



Ontario
Home Builders'
Association

Co-ordinated Review
EBR: 012-7194

Proposed Growth Plan
for the
Greater Golden Horseshoe

- 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: Honourable Bill Mauro
Minister of Municipal Affairs
October 31, 2016

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About OHBA

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 30 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 residential construction industry employed over 330,000 people and contributed over \$51 billion to the Province's economy in 2015.

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 policy that affect the industry. 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

Background

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. 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 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.

Executive Summary

OHBA continues to support the guiding principles of protecting our most valuable environmental resources and the creation of complete communities that are the foundation of the Growth Plan and Greenbelt Plans. Our members and many municipalities do however have serious shared concerns with specific proposed amendments to the Growth Plan as well as ongoing concerns with the implementation of the plan, the significant infrastructure investments required to support the plan and the lack of alignment between local and provincial public policy.

OHBA's submission to the province in 2015 focused on the opportunity to change the conversation and setting the course for planning and economic development across the Greater Golden Horseshoe for the next few decades. We stated that it would be critical for the provincial, 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 proposed amendments to the Growth Plan are extensive and while OHBA and a number of municipalities do support some of the proposed amendments, we have very specific concerns that there will be serious implementation challenges with other proposed amendments and are concerned that a lack of evidence and data may have contributed to proposals that simply don't make practical sense in most GGH communities.

With respect to the Growth Plan, OHBA is supportive of the new "prime employment area" designation, which removes some employment uses from the combined persons and jobs per hectare density calculation. However, OHBA has previously recommended that *all* employment should be decoupled from the density calculation and we continue to support this recommendation. OHBA is supportive of proposals to require Major Transit Station areas to be delineated and to achieve specific density targets. Furthermore we support the creation on Strategic Growth Areas. OHBA is however very concerned that intensification and density targets apply a "one size fits all" approach across most of the GGH regardless of infrastructure/transit capacity and the characteristics of diverse communities. OHBA's primary concern however is that the newly proposed 80 PJH target for designated greenfield areas (DGA) are to be averaged across the entire DGA without adjusting to a 2016 built boundary to account for the built up area since 2006 as well as lands that have been committed for development through the planning approvals process.

The Growth Plan needs to have a greater focus on a long-term strategic planning policy framework, while supporting and managing economic growth. OHBA notes that it is often our members actually implementing the Growth Plan, be it through approved communities we build, the employment centres we develop or environmental protections the industry provides through the land-use planning process. As stakeholders in the planning process, we are partners with all levels of government in creating complete, transit-oriented communities, protecting the environment and ultimately implementing the plans.

On behalf of our 4,000 member companies and 11 local associations in 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. The co-ordinated review is the opportunity to connect the dots and look at how the Growth Plan has worked with other Provincial Plans and within the broader planning framework over the last 10-years. It is critical to refocus the province and municipalities on future community and economic development as we continue to build sustainable communities where we can all live, work and play.

OHBA Key Recommendations

Priority Recommendations

1. OHBA does not support the approach taken to create the proposed density target, the provincial application of the target, and the proposed implementation of the density target. OHBA recommends that policy 2.2.7.2 of the Growth Plan be amended so that the density target remains at 50 PJH for the immediate planning horizon and that any proposal to increase the density target shall not apply to DGA areas which have already been developed, or to undeveloped land that has been “committed” through a Council-approved Secondary Plan or draft plan approvals.
2. OHBA recommends that the current 40% intensification target be maintained and that any intensification increase only be made possible through consultation with lower-tier municipalities that have existing and planned/funded higher-order transit infrastructure.
3. OHBA supports the timeline to have a land needs assessment methodology by the end of 2017. OHBA is supportive of proposed amendments in 2.2.7.3 to exclude a number of features from the density calculation including: electricity transmission corridors, energy transmission pipeline corridors, provincial freeways and railways. OHBA further recommends that the province amend policy 2.2.7.3 of the Growth Plan to exclude the following features the greenfield density calculation:

○ Cemeteries	○ Landfills	○ Separate employment area related
○ SWM infrastructure	○ Arterial Roads	jobs from the density calculation
○ Schools	○ Employment lands	○ Public Parks / Public open space
4. OHBA supports formalizing the Whitebelt (The Whitebelt is commonly referred to as the rural areas beyond the lands that are currently designated for urban uses, that are not part of the Greenbelt) in Schedule #2 for long-term population and employment growth beyond the current planning horizon.
5. OHBA recommends the Province update the Built Boundary to a current 2016 reality.
6. Transition policies must be implemented to ensure that plans in process and ongoing municipal conformity that has taken place over a significant amount of years, have involved very complex planning exercises and studies, and have come with substantial costs not be subject to new policies or major studies that have not yet commenced. OHBA recommends transition policies be consistently applied for both the intensification target and the minimum density targets, with both applying only through the application of the 2041 forecasts during the next Municipal Comprehensive Review (MCR). This would support and confirm ten years of 2031 implementation work completed or in progress.

Complimentary Recommendations

- OHBA recommends that the Province apply a more targeted approach to intensification and density targets that recognize and differ between municipalities. Furthermore, any increase over the 40% intensification target should be considered through consultation and agreement with municipalities that have existing or planned/funded higher-order transit.

- OHBA supports Provincial policy to maintain alternative targets in the Outer Ring for municipalities without an UGC. OHBA recommends that due to proposals to significantly increase both density and intensification targets, that the Province expand eligibility for alternative targets to all outer ring municipalities.
- OHBA recommends the Ontario Growth Secretariat should therefore immediately engage municipalities and review their professional planning staff report to determine the impacts of the proposed policies in each municipality. Furthermore the province should release updated Growth Plan performance indicators with 2016 data to inform the proposed amendments.
- OHBA recommends that the Growth Plan remove proposed provisions for identifying and redesignating excess lands in the Outer Ring.
- OHBA is supportive of the introduction of Strategic Growth Areas.
- OHBA is supportive of the designated \$16 billion GTHA transit fund, however due to the growth anticipated and higher densities being proposed, OHBA recommends the Province increase transportation funding for both transit and transportation across the GTHA. Funding for new higher-order transit projects *should only occur* in municipalities that have updated both their Official Plan and Zoning to support transit-oriented development in the proposed transit corridor.
- OHBA supports the proposed amendments to Growth Plan that would require official plans to delineate MTSA's and proposed density targets. OHBA recommends that the Province implement policies requiring the delineation of MTSA's in Official Plans and that the policies be strengthened by specifically requiring municipal zoning by-laws within the delineated MTSA to be modernized to provide as-of-right densities designed to achieve the Growth Plan MTSA density targets with limited located flexibility.
- OHBA recommends that the Province work with municipalities to ensure long-term sustainable funding to support the necessary infrastructure in UGC's and Strategic Growth Areas.
- OHBA is supportive of the new "prime employment area" designation, which removes some employment uses from the combined persons and jobs per hectare density calculation. OHBA has previously recommended that *all* employment should be decoupled from the density calculation and we continue to support this recommendation. As a secondary recommendation, should the Province not be prepared to decouple all employment from the density calculation, OHBA supports municipal recommendations to permit office uses in Prime Employment Areas.
- OHBA recommends that the Growth Plan should take a more targeted approach and examine each of the 25 UGCs and update/increase targets in UGCs that have already met or are close to meeting density targets.
- OHBA recommends the Province maintain policies from the 2006 Growth Plan that *"encourage intensification generally throughout the built-up area"* (policy 2.2.3.6.b - Growth Plan, 2006).
- OHBA recommends that municipalities be required to modernize zoning so that "as-of-right" density permissions reflect the Growth Plan density targets.
- OHBA recommends that the proposed Growth Plan amendments' enactment be subject to the provincially-led implementation work and studies being completed.
- OHBA supports completing the identification of an agricultural system and related guidance by the end of 2018 and that all mapping be validated by municipalities to ensure accuracy.

Proposed Designated Greenfield Area (DGA) Density Targets (2.2.7)

- Municipalities that have advised the Province that they do not support increasing the minimum DGA target from 50 to 80 persons and jobs per hectare (PJH) include (some, not all are identified):
 - Georgina
 - Oshawa
 - Caledon
 - Markham
 - Collingwood
 - Pickering
 - Peterborough
 - Brantford
 - Hamilton
 - Durham
 - Whitchurch-Stoffville
 - Clarington
 - Peel
 - Dufferin County
 - City of Waterloo
 - Guelph
 - Niagara
- Municipalities that have requested that the 80 PJH target should be modified and only apply to unplanned and undeveloped areas of the DGA rather than as an average across the entire DGA (some, not all are identified):
 - Niagara Region
 - Waterloo Region
 - Peterborough
 - HAPP (Halton Area Planning Partnership)
- **York Region** planning staff reports have stated, that a Designated Greenfield Area (DGA) wide density target of 80 residents and jobs per hectare is unachievable in the York Region context, and would result a distribution of density that is contrary to the Region’s planned urban structure and that 80 residents and jobs per hectare when densities are averaged across the entire DGA to meet the 80 residents and jobs per hectare target, future community areas on the outer edge of the urban area would need to develop at densities ranging from 150 to 200 residents and jobs per hectare.
- **Peel Region** has recommended that, as a result of the analysis by Peel planning staff, that after excluding potential employment lands, approximately **84 per cent of Peel’s current DGA is estimated to be already built, or planned with approved secondary plans** at densities of approximately 69 PJH. As a result, the proposed increases to DGA density would have to be realized utilizing the **16 per cent of lands that remain unplanned**. This could result in densities of approximately 140 PJH in these unplanned areas. These new communities at the outer edges of Peel would be some of the most dense in Peel and would lack significant infrastructure, including transit, to support these densities.
- **Peel Region** has recommended that the new residential density target should apply only to the development planned for the post 2031A growth allocation at the regional level.

