



Ontario
Home Builders'
Association

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Ontario Growth Secretariat
Ministry of Infrastructure
777 Bay Street, Suite 425
Toronto, ON M5G 2E5

Re: Towards Performance Indicators: Growth Plan for the Greater Golden Horseshoe, 2006

Purpose

Recognizing that a review of *Growth Plan for the Greater Golden Horseshoe, 2006* is scheduled in 2016, the Ministry of Infrastructure, through the Ontario Growth Secretariat (“OGS”), is proposing twelve indicators for assessing the implementation of the *Growth Plan*. The proposed package also includes initial results for some of the indicators to help illustrate how they could be used to measure implementation progress.

OHBA appreciates the opportunity to provide feedback on the preliminary performance indicators (2014) for the *Growth Plan for the Greater Golden Horseshoe, 2006*. Furthermore, in this submission OHBA will also recommend a few additional performance indicators for consideration by the OGS. OHBA also noted that consideration should be given to the differences (sometimes significant) between the inner ring and outer ring municipalities and thus the indicators should reflect this. On behalf of our 4,000 member companies, OHBA looks forward to ongoing dialogue and consultation with respect to growth management and infrastructure planning across the Greater Golden Horseshoe.

About the Ontario Home Builders’ Association (OHBA)

The Ontario Home Builders’ Association is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 member companies, organized through 31 local associations across the province, 11 of which are based in the Greater Golden Horseshoe. The new housing, land development and professional renovation industry employed over 322,000 people and contributed over \$43 billion to the province’s economy in 2012. Our membership includes home builders, commercial and residential land developers, renovators, manufacturers, suppliers, planners, architects, engineers and lawyers.

Introduction

OHBA appreciates the opportunity to provide feedback on the preliminary performance indicators (2014) for the *Growth Plan for the Greater Golden Horseshoe, 2006* (“*Growth Plan*”), in part, through the ongoing dialogue and engagement between the OGS and our member companies at public and technical consultations. OHBA has generally been supportive of the guiding principles of the *Growth Plan*, yet continues to express concerns with specific aspects of the *Growth Plan* as well as the lack of clarity regarding the future status of the “white belt” lands and the delayed municipal official plan conformity process.

OHBA notes that in 2011 the Greater Golden Horseshoe was home to approximately 9 million people and 4.5 million jobs and by 2041 it is forecasted to increase to 13.5 million people and 6.3 million jobs. OHBA believes

that the *Growth Plan* needs to focus on a long-term strategic planning policy framework to support and manage economic growth. Our members note that the most recent conformity exercise became mired in detailed allocation of population and employment land resources and did not adequately take advantage of the opportunity to serve as a strategic economic plan supported by infrastructure planning and investments. Furthermore, we submit that the province and municipalities have not created an adequate planning and regulatory policy framework that supports and promotes intensification.

OHBA acknowledges the OGS efforts in recognizing that planning authorities need to take into account a longer-term perspective. It is essential that the province, municipalities, other stakeholders and the public have an honest, high level and comprehensive discussion on long-term growth planning. Our comments on the proposed performance indicators for the *Growth Plan* are intended to assist the government in preparing for the 2016 review of the *Growth Plan* and for achieving sustainable growth by protecting housing choice and affordability, establishing employment centres and balancing the province's economic, social and environmental interests over the long-term.

Municipal Conformity Process Needs to be Improved

OHBA continues to support the *Places to Grow* legislation and the general principles of the *Growth Plan*. However, we have serious concerns with respect to the slow conformity process which created, in light of continued strong housing and employment demand, a declining supply of available designated land, which limits housing and employment centre options. Furthermore, delays to the approvals and flow of funding for major transportation infrastructure projects are also creating uncertainty for private sector investments that support the goals and objectives of the *Growth Plan*. With the *Growth Plan Amendment #2*, and anticipated second round of municipal conformity, it is critical that the upcoming second conformity process run more smoothly and efficiently than the current/recent conformity exercise.

The White-Belt is intended as a Long-Term Urban Reserve

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

It has further been established that the long-term strategic "white-belt" acts as a buffer between the Greenbelt and OP designated areas. OHBA is concerned by potential land restrictions in the "white-belt" that could have a negative impact on affordability, consumer choice and economic competitiveness. OHBA cautions that the "white-belt" lands in the GTA are of critical importance for future economic growth. OHBA is opposed to expansions of the Greenbelt that would reduce long-term "white-belt" areas. Any reductions to the "white-belt" to accommodate future growth will ultimately have an impact on population/employment allocations, and the associated and necessary designated land supply needed to support it, which will ultimately challenge housing affordability and Ontario's economic competitiveness.

