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

RE: Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017
ERO: 013-4504

ABOUT THE ONTARIO HOME BUILDERS' ASSOCIATION (OHBA)

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 29 local associations across the province. Our membership is made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, manufacturers, consultants and suppliers. The residential construction industry employed over 513,000 people and contributed over \$62.3 billion to the province's economy in 2017.

On behalf of 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 with respect to the *Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017*. OHBA also appreciated to opportunity for our members to participate in and consult directly with the Ministry in workshops hosted by the Ministry during fall of 2018 and roundtables throughout the Greater Golden Horsehoe (GGH) in winter 2019.

#HOMEBELIEVER

It is important to connect the ongoing discussions on the Growth Plan and *Housing Supply Action Plan* to Ontario **#homebelievers** and their goal to achieve the great Canadian dream of home ownership.

With over 100,000 people joining the GGH every year, we need to add more housing supply and choice to communities across the region so that **#homebelievers** can find a home in the communities where they want to live, work and play.

I am a #homebeliever

I believe in the great Canadian dream of home ownership.
I believe that we should be able to find homes we can afford, and
in communities where we can live, work and play.
I believe that the dream of home ownership is slipping out of
reach for many Ontarians.
As a #homebeliever I will support more housing choice and supply
across Ontario to help all of us achieve the great Canadian dream
of home ownership.

DESCRIPTION OF PROPOSED POLICY

The *Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017* was posted for public consultation following a series of workshops in the fall of 2018. The Environmental Registry posting recommends that Proposed Amendment 1 be read in conjunction with the *Growth Plan for the Greater Golden Horseshoe, 2017*, as it sets out proposed modifications and references to definitions and policies included in the Growth Plan. To assist in reading these documents together, the Ministry prepared the *Draft Amended Growth Plan* which is meant to show how the Growth Plan for the *Greater Golden Horseshoe, 2017* would read if *Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017* is approved.

GENERAL SUPPORT THAT GROWTH PLAN AMENDMENTS WILL ASSIST TO ADDRESS HOUSING SUPPLY

OHBA welcomes the proposed amendments to the Growth Plan. These changes will facilitate intensification without applying a “one size fits all” approach and will support the development of complete communities across the GGH. OHBA believes that the proposed amendments to the Growth Plan are the right approach to fulfill the government’s commitment to increase housing supply, reduce red tape and make it easier to live and do business in Ontario.

The new housing and commercial development industry face a variety of inter-related challenges that affect its ability to build the necessary supply of new housing in order to meet growing demand for people and businesses. Ninety-five per cent of Ontario’s new housing supply is built by the private sector, and new home prices reflect both market conditions and the legislative framework set by government policy through municipal approvals, provincial legislation and regulatory frameworks as well as the federal rules on mortgage qualifications. Government sets the rules on where, what type and when housing supply comes to the market and the market prices homes accordingly.

In an environment where housing of all types and tenures is becoming more expensive and pricing more people out of the market, the government must consider the impacts of planning, fiscal and labour policy decisions on housing supply and ultimately prices. OHBA applauds the provincial government for recognizing the confusion and the constraints on housing supply created by the 2017 Growth Plan. OHBA believes that it is critical that the Growth Plan prioritize higher levels of intensification on transit lines and Urban Growth Centres, while also addressing the growing imbalance between strong demand for housing and limited supply and choice. This imbalance has contributed to dramatic cost escalation for both ownership and rental housing over the past few years. OHBA had been critical of the previous government’s approach with unrealistic intensification and density targets that created policy constraints which contributed to higher home prices in many GGH communities.

OHBA strongly believes that a healthy housing system exists when a city or region has the full mix and range of housing choices and supply that can address all residents’ shelter needs through their full life cycle. A properly functioning housing system should provide stability to both renters and owners, at prices people can afford and in the choice that meets their needs. The housing system must also be able to respond to meet projected demographic and market requirements for current and future residents. The Greater Golden Horseshoe is going to welcome three million new [#homebelievers](#) in the next 20 years, and the proposed amendments to the Growth Plan will better support intensification where transit infrastructure exists, without applying a “one size fits all” approach to every municipality. These are practical and realistic approaches that OHBA believes will create the housing supply and choice needed in these communities.