Approximate DGA Land supply by status and municipality within Peel Region					
Municipality	Status	Residential DGA		Possible Employment Exclusion	DGA Total
Caledon	Total DGA	878 ha		639 ha	1,517 ha
Brampton	Total DGA	5,314 ha		1,477 ha	6,791 ha
Mississauga	Total DGA	180 ha		0 ha	180 ha
Peel	Developed	3,105 ha	49%	525 ha	3,631 ha
	Committed	2,236 ha	35%	1,265 ha	3,501 ha
	Unplanned	1,030 ha	16%	326 ha	1,357 ha
Total		6,371 ha	100%	2,167 ha	8,489 ha

Source: Region of Peel

- **City of Markham** has stated that the DGA density target is too high to be achievable.
- **Durham Region** does not support increasing the density target, nor does it support applying the proposed target to the entire DGA.
- **City of Waterloo** staff expressed “significant concern” they will be required to re-plan recently approved areas to achieve overall 80 PJH target. Waterloo further states, of particular concern for staff is that achieving 80 PJH will actually require planning for densities that are significantly higher than 80 PJH.
- **York Region** has calculated the impacts of meeting density targets DGA wide.
 - The entire DGA is 8,930ha – which would have to achieve an average density of 80 pjh
 - The pre growth plan community of 7,280 hectares has 414,960 people and jobs per hectare for a density of 57 PJH.
 - The remaining 2031 new community area is 1,650ha and would have to achieve a density of 180 PJH to achieve the 80 average.
- **Dufferin County** has requested to maintain alternative targets and has stated that the proposed targets would not be achievable in Dufferin.
- **City of Hamilton** has recommended that the province amend policy 2.2.7.2 of the Growth Plan regarding the increase in the minimum greenfield density target to 80 PJH to indicate that this target shall not apply to greenfield areas which have already been developed, or undeveloped land in a Council-approved Secondary Plan.
- **City of Hamilton** is not in a position to support the increase in density until such time as the Province evaluates the impact on housing mix and demand in Hamilton, in conjunction with City and Provincial direction to ensure complete communities.
- **Niagara Region** has recommended that the province extend the time period by which upper- or single-tier municipalities should conform to the target of 80 PJH to allow growth to phase-in over a longer time horizon (e.g. 50 in 2031, 60 in 2041, etc).
- **City of Guelph** has stated that the 80 PJH target will create an unrealistic growth scenario for the City of Guelph. Guelph estimates that 37% of the city’s total DGA has been committed to date at a density of approximately 52 PJH. As proposed the policies will require future growth to be at a density of between 95 and 100 PJH in over to compensate for development that has been planned for the past ten years at a density of 50 PJH.

From a development industry perspective OHBA has a number of concerns that we share with many municipalities with the proposed density target of 80 PJH increase:

- Based on outdated provincial DGA data, the current proposal makes a number of evidence-based policy decisions without the up-to-date evidence and applies a “one-size fits all” approach to both future and density and intensification targets.
- As has been confirmed by a number of the Regional and Municipal professional planning reports approved by their Councils and provided to the Provincial government and the Ontario Growth Secretariat responsible for the data presented in the background documents supporting the proposed density target of 80, the committed DGA was documented by the Province for the inner ring municipalities as a range of 2.6% to 6.7% in 2011 (Places to Grow Performance Indicators, 2015). However, detailed assessments by municipal professional planning staff have found that in some situations the committed DGA is actually well over 50% (As the Region of Peel clearly reports in the chart on the previous page – 84% of DGA lands are committed).
- The current proposal applies the new density target immediately upon provincial approval of the Growth Plan across entire DGA including areas already approved or built (despite incomplete provincial guidance documents).

- From a professional planning and practitioner perspective, that means the “80” target for new DGA communities is not really “80” as it will translate to a higher target to compensate and achieve an average of “80” due to the difference between what has already been approved, committed to and built to meet the previous “50” target.
- The effect of over-compensating density on remaining DGA would result in the highest densities being built at the urban periphery. These areas are often not supported by transit.
- The amendments may require municipalities, to revisit secondary plans in process for many years which have yet to be approved, to look for areas to increase densities.
- The application of the 80 PJH across the entire GGH applies a “one-size fits all” approach to the density targets instead of analyzing, identifying and respecting the individual municipality or community and recognize their different characteristics, geography, proximity to higher order transit etc.
- And again, the proposed targets were developed without the critical current data that Regional and municipal planning departments could have provided the OGS when determining if a new density target is necessary and ultimately what the appropriate density could be.
- We share the concerns of the municipalities that the development of the density target without the direct involvement of the municipalities – over 100 impacted municipal partners - by the proposed amendments completely undermines the evidence-based policy approach the Provincial government continues to promote and defend.
- The implementation of the proposed “one-size fits all” density will leave municipalities’ conflicted in dealing with plans they have already approved, infrastructure they have already financed, and community building decisions they have already made, as they are forced to immediately work towards “averaging out” the new 80 density.

OHBA does not support the approach taken to create the proposed density target, the provincial application of the target, and the proposed implementation of the density target.

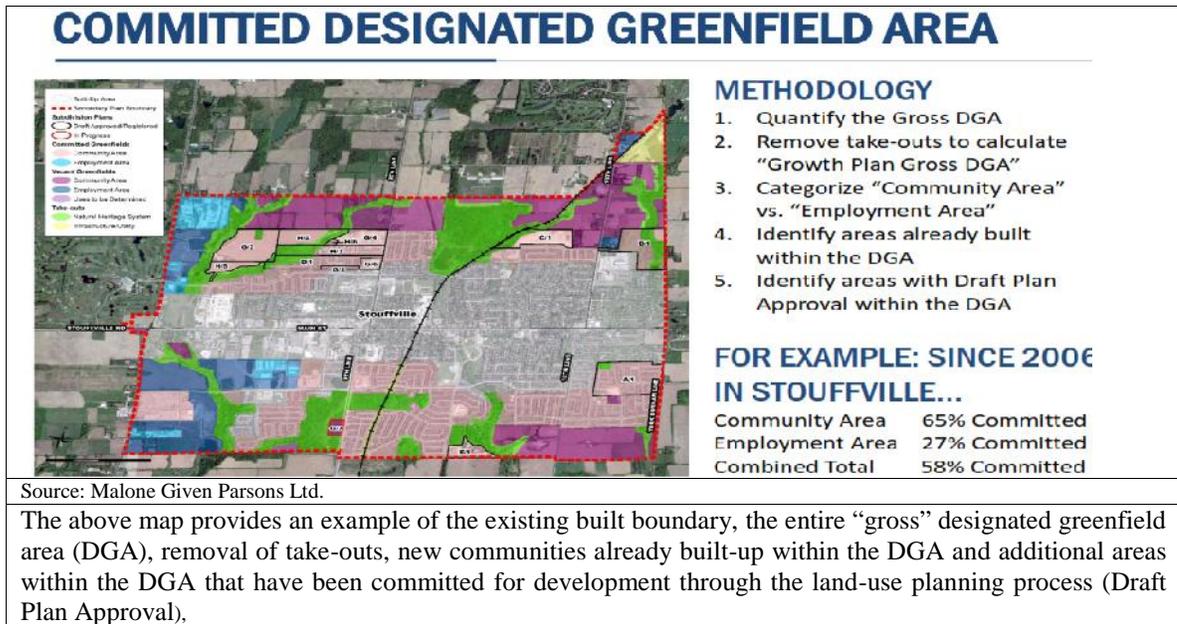
Regarding the approach, again the data that is the basis for the policy decision for the 80 PJH density target is outdated. The updated evidence provided by the regional and municipal staff reports provide the up-to-date data that **must** form the basis of any discussion to increase the density targets. The provincial application of the new density targets – this “one-size fits all approach” to community building across 100 municipalities is equally inappropriate, as it does not respect the community building process municipalities undertake as they approve new settlement areas that need to function within the existing community structure, along with the associated infrastructure and community amenities needed to support those new complete communities.

Lastly, the immediate implementation of the new density target currently proposed, completely undermines the previous 10 years of Growth Plan conformity work completed by municipalities that our members must work through and comply with in order to bring new housing supply to support the provincially legislated population and employment forecasts. Again, the municipalities have provided 2016 updated data regarding the DGA committed rates, and have provided their professional planning analysis of how the immediate application of the new density targets will require them to review and potentially reopen approved community plans or at the very least to average out the 80 by overcompensating for density in any new developments in order to make the planning by numbers math achieve a density average of 80 across the DGA to satisfy the provincial target. **OHBA agrees with municipalities, that community planning in the DGA to satisfy the provincial “numbers” is not the appropriate approach for local community building.**

OHBA recommends that policy 2.2.7.2 of the Growth Plan be amended, so that the target remains at 50 PJH for the immediate planning horizon (to 2031) and that any proposal to increase the target, shall not

apply to DGA areas which have already been developed, or to undeveloped land that has been “committed” through a Council-approved Secondary Plan or draft plan approvals.

Furthermore, OHBA notes without a transition provision, the introduction of a new DGA wide target of 80 PJH could reopen planning work completed to date – therefore transition policies should be consistently applied for both the intensification target and the DGA minimum density policy, with both applying only through the application of the 2041 forecasts during the next municipal comprehensive review.



