



June 5, 2023

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Via Email

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

Provincial Land Use Plans Branch
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c/o minister.mah@ontario.ca

**RE: Proposed Changes to Provincial Policy Statement and Growth Plan
ERO No. 019-6813 – 186 Hunter Street East, Hamilton**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) provides expert land use planning advice and assists proponents secure the required municipal approvals for a variety of development projects throughout southern Ontario and would like to thank you for the opportunity to comment on the proposed amendments to the Provincial Policy Statement and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) via ERO No. 019-6813. We represent the owner of the property municipally known as 186 Hunter Street East, Hamilton, which is located approximately 415.0 metres from the Hamilton GO station at the southwest corner of John Street South and Hunter Street East. In December of 2022, our office provided a letter in response to ERO No. 019-6177 regarding changes to the Growth Plan and this Letter is intended to support and add to the recommendations contained within the previously submitted letter.

As the Province works to address the housing crisis currently facing Ontario, the structure and policies outlined within the Provincial Policy Statement (PPS) will become even more critical to achieve higher densities and intensification desired across the various regions of the Greater Golden Horseshoe. Accordingly, it is important that Major Transit Station Areas (MTSAs) achieve their roles as strategic growth areas to be the focus of higher densities and intensification across the various regions of the Greater Golden Horseshoe. Given their connectivity within and across municipalities, MTSAs are strong candidates for high-density mixed-use development to facilitate the creation of complete, transit-oriented communities.

The above-noted Hunter Street East property is currently designated as 'Neighbourhoods' in the Urban Hamilton Official Plan (UHOP). However, as MTSAs generally encompass a 500 – 800 metre radius around a transit station, the subject property (being located approximately 415.0 metres away from the future Hamilton GO station) will be located in the Hamilton GO Centre MTSA designation, once created by the City of Hamilton. As such, our office submitted a Zoning By-law Amendment (ZAC-22-014) and Official Plan Amendment application (UHOPA-22-006) to the City of Hamilton on September 22, 2022 for a development concept consisting of one (1) 12 storey multiple dwelling with a total of 104 affordable

residential units. The above-noted applications are currently subject to an active appeal through the Ontario Land Tribunal (OLT-22-004063), on the basis of the City of Hamilton's failure to make a decision within the prescribed time period. Given the sizing constraints of the subject property, the proposed development will significantly exceed the proposed PPS' minimum density target of 150 residents and jobs per hectare for lands located within identified MTSAs (Policy 2.4.2.2); while still maintaining the envisioned scale and built form of development within MTSAs. As such, it is our (UrbanSolutions') recommendation that the Province increase this target to better reflect the anticipated scale and built form of development within MTSAs.

Major Transit Station Areas

As stated in Section 2.3 of the proposed PPS, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas, including Urban Growth Centres and MTSAs. Development in these areas provide a focus on investment in transit as well as other infrastructure to support forecasted growth and a diverse range and mix of housing options.

As noted above, Section 2.4.2 of the proposed PPS prescribes MTSAs to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. This intensification target is insufficient given that MTSAs are meant to act as key strategic growth areas. Development concepts which surround a major regional transit station typically result in much higher densities than what is currently considered by the proposed PPS. Higher density projects, like those which many municipalities have directed to MTSA areas, regularly exceed 500 units per hectare in density. While these development concepts represent the planned and intended built form, they are routinely well over the prescribed 150 residents and jobs per hectare outlined in the proposed PPS.

Given that the majority of regional growth will need to be directed to strategic growth areas like MTSAs, the prescribed rate of 150 residents and jobs per hectare established by Section 2.4.2 is in need of an increase to better represent the intensification needed to facilitate the expected growth outlined by the Province. As it is anticipated that many other sites will be developed and a majority of those sites located within the MTSA areas will contain high density development, it is clear that there is a disconnect between the provincial growth targets and those which will be constructed in reality. As such, we recommend that the prescribed densities under Section 2.4.2 are all increased to accurately reflect the planned built form envisioned by the MTSA.

Population and Employment Targets

One of the proposed changes to the PPS is the removal of Provincially-established growth targets which were traditionally applied through Schedule 3. Instead, the Province is recommending that municipalities take on the responsibility of carrying out their own forecasting, using 2051 targets as a minimum. Our concern with this approach is that a municipality's desire to reflect accurate growth forecasting will be dependent on their overall desire for development. While some municipal governments do understand the important need for housing at this time, there are still many which allow political agendas to influence housing decisions. Accordingly, we strongly encourage the Provincial government to maintain the responsibility of setting out the growth forecasts for municipalities to ensure the provincially-significant issue of housing is not dependent on individual municipalities.

Recommended Changes

MTSAs require a consistent, suitable policy framework to realize their vital role in realizing the Province's intensification targets. As such, UrbanSolutions recommends the following changes to the proposed PPS to achieve the Province's vision for transit-oriented communities that MTSAs emphasize:

1. Modify Policy 2.4.2.2(c) to increase the proposed density target from 150 to 500 residents and jobs per hectare for Major Transit Station Areas served by the GO Transit rail network; and proportionately increase said targets for those served by subways, light rail, and bus rapid transit as outlined in Policies 2.4.2.2(a) and 2.4.2.2 (b), respectively; and,
2. Include the Population and Employment targets and forecasts formerly set out in Schedule 3 of the Growth Plan as a part of the newly proposed Provincial Policy Statement.

As proposed, the aforementioned recommendations will strengthen the policy framework to provide clarity of implementation and ensure the goals and objectives of the Province are realized, and align with realistic growth and development outcomes. The balance of the proposed Provincial Policy Statement contains the appropriate range of policies to protect the matters of provincial interest while also ensuring sufficient residential intensification development is secured throughout the region.

Kind Regards,
UrbanSolutions


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Principal


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Planner

cc: Wellington Hamilton Non-Profit Housing Inc. (via email)