



**Ontario**  
Home Builders'  
Association

## Co-ordinated Review

EBR: 012-3256

Growth Plan for the Greater Golden Horseshoe

Greenbelt Plan

Niagara Escarpment Plan

Oak Ridges Moraine Conservation Plan

- BILD
- Bluewater
- Brantford
- Chatham-Kent
- Cornwall
- Greater Dufferin
- Durham Region
- Grey-Bruce
- Guelph & District
- Haldimand-Norfolk
- Haliburton County
- Hamilton-Halton
- Kingston-Frontenac
- Lanark-Leeds
- London
- Niagara
- North Bay & District
- Greater Ottawa
- Oxford County
- Peterborough & the Kawarthas
- Quinte
- Renfrew
- Sarnia-Lambton
- Saugeen County
- Simcoe County
- St. Thomas-Elgin
- Stratford & Area
- Sudbury & District
- Thunder Bay
- Waterloo Region
- Windsor Essex



**Submitted to:** Hon Ted McMeekin and Hon Bill Mauro  
Minister of Municipal Affairs and Housing  
Minister of Natural Resources and Forestry  
May 28, 2015

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## About OHBA

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The Ontario Home Builders' Association (OHBA) is the voice of the land development, new housing and professional renovation industries in Ontario. OHBA represents over 4,000 member companies, organized through a network of 31 local associations across the province. Our membership is made up of all disciplines involved in land development and residential construction including: builders, professional renovators, trade contractors, manufacturers, consultants and suppliers. Our members have built over 700,000 homes in the last ten years in over 500 Ontario communities. The Coordinated Review directly impacts 14 of OHBA's local associations. The residential construction industry employed over 313,000 people and contributed over \$44 billion to the province's economy in 2013.

OHBA is committed to improving housing affordability and choice for Ontario's new home purchasers and renovation consumers by positively impacting provincial legislation, regulation and policies that affect the industry and consumers. Our comprehensive examination of issues and recommendations are guided by the recognition that choice and affordability must be balanced with broader social, economic and environmental issues.

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## Background

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Ontario's Greater Golden Horseshoe is one of Canada's economic engines and contains some of Canada's best farmland and world-renowned natural features, like the Niagara Escarpment. It is also one of the fastest growing regions in the country. Today over nine million people live in the Greater Golden Horseshoe. This represents over a million new people and nearly a million new jobs since 2001. By 2041, an estimated 13.5 million people will call the region home, with the number of jobs forecast to rise from 4.5 million to 6.3 million. This will increase our population by 50 per cent and boost the number of jobs by 40 per cent.

Four provincial land-use plans work together to manage growth, protect the natural environment and support economic development in this region:

- The Growth Plan for the Greater Golden Horseshoe

- The Niagara Escarpment Plan
- The Oak Ridges Moraine Conservation Plan
- The Greenbelt Plan

Over the past few decades, the province has put in place legislation, plans, policies and programs that have guided the region's growth and protected its environment. Although developed at different times for different purposes, the plans work together to provide a broad, long-term planning framework for the region. The Ministry of Municipal Affairs and Housing and the Ministry of Natural Resources and Forestry are now considering in a co-ordinated fashion the opportunities and challenges that the region faces and if more can be done to achieve broad provincial goals and objectives.

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## *Introduction*

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OHBA appreciates the opportunity to provide feedback on the co-ordinated review in part through the ongoing dialogue and engagement between the Ministry of Municipal Affairs and Housing (MMAH), the Ministry of Natural Resources and Forestry (MNRF) and our member companies as well as at the town halls across the region. OHBA has generally been supportive of the guiding principles of the Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan, yet continue to express concerns with specific aspects of the Plans as well as concerns with the implementation of the planning and alignment of public policy.

The co-ordinated review provides an opportunity to change the conversation. The co-ordinated review fundamentally is about setting the course for planning and economic development across the Greater Golden Horseshoe for the next few decades. It is critical that the provincial government, local and regional governments, the public and stakeholders find common ground to better align public policy to focus: on creating the necessary housing supply to accommodate growth; creating employment centres to help attract jobs and support economic competitiveness; along with the necessary environmental protections, and agricultural policies to support our diverse economy and quality of life in Ontario. The co-ordinated review is more than just about the Greenbelt, Growth Plan, Niagara Escarpment Plan or Oak Ridges Moraine Conservation Plan, it is about connecting the dots between the plans and the broader economic, social and environmental goals for the entire region in the decades ahead.

OHBA is of the view that the four plans in the co-ordinated review need to be focused on a long-term strategic planning policy framework, supporting and managing economic growth and environmental protection. OHBA notes that it is often our members that are actually implementing the plans, be it through the communities we build, the employment centres we develop or environmental protections the industry provides through the land-use planning process – the wetlands, woodlots and ravines that are protected and the green spaces that are provided for the broader community. As stakeholders in the planning process, we are partners with the government in creating complete, transit-oriented communities, protecting the environment and ultimately implementing the plans.

This review provides an opportunity to enhance the plans through better inter-plan co-ordination and by ensuring that municipal planning documents are better aligned with provincial policy. It is important that the province recognize that planning authorities need to take a longer-term perspective in terms of major infrastructure, urban structure and environmental protection. Our comments on the four plans in the coordinated review are intended to assist the government in achieving sustainable growth by protecting housing choice and affordability, creating complete communities, attracting employment opportunities and balancing the province's economic, social and environmental interests over the long-term. On behalf of our 4,000 member companies, we look forward to ongoing dialogue and consultation with respect to growth, environmental and infrastructure planning across the Greater Golden Horseshoe.

The co-ordinated review is the opportunity to connect the dots, looks at how the plans have worked together over the last 10 years and refocus the province, the regions and municipalities on future community and economic development as we continue to build safe, affordable and sustainable communities where we can all live, work and play.

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## *OHBA Key Recommendations*

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### **How can the plans better direct urban development to areas already developed?**

- Provincial investments in transportation and transit infrastructure are critical for supporting and directing urban development to areas that are already developed;
- Ensure municipal planning implementation policies (including Official Plans and Zoning by-Laws) are modernized and in conformity with the Provincial Policy Statement (PPS) and Provincial Plans in terms of land-use designations as well as appropriate height and densities;
- Better link transit and transportation investments with land-use planning including pre-zoning along transit corridors to support transit-oriented development;
- The province needs to support intensification through a more coordinated and multi-ministry approach to infrastructure investment including locations for hospitals, courts, schools, colleges and universities;
- The province support intensification by leveraging its own assets (land & buildings) in Urban Growth Centres, Mobility Hubs and on transit corridors to partner with the private sector to build affordable housing;
- Maintain the existing 40 per cent intensification target and alternative targets in five outer ring municipalities to reflect local circumstances;
- The province should amend the Growth Plan to increase minimum gross density targets in Urban Growth Centres that have existing or planned higher order transit connections;
- Parking standards be reduced/eliminated, cash-in-lieu of parkland dedication requirements be reduced/capped and pre-zoning be required by the Growth Plan in Urban Growth Centres;
- Streamline and better integrate Environmental Assessment process with the Planning Act;
- Launch a Public Education Program.

### **Where are the opportunities to expand the Greenbelt both within the urban areas, such as Urban River Valleys, and in rural areas beyond the Greater Toronto Area?**

- OHBA publically supported the creation of the Greenbelt Urban River Valley (URV) designation that gave municipalities the opportunity to connect publicly-owned and protected urban river valleys to the Greenbelt through a public Official Plan process;
- The Provincial Government continue to support the six criteria which provide for transparency and accountability for municipalities to lead the process to Grow the Greenbelt as was established in 2008;
- That further consideration be given to adding appropriate publically-owned lands to be included in the Greenbelt;
- Approve a transparent and accountable notification process to ensure all impacted landowners are consulted and receive notification prior to finalizing any new land-use designations.

### **What new approaches or tools could be used to protect agricultural land, water and natural areas?**

- That the Ministry consider, with a view to improving and enhancing our current Greenbelt, engaging its stakeholders in a creative, collaborative and progressive conversation about potential additional land-use

options to expand public access and public use, on Greenbelt and related lands, while still maintaining its integrity and significance;

- Implement provincial programs that link growth planning with environmental protection and investment that will enhance the ecological value of the Greenbelt.

### **How can we grow and strengthen the region's network of open spaces to provide for recreation opportunities?**

- The province should carefully consider public policy amendments, greater partnership programs and strategic investments to enhance recreational opportunities throughout the existing Greenbelt plan area including the Oak Ridges Moraine and the Niagara Escarpment;
- Some land-use options be provided to local municipalities to create and expand municipal parks and trail systems within the Greenbelt Plan, Niagara Escarpment Plan and Oak Ridges Moraine Conservation Plan;
- The Ministry should consider new designations in the greenbelt that would support specific provincial goals and objectives (i.e. recreational designation).

### **How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario's economy?**

- An enhanced focus on improving the economic viability of agricultural opportunities for farmers. The province should review greenbelt policies through the lens of supporting and facilitating agriculture businesses and their associated land needs at it relates to retail, eco/agri-tourism, production, processing facilities for farm purposes and ongoing operational purposes;
- The province made improvements to the PPS to clarify policy, criteria and definitions for agricultural-related and on-farm diversified uses. These same policies should be reflected throughout the Greenbelt Plans to provide consistent guidance for agricultural lands.

### **How can the plans better leverage transit investments across the region?**

- Transportation infrastructure investments by the province needs to be packaged with municipal implementation tools including *pre-zoning* and *Community Planning Permit Systems* to create certainty and investment-ready communities;
- Require pre-zoning and pre-designation of transit corridors *prior* to funds flowing to finance the construction of higher-order transit lines at a density level that will ensure that future operations of the line will not be a long-term liability;
- Support a *National Transit Strategy* that dedicates funding to support municipal transit expansion.
- The Minister of Transportation commence consultations with stakeholders to implement a Transportation Planning Policy Statement (TPPS) that would apply to higher-order transit corridors across Ontario.

### **How can the plans better promote livable, walkable communities that use new and existing infrastructure in the most cost effective way?**

- Pre-zoning / pre-designating lands or implementing a Community Planning Permit System (Development Permit System) along intensification corridors and Urban Growth Centres that works towards achieving intensification goals of the Growth Plan;
- That the province leverage its own assets to build affordable housing in livable, walkable, location-efficient communities;

- That the province implement policies that support public transit and both mid-rise and high-rise development by requiring municipalities to reduce parking requirements, set-back requirements and road width requirements in Urban Growth Centres and intensification corridors;
- That the GTA's transit system be co-ordinated with an enhanced cycling network in appropriate urban areas that provides for an active, carbon free and safe alternative mode of transportation;
- That the province use new and existing infrastructure in a more cost-effective way by amending the Growth Plan to include policies supporting community hubs in strategic locations;
- The Community Hub Framework Advisory Group co-ordinate their recommendations to support the Growth Plan;
- That the province use the proposed regulatory authority in Bill 73 to create area specific development charges to establish lower charges for areas of intensification;
- That the province support brownfield redevelopment, reuse of construction materials and balance soil movement on-site to optimize limited resources and better use new and existing infrastructure.

### **How can the plans align long-term infrastructure planning with planning for growth?**

- That the province better integrate decision making across Ministries to make key provincial facility location decisions according to Growth Plan principles;
- Requiring pre-zoning for higher densities in Urban Growth Centres and transit corridors;
- That any new Greenbelt designations be based on science and not contain any additional planning, permit, environmental assessment or construction-related constraints for new or existing infrastructure;
- Reaffirm the "*whitebelt*" lands as the long-term urban reserve;
- Support municipal recommendations that the provincial government establish a municipally led process by which existing boundaries can be fine-tuned and adjusted to correctly correlate with natural heritage features and both infrastructure on the ground as well as planned infrastructure;
- Support municipal recommendations that criteria for landowners and municipal governments by which existing and proposed Greenbelt designations can be assessed;
- An open and transparent process by which a set of criteria be established to review Greenbelt designations in the Greenbelt Plan.