What does 80 PJH mean when “averaged” across the entire DGA (Built Form)

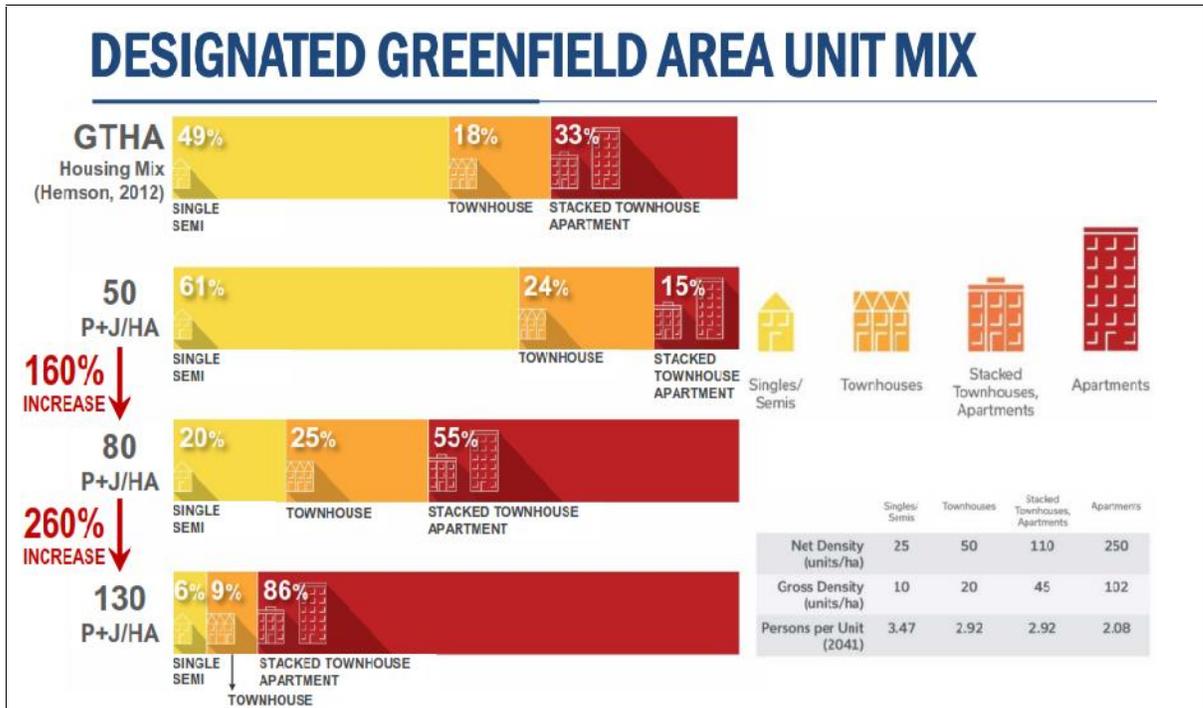
- **City of Markham** has reported through their professional planning report that according to analysis by Regional staff, in order to meet the proposed new and immediate minimum 80 PJH in York Region, that Future Urban Area in Markham would potentially have to be developed at over 150 PJH.
- **York Region** has reported that when densities are averaged across the entire DGA to meet the 80 PJH target, future communities on the outer edges of the urban area would need to develop at densities ranging from 150 to 200 PJH.
- **York Region** has further stated that achieving the DGA wide density target, largely in the outer fringes of existing communities, will have perverse consequences on the Region’s urban structure by requiring densities comparable to Centres and Corridors in the outer fringes.
- The **Region of Peel** has stated that the DGA target would result in densities of approximately 140 PJH in unplanned areas. These new communities, typically at the outer edges of Peel, would be some of the densest in Peel. Moreover, they would lack the infrastructure – for instance, substantial transit – required to support these densities.
- The **Region of Waterloo** has stated that since the built boundary and the DGA were established in 2006, planning approvals and development have occurred in the DGA in a manner which has contributed to the achievement of the 50 PJH density target. As a result of this development and because these areas are not excluded from the DGA density calculation, the remaining vacant DGA land will be required to achieve a density greater than 80 PJH to “compensate” for the DGA lands that have previously received development permissions or developed in conformity with density requirements of the 2006 Growth Plan in order to achieve 80 PJH across the entirety of DGA.

Regional staff estimate that the Region's remaining vacant, uncommitted DGA would need to be planned to achieve a density approximately 2.5 times as dense as the development that has already been planned and built DGA to meet the proposed minimum density target of 80 persons and jobs per hectare across the entirety of the DGA. It is anticipated that achievement of this density would require a built form comprised of mostly apartment dwellings. Regional staff are also concerned with the location of the uncommitted DGA that will be required to achieve densities of 80 or more PJH. For the most part, the uncommitted DGA is located on the outer edge of the Region's urban areas where development at these densities may not be appropriate or desirable due to the lack of available public transit, infrastructure constraints and to provide for a transition to the Region's adjacent agricultural areas.

- The **City of Hamilton** has noted that the 80 PJH should not be applied to current Council-approved Secondary Plans since this target will require a density of well over 80 PJH for newly developed areas to make up for the shortfall of the existing secondary plans. Instead, this new target should be required for Plans approved after a certain date.
- **City of Oshawa** staff is concerned by the target of 80 PJH being applied to both developed and undeveloped land in the DGA. Since the Kedron Planning Area will have approvals at 50 persons and jobs combined per hectare, the implication is that undeveloped land in the greenfield will need to be much higher than 80 PJH in order to pull up the average and achieve the target.
- The **City of Waterloo** has stated they have limited continuous greenfield land available, thus it will be challenging to achieve densities at 80 PJH on the remaining greenfield sites. The remaining greenfield lands in Waterloo are generally located far from frequent transit, fragmented, and are small in size. By solely focusing on density targets, Waterloo staff note that community features that contribute to complete communities (e.g. parks) may be reduced or restricted in greenfield areas in an attempt to meet the target numbers.
- The **County of Wellington** notes that some designated greenfield is made up of subdivision plans historically approved or supported by the province at lower densities. Making up for these lower densities in the remaining area is not realistic so the application of the target needs to exclude the build out of these plans.
- The **Town of Collinwood** has reported that the town already faces difficulty reaching the current targets, and any higher level would have the potential to negatively affect the character of the community.
- The **City of Peterborough** has articulated concern that the proposed targets will result in Peterborough looking like other GGH communities, which may facilitate the loss of community identity due to blanket application of policies across the GGH. The City further notes concern that housing affordability will erode and staff have specifically stated their concern that the housing industry could look elsewhere to conduct business.
- The **City of Guelph** has stated that the proposed policies will require future growth to be at a density of between 95 and 100 PJH and the effect of this will be that some of the densest neighbourhoods will be positioned toward the fringe of the City, resulting in an inefficient distribution of growth and servicing infrastructure.
- **Dufferin County** has noted that increasing greenfield densities on uncommitted greenfield areas on the periphery of the urban settlement areas, will result in more intensive development that is further removed from the downtown core areas, and less accessible with respect to transit, public services and community amenities.

OHBA notes that the provincial government never provided the industry, municipalities, the public or any stakeholders a vision or breakdown of the built form type of housing mix in relation to the proposed 80 PJH density target. For the purposes of an evidence based consultation and discussion, the province

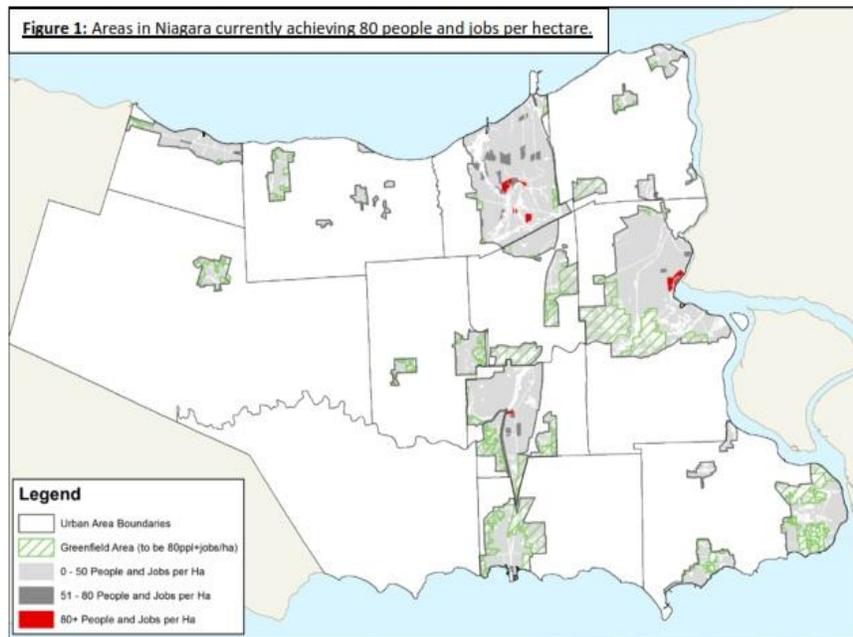
should have provided all stakeholders and municipalities with data and housing supply that would support the proposed targets.



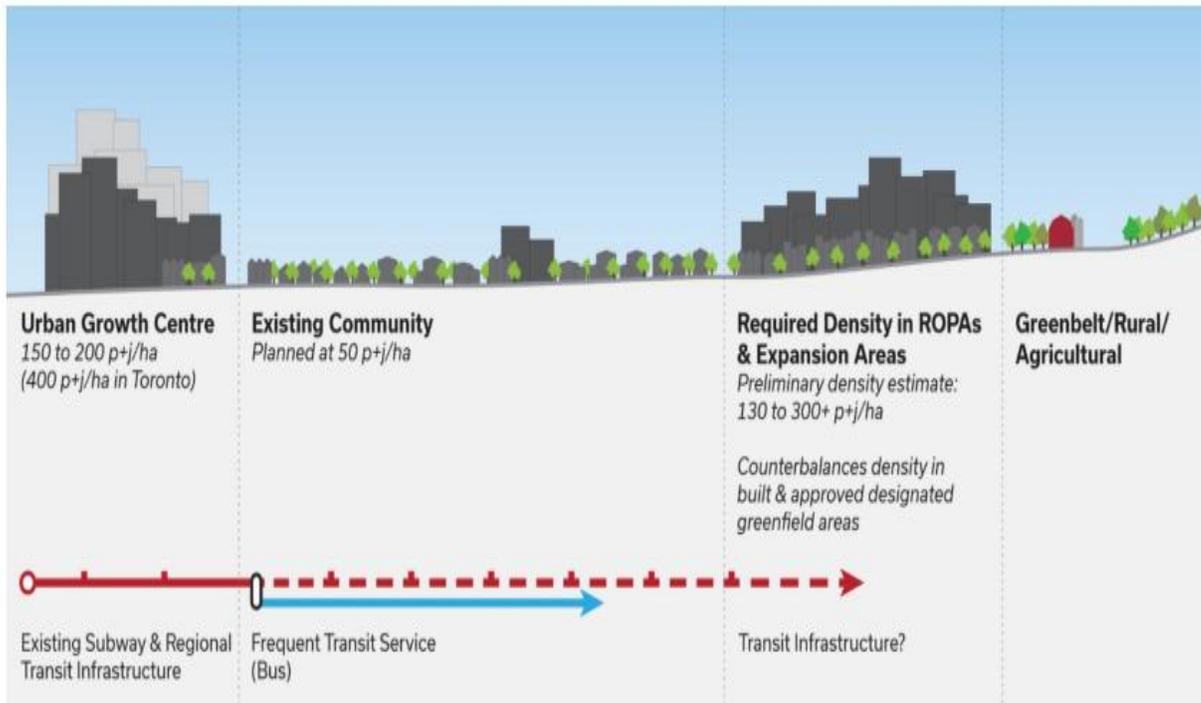
Source: Malone Given Parsons Ltd.

