered as municipalities plan to ensure that a sufficient and appropriate mix of land is available to:</p> <ul style="list-style-type: none"> • accommodate all housing market segments; • avoid housing shortages; • consider market demand; • accommodate all employment types, including those that are evolving; and • plan for all infrastructure services that are needed to meet complete communities’ objectives to the horizon of the Plan 	<p>Staff recommend that the Province provide clarity around how the key factors are to be incorporated into the LNA. This could be achieved by providing key examples such as what would suffice as consideration for ‘market demand’.</p>
Implementation and Conformity	<p>It does not preclude municipalities from considering alternate assumptions about population and employment growth to the horizon of the Plan.</p>	<p>The Region currently utilizes a scenario-based approach to test growth assumptions as a part of an integrated approach to growth management.</p> <p>The Region supports the flexibility provided by the Province to test alternative growth assumptions to determine appropriate growth assumptions based on localized conditions.</p>
LNA Components – Community Area	<p>Community Area Land Needs Assessment</p> <ul style="list-style-type: none"> • Population Forecasts • Housing Needs Analysis • Housing Allocation and Supply Inventory • Community Area Jobs Analysis and Reconciliation 	<ul style="list-style-type: none"> • References to ‘minimum intensification and Designated Greenfield Area (DGA) targets’ should be clarified to note that this will be the minimum intensification and DGA target established by the municipality through their MCR analysis. • The Region supports direction from the Province to support the reduction of the rate at which land is consumed and the integration of viable transit services to support a compact built form. Provincial investment in Regional transit infrastructure is an important part of delivering on this objective.
Housing Needs Analysis	<p>Housing need can be broken down by type of dwelling to include age-specific household formation rates in order to forecast growth in the number of households to the Plan horizon, categorized by dwelling type (i.e. ground-related versus high-rise). It should consider both historical and future trends for household growth by units by type.</p>	<p>The methodology does not address how affordable housing will be considered as a part of the housing need discussion. With affordability being a key issue in the GGH, there is an opportunity to require consideration through the land needs discussion to incorporate affordable housing into the allocation and supply inventory assessment. This objective could be delivered by incorporating consideration for the following:</p> <ul style="list-style-type: none"> • Specify the amount of supply that must be maintained to ensure affordable ownership housing prices

	<p>Municipalities may refer to background information on housing growth by type prepared as part of the review and update of A Place to Grow's population and employment forecasts.</p> <p>Household demand can be adjusted for factors such as changes in vacancy rates, market contingencies, additional housing needs for post-secondary students, temporary workers, or units that will be lost over time for various reasons.</p>	<p>to the forecast population and income distribution - simply meeting demand with supply will help ensure price stability, but not necessarily lowered prices.</p> <ul style="list-style-type: none"> • Require municipalities to incorporate trends around household composition as well as corresponding income distribution in order to specify minimum amounts of affordable housing. • Give municipalities more authority to require developers to deliver on a reasonable share of housing that addresses community need, including how the planned range and mix of housing options is considered. • Require tenure and price points, e.g. affordability for the forecast population and income distribution. • Capture tenure, asking prices, unit type and bedroom count as a part of the housing supply inventory
<p>Employment Allocation and Reconciliation</p>	<p>Municipalities can allocate the categorized forecasted jobs with the understanding that community area jobs are to be located within settlement areas but outside employment areas while employment area jobs are located in the employment areas. In addition, community area jobs in the designated greenfield area may be counted towards the minimum density target.</p> <p>Through allocations municipalities can determine whether there are sufficient employment area lands in the municipality to accommodate the employment growth established.</p>	<ul style="list-style-type: none"> • Clarity is required within the methodology regarding the inter-relationship between office jobs in Community Area lands versus Employment Area in existing settlement areas and potential expansion areas. • Additional details are required on the process and at what stage of the LNA municipalities will reconcile lands to be converted through employment conversions.