### **How can the plans better support goods movement by all modes of transportation?**

- Align 2014 PPS policies that strengthen the protection of corridors for good movement and to protect employment areas in close proximity to corridors and facilities for goods movement with the Growth Plan.

### **How can the plans identify and better protect the strategic infrastructure corridors needed over the long-term?**

- OHBA recommends that Schedules 2, 5 & 6 of the Growth Plan be amended to better reflect refined alignments for major highway infrastructure (the Bradford link between Highways 404 and 400, the GTA West-Corridor and the committed / under construction extensions of Highways 404, 427 and 407), as well as to reflect consistency with transit plans as they evolve and other important transportation facilities;
- The Growth Plan should also include schedules / mapping of critical water and waste-water and utility infrastructure that is required to support both population and employment growth;
- The province should also consider the long-term urban structure of the region beyond 2041 population and employment planning horizon in terms of protecting not only strategic corridors for infrastructure, but also to consider strategic employment lands;



- Plans should protect and designate the lands adjacent to 400 series highways as employment lands;
- That the Province establish strategic employment designations along 400 series highways that are disconnected from the 50 people and jobs per hectare density target to recognize that certain desirable employment facilities on these corridors are not job intensive;
- To enable the delivery of critical infrastructure to enable investment ready communities, the province should support new infrastructure financing and delivery models such as a utility model to support Places to Grow.

**How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?**

- The province must continue to focus on both provincial and municipal asset management plans as a key tool to balance the need for critical infrastructure to support economic growth with environmental protection;
- Utilize modern infrastructure investments to improve environmental features where applicable

**How can the plans provide more direction on designing: Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets; a safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations?**

- That the province better integrate decision making across Ministries to make key provincial facility location decisions according to growth plan principles;
- Decisions to rationalize or close public facilities such as schools in Urban Growth Centres should also be evaluated in terms of impacts on Growth Plan objectives;
- That the modernized cash-in-lieu of parkland dedication policy in the *Planning Act* (proposed by the *Smart Growth for Our Communities Act, Bill 73*) which supports intensification and density targets in the growth plan be passed by the Legislative Assembly;
- The province must ensure better monitoring to ensure that municipalities monitor future housing supply to accommodate future growth.

**How can the plans better support the development of a mix of housing that meets the needs of the region's growing population, including affordable housing?**

- Strictly enforce existing *Planning Act* requirements for municipalities to update their Official Plans every five years (OHBA is concerned by the proposal within the *Smart Growth for Our Communities Act, Bill 73* to shift to a 10-year cycle) and their Zoning By-Laws within three years of an Official Plan review;
- Amend the *Planning Act* to allow for as-of-right secondary suites across Ontario;
- The cost and choice of housing should be a performance indicator of the success of the Growth Plan.
- That the province (including Metrolinx and other agencies, boards and commissions) leverage its own assets to build affordable housing in livable, walkable, location-efficient communities;
- Support a wider diversity of housing including mid-rise opportunities by adjusting parkland dedication standards, municipal parking standards and zoning standards to ensure that they are practical and mid-rise development is economically viable.

**How can the plans better support the development of vibrant office and mixed-use employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near critical transportation infrastructure?**

- That the *Growth Plan* be amended to eliminate/disconnect employment lands from the density target of 50 people and jobs per hectare as certain employment facilities are not job intensive;
- That planning for major office development recognize the continuing role of business parks in accommodating this use, and that such parks receive greater consideration in planning for transit;
- That the Growth Plan better align with 2014 PPS policies to promote investment-ready communities, place-making and mixed-use areas to support economic development (Policies 1.3.1 and 1.7.1);
- Consider the nature of employment functions in urban settings, and further consider and encourage a range of complimentary uses to be permitted as-of-right, to support the very nature of the employment function;
- The Growth Plan be amended to stipulate that employment areas be reviewed at certain intervals (five-years) to assess conversion opportunities that might be necessary to ensure that all forms of employment, including retail are being appropriately provided for;
- Local flexibility in Outer-Ring municipalities to attract jobs and support economic development.

**What is the role of retail in building vibrant communities and how can the plans support or direct retail development?**

- The *Growth Plan* should be amended to define “Major Retail”, and that it clearly identify retail as a use that must be comprehensively planned by municipalities.

**How can the plans’ policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities?**

- Local flexibility to attract jobs and economic development.

**How can the plans contribute to reductions in greenhouse gas emissions?**

- Successful implementation of the *Greenbelt* and *Growth Plans* can contribute to achieving the province’s climate change goals of reducing greenhouse gas emissions;
- Invest in active transportation, which contributes to healthier communities as people can walk and cycle to meet their daily needs;
- Invest in transit including Regional Express Rail and approved and necessary land-uses that support transit operations;
- That the province implement policies that support public transit by requiring municipalities to reduce parking requirements in Urban Growth Centres and infrastructure corridors;
- Promote culture of conservation by enacting Section 3 of the *Green Energy and Green Economy Act, 2009* to enable mandatory home energy audits prior to the sale of an existing home (re-sale);
- Consider a provincial program modeled on the now expired federal ecoENERGY Retrofit – Homes Program to provide grants to help homeowners undertake targeted renovations to upgrade and make their homes more energy-efficient;
- Consider establishing a Home Renovation Tax Credit, modelled on the Healthy Homes Renovation Tax Credit (HHRTC), which includes targeting energy-efficient upgrades to Ontario’s existing housing stock. An additional public policy benefit would be that such a tax credit would assist to combat the underground economy by encouraging consumers to use legitimate contractors and create a paper trail.

**How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?**

- Implement provincial programs that link growth planning with environmental protection to support rehabilitation of wetlands and wood-lots to act as carbon sinks and fight climate change;
- Ministry of the Environment and Climate Change support, approve and encourage green infrastructure by providing discounts of development charges and off-setting hard infrastructure requirements.

**Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?**

- Ensure municipal Official Plans and Zoning By-Laws are in conformity with the 2014 PPS.
- Implement provincial programs that link growth planning with environmental protection and investment that will enhance the ecological value of the Greenbelt.

**Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?**

- OHBA is, however, broadly supportive of streamlining and harmonizing, where possible, to better align the language and definitions within the four plans. This will enhance clarity, transparency and accountability within Ontario's land use planning system.

**What policies of the plans do you think have been successful and should be retained?**

- Retaining and generally supporting current policies (with minor amendments) including:
  - Growth Plan intensification targets and alternative targets;
  - Minimum gross density targets in Urban Growth Centres;
  - Criteria established in 2008 to Grow the Greenbelt;
  - Urban River Valley designation for publically-owned lands;
  - Requiring municipal Official Plan and Zoning by-Law conformity with the Plans.

**Should the province develop any additional tools or guidance materials to help support implementation?**

- The province must lead the conversation and educate municipalities and the public with respect to how provincial planning policies and objectives will impact their existing communities and neighbourhoods so that residents are engaged and informed as why their communities are evolving;
- A Task Force should be established, comprised of provincial, regional and municipal planners, industry land economists, and development industry representatives, to develop for all of Ontario, a standard methodology for residential and employment land budget and supply guidelines, and that this approach include land vacancy factors.

**Are there other opportunities to better facilitate implementation?**

- That the province study a utility based model for water and waste water infrastructure focusing on reducing debt burdens on municipalities, and adding certainty to timing and delivery of infrastructure;

- That the Growth Plan be amended to clearly define the White-Belt, and to state the intention that these lands constitute the GTAH’s land reserve for future urban growth when planning for the creation of complete communities;
- That the regional municipalities be allowed, as part of the next five year review of their Official Plans, to prepare horizon-free Urban Structure Plans defining the structure of uses for white-belt lands, including employment reserves, arterial roads, nodes and corridors as well as assessing long term servicing and transportation alternatives;
- That the Growth Plan be amended to enable good planning to guide the locations of 20-year settlement boundaries (e.g., arterials, mid-block lot lines, open space edges) versus a strict adherence to land budget calculations;
- That the Growth Plan be amended to clearly enable the provision of lands to accommodate required medium and high-density uses over a longer planning horizon.

**Do the plans appropriately distinguish the differences between urban and rural communities?**

- Local flexibility in outer ring municipalities to attract jobs and economic development.

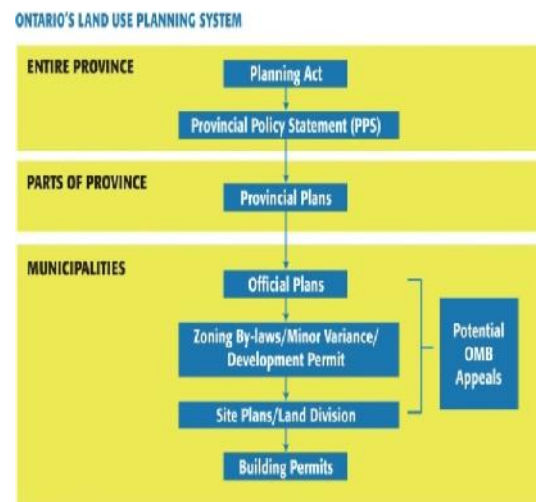
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### *Ontario’s Planning Framework*

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Ontario’s land-use planning framework is critical in supporting provincial goals for healthy, sustainable communities. The responsibility for land-use planning in Ontario is split between the province and municipalities: the province sets the rules and direction for land-use planning; the municipalities are the primary implementers of the policy framework. The *Planning Act* provides the legislative framework for land-use planning in Ontario working together with the *Provincial Policy Statement (PPS)*, provincial plans (Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan) and other legislation.

Implementation of the PPS is set out through the *Planning Act*, which requires that decisions on land-use planning matters made by municipalities, the province, the Ontario Municipal Board (OMB) and other decision-makers “shall be consistent with” the PPS and provincial plans. Municipalities are tasked with implementing the PPS and provincial plans through policies in their Official Plans and through decisions on other planning matters. Ensuring a strong land-use planning framework that properly aligns municipal planning implementation documents to provincial policy will be critical in the province’s efforts to promote intensification, protect the environment and to mitigate climate change.



Source: Ministry of Municipal Affairs and Housing

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## *Recent Reforms to Ontario's Planning Framework*

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Since 2001, Ontario's land-use planning framework has evolved significantly and, consequentially, the land development and new housing industry has undergone a fundamental paradigm shift. The legislation, provincial plans and policy introduced since 2001 with direct impact on the land development, new housing and the professional renovation industry are as follows:

- *Made in Ontario Smart Growth (2001)*
- *Oak Ridges Moraine Protection Act (2001)*
- *The Brownfields Statute Law Amendment Act (2001)*
- *Strong Communities (Planning Amendment) Act, Bill 26 (2004)*
- *Greenbelt Act & Greenbelt Plan (2005)*
- *Provincial Policy Statement (2005)*
- *Planning and Conservation Land Statute Law Amendment Act, Bill 51 (2006)*
- *Places to Grow Act & The Growth Plan for the Greater Golden Horseshoe (2006)*
- *Endangered Species Act (2007)*
- *Metrolinx Act (2006) & The Big Move Regional Transportation Plan (2008)*
- *Lake Simcoe Protection Plan (2009)*
- *Growth Plan for Northern Ontario (2011)*
- *Strong Communities Through Affordable Housing Act (Schedule 2) (2011)*
- *Transit Supportive Guidelines (2012)*
- *Growth Plan Amendment 1 (2012) & Growth Plan Amendment 2 (2013)*
- *Greenbelt Amendment 1 (2013)*
- *New Provincial Policy Statement (2014)*

Currently, and in the immediate future, a number of other land-use planning related reforms and reviews are anticipated:

- *Co-ordinated Review: Growth Plan / Greenbelt / Oak Ridges Moraine / Niagara Escarpment Plan (2015)*
- *Smart Growth for Ontario Communities Act, Bill 73 (2015)*
- *Big Move, Regional Transportation Plan Review (2016)*

OHBA is supportive of the provincial leadership role within the planning framework, but remains concerned that many municipalities continue to have outdated Official Plans and Zoning By-Laws in effect that do not conform to provincial plans or the new PPS. The province's lack of oversight in ensuring the planning system is functioning properly and up to modern standards requires immediate attention.

