



Ontario
Home Builders' Association

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Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay St, 17th Floor.
Toronto ON M5G 2E5

RE: Growth Plan: Settlement Boundary Expansion
Density and Intensification Targets
Employment Conversions

On behalf of the Ontario Home Builders' Association (OHBA) and our 11 local home builders' associations impacted by the Growth Plan (BILD, Niagara HBA, Haldimand-Norfolk HBA, Brantford HBA, Hamilton-Halton HBA, Guelph & District HBA, Waterloo Region HBA, Dufferin County HBA, Simcoe Country HBA, Durham Region HBA and the Peterborough & the Kawarthas HBA), we appreciate the opportunity to provide comments following the workshops hosted by the Ministry during November 2018.

OHBA Commentary:

Ontario's Greater Golden Horseshoe (GGH) is Canada's primary economic engine and is the fastest growing region in the country but it also contains some of Canada's best farmland and natural features. As such, it is critical that the Growth Plan and the Greenbelt Plan work together to provide a broad, long-term and comprehensive planning framework that promotes growth while protecting our most valuable environmental resources. It is equally critical to ensure that a clear, transparent and effective public policy framework exists to guide and support the extensive and unwavering growth. OHBA supports an objective to ensure a predictable process for growth management decision-making in a manner that is consistent across municipalities while providing flexibility to respond to local circumstances.

OHBA believes that the new density and intensification targets are overly restrictive and that far-reaching settlement boundary expansion policies have significantly impacted the market place, creating a deficiency in housing supply and choice. By virtue of the 2017 Growth Plan policies, Greenfield development has become a low priority making it extremely difficult and time-consuming to construct complete communities that satisfies consumer demand. In this vein, the public policy pendulum has swung too far with many components of the 2017 Growth Plan creating serious implementation challenges and adverse consequences for housing.

OHBA supports the underlying principles of the Growth Plan, but strongly recommends that the new government take a more practical approach by making a series of amendments to the Growth Plan to support job creation and ensure appropriate available housing supply and choice across the GGH. Bold change is required if Ontario is truly going to be "open for business."

OHBA's key recommendations for the Ministry of Municipal Affairs and Housing are as follows:

Settlement Boundary Expansions

1. The "Whitebelt" should be designated as a long-term urban reserve designed to accommodate the future growth of the region, and this principle should be reflected in Regional Official Plans and Long-Term Urban Structure Plans.
2. A longer planning horizon specific to coordinating infrastructure and the long-term urban structure should be established within the Growth Plan. In this vein, the province should commence the process to update the Schedule #3 forecasts for the Growth Plan to 2051.
3. The Whitebelt should be exempt from the application of the province's new Natural Heritage System (NHS) and Agricultural System mapping and associated linkages, relying instead upon the NHS system that naturally flows from subsequent planning processes at the local and regional levels (including the work of the Conservation Authorities). This was expressed in our October 30, 2018 letter to the MMAH with respect to the NHS and Agricultural System.
4. In an October 30, 2018 letter, OHBA also recommended that the linkage features be eliminated entirely from the provincial NHS. Such a change to the NHS would reduce red tape and background study requirements for Settlement Boundary expansions in the Outer Ring.
5. A contingency or "vacancy" factor of population and employment allocation should be provided to lower or upper tier municipalities during and after the MCR process, to respond to marketplace supply pressures, rounding out needs and other local "on the ground" circumstances. Planning to precise numbers without some "flexibility" has resulted in some artificial and distorted community boundaries that do not reflect appropriate boundary limits, such as roads and natural features.
6. The policy of encouraging intensification throughout the entire Built-Up area within the built boundary be renewed (it was a key component of the original Growth Plan yet was removed from the 2017 Growth Plan).
7. Reduce red tape and duplication in the planning process by removing requirements for agricultural impact, sub-watershed studies and other studies in the Growth Plan that duplicate those already required under the Provincial Policy Statement.
8. The municipal process for conformity with the Growth Plan should be simplified and streamlined by withdrawing *2018 Land Needs Assessment Methodology* and the draft *Application of Intensification and Density Targets* and *Municipal Comprehensive Review Process* guidance documents. The Provincial Projections Guideline Methodology augmented by current best practices should be used.
9. The *Planning Act* provisions to permit landowners to submit private OPAs for Urban Boundary Expansions should be reinstated (end current restrictions).
10. The *Planning Act* provisions to permit landowners to appeal MCR OPAs for Urban Boundary Expansions should be reinstated (end current restrictions).
11. The province should recognize all previously completed technical urban expansion work completed prior to July 2017 and allow this work to be transitioned under the previous Growth Plan as a priority urban expansion for any given region (municipality) and phasing of MCRs on an area-by-area basis should be considered.
12. Lands included within an existing urban boundary should be exempt from complying with OMAFRA's MDS requirements. The application of the MDS formula along the urban edge complicates the municipal planning and approval process and has the direct effect of reducing the available supply of land designated for growth within an urban area.
13. All existing Secondary Plans should be exempt from the 2006 and/or 2017 Growth Plan requirements and permitted to develop as approved. The concept of policy "reach back" should be eliminated.
14. Schedule #7 of the Growth Plan (Simcoe County) should be repealed as it creates additional restrictions which no other upper-tier municipal government is subject to. OHBA supports a consistent policy framework for all regions.