OHBA strongly recommends that the province clearly affirm its statement that, "it will be necessary to bring new lands into the urban envelope," through the upcoming 2016 review and a future amendment to the *Growth Plan* and that this be reflected in Regional Official Plans. Furthermore, the province should take all necessary action to stop Regional OPs from including policies that allow municipalities to sterilize such land from future development by permitting "food-belt", "protected countryside", similar designations or Greenbelt expansion requests on

lands not owned by public bodies. OHBA supports balanced growth initiatives for new communities that do not compromise affordability and competitiveness while utilizing *Growth Plan* principles to create complete, livable and sustainable neighbourhoods where Ontarians can live, work and play.

Towards Performance Indicators

OHBA notes that, despite the *Growth Plan* nearing its ten-year anniversary, we truly remain in the “early days” of *Growth Plan* implementation and that it may be premature to adequately measure the successes or failures of *Growth Plan* policies. While the plan itself is nearly ten-years old, upper-tier municipal *Growth Plan* conformity has only recently occurred and some lower-tier municipalities still do not have their Official Plans in conformity with the *Growth Plan*. Furthermore, OHBA notes that despite the *Planning Act* requiring municipalities to have local zoning by-laws brought into conformity with their Official Plans, within three-years of an Official Plan review, that few municipalities have actually undertaken this task. OHBA contends that there is a disconnect between provincial policy and municipal planning implementation tools.

Despite the *Growth Plan* nearing its ten-year anniversary, much of the actual on-the-ground new housing and land development projects that have recently been completed or that are currently under construction were approved either prior to the *Growth Plan* taking effect or prior to local Official Plans being brought into conformity with the *Growth Plan*. This creates a situation in which the preliminary performance indicators for discussion may not actually measure the results of the policies contained within the *Growth Plan*.

While OHBA is supportive of measuring and evaluating public policy, especially prior to the legislated 10-year review of the *Growth Plan*, it is important that the results of the performance indicators be considered within the context of the time-lag of municipal conformity and the lengthy land-use planning and approvals framework. The performance indicators should focus on items that the *Growth Plan* policies impact and on planning, social and/or economic items/issues that influence urban form. Furthermore, the indicators do not speak to the quality or the effectiveness of the policies in achieving their objectives through the resultant development. This continues the approach of planning by numbers where a per cent of development occurs within the growth centre, built-up area or within designated greenfield areas, but is it creating diverse, livable complete communities and is it right for the local community.

These performance indicators should be examined and considered for longer-term use as the true value may better be realized five or ten years down the road as time-series data that can measure progress over a number of years following municipal conformity with the *Growth Plan*. The indicators should be focused on provincial policy and not on local issues, they should be designed as a tool to evaluate how growth is unfolding in the GGH against the *Growth Plan* policies.

OHBA recommends that the OGS consider a dynamic model where performance indicators are updated and utilized regularly rather than a static model where reports are only produced in five or ten-year increments. OHBA again notes that consideration should be given to the differences between the inner ring and outer ring municipalities and thus the indicators should reflect this. The performance indicators should measure outcomes of past public policy decisions rather than compliance with a view towards measuring progress over time and informing the mandated review of the *Growth Plan*.

Indicator #1: Achieving Intensification

This proposed indicator will measure the percentage of new residential units constructed within the built-up area of municipalities in the region. OHBA is supportive of this proposed indicator to measure one of the foundational principals of the *Growth Plan* to direct a minimum of 40 per cent of all residential development occurring

annually within each upper- and single-tier municipalities within the built-up area. OHBA does have some general concerns with the use of customized MPAC data to identify all residential properties developed from 2006 onwards. OHBA notes that MPAC data is often out-of-date and lagging behind actual development trends. Many of our members have developed new communities for which MPAC assessments can take a few years to occur after residents have moved in.