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## Consultation Discussion Paper Questions

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### 1. How can the plans better support the long-term protection of agricultural lands, water and natural areas?

The co-ordinated review consultation paper notes that our agricultural lands, lakes, rivers, wetlands and woodlands are finite and valuable resources that feed and provide drinking water to communities in our region and beyond. They provide important economic and ecological benefits and improve our quality of life:

#### How can the plans better direct urban development to areas already developed?

OHBA Recommendations:

- Provincial investments in transportation and transit infrastructure are critical for supporting and directing urban development to areas that are already developed;
- Ensure municipal planning implementation policies (including Official Plans and Zoning by-Laws) are modernized and in conformity with the Provincial Policy Statement (PPS) and Provincial Plans in terms of land-use designations as well as appropriate height and densities;
- Better link transit and transportation investments with land-use planning including pre-zoning along transit corridors to support transit-oriented development;
- The province needs to support intensification through a more co-ordinated and multi-ministry approach to infrastructure investment including locations for hospitals, courts, schools, colleges and universities;
- The province support intensification by leveraging its own assets (land & buildings) in Urban Growth Centres, Mobility Hubs and on transit corridors to partner with the private sector to build affordable housing;
- Maintain the existing 40 per cent intensification target and alternative targets in five outer ring municipalities to reflect local circumstances;
- The province should amend the Growth Plan to increase minimum gross density targets in Urban Growth Centres that have existing or planned higher order transit connections;
- Parking standards be reduced/eliminated, cash-in-lieu of parkland dedication requirements be reduced/capped and pre-zoning be required by the Growth Plan in Urban Growth Centres;
- Streamline and better integrate Environmental Assessment process with the *Planning Act*;
- Launch a public education campaign.

OHBA Commentary:

OHBA is supportive of provincial policy objectives to support a diversity of housing and to support higher levels of intensification. Higher density communities typically offer better value for infrastructure investments and offer a healthier lifestyle by reducing auto dependence while promoting a broader mix of land uses. OHBA notes that the current Growth Plan and the evolving housing market have created a

paradigm shift in how communities are built today versus a decade ago. While the Growth Plan has been successful in promoting intensification, OHBA believes that the plans should be enhanced to be much more effective in directing urban development to areas that are already developed, while continuing to offer a variety of housing choices that people can afford.

Provincial investments in transportation and transit infrastructure are critical for supporting and directing urban development to areas that are already developed. OHBA is concerned that higher density and intensification targets may be difficult to achieve in some regions and Urban Growth Centres without the additional investment in transit and transportation infrastructure. The province must ensure its own investments for major public facilities such as hospitals, courts, schools, colleges and universities align with the Growth Plan as they also play a significant role in attracting growth and ancillary employment. OHBA further notes that the province should leverage and take advantage of its own assets in Urban Growth Centres and along transit lines to facilitate intensification by partnering with the private sector in the development of affordable housing in walkable, transit-oriented development. The Growth Plan should ensure that public facilities and affordable housing projects are planned for and built in transit-oriented, location-efficient communities.

OHBA notes that the Performance Indicators for the Growth Plan indicate that many municipalities are now achieving or exceeding their required intensification targets. Between 2007 and 2010, upper and single-tier municipalities across the region achieved an annual average intensification rate of 60 per cent (excluding Toronto, the intensification rate for the GGH is 44 per cent). OHBA recommends maintaining the 40 per cent intensification target and continues to support alternative targets in five outer ring municipalities to reflect local circumstances. These targets should continue to be closely monitored and reported on by the Ministry of Municipal Affairs and Housing.

Achieving minimum gross density targets in Urban Growth Centres have not been as successful over the first decade of the Growth Plan. While these targets are not required to be achieved until 2031, OHBA contends that this co-ordinated review provides an opportunity to strengthen and better align public policies that will facilitate higher levels of intensification in Urban Growth Centres. Tools to support intensification including pre-zoning for greater height and density, eliminating parking standards and reducing parkland dedication standards should be required in all Urban Growth Centres to ensure greater progress to achieving minimum gross density targets over the next decade. Furthermore, OHBA notes that

minimum gross density targets have been met or are close to being met in downtown Hamilton, Yonge-Eglinton, North York and Downtown Toronto and thus should be increased. OHBA also suggests the province should consider increasing minimum gross density targets in some other UGCs that have existing and planned higher-order transit connections such as Etobicoke Centre, Scarborough City Centre, Mississauga City Centre, Vaughan Metropolitan Centre and Downtown Brampton.

**Where are the opportunities to expand the Greenbelt both within urban areas, such as urban river valleys, and in rural areas beyond the Greater Toronto Area?**

OHBA Recommendations:

- OHBA publically supported the creation of the Greenbelt Urban River Valley (URV) designation that gave municipalities the opportunity to connect publicly-owned and protected urban river valleys to the Greenbelt through a public Official Plan process;
- The Provincial Government continue to support the six criteria which provide for transparency and accountability for municipalities to lead the process to Grow the Greenbelt as was established in 2008;
- That further consideration be given to adding appropriate publically owned lands to be included in the greenbelt;
- Approve a transparent and accountable notification process to ensure all impacted landowners are consulted and receive notification prior to finalizing any new land-use designations.

OHBA Commentary:

The 2014 Liberal Election Platform stated that: “as part of our review of the Greenbelt, we will work with communities and expand the outer boundary of the Greenbelt over the next six years, using established processes continuing our legacy of protecting Ontario’s irreplaceable ecological and agricultural lands from urban sprawl. We will ensure that the Greenbelt Act is effectively meeting the goal of protecting ecologically sensitive and agricultural lands.” OHBA supports the Greenbelt, but believes that it needs to be more than lines on a map and that there are opportunities to enhance the effectiveness of the Greenbelt to achieve more clearly defined government priorities to enhance ecological services, enhance biodiversity and combat climate change.

OHBA supports efforts by the province to preserve environmentally sensitive and natural heritage features for future generations of Ontarians. In 2013, in a joint press release with Environmental Defence, OHBA welcomed the new Greenbelt Urban River Valley (URV) designation that gave municipalities the opportunity to connect publicly-owned and protected urban river valleys to the Greenbelt through a public Official Plan process. At the time, Joe Vaccaro, CEO of the OHBA stated, “This is the appropriate way to grow the Greenbelt for future generations to enjoy.” OHBA continues to support this process and encourages the



provincial government, conservation authorities and municipalities to consider additional appropriate publically-owned lands to be included in the Greenbelt. Furthermore, within urban areas, OHBA believes there are opportunities to add existing parkland that is connected to the Greenbelt to the Greenbelt. This would enhance recreational opportunities as well as enhance urban access to Ontario's Greenbelt. OHBA notes that, as part of the land-use planning appeals process, developers (through new neighbours purchasing new homes and condos) dedicate parkland or cash-in-lieu of parkland to municipalities for acquisition of parkland. In select and appropriate circumstances, parkland dedication could support to acquisition of new parkland in communities that are directly connected to the existing Greenbelt.

The robust criteria that the Ministry of Municipal Affairs and Housing established in 2008 to provide an opportunity for municipalities to identify areas that could be included in the Greenbelt should be followed. OHBA, believes it is important for the provincial government to be transparent and accountable to the six criteria of the Growing the Greenbelt process established in 2008. For reference, the six criteria include: begins with a municipal request, passed by a council resolution: identifies an area either adjacent to, or having a functional relationship to the Greenbelt, embraces the Greenbelt purpose, connects to Greenbelt systems, complements the Growth Plan for the Greater Golden Horseshoe, and timing and relationship to other provincial initiatives.

OHBA notes that during public consultations at Town Hall meetings across the Greater Golden Horseshoe during the spring of 2015, the Ministry of Municipal Affairs and Housing invited individual land owners to make submissions to the Environmental Registry regarding individual issues with respect to Greenbelt designations, lack-of-notification and mapping errors. This invitation from the Ministry will result in numerous requests through the Environmental Registry process to have individual situations reviewed and considered by the province.

#### **What new approaches or tools could be used to protect agricultural land, water and natural areas?**

OHBA Recommendations:

- That the Ministry consider, with a view to improving and enhancing our current Greenbelt, engaging its stakeholders in a creative, collaborative and progressive conversation about potential additional land-use options to expand public access and public use, on Greenbelt and related lands, while still maintaining its integrity and significance;
- Implement provincial programs that link growth planning with environmental protection and investment that will enhance the ecological value of the Greenbelt;

OHBA Commentary:

The Ontario *Planning Act* and PPS provide for the wise use and management of resources including significant requirements protecting natural heritage, water and agriculture. These policies were recently reviewed through extensive public and stakeholder consultation and enhanced just last year with the new 2014 PPS. The Greenbelt protects natural heritage systems as well as agricultural systems. OHBA believes the co-ordinated review offers an opportunity to enhance the ecological value of currently protected Natural Heritage Systems and to better support agricultural systems by better supporting farmers. OHBA also notes that there are regional differences across the Greater Golden Horseshoe in terms of Natural Heritage Systems and agricultural practices that need to be considered during the co-ordinated review.

OHBA notes that there may be opportunities to better link growth planning to agricultural, water and natural areas protection. Other jurisdictions may offer valuable insights into successful programs that allow for better implementation of population and employment planning while facilitating programs to combat climate change and enhance the ecological value of natural heritage resources or the agricultural value of agricultural resources within the Greenbelt, Oak Ridges Moraine and Niagara Escarpment.

**How can we grow and strengthen the region's network of open spaces to provide for recreational opportunities?**

OHBA Recommendations:

- The province should carefully consider public policy amendments, greater partnership programs and strategic investments to enhance recreational opportunities throughout the existing Greenbelt plan area including the Oak Ridges Moraine and the Niagara Escarpment;
- Some land-use options be provided to local municipalities to create and expand municipal parks and trail systems within the Greenbelt Plan, Niagara Escarpment Plan and Oak Ridges Moraine Conservation Plan;
- The Ministry should consider a new designations in the greenbelt that would support specific provincial goals and objectives (i.e. recreational designation);

OHBA Commentary:

The Greenbelt has been successful as a plan to preserve greenspace and prevent significant new development over large geographic areas in central Ontario. However, the Greenbelt has not realized its full potential as a network of open spaces to provide for recreational opportunities. Therefore, land owners should be permitted some land-use flexibility to create and expand on recreational opportunities within the Greenbelt, Oak Ridges Moraine and Niagara Escarpment. Active parkland and recreational opportunities could be provided through parkland dedication from urban lands adjoining the Greenbelt and other

opportunities may exist for storm water management ponds that maintain the Greenbelt's integrity. Such flexibility would assist to strengthen the region's network of open spaces, provide for recreational opportunities and enhance connections between our built community and the Greenbelt.

Lastly, following the model and public consultation that took place a couple of years ago to create the Urban River Valley Designation, OHBA would support the creation of new Greenbelt designations within the Greenbelt that would support the implementation of specific provincial goals and objectives (i.e. a recreational designation). This additional flexibility with respect to land-uses within the greenbelt could enhance the ability of the Greenbelt to better accomplish various provincial objectives with respect to recreation, agriculture, natural heritage and/or climate change.