This graphic created by Malone Given Parsons Ltd., depicts the potential housing mix resulting from the proposed Growth Plan amendments and visualizes how the proposed 80 PJH target would translate to units when applied, and the resulting more intense levels of built form when the 80 target must be “over-compensated” for. In this scenario, over three quarters of the projected built form are stacked town houses and apartments which would be built in areas where the necessary transit and other forms of infrastructure are not present.

- Niagara Region** has noted, 80 PJH on the periphery of communities would create development patterns and infrastructure demands that have not been anticipated as well as land-use conflicts related to agricultural lands.



THE EFFECT OF ACHIEVING 80 P+J/HA



Source: Malone Given Parsons Ltd.

As seen in the depiction above provided by Malone Given Parsons Ltd., and as noted by a number of municipal planning reports responding to the consultation, the effect of over-compensating density on remaining designated greenfield areas would result in the highest densities being built at the urban periphery. These are areas often not supported by transit, which would result in municipalities not being able to build and deliver the sought out complete communities which are essential for a vibrant, efficient and cohesive GTA

From a development industry perspective OHBA and a number of municipalities have expressed concern that the 80 PJH target across the entire DGA will result in a number of unintended consequences. Several municipal planning departments have noted that applying the target to areas already built-out results in much higher densities needing to be accommodated in the remaining DGA. OHBA is concerned that the density targets being proposed and the even higher densities that will need to be achieved to meet the average DGA target, will not result in the industry delivering “complete communities” with a healthy balance of housing options. OHBA is further concerned that an unintended consequence of the proposed amendments will result in much more intensive development occurring on the urban periphery, which is far removed from transit. OHBA does not support approach taken to create the proposed density target, the provincial application of the target, and the proposed implementation of the density target.

OHBA and a number of municipalities have been critical of a “planning by numbers” and “one size fits all” approach by the Provincial Government. A number of municipal planning staff reports have noted that there is a lack of current data, no new 2016 built boundary and a lack of evidence from the province to

support the proposed public policy amendments. **OHBA recommends the Ontario Growth Secretariat should therefore immediately engage municipalities and review their professional planning staff report to determine the impacts of the proposed policies in each municipality. Furthermore the province should release updated Growth Plan performance indicators with 2016 data to inform the proposed amendments.**

Ontarians can only have a real evidence based public policy discussion when the province provides the appropriate and up-to-date data and evidence to support the proposed amendments to the Growth Plan.

Greenfield Density Calculation / Take-outs (Standard Methodology)

The province has proposed changing the methodology for calculating greenfield densities (2.2.7.3). The change in calculation for greenfield density is to remove *prime employment areas*, hydro, rail, and transportation corridors from the density calculation, in addition to natural heritage lands which are already exempted.

- The **City of Hamilton** encourages the Province to immediately begin, in conjunction with municipalities, the development of a land budget methodology with a target completion date of mid-2017
- The **City of Hamilton** is supportive of the proposed change to include prime employment areas in density ‘take-outs’.
- The **City of Hamilton** has also recommended that the province amend policy 2.2.7.3 of the Growth Plan to add cemeteries, landfills, infrastructure (SWM ponds, roads) and public parks to the features to be excluded from the greenfield density calculation.
- **Halton Region** has requested that the density calculation should exclude all employment areas, land use for infrastructure and portions of the DGA planned under a prior existing planning regime.
- The **City of Oshawa** supports a consistent methodology from the province and has stated this should be a priority.
- The **County of Dufferin** has recommended that consideration should be given to excluding other land intensive and low employment yielding uses from the greenfield density targets, such as larger institutional uses (i.e., schools, places of worship), which would otherwise result in requiring higher greenfield density targets in smaller urban centres to compensate for these uses.
- **City of Waterloo** has expressed concern that higher densities are required to take into account parks, SWM ponds, roads, schools and land already planned and built since 2006. Waterloo recommends that density calculations should be done on a net basis and exclude lands that cannot be developed.
- The **City of Guelph** has recommended that the DGA density measurement policies be modified to exclude all features and areas that contribute to the function of the NHS and that additional clarity and guidance on the exclusions is provided.
- **Niagara Region** has recommended that the province expand the list of features to be excluded from the greenfield density calculation to ensure that the lands reflect an extension of the complete communities concept, as defined in Policy 2.2.1.3 (e.g. public service facilities, parks / trails and recreation facilities, regional / municipal roads / right of ways and transit facilities, and consideration for urban agriculture).
- The **City of Guelph** has recommended that the residential and employment density targets within the DGA be separated.

- **Simcoe County** is supportive of a standard land budget template and urges completion as quickly as possible. Simcoe has noted concern that seasonal population is not included as a factor in the plan and that seasonal populations influence many parts of Simcoe County.
- The **Region of Waterloo** has recommended that the Province include lands in the DGA that have been subject to a complete application, draft approved, registered, built or included within an approved secondary plan, community plan or district plan in conformity with the 2006 Growth Plan to the list of features which can be excluded from the calculation of the DGA minimum density target in Growth Plan Policy 2.2.7.3
- The **Region of Waterloo** has further recommended that the province amend the list of features excluded from the calculation of DGA density target to include parks, cemeteries, landfills and arterial roads.
- **The Region of Waterloo** has further recommended that the Province separate people from employment-area related jobs in the calculation of the minimum DGA density target
- **Durham Region** recommends the province prioritize the development of a definitive, standardized and non-appealable land needs methodology.
- **HAPP (Halton Area Planning Partnership)** supports excluding all roads and non-linear infrastructure that cannot be built more compactly (i.e. sewage treatment plants) from the density calculation.

From a development industry perspective there is a need to exclude permanent existing uses from the land budget methodology to ensure greater transparency, predictability and accuracy regarding densities. This is due in part to the growing amount of public land uses required by various levels of government, leaving a smaller percentage of remaining land available for actual housing supply and employment centres. Without appropriate evidence based take-outs, there will be great variation from community-to-community with respect to net densities. **OHBA supports the timeline to have a land needs assessment methodology by the end of 2017. OHBA is supportive of proposed amendments in 2.2.7.3 to exclude a number of features from the density calculation including: electricity transmission corridors, energy transmission pipeline corridors, provincial freeways and railways. OHBA further recommends that the province amend policy 2.2.7.3 of the Growth Plan to exclude the following features the greenfield density calculation:**

- | | | |
|----------------------|--------------------|--|
| ○ Cemeteries | ○ Landfills | ○ Separate employment area related jobs from the density calculation |
| ○ SWM infrastructure | ○ Arterial Roads | ○ Public Parks / Public open space |
| ○ Schools | ○ Employment lands | |

Proposed Intensification Targets (2.2.2)

- In general, all municipalities do not support the proposed “on-size fits all” implementation of the 60% intensification requirement.
- Municipalities that have advised the Province that they do not support increasing the intensification target from 40% to 60% include (based on our review):

○ Georgina	○ Bradford West Gwillimbury	○ Peel
○ Oshawa	○ Durham	○ Dufferin County
○ Caledon	○ Hamilton	○ Peterborough
○ Markham	○ Brantford	○ Collingwood
○ Pickering	○ Whitchurch-Stouffville	○ Guelph
- **Peel Region** has recommended that the new residential intensification target should apply only to the post 2031A period at the regional level.
- **York Region** has expressed concern that directing 60% of the Region’s growth to the built-up area may prevent an appropriate balance of housing forms in York Region.

- The **City of Brantford** has stated there is very little demand for high density development in their Built Boundary or UGC – in fact the municipality has noted that in the past 20 years there has only been one high density development in the built-up area.
- The **City of Hamilton** has stated it is not in a position to support the increase in the intensification target.
- The **City of Markham** has stated that the intensification target is too high to be achievable and that it be lowered to better reflect the ability of the Region and local municipalities to deliver new communities.
- The **City of Oshawa** will be further challenged to achieve the increased target of 60% of all residential development occurring annually within the built-up area. The City only achieved 28% in 2014 and 33% in 2015 of the total number of units constructed in the built-up area.
- **City of Peterborough** Planning Staff are critical that the intensification targets may not be achievable.
- The **City of Guelph** has recommended that the Province reconsider the proposed intensification target and establish a process to work with single and upper tier municipalities to determine appropriate intensification targets and timelines for implementation.
- The **County of Dufferin** is opposed to increasing the intensification target from 40% to 60%.
- The **County of Dufferin** has further stated that the policies of the Growth Plan do not adequately address the issues and challenges faced by smaller urban centres in the outer ring, without an urban growth centre. The County further stated that the minimum intensification targets and greenfield density targets are more urban-centric and based on assumptions that community infrastructure and transit.
- The **Halton Area Planning Partnership** has recommended that the intensification target should be measured across Halton from 2031 to 2041.
- **Niagara Region** has expressed concern that The proposed 60 percent intensification target will result in recently constructed infrastructure being undersized for new density requirements
- The **Region of Waterloo** has recommended that the Province phase the implementation of the new annual minimum intensification target of 60 per cent in a similar manner to the “phase in” of the minimum intensification target in the 2006 Growth Plan.

From a development industry perspective OHBA recognizes that the local municipal circumstances differ from municipality to municipality, especially with respect to servicing infrastructure and higher-order transit. The proposed “one-size fits all” approach of the 60% intensification target does not respect the local municipal community building process, and will surely create greater conflicts between development applicants and local ratepayers. OHBA notes that the proposed amendments represent a significant increase from current 40% intensification target to 60% target (2031-2041 period) and represent a paradigm shift in land-use planning. A number of concerns:

- New target will require significant investment to upgrade and expand both provincial and municipal infrastructure and services within the built boundary;
- There will be significant financial impacts on municipalities for parkland, road widenings, transit, community services etc., as well as school boards for new/expanded schools;
- Some municipalities have not yet achieved 40%, but are now being asked to plan for 60%.