Indicator #2: Urban Growth Centre Density

Once again the proposed indicator will measure a key component of the *Growth Plan* for each of the 25 Urban Growth Centres (UGCs) identified. OHBA is supportive of this proposed indicator to measure one of the foundational principals of the *Growth Plan*. OHBA notes that this particular indicator will, in the future, be an excellent time-series measure of progress for each UGC. OHBA is concerned that some UGC density targets are too low and this proposed performance indicator should assist to inform the upcoming 10-year review of the *Growth Plan* with respect to modernizing the UGC density targets. Furthermore, base zoning by-law permissions in many UGS are also too low, resulting in too many zoning by-law amendment applications for projects that should be as-of-right to achieve UGC density targets.

OHBA notes that the OGS has flagged the Statistics Canada voluntary 2011 National Household Survey as being a concern to accurately compare employment data with the 2006 mandatory long-form census. In the absence of the long-form census, this data set will likely provide the closest match to measure data. OHBA is concerned about utilizing different sets of data to analyze the evolving nature of UGCs. Furthermore, extrapolating data from smaller geographies (UGCs) that may not match individual census tracks could produce inaccurate results.

Indicator #3: Major Transit Station Area Density

Similar to the previous indicator this proposed indicator will generate data central to the *Growth Plan* and also for long-term infrastructure planning through the Metrolinx *Regional Transportation Plan* (“The Big Move”). Once again this particular indicator could be an excellent time-series measure of progress for existing transit stations, for new stations that should generate immediate growth and for future planned stations. OHBA notes that it is critical that local municipal planning implementation tools align with existing and planned transit infrastructure by pre-designating and pre-zoning for higher densities or through the implementation of a Development Permit System. OHBA notes that while this proposed indicator may be valuable for most inner ring municipalities (Niagara Region does not contain any major transit stations); the proposed indicator has little relevance for outer ring municipalities (with the possible exception of Waterloo Region).

OHBA is supportive of the 500 meter radius calculation for density as transit oriented-development (TOD) is generally located within such a radius that is considered to be an appropriate scale for pedestrian access to transit. OHBA notes that some existing stations are missing from the preliminary performance indicator package (i.e. Clarkson GO Station) and that while some proposed/funded routes are included (i.e. Finch and Sheppard LRT), that other proposed lines should also be included for analysis (i.e. Downtown Relief Line and the Scarborough Subway rather than the Scarborough LRT). Furthermore, the analysis should extend beyond the GTA and include proposed LRT lines in Hamilton and Waterloo Region as well as the western GO network on the Lakeshore West and Georgetown lines.

Indicator #4: Designated Greenfield Area Density

The proposed indicator will measure the number of people and jobs per hectare in built portions of the designated greenfield areas as well as the characteristics of development that has occurred in these areas. While OHBA is supportive of measuring greenfield density as a foundational component of the *Growth Plan*, we are

unclear on the rationale or the accuracy of the proposed data to measure characteristics. OHBA has expressed concerns to the OGS regarding the accuracy and time-lags with MPAC data, especially if characteristics are intended to be measured. OHBA recommends that the OGS consider other data sources including data that may be available from single and upper-tier municipalities. Furthermore, depending on the data available, the OGS should consider only tracking inner ring municipalities as the volume of greenfield growth in many outer ring municipalities may not be statistically significant, especially if the data sources are weak.

OHBA is also concerned with how density will be calculated. OHBA has noted concern in the past regarding a focus on “gross” density rather than “net” density. While the private sector is working towards *Growth Plan* conformity to achieve higher net densities of residential and employment land development, OHBA continues to express concern with respect to ever increasing environmental “take-outs” and “buffers”. Furthermore, “public-sprawl” of public facilities (i.e. provincial, municipal, school board etc.) and land-use requirements for public infrastructure such as road allowances should be carefully examined in the context of the upcoming 10-year review of the *Growth Plan* and for the purpose of generating accurate performance measures. If the OGS seeks to adequately measure progress towards achieving the objectives of the *Growth Plan*, a finer grain analysis regarding land-use and land consumption is required to better understand the different “drivers” of so called “urban sprawl”.

OHBA recommends that the OGS focus on “net” densities rather than “gross” densities and consider different data sources for analysis. Other data sources could include CMHC for residential building characteristics and municipal GIS data, Malone Given Parsons or data from the Neptis Foundation to more accurately reflect land-use. OHBA further recommends that either this proposed performance indicator be expanded to include what the environmental and public “take-outs” are or that the OGS add a new indicator to measure other “public” drivers of land consumption (i.e. school board requirements, local/regional/conservation authority buffers and/or infrastructure requirements). All stakeholders must better understand the full range of the drivers of land consumption to better inform future public policy decisions aimed at reducing overall land (both public and private) consumption.