### **How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario's economy?**

OHBA Recommendations:

- An enhanced focus on improving the economic viability of agricultural opportunities for farmers. The province should review Greenbelt policies through the lens of supporting and facilitating agriculture businesses and their associated land needs at it relates to retail, eco-agri-tourism, production, processing facilities for farm purposes and ongoing operational purposes;
- The province made improvements to the PPS to clarify policy, criteria and definitions for agricultural-related and on-farm diversified uses. These same policies should be reflected throughout the Greenbelt Plans to provide consistent guidance for agricultural lands.

OHBA Commentary:

While the Greenbelt Plan is primarily focused as a land-use plan, OHBA recommends an enhanced focus on improving the economic viability of agricultural opportunities for farmers. For the Greenbelt Plan to be a success, the economic viability of agriculture within the Greenbelt should be enhanced. Improvements to the Greenbelt Plan should therefore consider supporting and facilitating a wider diversity of agricultural and agriculturally-related uses that support farming operations and enhance the economic viability of farming. This could include a range of considerations such as flexibility of uses on agricultural lands, promotion of agri-tourism, farmers markets and better local food access to residents in the Growth Plan area through enhanced infrastructure in the Greenbelt.

## 2. How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?

The co-ordinated review consultation paper notes that aligning land-use planning and infrastructure, including transit, can realize cost savings, produce more vibrant communities, ensure the mobility of people and goods, and increase our region's sustainability over the long-term.

### How can the plans better leverage transit investments across the region?

#### OHBA Recommendations:

- Transportation infrastructure investments by the province needs to be packaged with municipal implementation tools including pre-zoning and *Community Planning Permit Systems* to create certainty and investment-ready communities;
- Require pre-zoning and pre-designation of transit corridors *prior* to funds flowing to finance the construction of higher-order transit lines at a density level that will ensure that future operations of the line will not be a long-term liability;
- Support a *National Transit Strategy* that dedicates funding to support municipal transit expansion;
- The Minister of Transportation commence consultations with stakeholders to implement a Transportation Planning Policy Statement (TPPS) that would apply to higher-order transit corridors across Ontario.

#### OHBA Commentary:

OHBA strongly support investments to expand transit services across the Greater Golden Horseshoe. Better linking transit and transportation investments with efficient land-use planning can help maximize the value of these investments and minimize environmental impacts. Transportation infrastructure investments by the province should be packaged with municipal implementation tools including pre-zoning and *Community Planning Permit Systems* to create certainty and investment-ready communities. OHBA is generally supportive of the concept of *Community Planning Permit Systems* on the basis that they would work towards the goal of achieving the intensification and density targets of the Growth Plan as well as incenting development opportunities in areas that should be intensifying, yet have not attracted the necessary investment. The province should also ensure that transit-oriented location-efficient communities remain affordable for people to purchase or rent housing and attract employers. The private sector will invest in transit-oriented development along transit corridors, but we require better planning certainty to bring these communities forward in more communities in a more efficient and affordable manner. This requires an approach to “*take the politics out of planning*” through pre-designation and pre-zoning.

While progress has been made over the past decade, too many existing and planned transit corridors are

lined with low-density development and decades out-of-date planning permissions. Some half measures are being introduced on some transit corridors, through initiatives such as *Eglinton Connects* in the City of Toronto, however the province must take a far more assertive role to require pre-zoning and pre-designation of transit corridors *prior* to funds flowing to finance the construction of higher-order transit lines. The province needs to step up to ensure intensification occurs in the right places along transit lines to support the long-term operational viability of transit. That means a stronger pro-active approach to ensure municipal conformity with provincial policy and the declaration of a provincial interest in achieving enhanced levels of intensification through a Transportation Planning Policy Statement (TPPS).

OHBA is very supportive of the 2015 Ontario Budget commitments to increase transit infrastructure funding over the next decade in the GTAH to approximately \$16 billion including significant enhancements to GO Transit service and the construction of the Hurontario – Main LRT and the Hamilton LRT. OHBA strongly recommends that the provincial government take the next step and declare a provincial interest in achieving higher levels of intensification on these transit corridors through a TPPS, and furthermore, require pre-zoning or a Community Planning Permit System on the Hurontario – Main LRT corridor as well as the Hamilton LRT corridor as part of the master-servicing agreements with Mississauga, Brampton and Hamilton. Establishing land-use planning certainty to require minimum densities along future transit corridors should be a key outcome of the co-ordinated reviews and upcoming review of the Metrolinx *Big Move*.

The province and municipalities must enhance links between land-use planning and planning for infrastructure so that transit, roads, water, waste-water and energy are better co-ordinated to serve Ontario's growing communities. OHBA is encouraged by the significant \$31.5 billion in dedicated transportation-related infrastructure that the provincial government has committed to over the next decade. The cost of these infrastructure investments, as outlined in the 2014 provincial budget, was equitably allocated from the general tax-base and through a targeted repurposing of the existing gas tax, as was recommended by OHBA (OHBA resolution in 2007 recommended allocating an additional portion of the existing gas tax specifically for transportation infrastructure). It will be critical in the coming years to ensure that the Federal Government plays a much stronger role in sharing funding of transportation infrastructure in communities across Ontario. OHBA passed a resolution at its 2012 Annual Meeting of Members supporting a *National Transit Strategy* that dedicates funding to support municipal transit expansion.

OHBA supports a land-use planning framework that is integrated with transportation infrastructure to create

complete, investment-ready communities with transit supportive densities. It is critical that the province better align transportation planning and land-use planning to maximize limited resources. The provincial government is currently constructing the multi-billion-dollar “first wave” of Metrolinx “*Big Move*” projects, yet most municipalities have not updated and modernized **both** their Official Plans and Zoning By-Laws to support as-of-right transit-oriented development along new/planned transit corridors, in new/planned Mobility Hubs and surrounding new/planned transit stations. OHBA believes that the “*next wave*” of Metrolinx “*Big Move*” projects including recent announcements in Mississauga/Brampton and Hamilton, as well as higher-order transit projects in Waterloo Region and the City of Ottawa, provide an opportunity to better align transit planning and land-use planning through **both** updated and modernized Official Plans and Zoning By-Laws to encourage as-of-right transit-oriented development.

OHBA notes that under Sec 31.1 of the *Metrolinx Act*, “The Minister may issue policy statements that have been approved by the Lieutenant Governor in Council on matters relating to transportation planning in the regional transportation area.” And that the Minister’s Transportation Planning Policy Statement (TPPS) must [Sec 31.1 (2) (c)], “ensure that the transportation planning policy statement is in alignment with the Growth Plans prepared and approved under the *Places to Grow Act* applicable in the regional transportation area.” And furthermore, [Sec 31.1 (4)], “A decision under the *Planning Act* or the *Condominium Act, 1998* made by a municipal council, local board, minister of the Crown or ministry, board, commission or agency of the Government of Ontario, including the Ontario Municipal Board, that applies in the regional transportation area shall be consistent with the designated policies set out in a transportation planning policy statement.”

OHBA passed a resolution at our 2014 Annual Meeting of Members resolving that the Minister of Transportation commence consultations with stakeholders to implement a Transportation Planning Policy Statement (TPPS) that would apply to higher-order transit corridors across Ontario. The TPPS should be structured to require municipal Official Plans and Zoning By-Laws to be in conformity with the TPPS and allow appropriate as-of-right transit-oriented development on transit corridors and surrounding new/planned transit stations. The Zoning By-Laws that are brought into conformity with a TPPS should ensure that each transit project is positioned to have strong ridership growth (which would reduce ongoing operational costs) supported by transit-oriented development.

Everything that OHBA has discussed within this section speaks to planning and planning tools to support infrastructure investment. It is critical that the province not undermine its own planning objectives through a misalignment of tax/fiscal policy. OHBA notes that location-efficient communities are already generally

less affordable for people to purchase or rent housing. It is important that the province consider affordability to ensure our communities make the best use of key infrastructure and align tax/fiscal policy with planning policy. OHBA notes that financial considerations have created in some cases perverse incentives to down-zone and in some cases municipalities have considered additional intensification development charges. OHBA is concerned that other provincial initiatives such as *the Smart Growth For Our Communities Act* (Bill 73) will increase taxation in the very communities in which the Growth Plan is trying to direct growth.

The 2013 Metrolinx Investment Strategy included the proposed creation of a new development charge to support their transit expansion plans. Instead of making transit-oriented communities more affordable to attract the necessary population and employment to support the long-term viability of transit operations, these transit taxes only serve to undermine the affordability of these new transit-oriented communities. OHBA continues to see governments and government agencies undermine affordability in their drive for short-term revenue instead of supporting long-term community-building objectives by ensuring that we are building transit-oriented homes and employment centres that people can afford. The current debate on the proposed *Smart Growth For Our Communities Act* continues to be focused on how municipalities can generate more new neighbour taxes (taxes, levies, fees) instead of achieving smart growth objectives. OHBA continues to advocate for fairness and transparency for new neighbours, and that Bill 73 cannot result in a further piling on of taxes on the backs of future new home purchasers and employers. The Government of Ontario has a responsibility to ensure that Growth Plans are not undermined by taxation and financial burdens. Transit-oriented communities should be the most affordable and attractive communities for Ontario's future residents and employers.

#### **How can the plans better promote livable, walkable communities that use new and existing infrastructure in the most cost-effective way?**

OHBA Recommendations:

- Pre-zoning / pre-designating lands or implementing a Community Planning Permit System (Development Permit System) along intensification corridors and Urban Growth Centres that works towards achieving intensification goals of the Growth Plan;
- That the province leverage its own assets to build affordable housing in livable, walkable, location-efficient communities;
- That the province implement policies that support public transit and both mid-rise and high-rise development by requiring municipalities to reduce parking requirements, set-back requirements and road width requirements in Urban Growth Centres and intensification corridors;
- That the GTA's transit system be co-ordinated with an enhanced cycling network in appropriate urban areas that provides for an active, carbon free and safe alternative mode of transportation.

- That the province use new and existing infrastructure in a more cost-effective way by amending the Growth Plan to include policies supporting community hubs in strategic locations;
- The Community Hub Framework Advisory Group co-ordinate their recommendations to support the Growth Plan;
- That the province use the proposed regulatory authority of Bill 73 to create area-specific development charges to establish lower charges for areas of intensification;
- That the province support brownfield redevelopment, reuse of construction materials and balance soil movement on-site to optimize limited resources and better use new and existing infrastructure.

OHBA Commentary:

The members of OHBA are an integral partner with the provincial government in implementing the Growth Plan through the creation of complete communities that improve the range of opportunities for people to live, work, and play in the GGH. The challenge to increase densities and intensify development requires additional financial and policy tools to support intensification from the province and municipalities. Tools such as pre-zoning / pre-designating lands or implementing a Community Planning Permit System (Development Permit System) along intensification corridors and Urban Growth Centres would facilitate mixed-use, complete communities, at higher densities. OHBA also suggests that the province identify through open data, publically owned lands and buildings locations in Urban Growth Centres, Mobility Hubs and transit corridors that could be leveraged through partnership with the private sector to build affordable housing in livable, walkable, location-efficient communities. Furthermore, infrastructure standards and design criteria should be reviewed by the province to ensure they are modernized to acknowledge new conservation techniques and are built at appropriate capacity levels. It is critical that pro-active measures are taken by the province and municipalities to reduce the barriers to intensification.

Optimizing infrastructure in a cost effective way requires investment in transit as the necessary ingredient to ensure the creation of higher density, compact, pedestrian and affordable, transit-oriented communities. Such investment should be used in tandem with revisions to parking standards that are often extremely onerous and can make housing more affordable by assisting to reduce the costs associated with underground and structured parking facilities. Policy revisions to reduce municipal parking requirements in residential projects would improve housing affordability in location-efficient communities while supporting transit ridership. OHBA in partnership with the Pembina Institute identified a number of these public policy barriers that should be removed to facilitate more affordable transit-oriented communities in our joint “Make Way For Mid-rise” report released in May 2015.