15. The Growth Plan should be revised to remove all provisions for identifying excess lands in the Outer Ring and/or that clarification be provided in the Plan to ensure that identified excess lands will not be removed from an established Settlement Area Boundary.
16. Provincial transportation and transit infrastructure planning must be better aligned with growth, particularly within the Whitebelt. As an example, Schedules #5 and #6 of the 2017 Growth Plan removed key transportation elements that were being planned for in the 2006 Growth Plan to support growth, namely the GTA West Corridor and Higher Order GO service to Bolton and West Vaughan. These and other related projects should be reinstated on the Schedules.
17. The 10-hectare limitation of urban expansions into the Greenbelt and ORM is unrealistic and problematic to work with on the ground and should be removed. The municipality should be given flexibility to determine the nature and extent of the encroachments as part of their Settlement Boundary Expansion process.
18. In 2017, the Province removed 17 properties from the Greenbelt (total area approximately 58 ha). During the time these properties were in the Greenbelt, settlement area boundaries were mapped around them to avoid their inclusion. Many of these properties are adjacent to approved development that is proceeding and proximate to transportation, transit and servicing infrastructure. OHBA therefore recommends that the Province allow Upper/Single-Tier municipalities to initiate settlement boundary expansions prior to a MCR for those specific lands removed from the Greenbelt on July 1, 2017, without having to wait until completion of their next MCR.
19. Related to the Growth Plan, there are several changes to the PPS that are warranted:
 - The definition of Regional Market Area should be revised so a Market Area or sub-markets can be measured at a local municipal level.
 - Amend Section 1.4.1 (a) to ensure there is a 10-year supply of “designated and available greenfield land for development” over and above residential intensification and redevelopment.
 - Amend Section Section 1.4.1 (b) to include a 3-year supply of “draft approved greenfield residential building lots/blocks” over and above residential intensification and redevelopment.

Density & Intensification

1. Amend the 2017 Growth Plan to return to the 2006 Growth Plan Intensification Target of 40%. While municipalities can be encouraged to go beyond a 40% target, the original target is a more practical and realistic approach for most GGH municipalities and would reduce the number of municipalities applying for alternative targets (thus reducing red tape and streamlining the MCR process for many municipalities).
2. Amend the 2017 Growth Plan to return to the 2006 Growth Plan Designated Greenfield Target of 15 units/ha (equivalent to 50 residents and jobs/ha). The province must recognize that in the 12 years since the original Growth Plan, many of the communities that were planned at that time are only starting to be built – a decade is not a long time when it comes to land use planning and more time for implementation is required prior to adjusting the density targets upwards. The original greenfield density targets should be reinstated to ensure a healthy and balanced housing supply for both greenfield and intensification areas.
3. The Ministry should review each of the Urban Growth Centre (UGC) targets (150 persons and jobs per hectare for some, 200 persons and jobs per hectare for others and 400 persons and jobs per hectare for the Toronto UGCs). A number of UGCs are close to meeting or have exceeded their minimum targets and thus should have amended targets to encourage even higher levels of intensification (i.e. Yonge-Eglinton and Downtown Toronto).
4. The Ministry should maintain the current list of UGCs and not remove any from the Growth Plan.
5. Municipalities should be required to pre-zone UGCs to achieve the density targets and streamline the planning process in order to deliver new housing supply more efficiently.
6. The province should add additional “take-outs” that are excluded from density/intensification targets as they consume land, but have no persons or jobs attributed to them (i.e. parks, SWM ponds, schools, extra wide ROW for internal roads etc).

7. Other Ministries should have Growth Plan principles applied to their decision-making process when making critical land-use decisions and when designing structures to be less land-consumptive, such as hospitals, universities and/or schools.
8. The Ministry should clarify policies with respect to “undelineated built-up areas”, by mapping a built-boundary of these communities so that intensification is treated as intensification and greenfield growth is treated as greenfield growth. Such an approach would be far more accurate than either the 2006 Growth Plan or the 2017 Growth Plan approach to undelineated areas.
9. The 2017 Growth Plan policy of netting out employment should be maintained.

Employment Conversions

1. Employment conversions through private OPAs should be permitted at any time (not pursuant to an MCR) to give municipalities and the industry the ability to address local market needs and to allow for more immediate and efficient use of infrastructure and services.
2. The province should not have such a rigid position on employment lands by allowing for greater flexibility for mixed-use (residential) by focusing on criteria for conversions allowing mixed-use such as a “no net-loss” of jobs policy.
3. The Growth Plan be revised to permit “office” uses in any definition of “Prime Employment Areas”.

Transition Considerations

1. Fix the transition provisions of the Growth Plan to allow comprehensive transitioning i.e. where one application is transitioned any accompanying implementing application should also be transitioned. For example, if a subdivision application is transitioned, then any implementing zoning application should also be transitioned, and vice versa.

Broadly speaking, OHBA is very concerned that some municipalities are extremely far behind, in even their previous MCR work and the new policy framework and updated Growth Plan changes further compound delays with implementation. Furthermore, higher targets in the 2017 Growth Plan adds an additional layer of uncertainty and red tape for the numerous municipalities that will likely apply for alternative targets. Returning to the original targets will greatly reduce the need for alternative targets. Ultimately, OHBA supports a streamlined process to deliver planning certainty and more housing supply across the GGH.

On behalf of our 4,000 member companies across Ontario and 11 local associations within the Growth Plan area, we look forward to ongoing dialogue and consultation with respect to growth, environmental and infrastructure planning across the Greater Golden Horseshoe and the Province

Sincerely,



Michael Collins-Williams, MCIP, RPP
Director, Policy
Ontario Home Builders' Association