OHBA recommends that the current 40% intensification target be maintained and that any increase only be made possible through consultation with lower-tier municipalities that have existing and planned/funded higher-order transit infrastructure. The opportunity to increase densities in these municipalities, through real and meaningful consultation and agreement with municipalities that

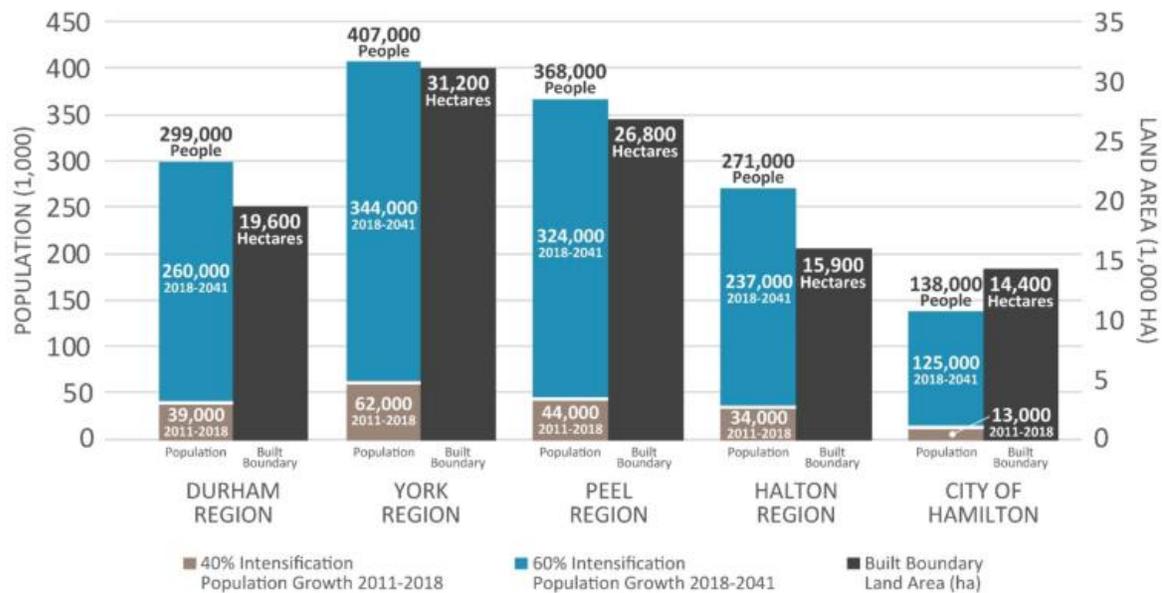
benefit from provincial investments in transit creates a collaborative approach that will support a more intense built form.

OHBA continues to support better alignment of the provincial infrastructure investments and land-use planning, the proposed amendment regarding intensification doesn't support this goal by itself without the necessary local support of the municipalities.

“One size Fits all” Intensification and Density Target

- The **City of Oshawa** has recommended that rather than have one intensification target for all municipalities within the Growth Plan Area, the Province should consider implementing targets specific to each Region or municipality.
- **York Region** has stated that proposed revisions to the Growth Plan inappropriately attempt to apply a one-size-fits-all approach to a very diverse GTHA region, and communities within York
- The **City of Brantford** has recommended that the province eliminate the one size fits all approach to the allocation of intensification and density targets, particularly in the outer ring municipalities.
- **City of Peterborough** planning staff are critical that the targets treat Peterborough the same as much larger inner ring cities.
- The **County of Dufferin** has stated that applying the same intensification target to all municipalities is not reflective of the character and challenges facing each individual municipality, and greater flexibility should be considered. Consideration should be given to establishing a lower overall intensification target for municipalities within the outer ring, without a UGC, while maintaining their ability to seek alternative minimum intensification targets.
- **Niagara Region** has stated the provincial approach is more focused on achieving a numerical target, rather than the principles of good planning. Niagara further states that achieving a blanket density for greenfields in all upper and single tier municipalities across the GGH is not practical given the different servicing levels and existing pattern of development in existing built-up areas. While this level of density might be appropriate in areas of the GTA where significant Provincial and Federal investment in infrastructure and higher order transit has been provided for many years, there are only a few areas in Niagara that approximate this level of density.
- The **Region of Peel** has stated that proposed changes to Growth Plan targets for DGA density and overall intensification rates are being proposed at a regional scale and may not reflect the ability of the local municipalities to respond appropriately. As such, the Province must work with municipalities to understand what is reasonable to achieve within each community in order to realize the aims of the Growth Plan.
- The **City of Guelph** notes that imposing the same requirements for all municipalities in the GGH given the diverse nature of those municipalities creates unnecessary challenges in obtaining the vision established by the growth plan.
- The **City of Pickering** has stated that the Province's new plan for growth does not give recognition to the dynamic and diverse character of the GTA, but treats it as a Toronto-centric “one model fits all.” It is evident that the Province is not planning for “complete communities,” but rather planning by numbers, with little or no regard to aspects such as urban structure, community integrity, built form character, place-making, local housing affordability and choice, availability of transit and infrastructure, and financial capacity.
- Following the **GTHA Mayors and Chairs Summit**, **Chair Hazel McCallion** stated, “The message was clear – one size does not fit all. As a group, the municipalities are united in opposing this approach with does not respect individual city building process and differences across the GTHA regions.”

INTENSIFICATION...ONE SIZE DOESN'T FIT ALL



Source: Malone Given Parsons Ltd., 2016;
Preliminary rounded estimates of built-up areas for each region

Source: Malone Given Parsons Ltd.

This chart also illustrated the challenge to line up densities with targets in a reasonable way that takes in to account the existing populations, individual municipal geographies, their opportunities and constraints, the current built boundary (2006) and how much additional growth is supposed to be accommodated without adjustments to the built boundary to a 2016 reality.

From a development industry perspective OHBA is concerned that notwithstanding some outer ring alternative targets, that the policies in the Growth Plan apply a “one size fits all” approach that is not reflective of the character, servicing and infrastructure capacity (inc.transit) of each individual municipality. **OHBA strongly recommends that the Province apply a more targeted approach to intensification and density targets that recognize and differ between municipalities that:**

- Are built or nearly built out
- Have existing or planned/funded higher order transit lines (LRT, Subway, GO, RER)
- Have a UGC / Do not have UGC
- Outer Ring vs Inner Ring
- Water / Waste Water Infrastructure capacity

Alternative Targets

- The **County of Wellington** supports the continued ability of the County to establish alternative targets; however, they are concerned about the upward pressure on targets and that major density increases are not accepted by the public in small town Ontario.
- The **City of Peterborough** has recommended that Peterborough be given the flexibility to seek an alternative density target for DGA and an alternative intensification target for the Built-up Area similar to other Outer Ring municipalities because of the City’s unique demographics and relative isolation from other UGC.
- **Niagara Region** has recommended that the province amend Policy 2.2.4.7 of the Growth Plan by removing the limitation, ‘and does not have an Urban Growth Centre’. This change will permit

municipalities, such as Niagara, to request an alternative density that considers the unique geographical landscape and population distribution.

- As an outcome of the **County of Dufferin's** Growth Management Strategy, the province approved an overall target of 40% for the County, and alternative intensification targets for the urban settlement areas, which include: Grand Valley: 12%; Shelburne: 38% and Orangeville: 50%. Based on the Dufferin County Land Needs Update, July 2016, the County's urban settlement areas are currently facing challenges in achieving the approved alternative minimum intensification targets.
- **City of Kitchener** has suggested that the outer ring (with a UGC) should have a policy that considers an alternative target.
- **Simcoe County** has requested clarification from the province that the current alternative density and intensification targets continue to apply to the County and the local municipalities until the County undertakes its next growth management study and MCR. The County further recommended that more direction be provided within the Growth Plan in order to ensure the clarity of alternative intensification and density targets.
- **Town of Innisfil** recommends it maintain its alternative targets.

From a development industry perspective OHBA supports provincial policy to maintain alternative targets in the Outer Ring for municipalities without an UGC. **OHBA recommends that due to proposals to significantly increase both density and intensification targets, that the Province expand eligibility for alternative targets to all outer ring municipalities. Furthermore the Province should apply a more targeted approach to intensification and density targets for inner ring municipalities where any increase over the 40% intensification target should only be considered through consultation and agreement with municipalities that have existing or planned higher-order transit.**

Built Boundary

- **Georgina** has recommended that the Province undertake a review and adjustment of built boundary – which recognizes the DGA lands that have been developed since establishment of built boundary.
- The **City of Markham** has recommended that the built boundary should be revised to include all of Markham's Urban Area, with the exception of the greenfield Future Urban Area identified in Markham's 2014 OP.
- **Oshawa** has recommended that the Built Boundary should be revised to include additional development that has occurred since the current boundary was established.
- The **City of Guelph** has recommended that the built boundary be adjusted to include the developed urban area to 2016.
- The **City of Hamilton** has recommended that the Province revise the built boundary to include developed "greenfield areas," since they are more appropriate to be included within the built-up area.
- **City of Peterborough** noted that the built boundary was delineated in 2006 and included some registered and unbuilt plans of subdivision. Staff recommended that the province needs to look at updating the boundary of the greenfield and built areas.
- **Dufferin County** has stated that the minimum greenfield density target should not be applied across the entire greenfield area, but should only apply to uncommitted greenfield areas which have yet to be planned or developed. The County has recommended that consideration could be given through policy amendments, or by updating the built boundary to reflect the existing greenfield areas that have already been developed at lower greenfield densities or are subject to ongoing planning applications.

- **Simcoe County** recommends that change be made to the built boundaries within Simcoe County and/or adding a built boundary to some settlement areas that do not currently have one.
- **Niagara Region** has recommended that Province develop a process to update the built boundary, as envisioned in Policy 5.2.2.1(a).
- **Clarington** has recommended the built boundary be updated to incorporate lands developed over the past 10 years.