The province should utilize proposed authorities in the *Smart Growth For Our Communities Act* (Bill 73) to



implement area-specific development charges within transit corridors and urban growth centres to establish lower development charges and thus support both housing affordability and intensification. The province should also review brownfields policies, incentives and tax policies as well as soil management policies to encourage brownfield redevelopment as a means to increase densities, intensify within existing communities, rehabilitate contaminated properties and utilize existing infrastructure in a more efficient manner.

OHBA supports community hubs that are well serviced by transit and active transportation opportunities that will attract residents and jobs. A community hub can be a school, a neighbourhood centre or another public space that offers coordinated services such as education, health care and social services. The province should make better use of existing community infrastructure and co-ordinate new infrastructure investments so that public facilities, such as schools, community centres, parks and libraries, be located together (or in close proximity) to serve a range of community uses and maximize both hard and soft infrastructure. These facilities can also attract private sector investment for ancillary uses that further optimize infrastructure in a cost-effective way while supporting transit ridership. Co-ordinating and leveraging Community Hubs will ensure that the Plans better promote livable, walkable communities that use new and existing infrastructure in the most cost-effective way.

### **How can the plans align long-term infrastructure planning with planning for growth?**

OHBA Recommendations:

- That the province better integrate decision making across Ministries to make key provincial facility location decisions according to Growth Plan principles;
- Requiring pre-zoning for higher densities in Urban Growth Centres and transit corridors;
- That any new Greenbelt designations be based on science and not contain any additional planning, permit, environmental assessment or construction-related constraints for new or existing infrastructure;
- Reaffirm the “whitebelt” lands as the long-term urban reserve;
- Support municipal recommendations that the provincial government establish a municipally led process by which existing boundaries can be fine-tuned and adjusted to correctly correlate with natural heritage features and both infrastructure on the ground as well as planned infrastructure;
- Support municipal recommendations that criteria for landowners and municipal governments by which existing and proposed Greenbelt designations can be assessed;
- An open and transparent process by which a set of criteria be established to review Greenbelt designations in the Greenbelt Plan;

OHBA Commentary:

To better align infrastructure and growth planning it is critical that the province better integrate decision

making across Ministries. This requires the Ministry of Health, the Ministry of the Attorney General as well as the Ministry of Education and Ministry of Training, Colleges and Universities to make key provincial facility location decisions according to Growth Plan principles. These public sector investments should be located within Urban Growth Centres, mobility hubs, community hubs, and transit/transportation corridors. These public sector investments leverage further investments from our members in the private sector, that, if located appropriately and to modernized appropriate standards, would increase population and employment densities and facilitate intensification.

OHBA again reiterates that requiring pre-zoning (as-of-right zoning) for higher densities in Urban Growth Centres and transit corridors is critical to better aligning land-use planning for population and employment growth with infrastructure planning. As such, the province must strictly enforce existing *Planning Act* requirements for municipalities to update their Official Plans every five years (proposed by the *Smart Growth for Our Communities Act, Bill 73* to shift to a 10-year cycle) and their Zoning By-Laws within three years of an Official Plan review. While many municipalities across the Greater Golden Horseshoe have brought their Official Plans into conformity with the four plans that are a part of the co-ordinated review, local Zoning By-Laws in many municipalities are out-of-date and completely disconnected from growth and density targets as well as existing or planned infrastructure.

OHBA notes that infrastructure standards, building standards for schools, and the efficiency of new communities that require significant environmental take-outs, road allowances etc should be reviewed in the context of facilitating intensification. Many standards used today are out-of-date and not necessarily modeled to support the types of complete transit oriented communities that the Growth Plan strives to achieve. The province should therefore consider the efficiency of infrastructure standards, building standards and environmental standards to ensure broader provincial objectives are being met.

The URV Greenbelt designation, or other future considerations for Greenbelt expansion, must not impact either existing infrastructure, projects approved by way of an Environmental Assessment, or planned/additional strategic infrastructure required to service the growing region. As the province continues to forecast population and employment growth in the Greater Golden Horseshoe, such growth will require new infrastructure to cross urban river valleys and other existing Greenbelt designated lands.

Recognizing that growth (employment and population) will continue to the 2041 forecast horizon and

beyond and recognizing that while a minimum of 40 per cent of this new growth will be accommodated through intensification, “because of the magnitude of growth that is forecast”, the Ministry of Infrastructure had stated in the five-year update of the Growth Plan posted online that, “it will be necessary to bring new lands from the “*White-Belt*” into the urban envelope”. While OHBA is supportive of Growing the Greenbelt through a URV designation south from the existing Greenbelt on publicly-owned lands towards Lake Ontario, it is important that the new URV designation not impact, directly or indirectly, the future and necessary development of the long-term urban structure of the region. Growing the Greenbelt on the outer edges should therefore be municipally led, not occur in areas that compromise existing and approved servicing or infrastructure and follow the established criteria.

OHBA’s support of the URV designation south of the existing Greenbelt is predicated on only existing publically-owned lands being eligible for inclusion. However, if expansions were to result in permissive rules that would allow the MNRF, municipalities, Conservation Authorities or other authorities to impose setbacks, additional buffers or create connectivity corridors or protected additional parcels across White-Belt lands, OHBA would have significant concerns. OHBA is also opposed to any further encroachment of the Greenbelt onto future urban reserve “*White-Belt*” lands. Furthermore, OHBA previously has noted that a URV designation within existing built-up urban areas could result in a wide variety of buffer and set-back conditions. The existing urban area has evolved through decades of differing planning practices and therefore, different approaches to set-backs and environmental protection. OHBA notes the URV designations through the existing urban area should continue to only include publicly-owned lands and not result in any additional buffer requirements on private property abutting the URV systems. The URV designation must recognize and respect that older communities did not approach natural heritage features or hazard lands in the same way that we do today.

OHBA notes that concerns have been raised by stakeholders in several sectors and from land owners with respect to mapping errors and mapping changes that occurred without consultation when the greenbelt was initially created. It is therefore important that through the co-ordinated review that the provincial government respond to municipal recommendations to establish a municipally-led process by which existing boundaries can be fine-tuned and adjusted to correctly correlate with natural heritage features and existing/planned infrastructure and servicing on the ground. A transparent, municipally-led process, where a set of criteria is established by the province to review Greenbelt designations in the Greenbelt Plan, should protect the integrity of the Greenbelt while providing municipalities the opportunity to fine-tune boundaries

based on natural heritage features and local circumstances including infrastructure, servicing and employment.

### **How can the plans better support goods movement by all modes of transportation?**

#### OHBA Recommendations:

- Align 2014 PPS policies that strengthen the protection of corridors for goods movement and to protect employment areas in close proximity to corridors and facilities for goods movement with the Growth Plan.

#### OHBA Commentary:

The co-ordinated review should better align existing and planned transportation corridors and other modes of transportation (ports, airports) with employment planning. Land-use planning policies should support existing and planned transportation corridors and facilities and vice versa. The schedules of the provincial plans should be amended to accurately reflect existing under construction and planned transportation corridors and facilities.

OHBA notes that the PPS was revised in 2014 to strengthen the protection of corridors for good movement and to protect employment areas in close proximity to corridors and facilities for goods movement (policies 1.3.2.3 and 1.6.8). OHBA recommends that these PPS policies to better support goods movement should be more formally asserted in the Growth Plan to fully realize the benefits that these policies seek to achieve. It is critical that the planning for transportation and transit networks in the GGH give better consideration to the needs of employers to efficiently move goods and bring them to the market.

### **How can the plans identify and better protect the strategic infrastructure corridors needed over the long-term?**

#### OHBA Recommendations:

- OHBA recommends that Schedules 2, 5 & 6 of the Growth Plan be amended to better reflect refined alignments for major highway infrastructure (the Bradford link between Highways 404 and 400, the GTA West-Corridor and the committed / under construction extensions of Highways 404, 427 and 407), as well as to reflect consistency with transit plans as they evolve and other important transportation facilities;
- The Growth Plan should also include schedules / mapping of critical water, waste water and utility infrastructure that is required to support both population and employment growth;
- The province should also consider the long-term urban structure of the region beyond 2041 population and employment planning horizon in terms of protecting not only strategic corridors for infrastructure,

but also to consider strategic employment lands;

- Plans should protect and designate the lands adjacent to 400 series highways as employment lands;
- That the Province establish strategic employment designations along 400 series highways that are disconnected from the 50 people and jobs per hectare density target to recognize that certain desirable employment facilities on these corridors are not job intensive;
- To enable the delivery of critical infrastructure to enable investment-ready communities, the province should support new infrastructure financing and delivery models such as a utility-based model for water and waste water infrastructure to reduce municipal debt and add certainty to the timing and delivery of infrastructure.

OHBA Commentary:

The co-ordinated review offers an opportunity to improve strategic long-term planning for infrastructure corridors. Long-term uses, including employment lands should be considered in tandem with infrastructure planning. While transportation and transit facilities have been discussed extensively, there is a need for more accurate and transparent mapping to be made available for other types of growth-related infrastructure. Much of the discussion and public discourse with respect to “land supply” has been disconnected from actual short-term “housing supply”. There is a disconnect between land-use designations and from where critical infrastructure such as water, sanitary sewers, road and transit servicing is actually located. Land that may be allocated for low-rise or high-rise housing or for employment facilities may not have servicing to effectively be considered as part of the region’s actual “housing supply” or investment-ready communities for population and employment growth.

As noted in the previous question, transportation and transit corridors/facilities should be better mapped (where geographically appropriate) in the Growth Plan, Greenbelt Plan, Niagara Escarpment Plan and the Oak Ridges Moraine Conservation Plan to improve transparency and co-ordination of public policy. Furthermore, strategic employment lands along the 400 series highways should also be mapped while receiving strategic designations to disconnect these employment lands from the 50 persons and jobs per hectare density requirement. Such a decoupling from the density target would support job creation while recognizing the reality that many important and desirable economic functions in our 21<sup>st</sup> century economy are not job intensive.

Lastly traditional delivery models are becoming a challenge, thus the province should consider new models for financing and delivering infrastructure. The province should consider shifting funding for some critical infrastructure, such as water and waste water, to user fees based on a private utilities model (i.e. like the energy and gas industry). Such a shift would ensure full cost pricing within the user rate for the service,

maintenance (state of good repair) and growth-related infrastructure investment. Shifting the source of funding some critical infrastructure to user fees would yield a number of benefits, including: increasing economic efficiency, increased housing affordability, reducing municipal debt and more equitable treatment of service users.

**How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?**

OHBA Recommendations:

- The province must continue to focus on both provincial and municipal asset management plans as a key tool to balance the need for critical infrastructure to support economic growth with environmental protection;
- Utilize modern infrastructure investments to improve environmental features where applicable;

OHBA Commentary:

The Greater Golden Horseshoe continues to attract approximately 100,000 people and 50,000 jobs per year. The Plans provide the framework by which we can accommodate this growth while continuing to protect valuable natural assets. In order for these plans to work and to provide people with the live, work, play opportunities that they should have within their communities, we need to recognize that all the jobs cannot be located in Toronto. Outer ring municipalities continue to be challenged due to a lack of underlying infrastructure and difficult economic circumstances. Provincial leadership is required to ensure all communities in the Greater Golden Horseshoe prosper and maintain a high quality of life. Therefore it is important that the province continue to invest in critical infrastructure so that communities can attract the necessary jobs to make the plans work. OHBA believes that this can be accomplished without sacrificing important environmental protections.

### 3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?

The co-ordinated review consultation paper notes that healthy, livable, inclusive and complete communities can improve our quality of life, attract people and jobs to the region, reduce healthcare costs and be accessible to all Ontarians at all stages of life.