OHBA COMMENTARY

Ontario’s GGH is Canada’s primary economic engine and is the fastest growing region in the country, it also contains some of Canada’s best farmland and natural features. As such, it is critical that the Growth Plan work

with the *Planning Act*, PPS and other Provincial Plans to provide a broad, long-term and comprehensive planning framework that promotes employment growth and an appropriate supply of housing while protecting our most valuable environmental resources. It is critical to ensure that a clear, transparent and effective public policy framework exists to guide and support the extensive and unwavering growth this region continues to experience. OHBA supports an objective to ensure a predictable process for growth management decision-making in a manner that is consistent across municipalities while providing policy direction to respond to local circumstances and infrastructure capacity.

OHBA believes that the “one size fits all” 2017 density and intensification targets brought in by the previous government were overly restrictive and contributed to constraints in the market place that created a deficiency in housing supply and choice. By virtue of the 2017 Growth Plan policies, greenfield development became extremely difficult and time-consuming to plan, process and respond to strong consumer demand. Furthermore, OHBA understands that virtually all the Outer Ring municipalities notified the province that they would have to apply for alternative targets to implement the Growth Plan. To put it simply and bluntly, “one size does not fit all” and the previous 2017 Growth Plan targets were not reasonable nor achievable. In this vein, the public policy pendulum had swung too far with many components of the 2017 Growth Plan creating imbalances and implementation challenges for municipalities with adverse consequences for housing.

OHBA supports the underlying smart growth principles of the Growth Plan and is encouraged by the more practical approach being undertaken by the current government with respect to the proposed amendments to the Growth Plan to support job creation and facilitate appropriate available housing supply and choice across the GGH. Bold change is required if Ontario is truly going to be “open for business” and to address housing supply.

OHBA’s key recommendations for the Ministry, within the six key themes are as follows:

THEME: INTENSIFICATION AND DENSITY TARGETS

- OHBA is supportive of the practical and realistic approach presented in these proposals to simplify and streamline the intensification and designated greenfield density targets by grouping municipalities by infrastructure and transit capacity.
- OHBA is supportive of moving away from a “one size fits all” approach that provides greater local autonomy and respects local circumstances with the proposal to group targets by municipality (Group A, Group B, Group C).
- OHBA is supportive of the proposal to allow all municipalities to apply for alternative intensification and density targets.
- In the 13-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 OHBA believes that more time for implementation is required prior to significantly adjusting the density targets upwards. OHBA previously recommended that the original greenfield density targets should be reinstated to ensure a healthy and balanced housing supply for both greenfield and intensification areas, however we recognize the proactive approach by the current government to apply higher targets where higher order transit infrastructure is being built and/or planned.
- We are concerned that the 60 per cent target in for Group A, and 50 per cent target for Group B, to take effect by 2022 is still too ambitious given transit investments and observed rates of building within the built-up area. To put this in perspective, the proposed Group A target represents a 50 per cent increase in the population to be accommodated within the Built Boundary and the proposed Group B target represents a 20 per cent increase in the population to be accommodated within the Built Boundary. These proposed targets represent a very significant shift in built form for existing communities and will be challenged by local NIMBY politics and lack of necessary transit infrastructure.
- The practical reality of the proposed Group A and Group B intensification targets require a commitment to transit that has yet to be confirmed by the provincial and municipal governments. Setting targets without the necessary transit investments will undermine these proposals and has the potential to disrupt housing supply.