From a development industry perspective, it is important that the 2016 Growth Plan reflect the 2016 data and serve the important evidenced-based planning decisions the Province is promoting through this Growth Plan exercise. New communities built in the pre-2016 settlement areas are now part of the urban fabric of the municipality, and as such, they should be included in the 2016 built boundary. To leave those new communities outside the built boundary, ignores the data and the evidence. Again, the background data provided by OGS in the Performance Indicators presented a DGA absorption rate ranging from 2.6% to 6.7% in 2011, but as the regions and municipalities have presented in their professional planning staff reports, the new communities committed to through the 2006 growth plan conformity process are as high as 84% (Region of Peel Report). Therefore the evidence-based policy decision should be re-evaluated to recognize these new communities as part of the municipalities built boundary. **OHBA recommends the province update the Built Boundary to 2016 reality.**

Excess lands (2.2.8.3)

- The **City of Peterborough** recommended that consideration be given to removing 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.
- The **County of Dufferin** is opposed to the proposed changes that would require the prohibition of development on lands that are identified as excess lands, and has recommended that this should be an optional component to the settlement area expansion policies. The County has stated concern of the legal ramifications that may be associated with de-designating lands or restricting existing development permissions or entitlement, and should not be put in a position to legally defend any such challenges.
- **Simcoe County** encourages the Province to make it more clear regarding when the excess lands are to be identified and what the responsibilities of the upper-tier and lower-tiers are in that analysis.
- **Niagara Region** has recommended that regarding Policy 2.2.8 settlement area boundary expansions, the Region requests a phasing approach to deal with excess lands. The Region requested that it only need to identify excess lands on their Regional Official Plan schedules and indicate through policy that these lands are “Post 2041” and development is prohibited to the horizon of the plan. The Region recommended that a policy be introduced stating that if there is no requirement for those lands identified as excess lands upon the completion of the next MCR, then those lands will be considered for de-designation. Niagara requested that policy 2.2.8.3 (b) be revised to allow for the Region to identify urban expansion areas and not be required to de-designate lands, but alternatively identify additional excess lands (i.e. “Post 2041”).
- The **Region of Waterloo** has recommended that the Province develop, in consultation with the outer ring municipalities, policies containing criteria to be used in the identification of excess lands similar to the settlement area boundary expansion criteria contained in Growth Plan policy 2.2.8.2.

From a development industry perspective OHBA recommends that the Growth Plan remove proposed provisions for identifying and redesignating excess lands in the Outer Ring.

Strategic Growth Areas

- The **City of Hamilton** supports the *strategic growth areas* concept as it addresses another concern identified by the City regarding policy recognition that intensification may not be appropriate in certain areas.

From a development industry perspective OHBA is supportive of the introduction of Strategic Growth Areas, defined as areas *“Within settlement areas, nodes, corridors and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form”*. OHBA notes that Strategic Growth Areas include *“urban growth centres, major transit station areas, mobility hubs and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields.”* Lands along major roads, arterials or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.” **OHBA however recommends that the Province maintain policies from the 2006 Growth Plan that “encourages intensification generally throughout the built-up area” (policy 2.2.3.6.b Growth Plan, 2006).**

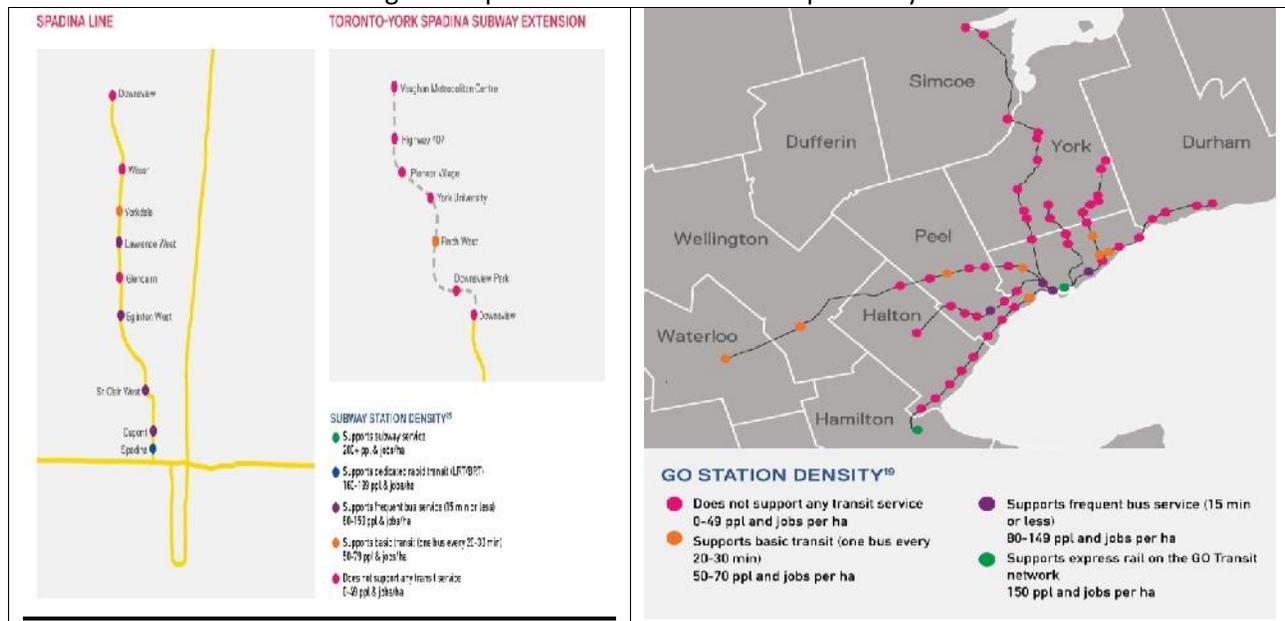
Transit / Transportation Infrastructure

- **City of Oshawa** has requested additional provincial financial support to improve transit in Durham.
- **Town of Caledon** has stated that planning for higher order transit needs to be an integral part of the Growth Plan.
- **York Region** has stated that identification and funding of rapid transit corridors, including the Yonge Street subway connection between Finch Avenue and Highway 7 is essential for York Region to achieve forecasted growth.
- **York Region** has stated the proposed 400-404 link (Bradford Bypass) and GTA West Corridor are planned transportation corridors which ensure a comprehensive, active transportation network to move people and goods.
- **Keswick** has stated that the community does not have mass transit services to serve these higher density greenfield communities.
- **City of Waterloo** supports recognizing future high-speed rail connection between Waterloo Region and GTA.
- **Durham Region** requests that Schedule 6 be revised to include the planned extension of 404, the existing 407 and 412 and the future 418.
- **Simcoe County** has recommended that Schedule 6 include the 404 extension link to the 400.
- **Town of Innisfil** recommends that Schedule 6 include the 404 extension link to the 400.
- The **Region of Peel** has recommended that the province support regional and local municipal planning efforts by expediting GTA West-related decision-making.

From a development industry perspective OHBA is supportive of the designated \$16 billion GTAH transit fund, however due to the growth anticipated and higher densities being proposed, OHBA recommends the province increase transportation funding for both transit and transportation across the GTHA.

Major Transit Station Areas (MTSA)

- The **City of Markham** supports the principle of identifying Strategic Growth Areas and MTSA, but has requested flexibility in identifying the MTSA's as well as minimum densities.
- **City of Markham** has also requested clarification on how much discretion municipalities will have in identifying MTSA's as existing land uses within a 500m radius may preclude achieving the targets.
- **City of Markham** has also noted that a number of transit projects (Yonge Subway Extension) are not currently identified as Priority Transit Corridors on Schedule 5 to the Growth Plan and need to be added.
- **City of Waterloo** supports the Transit Corridor and MTSA policies.
- **York Region** has stated that focusing density targets around MTSA's is appropriate as they support existing and planned municipal infrastructure and promote transit oriented development. However, municipalities through their city building initiatives should be permitted to establish densities for the MTSA's based upon local context related to the mode of transit.
- The **Region of Waterloo** has recommended that the Province provide flexibility for municipalities to determine alternative minimum density targets, the area within which the target is to be achieved, and to identify MTSA's which should be exempt from the target, to allow for appropriate density targets to be established for each MTSA based upon local circumstances such as physical constraints and existing development located within or in proximity to the station area.



Source: Ryerson City Building Institute

The above maps from the Ryerson City Building Institute (published in the joint “Suburbs on Track” report with OHBA) demonstrate that existing densities in the areas immediately surrounding Major Transit Station Areas today are typically too low to sufficiently support the level of transit services that exists.

From a development industry perspective OHBA notes that many existing and planned transit station areas are failing to achieve transit supportive densities. OHBA supports the proposed amendments to Growth Plan that would require official plans to delineate MTSA's and proposed density targets. OHBA has consistently supported pre-zoning through joint reports with Pembina “Make Way for Mid-rise” and Ryerson CBI “Suburbs on Track” that municipalities should be required to pre-zone transit station areas and transit corridors for transit oriented development.

OHBA recommends that the Province implement policies requiring the delineation of MTSA's in Official Plans and that the policies be strengthened by specifically requiring municipal zoning by-laws within the delineated MTSA to be modernized to provide as-of-right densities designed to achieve the Growth Plan MTSA density targets with limited located flexibility (recognizing limited circumstances where an alternative target may be necessary i.e. the station is in Heritage Conservation District or has extensive Natural Heritage Features within the station area etc).

Employment Lands / Prime Employment

The Province has proposed a new definition – *prime employment areas* - which are areas designated in Official Plans for land extensive and low density employment uses such as warehousing, manufacturing and logistics, and which prohibit residential and institutional uses, and retail, commercial and office uses that are not ancillary to the primary employment use. These areas are to be located in the vicinity of major highway interchanges and goods movement facilities and corridors.