Indicator #5: Mix of Housing Types

The proposed indicator will measure the range and mix of housing that has been completed in each upper and lower-tier municipality using CMHC data. OHBA is supportive of this proposed indicator which should demonstrate general trends and the evolving nature of communities in the GGH using time-series data. However, as the OGS has noted, that data does not include demolitions, conversions or changes to existing housing stock (i.e. secondary suites).

Indicator #6: Diversity of Uses

The diversity of uses performance indicator utilizes the *Simpson Diversity Index* to measure the diversity of land uses in a given area and generates a “diversity score”. OHBA is concerned by another indicator that intends to utilize underlying land-use data from MPAC and is unclear with respect to how the diversity score will be utilized to influence public policy or for the upcoming review of the *Growth Plan*. While OHBA recognizes the planning rationale for supporting a diversity of “live, work and play” land uses, the rationale for utilizing this particular indicator is unclear. OHBA is also concerned that the proposed indicator is examining very local planning issues, rather than the impacts of provincial policy. Other measures such as a “walk score” could also be utilized to develop a more accurate assessment for the area under consideration. OHBA does not see a strong case or rationale for this particular indicator and recommends that it not be utilized in the final performance indicator package.

Indicator #7 Community Infrastructure

This proposed performance indicator measures the percentage of the population in a UGC, major transit station area, and the built-up area within walking distance of a community centre, park and school. OHBA is generally supportive of such an indicator that measures key components of a complete community. OHBA does however note that some municipalities in the GGH do not have community centres and would thus be penalized under such a proposed indicator, therefore the performance indicator should be refined to include simply parks and schools. The OGS has recognized some drawbacks of the proposed approach, in particular that the quality of the walking environment, land-use diversity and street connectivity to these land uses is not considered. Despite these drawbacks, OHBA supports the indicator with some minor refinements.

Indicator #8: Street Connectivity

This performance indicator measures the number of intersections per hectare in UGCs, major transit station areas and the built-up area. While street connectivity is fundamental to walkability and complete communities, OHBA questions the value of this proposed indicator to influence public policy. While the data might be “nice to have”, there is not a strong rationale as to why this particular data is of provincial interest. Furthermore, just because an intersection exists, doesn’t necessarily equate to pedestrian connectivity as many suburban arterial intersections are not in any way pedestrian-friendly. Many existing communities have well-defined street networks and grids with intersection spacing generally being a product of the era in which the community was constructed. Once established, these patterns change very little over time, even in rapidly re-urbanizing communities where intensification is occurring. Furthermore, OHBA is again concerned that the proposed indicator is closely examining a very local planning issue rather than growth patterns strongly influenced by provincial policy. Therefore, OHBA recommends this proposed performance indicator not be included in the final package as it will not likely have any significant impact on urban form in the future.

Indicator #9: Transportation Modal Split

The proposed transit modal split performance measure will define the percentage of trips made to work by car, bike, transit or walking by each census division in the GGH. OHBA supports such a performance indicator to measure progress over time for complete communities that are well-served by transit and contain an integrated transportation network. The proposed indicator should yield valuable information for inner ring municipalities, however consideration should be given to very different (lack of) modal options in outer ring municipalities. This indicator not only supports planning related to the *Growth Plan*, but also the *Metrolinx Regional Transportation Plan*. However, OHBA is concerned by data gaps and differences between the 2006 mandatory long-form census and the 2011 voluntary National Household Survey. Furthermore, the OGS has already noted data gaps for non-work related travel.

Indicator #10: Commute Time By Mode

This proposed indicator will show commute time by census division in the GGH by mode of transportation, broken into 30 minute intervals. OHBA has some concerns regarding the validity or accuracy of data collected through the new 2011 Stats Canada National Household Survey. Furthermore, this information could be misinterpreted regarding planning priorities, as automotive trips would generally be concluded to be the best option based on length of commute. Such an indicator could lead to erroneous conclusions. OHBA recommends that rather than the length of the commute based on a “time”, that the OGS consider a length of commute

based-on “vehicle kilometers travels” (VKT) to better understand commuting patterns for the purpose of longer-term planning and the creation of complete communities.