- OHBA suggests that this revision to the proposed targets is necessary, as municipalities were only to comply with 40 per cent intensification as of 2015 and many municipalities have not yet achieved compliance while maintaining sufficient growth rates, nor has sufficient transit investment occurred to rationalize additional higher levels of intensification for a prolonged period of time.
- A practical approach to setting these targets would be for the province to examine current levels of Growth Plan conformity and for formal consultation with upper/single tier municipalities to adjust the proposed intensification targets for these areas.
- With respect to the proposed minimum *Designated Greenfield Area* (DGA) density targets, OHBA is again supportive of moving away from a “one size fits all” approach., to the proposed Group A, Group B and Group C approach. This is a more practical and reasonable approach, reflecting local community character, urban maturity, infrastructure and transit capacity.
- OHBA is again supportive of the proposal to allow all municipalities to apply for alternative intensification and density targets.
- Specific to the Group A’ *Designated Greenfield Area* density target of 60 residents and jobs per hectare, OHBA notes that the proposed target represents a significant shift in built form and will be challenged by a lack of necessary transit infrastructure. Again, a more practical approach to updating this target would be for the province to examine current levels of Growth Plan conformity and for formal consultation with Group A municipalities to adjust the proposed density target for these areas.
- OHBA supports the ‘Group B’ proposed target and notes that maintaining the target from the original Growth Plan may smooth out potential transition issues to the new plan.
- Lastly the proposed ‘Group C’ targets are an appropriate recognition of slower growth rates and the local (more rural) realities in which Toronto-centric planning is not appropriate.
- OHBA recommends that the province clarify that the *Population and Employment Forecasts* and targets in *Schedule #3* of the Plan are to be used as minimums in municipal implementation. This is essential for providing flexibility and clarity that local increases in density and intensification (promoted through all versions of the plan) do not need to be rationalized through an increase in *Schedule 3* forecasts. Moreover, it clarifies that the *Schedule 3* forecasts and estimates, not to be erroneously used as maximums/caps.
- OHBA recommends adding stormwater management facilities, schools, and arterial roads to the list of *Designated Greenfield Area* ‘take-outs’ that are netted out of gross areas as these uses consume land, but have no persons or jobs attributed to them. These uses can also vary substantially from area to area thus creating disparities in estimating community form. OHBA notes that the closer to a net number, the closer to certainty in terms of the accurate outcomes and housing form.
- OHBA notes that the proposed amendments maintain all existing 25 *Urban Growth Centres* (UGCs) in the Growth Plan. OHBA supports maintaining all 25 UGCs in the Growth Plan; however, we recommend an increase in density targets for those UGCs that have exceeded or are close to meeting their density targets. Furthermore, 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 in UGCs more efficiently. OHBA specifically recommends municipalities be required to pre-zone UGCs so that the base zoning density (i.e. Floor Area Ratio) will achieve the prescribed density targets. The failure of a municipality to pre-zone the UGCs in a timely manner should result in the province extending its legislative powers to zone the UGCs to support housing supply in those UGCs.
- OHBA was pleased to see our “encourage intensification generally throughout the delineated built-up area” recommendation adopted into the proposed amendments to the 2017 Growth Plan. OHBA is very supportive of proposed policy 2.2.2.3.c that will encourage “missing middle” and “gentle density” development (which is a key focus of the *Housing Supply Action Plan*). OHBA notes this policy was originally in the 2006 Growth Plan policy 2.2.3 subsection 6b (“General Intensification”), but was removed from the 2017 Growth Plan. OHBA supports the proposed re-introduction of this policy.
- OHBA recommends that MMAH update the 2006 *Built Boundary* to 2019 to ensure an accurate and up-to-date *Built Boundary* that will more appropriately define greenfields vs. intensification development. OHBA is concerned that the measurement of updated density targets will be averaged across greenfield built since the initial 2006 *Built Boundary*, which may skew the numbers going forward rather than being an accurate reflection of new development following the next MCR. OHBA recommends that if density and intensification

targets are being updated, that the *Built Boundary* should also be updated to ensure an accurate picture of new development going forward.

THEME: MAJOR TRANSIT STATION AREAS (MTSAS)

- OHBA supports the density targets for MTSAs that have been maintained from the 2017 Growth Plan. The province must ensure municipalities are required to update zoning to achieve these targets. Pre-zoning would expedite the delivery of new housing supply, reduce risks and ultimately costs, thus improving affordability. The failure of a municipality to pre-zone the MTSAs in a timely manner should result in the province extending its legislative powers to zone the MTSAs to support housing supply in those UGCs.
- OHBA is supportive of the proposed amendment will allow municipalities to delineate MTSAs before their MCR, while maintaining provincial approval and protection, by designating these areas as “protected major transit station areas” under the *Planning Act*.
- OHBA recommends special consideration for higher MTSA targets for major interchange stations (e.g Yonge & Bloor / Yonge & Eglinton etc.).
- OHBA supports the proposal to streamline the process and criteria for alternative targets applicable to MTSAs to reflect on-the-ground constraints and realities.
- OHBA recommends clarifying the requirements for MTSAs (both in policies and the definition) to require both a density and people and job requirement to ensure a minimum size of MTSAs be achieved within walking distances of stations and stops. This provides municipalities with greater certainty in planning these areas while allowing flexibility for them to be delineated to account for local circumstances.
- OHBA is supportive of the broader 800m radius in which high levels of density and intensification are to be encouraged surrounding the transit station itself. The broader 800m radius will encourage more transit supportive development in transit efficient locations. OHBA further notes that the *Housing Supply Action Plan* specifically targets the need for more gentle density and missing middle housing supply, which OHBA strongly believes that an 800m radius within a short walking distance to the actual transit station will better facilitate vs. a smaller 500m radius.