#### How can the plans provide more direction on designing:

**A) Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets?**

**B) A safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations?**

#### OHBA Recommendations:

- That the province better integrate decision making across Ministries to make key provincial facility location decisions according to Growth Plan principles;
- Decisions to rationalize or close public facilities, such as schools, in Urban Growth Centres should also be evaluated in terms of impacts on Growth Plan objectives;
- That the modernized cash-in-lieu of parkland dedication policy in the *Planning Act* (proposed by the *Smart Growth for Our Communities Act, Bill 73*), which supports intensification and density targets in the Growth Plan be passed by the Legislative Assembly;
- The province must ensure better monitoring to ensure that municipalities monitor future housing supply to accommodate future growth.

#### OHBA Commentary:

OHBA is strongly supportive of, and our members are in the business of, developing complete communities where people can live, work, play and access services in close proximity. The Growth Plan requires municipalities to plan for a mix of housing types, land uses and employment opportunities and an urban form that supports walking, cycling and transit. OHBA notes that the housing market has undergone a paradigm shift over the past decade in which consumers are demanding affordable, location-efficient communities with a range of different housing options. This shift in the housing market is producing positive results (as articulated in the Ministry of Municipal Affairs and Housing's 2015 Growth Plan Performance Indicators), however OHBA believes that a number of public policy adjustments would improve housing choice, supply and affordability while achieving better results in new and evolving communities across the Greater Golden Horseshoe.

It is important to better integrate decision making across Ministries in support of the four plans. Important decisions on major facility locations by the Ministry of Health and Long-Term Care, the Ministry of Training,

Colleges and Universities and the Ministry of Education are critical to support the evolution of complete communities. These types of facilities are major community hubs, create ancillary employment uses in their immediate surrounding areas and generate significant transportation demands (via transit, automobile or active transportation). Past experience over the first decade of Growth Plan implementation strongly suggest there is room for improvement to ensure investment decisions for hospitals, schools, colleges and universities be located in Urban Growth Centres and along transit corridors. Public policy should be reviewed to ensure that Growth Plan principles to use resources efficiently are considered within building standards and consider opportunities to combine facilities. Furthermore, decisions to rationalize or close public facilities such as schools in Urban Growth Centres should also be evaluated in terms of impacts on Growth Plan objectives. OHBA strongly recommends that future public sector investments in major public facilities better align with Growth Plan objectives.

OHBA remains very concerned that some municipalities have excessive parkland dedication fees that continue to discourage medium and high-density projects while curtailing housing affordability. The cash-in-lieu of parkland fees, often charged at the maximum allowable amount under the *Planning Act*, significantly adds to the cost of medium and high-density projects without drastically improving or adding park facilities within the area of the new development. As noted in the joint OHBA-Pembina “Make Way For Mid-rise” report, the increased cost to builders is passed onto new home buyers which decrease the affordability of housing within Urban Growth Centres and intensification corridors. Proposed amendments to the *Planning Act* regarding parkland dedication policies are a good first step and are supported by OHBA as they will support fairness for new residents of mid-rise and high-rise development while facilitating higher levels of intensification and transit-oriented development. The new modernized cash-in-lieu of parkland dedication policy in the *Planning Act* (proposed by the *Smart Growth for Our Communities Act*, Bill 73 to shift to 1 ha per 500 dwelling units) will support intensification and density targets in the Growth Plan. It is important that this proposed improvement to housing affordability is not undermined by the piling on of other taxes through proposed amendments to the *Development Charges Act*. As mentioned earlier, we should be working to ensure that transit-oriented communities be the most affordable and attractive communities for Ontario’s future residents and employers.

OHBA notes that municipalities have had the ability to create local parkland by-laws to support intensification, however very few have undertaken this initiative despite provincial encouragement. Municipalities should consider a ‘cap’ on the formula to put a ceiling on the maximum amount of parkland



requirements obtained from a development, based on its size along a graduated threshold. Furthermore, where higher density developments provide facilities, (such as play facilities, passive recreational space, green roof, interior courtyard areas with public easements, easements over open space in condominium lands for public through fare, dry storm water management ponds etc.) a discount on parkland requirements or levies could be provided in Urban Growth Centres.

OHBA notes that it is important for municipalities to plan for, and have an appropriate supply of, a full range of housing, including apartment, row, semi and singles. OHBA is concerned that some municipalities have a very constrained supply of specific housing types, despite strong demand, thus leading to affordability challenges. The land-use planning and environmental assessment process is part of problem of “regulatory inertia” that leads to many of the issues with respect to uncertainty in the housing supply and affordability. The province has its own role in supporting the approvals of new communities and must do a better job of providing the necessary provincial approvals to allow for municipal Official Plans to move forward. In this way the province can directly improve housing choice and affordability throughout the GGH. The province must ensure better monitoring to ensure that municipalities maintain an appropriate supply of housing (both low and high-rise). Ensuring both housing choice and affordability is a critical challenge in many communities across the Greater Golden Horseshoe. The co-ordinated review offers the opportunity to implement public policies that will ensure a supply of housing that people can afford. OHBA is very concerned that the Greater Golden Horseshoe is challenged by deteriorating affordability, a lack of housing choice, and a strained transportation system – all of which require a regional policy approach.

### **How can the plans better support the development of a mix of housing that meets the needs of the region’s growing population, including affordable housing?**

OHBA Recommendations:

- Strictly enforce existing *Planning Act* requirements for municipalities to update their Official Plans every five years (OHBA is concerned by the proposal within the *Smart Growth for Our Communities Act, Bill 73* to shift to a 10-year cycle) and their Zoning By-Laws within three years of an Official Plan review;
- Amend the *Planning Act* to allow for as-of-right secondary suites across Ontario;
- The cost and choice of housing should be a performance indicator of the success of the Growth Plan;
- That the province (including Metrolinx and other agencies, boards and commissions) leverage its own assets to build affordable housing in livable, walkable, location-efficient communities;
- Support a wider diversity of housing including mid-rise opportunities by adjusting parkland dedication standards, municipal parking standards and zoning standards to ensure that they are practical and mid-rise development is economically viable.

OHBA Commentary:

A paradigm shift has occurred over the past decade in terms of the new communities being built across the Greater Golden Horseshoe with a significant focus on intensification. While the successes should be celebrated, a number of challenges have been percolating under the surface. These challenges include an increasingly weak diversity of housing choice, an overly congested transportation system and deteriorating housing affordability. A recent TD Economics Report (GTA Housing Boom Masks Growing Structural Challenges) went so far as to state, “affordable housing is no longer just a concern for low income renters, but has broadened to include the home ownership market.” TD recommended that to improve affordability, “the best chance of real success involves a co-ordinated approach that better targets scarce resources and brings down the cost of development.” Lastly, TD recommended, “housing policies that bring down the costs of construction, speed up delivery and improve the economics of investing in a broader array of housing types – including rehabilitation – would translate into lower costs for residents over the long run.” The co-ordinated review as well as some of the proposals in the *Smart Growth for Our Communities Act, Bill 73* (EBR 012-3651) provide a real opportunity to improve public policy to better meet the needs of the region’s growing population.

To better support the development of a mix of housing to meet the needs of the region’s growing population, the province should consider an array of planning policies to support intensification, bring down the cost of construction and improve the economics of investing in a broader array of housing types and employment. Removing costs and barriers to new housing supply will assist to alleviate affordability issues across the region, particularly for moderate income households. Furthermore, leveraging existing assets in Urban Growth Centres, Mobility Hubs and along transit corridors should be considered to support building affordable housing in location-efficient, transit-oriented communities. OHBA notes that the success of the Growth Plan to direct growth into existing built boundaries has presented an affordability challenge as these are locations where land is more expensive. Furthermore, municipal taxes, fees and in particular, development charges have been hiked in many Greater Golden Horseshoe municipalities to fund the growing cost of infrastructure, with these costs passed onto new neighbours in the form of higher housing costs. Lastly, OHBA notes that the land-use planning and environmental assessments process also contribute to issues with respect to housing affordability. The province must better co-ordinate and align planning, economic and housing policies to support the objectives of the Growth Plan.

**How can the plans better protect heritage buildings, cultural heritage landscapes and archaeological resources?**

**OHBA Commentary:**

Increased levels of intensification and focusing growth within existing communities will inevitably create conflicts and tension between new development, adaptive re-use and existing built form. It is important that an appropriate balance be struck between accommodating population and employment growth with protecting heritage buildings, cultural heritage landscapes and archaeological resources. OHBA believes that the new 2014 PPS and other relevant legislation should be maintained and continue to guide planning decisions with respect to heritage and archaeological resources.

**4. How can the plans better support the development of communities that attract workers and the businesses that employ them?**

The co-ordinated review consultation paper notes that communities need to be planned in ways that attract skilled workers and their employers, and that ensure land is readily available for a range of employment uses. This is fundamental to maintaining our economic competitiveness.

**How can the plans better support the development of vibrant office and mixed-use employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near critical transportation infrastructure?**

**OHBA Recommendations:**

- That the *Growth Plan* be amended to eliminate/disconnect employment lands from the density target of 50 people and jobs per hectare as certain employment facilities are not job intensive;
- That planning for major office development recognize the continuing role of business parks in accommodating this use, and that such parks receive greater consideration in planning for transit;
- That the Growth Plan better align with 2014 PPS policies to promote investment-ready communities, place-making and mixed-use areas to support economic development (Policies 1.3.1 and 1.7.1);
- Consider the nature of employment functions in urban settings, and further consider and encourage a range of complimentary uses to be permitted as-of-right, to support the very nature of the employment function;
- The Growth Plan be amended to stipulate that employment areas be reviewed at certain intervals (five-years) to assess conversion opportunities that might be necessary to ensure that all forms of employment, including retail are being appropriately provided for;
- Local flexibility in Outer-Ring municipalities to attract jobs and support economic development;

OHBA Commentary:

The co-ordinated review offers an important opportunity to enhance the Growth Plan as a tool to support economic development across the region. The means attracting local and international investment to support job creation and grow our economy. The plan must better support the development of vibrant office and mixed-use employment area while also recognizing the needs of other employment uses including manufacturing, major retail, warehousing and distribution centres. It is also important to acknowledge that Growth Plan policies must be effective to attract jobs and investment across the region and not be overly Toronto focused. The policies of the Growth Plan need to be more effective in communities outside of the “416”.

OHBA recommends that that the *Growth Plan* be amended to eliminate/disconnect employment lands from the density target of 50 people and jobs per hectare. This is a key recommendation to recognize that these are important and desirable employment opportunities that are land intensive, yet yield important economic functions in Ontario (e.g. warehouses, distribution centres, heavily automated manufacturing facilities etc). These employment uses are currently restricted by the 50 jobs/residents per hectare requirements in the Growth Plan and often result in perverse compensation situations with densities that may make for good math, but not strong planning rationale are applied by municipalities in locations that don't make sense. While the 50 jobs/residents per hectare may work within the City of Toronto, it is hindering efforts to attract jobs and investment in the regions outside of Toronto. The Growth Plan must be amended to work for the entire Greater Golden Horseshoe and not be a Toronto-centric plan.

The provincial reviews of the Growth Plan and the upcoming review of the Metrolinx Regional Transportation Plan, should focus beyond intensifying and directing growth to existing transportation corridors, but also on building more transportation corridors. The revised 2014 PPS contains policies to support long-term planning for employment areas (Policy 1.3.2.4), including master planning of employment parks and industrial sites coupled with critical infrastructure and appropriate residential construction to create alternative options for investors, workers and residents. These policies should be more formally asserted in the Growth Plan to fully realize the economic benefits.