- The **Town of Georgina** has recommended that municipalities identify a hierarchy of employment lands and to determine other types of uses that can be prohibited from locating in "employment areas."
- The **Town of Caledon** notes that the proposed amendments do not provide enough detail to differentiate between "prime employment areas" and "employment areas."
- The **City of Hamilton** has recommended that the province amend policy 2.2.5.5(a) of the Growth Plan to add the word "major" before the word "office", so it is clear the prohibition does not apply to small-scale, ancillary office uses.
- **York Region** has stated that while staff support the hierarchy approach to planning for employment land protection, major office needs to be permitted in Prime Employment Areas
- **City of Peterborough** has noted that Prime Employment designation may not be appropriate for Peterborough.
- **City of Markham** has stated that some of the employment lands most suitable for Prime Employment Area protection also contain office buildings and has recommended that the province confirm that policy 2.2.5.3 allows for the designation of existing business park lands, which include Major Office uses, to be identified as Prime Employment Areas and that Major Office uses be included in the definition of Prime Employment Area.
- **York Region** has stated that major office should be included within prime employment areas.
- **HAPP (Halton Area Planning Partnership)** has recommended the density target should exclude all employment areas.
- **Dufferin County** has noted that not including prime employment areas in the greenfield density target calculations is desirable, given the land intensive nature of these uses, however, consideration should also be given to excluding all employment areas from the minimum greenfield area density targets, as it is often difficult to anticipate the type and nature of the employment uses that may locate in employment areas.
- **Durham Region** does not support the introduction of the prime employment category of employment areas and recommends that the range of suitable employment uses be left to the Regional and area municipalities to determine.
- **Simcoe County** has noted the distinction between "prime employment" and "employment lands" does not encourage the opportunity for mixed uses or to expand downtown cores.
- **The City of Guelph** has noted the they have greenfield employment lands which may not meet the definition of "prime employment" and the city has recommended that residential and employment density targets within the DGA be separated. Guelph has further recommended that

the province expand the definition and policies for Prime Employment Areas to include other low density industrial uses.

From a development industry perspective, OHBA is supportive of the new “prime employment area” designation, which removes some employment uses from the combined persons and jobs per hectare density calculation. However the exclusion of “office” in Prime Employment Land limits the range of uses and may result in very little municipal take-up of new designation opportunity.

OHBA has previously recommended that all employment should be decoupled from the density calculation and we continue to support this recommendation. As a secondary recommendation, should the province not be prepared to decouple all employment from the density calculation, OHBA supports municipal recommendations to permit office uses in Prime Employment Areas.

Urban Growth Centres (UGCs)

From a development industry perspective, OHBA remains concerned that the proposed amendments to Growth Plan do not update any UGC density targets or compel municipalities to zone appropriately within UGCs. **OHBA recommends that the Growth Plan should take a more targeted approach and examine each of the 25 UGCs and update/increase targets in UGCs that have already met or are close to meeting density targets.**

General Intensification

From a development industry perspective, while OHBA is supportive of enhanced provincial direction for intensification along transit corridors and in strategic growth areas, we are concerned that the more general language on intensification is no longer in the proposed Growth Plan. This proposed amendment could seriously impede efforts to broadly intensify within existing communities across GGH (i.e. townhomes in existing communities).

OHBA therefore recommends that the policy of intensification throughout the current build-up area within the built boundary be renewed and furthermore, that such a policy of intensification throughout the built-up area also apply within a built boundary, updated to 2016. Furthermore, municipalities should be required to modernize zoning so that “as-of-right” density permissions reflect the Growth Plan density targets.

Housing Supply

Housing prices in Toronto, across the GTA and more recently across the GGH have reached heights that would stretch most homebuyer’s budgets. Governments are challenged to find solutions to improve affordability. While housing prices are impacted by a very wide range of factors from labour and material costs, federal fiscal policy and government imposed charges – the supply of housing (in all forms) versus housing demand is critical factor.

The issues limiting the region’s housing supply is not reflected in the overall amount of land that has been set aside for future development through the municipal conformity exercises. The issue is how much of that land has the critical infrastructure and approvals in place that makes housing possible. This is an issue for low-rise housing, mid-rise housing on major avenues (e.g. [Midtowners battle the rise of the midrise](#)) and high-rise housing in Urban Growth Centres and Major Transit Station Areas.

OHBA notes that long-term infrastructure deficits exist due to decades of under-investment, and significant areas for development have no access to existing water and waste water services. A number of regions and municipalities now have water and waste water allocation programs as they manage the limited amount of service capacity they can provide to support approved communities. Furthermore, while the provincial and federal governments are now investing in transit, decades of under-investment by governments of all political stripes have resulted in the region now playing “catch-up”.

OHBA is also concerned that a lack of housing supply is occurring in many urban and suburban centres. This is especially true in amenity-rich walkable transit-accessible neighbourhoods. Reports by OHBA and the Pembina Institute (“Make Way for Mid-rise” and “Make Way for Laneway”), as well as by OHBA and the Ryerson City Building Institute (“Suburbs on Track - Building transit-friendly neighbourhoods outside the Toronto core”) have articulated the numerous barriers that exist, such as decades out of date zoning by-laws that make the planning process more difficult and make it more expensive to build both higher density transit oriented communities and the “missing middle” of housing supply in urban and suburban centres.

OHBA notes that a more effective and well-implemented *Growth Plan*, as well as increased investments in critical infrastructure and the necessary approvals could actually unlock much needed housing supply in locations where growth has been approved and people want to live. OHBA is concerned that a number of proposed amendments to the Growth Plan, as well as a lack of clear transition policies may in fact slow down municipal planning processes and the delivery of critical infrastructure, by jeopardizing the implementation of Secondary Plans and other projects currently underway (that have been years in the making with extensive costs and public consultation) could translate in to even more significant delays in an environment where we are all having challenges with implementation of the *current* 2006 Growth Plan.

OHBA notes that the original 2006 Growth Plan conformity deadlines of 2009 were not met until after 2012, which pushed out the Official Plan review processes, and all of that associated infrastructure, budgeting and master planning. Much of that work associated to the 2006 Growth Plan is just being realized, and while the newly proposed Growth Plan policy amendments could be in effect by 2018, OHBA is concerned with the prospect of having to revisit Secondary Plans, and then having to wait yet again for Upper, Single and Lower-Tier Official Plans to come in to conformity.

Furthermore, OHBA is concerned that a lack of clear transition could also add additional frustration to the already complex and timely development approvals process that has delayed the ability of the industry to bring new communities to market, and create an additional challenge related to housing supply of all types (Please refer to “Land Development Process Generalize Flow Chart on the final page of this submission under OHBA Additional Materials and Resources). **OHBA recommends that transition policies be implemented by the Province to ensure that plans in process and the work associated to ongoing municipal comprehensive review exercises be respected, supported and confirmed in order to preserve the past ten years of work associated to the current Growth Plan’s 2031 implementation efforts, and to avoid other unintended consequences related to the provision of housing supply and the associated costs to that housing supply that would result from this serious delay.**

Financial Implications

- The **City of Pickering** has requested the province to conduct a financial analysis for the impact of the intensification and density targets on municipal infrastructure and service delivery.
- The **City of Brantford** has articulated concerns that bringing on less land in the initial stages of development will result in the city having to front end significant costs with a slower rate of return in terms of development charges and assessment growth.
- The **City of Hamilton** notes that the proposed density changes represent a 60% increase in the PJH and a 68% increase in the number of units per ha from the previous targets. As such, it is important that the Province provide a long term sustainable funding model to ensure that the full range of “hard” and “soft” infrastructure and services are provided to sustain the transit supportive community envisioned by the Growth Plan.
- The **County of Dufferin** has stated concerns regarding the increased demands on municipal services and community infrastructure.

From a development industry perspective OHBA recommends that the Province work with municipalities to ensure long-term sustainable funding to support the necessary infrastructure in UGCs and Strategic Growth Areas. This funding includes, but is not limited to: water and waste-water infrastructure, transit, schools, community hubs and hospitals. OHBA notes that the level of intensification proposed in the proposed Growth Plan will have significant implications for municipalities and existing communities that must be addressed by the provincial government.

Additional Studies and Provincially Led-Implementation Work

- **Halton Region** has recommended Province quickly develop necessary guidelines, impact assessment methodologies, system and key feature identification criteria, land budget methodology,
- The **City of Vaughan** has requested that clarifying policy Guidance Documents that will allow for municipalities to complete their respective MCRs be prioritized, including the methodology associated with the calculation of land needs and the municipal land budgets.
- The **City of Markham** has recommended that the Province provide for an opportunity for local municipal input into the preparation of guidance documents and mapping products through consultation with upper-tier municipalities.

As part of the 2006 Places to Grow implementation and conformity exercise, both stakeholders and municipal governments anticipated a set of Guidance Documents to aid in implementation. Without them, municipalities were left to interpret many policies and procedures. This resulted in significant delays, as all interested and affected stakeholders attempted their best to come to understand the new planning and policy regime.

As the Province moves towards implementation of an amended Growth Plan, it is important that the necessary work, studies and guidance documents that are required for the proper implementation of any new amendments be released, completed and understood prior to any of the proposed Growth Plan amendments be approved. These include:

- Land Supply Methodology
- Performance Indicators - update and guidance on reporting
- Population and Employment Forecasting Methodology
- Natural Heritage System Mapping for the Growth Plan Area
- Guidance on carrying out planning at Watershed level

- Agricultural System mapping - information and guidance for protection
- Guidance on Agricultural Impact Assessments
- Guidance on Stormwater Management and Low Impact Development

OHBA recommends that the proposed Growth Plan amendments' enactment be subject to the provincially-led implementation work and studies being completed.

Natural Heritage System (NHS) Mapping

- The **City of Markham** has recommended that policy 4.2.2.4 and 4.2.4.6 be revised to exclude settlement area expansion areas in the exemptions to the natural heritage policies.
- The **City of Markham** has recommended that policy 4.2.4.3 be amended to consider allowing certain components of SWM facilities to be located in the vegetation protection zones of valley lands, where the integrity of the feature and the buffer are protected and the impact is mitigated.
- **Niagara Region** has recommended the Province ensure the mapping of the Natural Heritage System is accurate and ground-truthed at a scale that is appropriate for development review. Niagara notes accurate mapping of the Natural Heritage system is critical to ensuring not just its protection, but also the reasonable restriction only on those lands where the features actually exist, and not where incorrect mapping has identified a feature.