THEME: AGRICULTURAL AND NATURAL HERITAGE SYSTEM

- OHBA expressed concern to the previous government, and during the fall 2018 working group sessions that the mapping of the provincial NHS was not accurate, as it was never ground-truthed at a scale that is appropriate for development review. To put it bluntly, the provincial mapping contains errors and must be fixed prior to implementation.
- The NHS must be ground-truthed so that when areas are being investigated (or staked) all stakeholders can ensure features are appropriately scrutinized based on science-driven merits and can then be protected (or not) where appropriate.
- OHBA is therefore supportive of the newly proposed approach to allow municipalities to use their existing Agricultural and Natural Heritage mapping as they transition to provincial mapping. OHBA is generally supportive of the proposed approach to make provincial mapping of the agricultural land-base and NHS apply only after the implementation of upper/single-tier Official Plans (through the MCR process).
- OHBA is also supportive of allowing upper/single-tier municipalities to refine and implement provincial mapping in advance of the next MCR should they choose to do so (however this should only occur following accurate refinement).
- OHBA recommends that the *Whitebelt* should be exempt from the application of the province’s new NHS and agricultural system mapping, relying instead upon the NHS system that flows from subsequent planning processes at the local and regional levels (i.e. CAs).
- OHBA is concerned with respect to the effect of additional mapping and policies in the *Whitebelt*, which will further diminish and place more strain on an already severely constrained housing supply. There should be no additional barriers or restrictive designations that will add uncertainty, while frustrating and delaying an already cumbersome planning process.

- The province should also recognize that as any application or settlement boundary expansion proposal moves through the planning process, it will ultimately be required that any significant natural heritage features or environmentally sensitive lands will be protected. OHBA therefore reiterates our recommendation that the *Whitebelt* should be defined and designated with status as an urban reserve in the Growth Plan and therefore be exempted from the NHS and Agricultural System mapping.
- OHBA remains concerned that the provincial minimum 500m (computer generated) linkage features are still intended to be a component of the provincial mapping following MCR. While OHBA recognizes that in some cases linkage features can be a valuable environmental planning tool to connect and protect corridors between “core” natural heritage features, the methods and mapping of a network of linkages are a “blunt” policy instrument. OHBA is very concerned that many of the linkages provide high-level protections on lands that are “working landscapes” including agricultural uses, private businesses, infrastructure ROWs and even homes that contain low natural heritage values.
- The reality is that in many cases, a 500m NHS linkage may traverse through, and protect lands that do not inherently have a higher ecological and environmental value than immediately adjacent lands on either side of the linkage. We note that often times those lands may have simply been protected based on the model suggesting it was the “best route” between two core areas of NHS protection. OHBA therefore strongly recommends that the linkage features be eliminated entirely from the provincial NHS.

THEME: SETTLEMENT AREA BOUNDARY ADJUSTMENTS

- OHBA is supportive of the proposal to remove the requirement to de-designate *excess land* when undertaking settlement boundary expansions. OHBA suggests that further clarification should be provided in the Growth Plan to ensure that identified *excess lands* will not be removed from an established settlement area boundary. OHBA further recommends removing all references to *excess lands*.
- OHBA is supportive of the proposed amendments to allow municipalities the ability to undertake settlement boundary expansions that are up to 40 ha outside of MCR subject to criteria (proposed policy 2.2.8.5 and 2.2.8.6) OHBA has a number of specific recommendations:
 - Allow for the completion of communities with interim expansion beyond 40 ha to a minimum size reflecting an appropriate size for completing partially planned neighbourhoods and communities that ‘ran out of numbers’ from the last Growth Plan.
 - The 40 ha limit is an arbitrary number and OHBA believes that boundary expansions should be allowed when they are warranted; otherwise we will continue to experience constrained housing supply. OHBA recognizes the province wishes to maintain a degree of control over the process, thus we recommend a higher threshold of 100 ha.
 - 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. OHBA believes the currently proposed amendment partially addresses this concern.
- OHBA supports the proposal to allow greater local autonomy to adjust settlement area boundaries outside the MCR if there is not net increase in land subject to criteria. This approach allows local autonomy to re-prioritize growth areas (proposed policy 2.2.8.4).
- OHBA supports the proposed approach to create a more outcome-focused approach to boundary expansions, rather than specifying the types of studies required to justify the feasibility and location of expansions. Such an approach focuses the planning system on outcomes rather than process.
- OHBA recommends reducing 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 PPS.
- OHBA recommends the province consider various regions that have worked in good faith towards Growth Plan conformity and permit the implementation of the Growth Plan via comprehensive review (versus MCR) to support increased housing supply and employment opportunities.