Furthermore, the Growth Plan should be amended to stipulate that employment areas be reviewed at certain intervals (five-years) to assess conversion opportunities that might be necessary to ensure all forms of employment, including retail, are being appropriately provided for. It is essential that the Growth Plan

provide review opportunities to ensure municipal planning documents regularly review and assess employment needs to support the development of vibrant office and mixed-use employment areas, as well as industrial, retail and other commercial uses. Lastly, the plans should better support the development of communities that attract workers and businesses by recognizing the diversity of communities across the Greater Golden Horseshoe. It is important that the plans recognize and provide local flexibility in rural and smaller outer-ring municipalities that face different local circumstances and challenges than inner ring municipalities. Many outer ring municipalities are suffering from higher rates of unemployment and slower or in some cases negative population growth. These communities require special attention and local flexibility to attract, retain and attract jobs and people to their communities.

### **What is the role of retail in building vibrant communities and how can the plans support or direct retail development?**

OHBA Recommendations:

- The *Growth Plan* should be amended to define “Major Retail”, and that it clearly identify retail as a use that must be comprehensively planned by municipalities.

OHBA Commentary:

Major retail uses are an important component of the urban structure and are a source of tens of thousands of jobs across the Greater Golden Horseshoe. A “job” is a “job” and retail employment should not be considered second class in terms of growth planning. The co-ordinated review provides an opportunity to enhance planning policies with respect to major retail and ensures that these facilities are appropriately located and that supporting infrastructure is planned and aligned with major retail facility planning

### **How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?**

OHBA Commentary:

OHBA notes that local market access to aggregate resources is critical to support our economy and the Growth Plan. New infrastructure and infrastructure renewal requires tremendous amounts of aggregate resources. Furthermore, as housing continues to shift more and more towards intensification type products, it must be recognized that higher density housing typically utilizes aggregates rather than wood products.

Local market access is critical to support a functioning construction sector, affordability and to limit greenhouse gas emissions through transportation of heavy aggregate materials. It is important that if new Greenbelt designations are being considered to extend into new areas, that due process and notification is provided to land owners.

**How can the plans' policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities?**

OHBA Recommendations:

- Local flexibility in outer ring to attract jobs and economic development.

OHBA Commentary:

The plans should better support and foster vibrant rural economies while taking into account the character of rural areas and communities by recognizing the diversity of communities across the Greater Golden Horseshoe. It is important that the plans recognize and provide local flexibility in rural and smaller outer-ring municipalities that face different local circumstances and challenges than inner ring municipalities. Many outer ring municipalities are suffering from higher rates of unemployment and slower or, in some cases, negative population growth. The Growth Plan must ensure that policies address the wide range of communities across the Greater Golden Horseshoe and not be overly Toronto-centric. These smaller communities and rural areas require special attention and local flexibility foster vibrant economies, attract and retain jobs and people.

## 5. How can the plans help address climate change?

The co-ordinated review consultation paper notes that climate change is one of the most significant challenges facing the region. Taking action to address climate change and build resilient landscapes and communities can improve our health and quality of life as well as reduce the damage and related costs resulting from extreme weather events.

### How can the plans contribute to reductions in greenhouse gas emissions?

#### OHBA Recommendations:

- Successful implementation of the Greenbelt and Growth Plans can contribute to achieving the province's climate change goals of reducing greenhouse gas emissions;
- Invest in active transportation, which contributes to healthier communities as people can walk and cycle to meet their daily needs;
- Invest in transit including Regional Express Rail and approved and necessary land-uses that support transit operations;
- That the province implement policies that support public transit by requiring municipalities to reduce parking requirements in Urban Growth Centres and infrastructure corridors;
- Ensure municipal implementation policies (including Official Plans and Zoning By-Laws) are modernized and in conformity with the Provincial Policy Statement (PPS) and Provincial Plans;
- Promote culture of conservation by enacting Section 3 of the *Green Energy and Green Economy Act, 2009* to enable mandatory home energy audits prior to the sale of an existing home (re-sale);
- Consider a provincial program modelled on the now expired federal ecoENERGY Retrofit – Homes Program to provide grants to help homeowners undertake targeted renovations to upgrade and make their homes more energy-efficient;
- Consider establishing a Home Renovation Tax Credit, modelled on the Healthy Homes Renovation Tax Credit (HHRTC), which includes targeting energy-efficient upgrades to Ontario's existing housing stock. An additional public policy benefit would be that such a tax credit would assist to combat the underground economy by encouraging consumers to use legitimate contractors and create a paper trail.

#### OHBA Commentary:

Successful implementation of the Greenbelt and Growth Plans can contribute to achieving the province's climate change goals of reducing greenhouse gas emissions and adapting the way we plan and grow in response to climate change. In terms of evaluating the impact that the Growth Plan has had on either Climate Change mitigation or adaptation, OHBA strongly cautions that, despite the Growth Plan nearing its 10-year anniversary, we truly remain in the "early days" of Growth Plan implementation and that it may be premature to adequately measure the successes or failures of Growth Plan policies. While the plan itself is nearly 10 years old, upper-tier and lower-tier municipal Growth Plan conformity with their Official Plans has only occurred in the last few years. Furthermore, OHBA notes that, despite the *Planning Act* requiring municipalities to have local Zoning By-Laws brought into conformity with their Official Plans within three

years of an Official Plan review, few municipalities have actually undertaken this task.

OHBA also encourages the provincial government to invest in active transportation, which contributes to healthier communities as people can walk and cycle to meet their daily needs. This will reduce the need to drive and decrease greenhouse gas emissions, while supporting complete communities.

Long-term shifts in development patterns to reduce land consumption and maximize limited resources will also facilitate modal shifts towards greater use of public transit and therefore reduce GHG emissions from the transportation sector. Furthermore, intensification reduces land consumption and assists to preserve carbon sinks in the Greenbelt, Oak Ridges Moraine and Niagara Escarpment. While the Greenbelt serves a purpose to protect lands from development, OHBA believes that the ecological value of the land and opportunity to leverage assets in the Greenbelt to mitigate against climate change can be enhanced. OHBA suggests that there may be opportunities to implement programs (some like this exist in a number of American jurisdictions and are often referred to as “Transfer of Development Rights” or TDR) to facilitate urban development and intensification in appropriate places, while leveraging ecological and agricultural enhancements within the Greenbelt to support climate change mitigation and adaptation objectives.

To mitigate against climate change, OHBA has consistently stated our position in favour of the *Green Energy and Green Economy Act, 2009* legislative intent to have mandatory energy labelling of existing homes at the time-of-sale (Sec 3. Mandatory Home Energy Disclosure). While mandatory energy labelling was included in the legislation, labelling needs to be implemented through cabinet regulations. OHBA notes that there would be many benefits to mandatory energy labelling upon the re-sale of an existing home, including:

- Consumer disclosure;
- Professional advice regarding potential energy-efficient upgrades;
- Market transformation as buyers make different choices based on energy performance of housing, while sellers would invest in energy-efficient upgrades prior to listing the home on the market;
- Home values would better reflect energy performance;
- Transparency and accountability;
- Reducing energy bills;
- Improves energy efficiency of existing housing stock;
- Demonstrated superior efficiency of new housing by differentiating high-performance new housing built to code or higher (ENERGY STAR, R-2000, LEED) versus older less efficient housing.

At the national level, the Canadian Home Builders’ Association (CHBA) was a strong supporter of the now-expired ecoENERGY Retrofit – Homes program. The ecoENERGY Retrofit – Homes program used NRCan’s



EnerGuide Rating System to help homeowners make smart energy retrofit decisions for their home. With this system, an energy advisor performs a professional evaluation of the energy efficiency characteristics of the house, including the EnerGuide pre-retrofit energy rating of the house with a detailed checklist of the recommended upgrades. The home owner then chooses which upgrades to have done and the advisor performs a post-retrofit energy evaluation, which includes providing an energy-rating label for the house. The residential sector is already a leader in reducing greenhouse gas emissions, and such a program in Ontario would help homeowners achieve even more. Improved energy efficiency saves homeowners money, and it helps Ontario meet its environmental goals to mitigate against climate change.

Lastly, OHBA supports a permanent targeted Home Renovation Tax Credit that could be established for contractor renovations specifically undertaking work to improve the energy efficiency of existing homes. Such a measure would have the added benefit of strongly encouraging consumers to use legitimate contractors and create a paper trail to deter underground activity while stimulating the economy. The tax credit could be targeted and tailored to achieve a number of specific public policy objectives related to climate change mitigation and adaptation. Therefore the provincial government should adapt the successful HHRTC and introduce a new Home Renovation Tax Credit specifically targeting energy-efficient upgrades to mitigate against climate change by improving Ontario's existing housing stock.

### **How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?**

OHBA Recommendations:

- Implement programs that link growth planning with environmental protection to support rehabilitation of wetlands and wood-lots to act as carbon sinks and fight climate change;
- Ministry of the Environment and Climate Change support, approve and encourage green infrastructure by providing discounts of development charges and off-setting hard infrastructure requirements.

OHBA Commentary:

The co-ordinated review offers an opportunity to better link and align growth planning objectives with ecological benefits in the Greenbelt. The province should examine opportunities to implement programs that would allow economic development opportunities to advance in growth plan areas while enhancing environmental features such as the rehabilitation of woodlots and wetlands that act as carbon sinks. Furthermore, OHBA believes there are opportunities to incent and encourage green infrastructure solutions that will result in more resilient communities that can withstand extreme weather events related to climate

change. Incentives to support and approve green infrastructure and low impact development could include development charges credits that reflect the fact the green infrastructure solutions reduce pressures and reduce or eliminate requirements for expensive municipal water and storm water infrastructure. Furthermore, on-site offset incentives are possible as local hard infrastructure requirements are reduced by the creation of green infrastructure / low impact development. Furthermore, OHBA notes that the Ontario Building Code continues to be improved with a new focus on water conservation, thus reducing water requirements from new development.

**Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?**

**OHBA Recommendations:**

- Ensure municipal Official Plans and Zoning By-Laws are in conformity with the 2014 PPS.
- Implement provincial programs that link growth planning with environmental protection and investment that will enhance the ecological value of the Greenbelt.

**OHBA Commentary:**

OHBA notes that the Ministry of Municipal Affairs and Housing recently completed a review that amended the PPS, which now contains policies specific to both climate change mitigation and adaptation. The PPS specifically notes, “strong, livable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change.” A number of policies in the PPS are also specific to climate change including:

- 1.1.3.2.a.3: Land-use patterns within settlement areas shall be based on: densities and a mix of lands which: minimize negative impacts to air quality and climate change, and promote energy efficiency.
- 1.6.1: Infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities shall be provided in a coordinated, efficient and cost-effective manner that considers impacts from climate change while accommodating project needs.
- 1.8.1: Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation through land-use and development patterns which:
  - a) promote compact form and a structure of nodes and corridors;
  - b) promote the use of *active transportation* and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas;
  - c) focus major employment, commercial and other travel-intensive land-uses on sites which are well served by transit where this exists or is to be developed, or designing these to facilitate the establishment of transit in the future;
  - d) focus freight-intensive land-uses to areas well served by major highways, *airports, rail facilities and marine facilities*;
  - e) improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion;
  - f) promote design and orientation which:
    - 1. maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and
    - 2. maximizes opportunities for the use of *renewable energy systems* and *alternative energy systems*; and
  - g) maximize vegetation within *settlement areas*, where feasible.
- 3.1.3: Planning authorities shall consider the potential impacts of climate change that may increase the risk associated with natural hazards.

OHBA notes that these new policies in the PPS apply to all new planning applications and municipal amendments to Official Plans and Zoning By-Laws within the geography of the co-ordinated review.

## 6. How can the implementation of the plans be improved?

The co-ordinated review consultation paper notes that better implementation and alignment between the plans can improve the efficiency with which the plans' goals are realized, and provide greater certainty for our communities and developers.

### **Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?**

OHBA Recommendations:

- OHBA is broadly supportive of streamlining and harmonizing where possible to better align the language and definitions within the four plans. This will enhance clarity, transparency and accountability within Ontario's land-use planning system.