Source: Niagara Region example for the need for accurate mapping

From a development industry perspective the proposed NHS policies should be revised to exclude settlement area expansion areas. OHBA further recommends allowing certain components of SWM facilities to be located in the vegetation protection zones of valleylands. OHBA also supports municipal recommendations for accurate mapping of the NHS to ensure not just its protection, but also the reasonable restriction only on those lands where the features actually exist, and not where incorrect mapping has identified a feature. OHBA supports a process, based on real-time data, and for the process to include an opportunity to for the landowner (farmer, non-profit, municipal, regional, institutional

and private) to appeal the mapping and confirm the accuracy of any identified e NHS features and the application of any required buffering.

OHBA would remind the provincial government that at this time the buffering of natural features actually runs through many existing occupied structures like barns, homes and community amenities. A “ground-truth” mapping process will prevent these situations from occurring in the future.

Agriculture Systems Mapping

- The **City of Brantford** has recommended that no new agricultural or environmental land use designations are applied to the Province to any lands in the expansion areas, as these lands will be reviewed as part of the MCR and Secondary Planning process to be completed by the city and reviewed by the province.
- **Simcoe County** has outlined concern regarding requiring the region to change local designation of “greenlands” designations to agricultural.
- **Niagara Region** has recommended that the Province establish a LEAR-styled mechanism of determining the soil and land uses within the Specialty Crop Areas of Niagara that would accurately identify agriculturally-related uses and potential.
- The **Region of Peel** has recommended the Province avoid duplication and instead provide policy guidance for municipalities to complete comprehensive agricultural and environmental mapping.

From a development industry perspective, the agricultural system mapping is important and has a direct link to Employment Areas within the urban area as they also accommodate many agri-food and agri-businesses. It also recognizes that infrastructure, on-farm and agriculture related businesses are equally important elements of a strong agricultural sector. OHBA supports completing the identification of an agricultural system and related guidance by the end of 2018 and that all mapping be validated to ensure accuracy.

Whitebelt

OHBA recommends that the Growth Plan be amended to allow for the Province to clearly reaffirm and state that the Whitebelt is intended to accommodate future growth as a long-term urban reserve, and that this be reflected in Regional Official Plans and Long-Term Urban Structure Plans.

As outlined in the Ministry of Infrastructure’s *Progress Report for the Growth Plan for the Greater Golden Horseshoe, 2006 – Five Years In*, “... Beyond the lands that are currently designated for urban uses, these municipalities also have approximately 55,000 hectares of rural and agricultural lands within their boundaries (that are not part of the Greenbelt)... In order to accommodate urban growth over the next 20 years, it is expected that some of these agricultural and rural lands outside of the Greenbelt will be re-designated for urban uses.”

The provincial government has already recognized the importance of the Whitebelt to Ontario’s future, and OHBA recommends that the Province formalize the Whitebelt as the long-term urban reserve. These Whitebelt lands would continue to be subject to the most up-to-date provincial planning framework and requirements with respect to settlement area boundary expansions, PPS, Planning Act and NHS protections etc.

Transition Policies

- **Halton Region** has recommended to Phase in the 60% intensification target starting in 2031 and measure it over the 2031-2041 time period to give municipalities time to determine the appropriate locations for intensification and time to build the required infrastructure.
- **York Region** has stated that transition provisions should be revised to respect current planning to 2031. Without a transition provision, the introduction of a new DGA wide target of 80 PJH will reopen planning work complete to date. The Region has stated that the Province should work with municipalities to identify appropriate transitions to reflect local planning that has been publicly initiated through a Growth Plan conformity exercise.
- **Peel Region** has recommended that the Province introduce transitional and implementation policies that ensure DGA density changes are only applied only to lands in the post-2031 planning period as planning until the year 2031 is already in effect.
- The **City of Hamilton** has recommended that the Province add transition regulation policies to all Plans, including a policy to address existing planning matters before the OMB.
- The **City of Markham** has recommended that the transition policies be consistently applied for both the intensification target and the DGA density targets, with both applying only through the application of the 2041 forecasts during the next municipal comprehensive review.
- The **Town of Richmond Hill** has requested that the Province put more guidance on realizing complete communities, particularly the density targets for the DGA, including what types of planning applications are transitioned from the new targets in areas that are already subject to comprehensive Secondary Plans.
- **City of Waterloo** stated that the updated Growth Plan should not implement new density and intensification targets before the effects of the previous targets are known and widely in-force.
- **City of Waterloo** stated Greenfield areas, which have undergone a planning process since the June 2006 implementation date of the first Growth Plan, should not be subject to being re-planned under the provisions of the updated Growth Plan. Staff strongly recommend that provision be added to the implementation section of the Growth Plan that any area subject to a planning process after 2006 under the Planning Act or District/Community Plans under a municipal Official Plan, which are in conformity with the previous Growth Plan (2006), should not be subject to the provisions of the updated Growth Plan.
- **Durham Region** has recommended the Province add transition provisions with respect to area municipal official plan and secondary plan reviews that commenced prior to the proposed Provincial Plan amendments.
- **Simcoe County** notes that Simcoe Sub-Chapter 6 has provisions referred to as the “20,000 population program” with a deadline of January 19, 2017 and has recommended that the effective date for an amended Growth Plan come into effect after that date, (which would allow the Province to remove those policies from the Growth Plan). Simcoe County further notes that the timing of the effective date of the new Growth Plan will have a direct bearing on the approval of local official plans.
- **Niagara Region** has stated, a transitioned approach is necessary, whether it be phasing in the density requirements over a longer period of time, or recognizing existing planning studies and work that has already been undertaken.
- The **Region of Waterloo** has recommended that the Province provide transition provisions similar to that of Amendment 2 to the 2006 Growth Plan which would permit municipalities to complete the implementation of policies and development approvals associated with the exercises to achieve conformity with the 2006 Growth Plan (as amended).
- The **City of Guelph** has recommended that the Province work with municipalities to determine appropriate transition policies and shield municipalities from associated OMB appeals. Guelph has

further stated that the proposed release of guidance documents in 2018 is too late when coupled with the proposed transition policies. Municipalities cannot pause all plans and studies to await guidance materials and cannot afford to “re-do” plans and studies in order to conform to transition policies.

From a development Industry perspective OHBA is concerned by some proposed amendments and that the Province has committed to a number of major studies that could complicate applications in process.

As proposed, the residential intensification target of 60% Region-wide would not apply until the next set of municipal comprehensive reviews in order to implement the 2041 population and employment forecasts. However, the proposed 80 residents and jobs per hectare density target, unlike the intensification target, is proposed to come into effect immediately upon approval of the new Growth Plan. Many municipalities have been left to question if the proposed targets can be easily integrated into the planning and implementation of secondary plans and other projects underway in order to achieve them. However, naturally and justifiably so, there is significant apprehension at the thought of even contemplating re-planning approved, but not yet built projects in the DGA to achieve the 80 persons and jobs per hectare target.

Transition policies should ensure that plans in process and ongoing municipal conformity that has taken place over a significant amount of years, have involved very complex planning exercises and studies, and have come with substantial costs not be subject to new policies or major studies that have not yet commenced. These secondary plan areas should be permitted to proceed on this already long-established road to adoption and approval, and a transition policy should be contemplated by the Province to allow for these processes to continue, and be completed, in accordance with the approved Regional Official Plans.

Again, as identified in municipal professional planning staff reports, the OGS data utilized in the development of the proposed amendments is out-of-date, OHBA recommends transition policies be consistently applied for both the intensification target and the minimum density targets, with both applying only through the application of the 2041 forecasts during the next MCR. This would support, confirm and respect ten years of 2031 implementation work completed or in progress.

Other

From a Development Industry perspective OHBA recommends that the Province ensure greater alignment among Ministries to support Growth Plan objectives as the public sector has a key role to utilize land more efficiently and support transit oriented development. This includes:

- **Ministry of Education: School locations, more compact school design, combined uses**
- **Ministry of Health: Hospital locations, more compact hospital design, transit access**
- **Attorney General: Court locations, more compact design, transit access**

Conclusion

Across the Greater Golden Horseshoe, OHBA, its members and 11 impacted local home builders associations are creating new complete communities, revitalizing and intensifying existing neighbourhoods and building transit oriented developments that will support the objectives of the Growth Plan. Due to the significant impact that the currently proposed Growth Plan will have on the long-term economic, social and environmental health of the Greater Golden Horseshoe, the Province should not consider the current consultation the last consultation prior to finalizing the four plans in the Co-ordinated Land Use Planning Review. **OHBA strongly recommends that the Province draft an amended proposed Growth Plan with an additional consultation period for stakeholders and municipalities to comment.**

As the region's population and employment base continues to grow, we are committed to working with the Province and our municipal partners, as we share and support the vision to create a vibrant, world class region. As a key partner to government, it is important that we all work together on the Growth Plan, to continue to develop the appropriate housing supply to support the long-term viability of all of the connected Plans and broader legislative framework that shape the GGH and our province.

Additional OHBA Resources and Materials

- [OHBA / BILD Press Release: More Intensification, More Condos, Less Choice for Higher Prices](#)
- [OHBA Coordinated Review Submission – May 2015](#)
- [Review and Strategic Assessment of the Growth Plan for the Greater Golden Horseshoe](#): by Deloitte
- [Improving the Growth Plan: A Commentary](#): by former Assistant Deputy Minister of the Ontario Growth Secretariat Brad Graham and economist Tom McCormack.
- [OHBA Tools to Support Intensification](#)
- [Suburbs on Track: Building transit-friendly neighbourhoods outside the Toronto core](#): by OHBA and the Ryerson City Building Institute
- [Make Way for Mid-Rise: How to build more homes in walkable, transit connected neighbourhoods](#): by OHBA and the Pembina Institute
- [Make Way for Laneway: Providing more housing options for the Greater Toronto Area](#): by OHBA and the Pembina Institute
- [OHBA Submission – Growth Plan Performance Indicators - 2014](#)