- OHBA recommends that lands included within an existing urban boundary should be exempt from complying with OMAFRA's Minimum Distance Separation (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.

THEME: RURAL SETTLEMENTS

- OHBA is supportive of the proposed approach that specifies rural settlements are not part of the DGA.
- OHBA is supportive of the proposed approach to define the term 'rural settlements' as a subset of 'settlement area' and the deletion of the term 'undelineated built-up areas'
- The Ministry should however achieve a more accurate picture with respect to "undelineated built-up areas"/ "rural areas", by mapping a 2019 *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 or even the newly proposed approach in the 2019 amendment.
- OHBA is supportive of the proposed approach to allow for 'minor rounding out' of rural settlements in keeping with the rural character of the area (proposed policy 2.2.9.7).

THEME: EMPLOYMENT PLANNING

- OHBA is generally supportive of the new *Provincially Significant Employment Zones (PSEZ)* concept, however OHBA will not be providing any site-specific comments as part of this consultation. OHBA notes that PSEZ mapping should be applied to limited areas of employment lands that truly are a priority for protection at the provincial level. As such, the province should be very cautious with any municipal requests to create additional PSEZs beyond those currently proposed.
- OHBA strongly recommends a PSEZ delineation process in which municipalities and landowners are consulted and a one-time appeal window be created with respect to designation. It is important the province gets the mapping and boundaries right.
- OHBA further recommends that the province carefully consider any situations where sites may have unintentionally or inappropriately been included in a PSEX and provide transition for any affected application in process.
- OHBA is supportive of the proposed approach to create a one-time window to allow municipalities to undertake some employment area conversions (outside of proposed new PSEZs) between the effective date of proposed amendments and the next MCR.
- OHBA also is supportive of this one-time window having local approvals and not requiring provincial approval.
- OHBA further recommends that employment conversions (outside the new PSEZs) 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.
- OHBA supports the approach that the province should not have such a rigid position on employment lands (outside PSEZs) by allowing for greater mixed-use opportunities.
- The 2017 Growth Plan policy of netting out employment should be maintained.
- OHBA is supportive of the proposed approach to allow density targets to be set by municipalities for each employment area.
- From OHBA's perspective, the Growth Plan policies regarding MTSAs should take precedence over the PSEZ policies. To have these two policy areas overlap on the same properties is both confusing and may not lead to the best possible outcomes. OHBA supports MTSAs taking precedence to uphold the provincial interest and to avoid any policy conflict if the areas overlap. Furthermore, municipalities should pre-zone MTSAs as soon as possible.