OHBA Commentary:

OHBA contends that a land-use planning policy disconnect has emerged between the province and many municipalities. This disconnect between provincial policy and municipal planning implementation tools threatens the successful implementation of the *Growth Plan*, *Greenbelt Plan*, *Oak Ridges Moraine Conservation Plan* and the *Niagara Escarpment Plan*. The disconnect manifests itself in increasing costs for new residents and businesses, longer and uncertain approvals processes, local decisions that do not align with provincial policy and challenges in housing affordability. Closing the gap and ensuring a better alignment between provincial land-use planning policy and municipal planning implementation tools was a major theme within OHBA's Land-use Planning and Appeals System submission to the Ministry of Municipal Affairs and Housing in 2014 and will again be a key recommendation to this consultation and the Ministry of Municipal Affairs and Housing proposed *Smart Growth for Our Communities Act* (EBR: 012-3651).

A further disconnect between many municipalities' local planning implementation policies and provincial infrastructure financing plans has emerged over the past decade as the province has made significant reforms to provincial policy. OHBA has consistently advocated for better alignment of public policy through resolutions passed at our AMM and at a number of significant provincial consultations over the past few years, including: review of aspects or amendments to the *Growth Plan for the Greater Golden Horseshoe*, the implementation of the Metrolinx *Big Move*, the review of the *Provincial Policy Statement* and the recent consultations on the Land-Use Planning and Appeals System as well as the Development Charges Review.

OHBA notes that the four plans in the co-ordinated review are a continuum of policy and are connected to

other provincial legislation and regulation. OHBA notes that planning and infrastructure investments can be undermined by other provincial initiatives such as some of the proposals in the *Smart Growth For Our Communities Act* (Bill 73) that will impose additional financial and regulatory barriers to achieving the objectives of the Growth Plan. Other provincial initiatives that increase the costs of transit oriented development, increase engineering standards (which increases costs), or create planning uncertainty or add barriers towards planning for intensification will frustrate the implementation of the four plans within the co-ordinated review. The province must ensure better alignment across Ministries and across the entire provincial legislative and regulatory framework.

With respect to alignment between the plans within the co-ordinated review, OHBA supports integrating definitions and language between the four plans and with the PPS. This would ensure greater consistency throughout the plans and reduce potential errors or misapplication of policy. OHBA notes however, that alignment of definitions and language should not be interpreted as an opportunity to align protections to the highest standard as each plan was implemented at a different time, in differing geographies and geologies to achieve specific public policy objectives.

#### **What policies of the plans do you think have been successful and should be retained?**

OHBA Recommendations:

- Retaining and generally supporting current policies (with minor amendments) including:
  - Growth Plan intensification targets and alternative targets;
  - Minimum gross density targets in Urban Growth Centres;
  - Criteria established in 2008 to Growth the Greenbelt;
  - Urban River Valley designation for publicly-owned lands;
  - Requiring municipal Official Plan and Zoning by-Law conformity with the Plans.

OHBA Commentary:

OHBA is generally supportive of the policies outlined in the above recommendations with some minor amendments such as increasing density targets in Urban Growth Centres that have already or are close to meeting those targets.

#### **Should the province develop any additional tools or guidance materials to help support implementation?**

OHBA Recommendations:

- The province must lead the conversation and educate municipalities and the public with respect to how

provincial planning policies and objectives will impact their existing communities and neighbourhoods so that residents are engaged and informed as to why their communities are evolving;

- That a Task Force be established comprised of provincial, regional and municipal planners, industry land economists, and development industry representatives to develop for all of Ontario, a standard methodology for residential and employment land budget and supply guidelines, and that this approach include land vacancy factors.

OHBA Commentary:

The province must lead the conversation and educate municipalities and the public with respect to how provincial planning policies and objectives will impact their existing communities and neighbourhoods so that residents are engaged and informed as to why their communities are evolving. OHBA has consistently expressed concern that NIMBYism and local political opposition to intensification is a major obstacle to Growth Plan implementation. There are many examples of NIMBYism that acts as a barrier to achieving provincial planning objectives played out almost daily across the region seen in places as wide ranging as urban communities in Toronto, suburban communities in Brampton and more rural communities in Simcoe County. In some cases, local politics have undermined provincial objectives resulting in both under-zoning and in some cases even down-zoning to satisfy vocal community activists. The province must undertake a more active role to change the conversation around intensification and through long-term education efforts, support a cultural shift where the public will better understand why intensification is occurring.

OHBA also recommends clear direction and guidance on how municipalities should undertake a land budget and provide for a balance of growth between greenfield and intensification would serve to reduce delays in conformity and create additional certainty for all stakeholders. As part of such an approach, the Province should clarify policy 2.2.7.3 to: exclude all Natural Heritage System take-outs (i.e. lands that due to OP policy are prohibited from being developed for all urban uses), exclude major infrastructure (i.e. power plants, highways, transmission corridors, rail lines, pipelines), and exclude “permanent” existing uses (i.e. cemeteries, estate subdivisions) from the land base subject of density target calculations for Greenfields and Urban Growth Centres. OHBA notes that more specific implementation guidance with respect to land budgeting methodologies and assumptions would create a uniform and level playing field for municipalities and other stakeholders across the GGH as well as provide greater certainty for potential appeals to the OMB regarding municipal comprehensive reviews. Furthermore, the Growth Plan should provide for some flexibility for municipalities to set and round out the boundaries and to allow “good planning” to guide the specific locations on settlement area boundaries (i.e. arterials, mid-block lot-lines, open space edges etc.) to meet local planning considerations. OHBA is concerned that the current strict adherence to the land budget

calculations have been counter-productive and have resulted in a “planning by the numbers” scenario rather than a more rational planning approach.

### **Are there other opportunities to better facilitate implementation?**

#### OHBA Recommendations:

- That the Growth Plan be amended to clearly define the White-Belt, and to state the intention that these lands constitute the GTA’s land reserve for future urban growth when planning for the creation of complete communities;
- That the regional municipalities be allowed as part of the next five-year review of their Official Plans to prepare horizon-free Urban Structure Plans defining the structure of uses for white-belt lands, including employment reserves, arterial roads, nodes and corridors as well as assessing long-term servicing and transportation alternatives;
- That the Growth Plan be amended to enable good planning to guide the locations of 20-year settlement boundaries (e.g., arterials, mid-block lot lines, open space edges) versus a strict adherence to land budget calculations;
- That the Growth Plan be amended to clearly enable the provision of lands to accommodate required medium and high-density uses over a longer planning horizon.

#### OHBA Commentary:

A further disconnect between many municipalities’ local planning implementation policies and provincial infrastructure financing plans has emerged over the past decade as the province has made significant reforms to provincial policy. OHBA has consistently advocated for better alignment of public policy through resolutions passed at our AMM and at a number of significant provincial consultations over the past few years, including: review of aspects or amendments to the *Growth Plan for the Greater Golden Horseshoe*, the implementation of the Metrolinx *Big Move*, the review of the *Provincial Policy Statement* and the recent consultations on the Land-Use Planning and Appeals System as well as the Development Charges review.

### **Do the plans appropriately distinguish the differences between urban and rural communities?**

#### OHBA Recommendations:

- Local flexibility in outer ring municipalities to attract jobs and economic development.

#### OHBA Commentary:

The Growth Plan for the Greater Golden Horseshoe characterizes the entire area including smaller urban centres and rural communities across the outer ring very similarly as urban inner ring municipalities for planning purposes. OHBA notes that the economic, environmental and social realities for communities in the outer ring

are very different than the GTA communities of the inner ring. Some regions in the outer ring face very different implementation challenges with respect to natural heritage systems, growth patterns, lack of employment opportunities and historical land-use designations. For example, Niagara Region requires flexibility for local circumstances as employment lands are primarily currently designated at the south end of the region far away from residents, existing infrastructure or market access. OHBA notes that intensification has been tremendously successful as planning policy in the inner ring, but remains a challenge in many smaller and rural communities of the outer ring.

The co-ordinated review provides an opportunity to recognize the different economic challenges that outer ring municipalities face and consider planning policies to support job creation, economic development in these communities. It is important to recognize that many communities in the outer ring once represented strong, independent, self-sustaining industrial, agricultural and manufacturing economies. Unfortunately, today, many of these outer ring communities have seen their economic and employment bases eroded and are increasingly serving as bedroom communities to the GTA rather than attracting employment opportunities themselves. The Growth Plan needs to consider appropriate policies to support local flexibility to attract jobs and ensure the economic success of the Greater Golden Horseshoe's smaller urban centres.

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### *The White-Belt is Intended as a Long-Term Urban Reserve*

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In the five-year anniversary update on the Growth Plan, the provincial Places to Grow website noted that, "because of the magnitude of growth that is forecast, it will be necessary to bring new lands into the urban envelope. The Growth Plan outlines a series of tests and criteria to ensure that expansions occur when necessary and where most appropriate, and in a way that ensures that infrastructure is in place and the natural environment is protected." The province has established how critically important the "white-belt" lands in the GTA are in supporting the long-term future demographic and economic growth when rational planning requires and permits urban expansion to occur.

It has further been established that the long-term strategic "white-belt" acts as a buffer between the Greenbelt and Official Plan designated areas. OHBA is concerned by potential land restrictions in the "white-belt" that could have a negative impact on affordability, long-term infrastructure planning and economic competitiveness.

OHBA is opposed to expansions of the Greenbelt that would reduce long-term “white-belt” areas except in circumstances of public ownership or through the new Urban River Valley designation. Any reductions to the “white-belt” to accommodate future growth will ultimately have an impact on long-term infrastructure allocations and the associated and necessary designated land supply needed to support it, which will ultimately challenge housing affordability and Ontario’s economic competitiveness. OHBA strongly recommends that the province clearly affirm its statement on the Places to Grow website for the five-year review that, “it will be necessary to bring new lands into the urban envelope,” through an amendment to the Growth Plan and that this be reflected in Regional Official Plans. Furthermore, the province should take all necessary action to stop Regional Official Plans from including policies that allow municipalities to sterilize such land from future development by permitting designations or Greenbelt expansion requests into this specific area. OHBA supports balanced growth initiatives for new communities that do not compromise affordability and competitiveness while utilizing growth plan principles to create complete, livable and sustainable neighbourhoods where Ontarians can live, work and play.

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## Conclusion

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OHBA appreciates the opportunity to submit our recommendations with respect to Ontario’s co-ordinated review for consideration by the Ministry of Municipal Affairs and Housing and the Ministry of Natural Resources and Forestry. OHBA expects this consultation will result in the province and municipalities demonstrating stronger leadership to ensure effective implementation of provincial policy. OHBA also notes that the province must connect the dots between the co-ordinated review and other initiatives such as the *Smart Growth For Our Communities Act* (Bill 73), which proposes to increase taxation on transit oriented development and make complete communities less affordable for new neighbours and new employers. Furthermore, with the initial consultation period coming to an end, the OHBA submission and other stakeholder submissions should serve as an opportunity for both Ministries to directly engage with stakeholders with respect to recommendations to improve Ontario’s long-term planning, co-ordination/alignment of planning and the implementation of the four plans.

This is the opportunity to review the last 10-years of the Greenbelt, Growth Plan, Oak Rides Moraine Conservation Plan and Niagara Escarpment Plan and their impact on the Greater Golden Horseshoe. The co-



ordinated review should reflect on outcomes of the first 10-years and provides for the opportunity to recommend improvements to the plans as the province, regions, municipalities and communities refocus efforts on how we will grow and what we will protect over the next 30 years.

OHBA members from across the Greater Golden Horseshoe and our 14 local associations impacted by the review will continue to be engaged with both the government and their provincial association through additional opportunities for consultation. OHBA continues to support balanced public policy initiatives that do not compromise the ability of Ontarians to be able to afford to purchase or rent housing in Ontario.