

July 29, 2020

Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
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*\*\* Sent via email to: [sandra.bickford@ontario.ca](mailto:sandra.bickford@ontario.ca) \*\**

Dear Sir / Madame:

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

We are pleased to submit for your review and consideration our comments on the Land Needs Assessment Methodology for the Greater Golden Horseshoe.

We support the Province's proposal to have 2051 serve as the plan horizon year for this land needs assessment. In the midst of the uncertainty caused by the pandemic and with this longer-range horizon, we believe there may be a need for a medium-term approach that reflects anticipated impacts from the pandemic which may last for some years, but may not be permanent, as well as the longer-term approach set out in this regulatory proposal. Either way, we underscore that there needs to be enforcement at the municipal level that the designation of development areas and related zoning put forward by municipalities is truly underpinned by a methodology using 2051 as the plan horizon year.

At this time, we can only speculate about the long-term impact the COVID-19 pandemic will have on this land needs methodology, particularly with respect to employment lands. For example, the market for large heavy industrial properties was practically non-existent in parts of the Greater Golden Horseshoe even before COVID-19, given the high cost of land and lack of available labour force. In light of the focus on repatriating certain supply chains and manufacturing, this property market may improve. However, any improvement is likely to be found outside of the GTA, in locations that offer a more competitive cost base for land and labour.

At the same time, the office market is also now in a state of flux. On the one hand, people expect working from home to continue to have a strong presence, which could impact the overall need for office space and the location of where jobs occur. On the other hand, there are expectations some level of physical distancing will become the standard, which could make the demand for office space stable despite having fewer people employed in that same given space. Right now, how long-lasting these market dynamics will be is unclear. As a result, we recommend the Province take another look at the persons and jobs per hectare numbers to determine if these numbers should be reduced in order to reflect the new circumstances.

With respect to the proposed methodology and land needs assessment, we are concerned there may be some inconsistency between the treatment of employment lands in the proposed methodology and in the proposed Amendment 1 to the Growth Plan. Specifically, the Provincial policy objective of building complete communities – mixed-use communities that include employment, residential and retail, amongst other uses, particularly in Major Transit Station Areas (MTSAs) and even when those areas fall within a Provincially Significant Employment Zone (PSEZ). As we noted in our submission with respect to Amendment 1, there are some municipalities that exploit any inconsistencies in the provincial planning documents to frustrate development, which has contributed to the undersupply of housing and the affordability crisis we find ourselves in. For the province to achieve its policy aims of more housing choice and better housing affordability, as well as ensuring adequate employment lands to meet the region’s anticipated growth, the provincial policies must be clear, consistent and unequivocal regarding how a municipality should receive relevant development proposals.

As the largest private-sector landowner in Halton Region, with many of these properties currently identified as employment lands, we raise some issues specific both to Halton Region, particularly the City of Burlington, and to employment lands. These are specific examples that should inform the Province’s approach to the land needs assessment methodology and requirements of municipalities, as similar issues arise in other municipalities as well.

There is a statement made in section 2.2 that *“For urban growth centres, municipalities must plan to achieve by 2031 or earlier, specific densities ranging from 150 to 400 residents and jobs combined per hectare.”* As you are aware, the City of Burlington is looking to eliminate the Urban Growth Centre designation from its downtown. Eliminating the Urban Growth Centre designation would leave Burlington without any Urban Growth Centre at all. Based on the expected growth in the Greater Golden Horseshoe over the coming decades, it is likely Burlington’s density will be insufficient to meet the growing demand without at least one area of the City designated as an urban growth centre. If that designation is being removed from downtown, perhaps a good alternative would be to designate one or more of the MTSAs in Burlington (ie. Aldershot GO Station or Appleby GO Station) as an Urban Growth Centre in order to ensure adequate land is available to accommodate the required growth, and provide convenient access to an appropriate mix of jobs and a full range of housing. These MTSAs may be more suitable to accommodate that growth anyway, subject to the conversion of employment land to allow for a mix of uses, including residential and retail.

To be clear, Penta Properties fully supports the new emphasis on the development of complete communities around major transit station areas. As we have highlighted in our submission on Amendment 1, provisions in provincial planning policies must be consistent for the Province to achieve its intended goals here. For example in Burlington, the lands surrounding the Aldershot GO Station and Appleby GO Station mobility hubs are currently designated as employment lands, with no indication that the City of Burlington or Region of Halton plan to amend or allow conversions to those designations. With statements in section 2.2 of the methodology that *“Employment areas are areas designated in an official plan for clusters of business and economic activities and in which residential development is prohibited”*, we are unsure how the concept of complete communities can ever be accomplished in these areas under the current policies and designations. At a minimum, section 2.2 needs to be amended to reflect the proposed change in Amendment 1, namely the allowance of conversions of employment areas to non-employment uses within a PSEZ that is located within a MTSA in order to achieve the

government's objective of intensification around MTSAs. We agree with the Province that this policy can encourage transit-oriented development while protecting and enhancing employment opportunities.

Similarly, for MTSAs on priority transit corridors, municipalities must plan for specific densities ranging from 150 to 200 residents and jobs combined per hectare. In Burlington, given the employment land designation surrounding the major transit station areas, these densities will be nearly impossible to achieve under current policies and designations. Particularly in and around major transit station areas, revisions are needed to the statements in section 2.3.2 that "*The Growth Plan employment area policies are intended to protect lands in employment areas for employment uses...*" and "*Where the outcome of land needs assessment indicates a surplus of land in employment areas, this should not undermine municipal efforts to protect these areas for employment uses.*" These statements are also reflected in the Growth Plan, and are counter-productive to what is needed in order to actually achieve complete communities and the target density numbers within MTSAs. Traditional employment land designations in these areas need to be replaced by mixed use and residential designations, something the local municipalities will not do without Provincial direction.

In the Key Terminology section 4.2, "Employment land employment" is defined as "*Jobs accommodated primarily in industrial-type buildings.*" Even with Ontario's manufacturing might – and even as this economic strength grows in the years to come with more domesticated supply chains – services account for the vast majority of Ontario's GDP and, in turn, employment. If employment lands are to be protected for industrial type jobs only, then they will continue to sit vacant and underutilized for decades to come. We recommend updating the terminology to reflect that a job is a job is a job, regardless where it is located. With technology being what it is and the new post-pandemic realities, jobs will be everywhere, including in residential home offices.

In general, we feel the methodology needs to be updated to reflect modern realities in a post-pandemic world, and more accurately reflect and encourage the goal of complete communities in and around MTSAs through greater consistency in the relevant provisions.

Should you have any questions regarding any of our comments, or wish to discuss any of these comments further, please contact us at (905) 632-6036.

Yours truly,  
**PENTA PROPERTIES INC.**



Angelo Paletta  
President