THEME: OTHER OHBA RECOMMENDATIONS

- The municipal process for conformity with the Growth Plan should be simplified and streamlined by withdrawing *2018 Land Needs Assessment (LNA)* methodology and the draft *Application of Intensification and Density Targets* and *Municipal Comprehensive Review Process* guidance documents (OHBA recognizes that these are intended to be used a “guidance” documents, but our experience suggests they are being utilized as policy). OHBA is concerned the current complicated methodology and convoluted policy interpretations ignore market realities and oversimplifies residential unit requirements by treating all residential unit types as the same (they are not). The *Provincial Projections Guideline Methodology* augmented by current best practices should be used. Failing the removal of this requirement, the LNA must be revised to take a market demand/projected needs -first approach in the methodology, versus a policy (e.g. arbitrary targets) first approach to determining housing needs with a focus on developability of lands (which could include contingency amounts for lands unlikely to development within the settlement area within the horizon of the plan).
- Section #6 and 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 (within which the province has proposed local autonomy and flexibility through the grouping of municipalities into Group A, Group B and Group C).
- OHBA generally supports adding requirements to have housing needs meet the projected needs of current and future residents within regional market areas added in the preamble and in the policies and definitions of the Plan. This is essential to delivering a supply of housing that matches the preferences of the population and that is responsive to the market.
- OHBA recommends that MMAH update the Schedules of the Growth Plan to:
 - Include a 2019 *Built Boundary* to reflect the current limit of the built-up area and provide more opportunities for intensification. Quite simply the built boundary should be accurate and reflect the GGH as it is today, not 13-years ago.
 - Add missing transportation elements including the EA approved Highway 404 corridor, GTA west corridor, Yonge Street Subway extension, updated Relief Line alignment, and locally identified priority transit corridors (in process);
 - Identify the future Designated Greenfield Area within the inner ring;
 - Identify the *Whitebelt*;
 - Include updated 2051 population and employment forecasts in Schedule 3.
- OHBA is supportive of formalizing the *Whitebelt* as the long-term urban reserve for long-term population and employment growth beyond the current Growth Plan planning horizon given their strategic locations adjacent to existing and planned infrastructure and to existing settlement areas. The *Whitebelt* should furthermore be designated, and have status as a long-term urban reserve, and this principle should be reflected in Regional Official Plans and Long-Term Urban Structure Plans.
- OHBA recommends adding policies to the Housing section to require municipalities to maintain a 20 year supply of lands that are designated and available for development and a 10-year supply residential units through lands zoned for intensification or in draft approved or registered plans. Further, municipalities as required by the *Planning Act*, must update zoning within 3-years of completing a comprehensive review to implement this Plan. These requirements will move the plan from a ‘just in-time provision’ of housing with associated shortfalls in supply to a priority for sufficient supply to be maintained at all times.
- 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.
- Other ministries should have Growth Plan principles applied to their decision-making process when making critical land-use decisions and when designing provincial facilities to be less land-consumptive, such as hospitals, universities and/or schools.

THEME: TRANSITION

- Fix the transition provisions of the Growth Plan to allow comprehensive transitioning of an entire development project 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.
- 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.
- Generally complete applications that were submitted to a municipality should be evaluated based on the policy regime that was in place on the date of the application.

CONCLUSION

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 the government with respect to growth, environmental and infrastructure planning across the GGH.

OHBA welcomes the proposed amendments to the *Growth Plan for the Greater Golden Horseshoe*. These changes will facilitate intensification without applying a ‘one size fits all’ approach to growth planning in communities across the GGH. OHBA believes that the proposed amendments to the Growth Plan are the right approach to support the government’s commitment to build more housing, reduce red tape and make it easier to live and do business in Ontario.

It is critical that the Growth Plan prioritizes higher levels of intensification on transit lines and Urban Growth Centres, while also addressing the growing imbalance between strong demand for housing and limited supply. This imbalance has contributed to dramatic costs for both ownership and rental housing over the past few years. While OHBA is generally supportive of the proposed approach to grouping municipalities by infrastructure capacity (Group A, Group B, Group C) for the purposes of intensification and density targets, OHBA is concerned that some of the targets are still too high and will be challenging to implement.

OHBA continues to support the important work the Ontario government is undertaking on the housing file. Along with the proposed amendments to the Growth Plan, the government has modernized Ontario’s apprenticeship system by bringing 1-to-1 ratios to all trades, stimulated more rental housing by exempting new rental units from rent control, and is generating new ideas through the *Housing Supply Action Plan* to bring more housing to communities across Ontario. While OHBA is generally supportive of the proposed amendments to the Growth Plan, OHBA cautions that there is much more work to be done to address the constraints impacting housing supply in Ontario and supporting [#homebelievers](#) looking to achieve the great Canadian dream of homeownership.

OHBA strongly believes that a healthy housing system exists when a city or region has the full mix and range of housing choices and supply that can address all residents’ shelter needs through their full life cycle. A properly functioning housing system should provide stability to both renters and owners, at prices people can afford and in the choice that meets their needs. The housing system must also be able to respond to meet projected demographic and market requirements for current and future residents. The GGH is going to welcome three million new [#homebelievers](#) in the next 20 years, and the proposed amendments to the Growth Plan will better support intensification where transit infrastructure exists, without applying a “one size fits all” approach to every municipality. These are practical and realistic approaches that OHBA believes will create the housing supply and choice needed in these communities.