Indicator #11: Location of Major Office Space

This proposed indicator will examine the percentage of major office space that has been developed inside UGCs and major transit station areas since 2006 utilizing data from the Real Estate Search Corporation. The OGS has noted that this data is only available for the GTA and not the entire GGH which leaves significant gaps in terms of analysis. OHBA notes that data from this proposed indicator should assist the review of the *Growth Plan* policies as part of the upcoming review. Furthermore, this data is of tremendous value for the purpose of transportation planning and the scheduled 2018 review of Metrolinx *Regional Transportation Plan*. It would however be beneficial to expand the data to include other parts of the GGH, especially larger UGCs such as Hamilton and in the Kitchener-Waterloo area. Furthermore, analysis of industrial and major retail would be beneficial for the upcoming legislated 10-year review of the *Growth Plan*.

Indicator #12: Land Consumption

The final proposed indicator intends to measure the ratio percentage change in planned population and employment to the percentage change in the settlement area. OHBA is generally supportive of such a measure ONLY if it considered both “net” and “gross” allocations of land with a finer grain analysis of various allocations and uses of land. One of the primary objectives of the *Growth Plan* is to make more efficient use of land and to reduce the per capita urban footprint. However, as OHBA noted in our comments on the proposed indicator #4 (Designated Greenfield Density) there are other drivers of land consumption that must be considered to properly address the progress we’ve made and to appropriately consider further public policy adjustments to achieve the goals and objectives of the *Growth Plan*.

OHBA has expressed concern with respect to ever increasing environmental “take-outs” and “buffers” as well as increasing land requirements for public facilities (i.e. provincial, municipal, school board etc.). If the OGS seeks to adequately measure progress towards achieving the objectives of the *Growth Plan*, a finer grain analysis regarding land-use is required to better understand the different “drivers” of urban sprawl. Therefore OHBA recommends that this proposed performance measure focus on “net” lands within expanded settlement areas OR provide a full breakdown on the percentage allocations within the settlement areas designated to specific uses including allocations towards Natural Heritage Features and public designations (i.e. school board requirements, local/regional/conservation authority buffers and/or infrastructure requirements). All stakeholders must better understand the full range of the drivers of land consumption to better inform future public policy decisions aimed at reducing overall land (both public and private) consumption.

Missing Indicators

The *Growth Plan* has had a significant impact on the broader land-use planning and approvals framework as well as land supply for new development within the Greater Golden Horseshoe. OHBA therefore recommends that the OGS consider a number of additional performance indicators:

- **Affordability:** OHBA contends that a key indicator missing from the discussion, regarding the health of our communities and on the economy, is an indicator regarding homes that people can afford. An affordability indicator could assist the OGS and partner Ministries measure the equity, accessibility and health of communities throughout the GGH. Furthermore, over time such an indicator could demonstrate trends occurring in different UGCs and Transit Nodes. Detailed data and analysis dating back to 1996 is available for the GTA through RealNet. An affordability indicator could also demonstrate the mix of

housing choices occurring in different communities to enhance affordability. OHBA is concerned about escalating new home prices and how over time these prices may negatively influence the objectives of the *Growth Plan* and quality of life for Ontarians.

- Government Imposed Charges: OHBA recommends that an additional performance indicator to measure the average “Government Imposed Charges” (GIC) imposed on new residential units for each UGC by housing type (single, semi, row, apartment). While an affordability measure would measure the accessibility and attractiveness of UGCs for consumers, a GIC performance indicator would measure how attractive the three levels of government are making UGCs for consumers (and by extension developers). Such an indicator could influence public policy decisions to ensure growth is directed to UGCs. The Canada Mortgage and Housing Corporation (CMHC) has undertaken similar studies of GICs in major municipalities across Canada (*Government-Imposed Charges on New Housing in Canada, 2009 & 2006*). These studies included the full range of GICs on new housing including: GST, provincial share of HST, development charges, land transfer taxes, permit fees, etc. The Altus Group conducted a more recent study in July 2012 of the GICs collected in five different GTA-based municipalities. OHBA continues to be concerned that GICs are increasing at a faster rate than either inflation or the CMHC New Housing Price Index (NHPI) and the recent Altus Study found that GICs can be upwards of 23 per cent of the cost of a median priced new home. The OGS should consider a performance measure of GICs specific to the UGCs in the *Growth Plan* as transit-oriented communities and intensification should in fact be more efficient to service and therefore be more affordable from a taxes, fees and charges perspective.
- Land Supply: OHBA recommends that a land supply indicator based on the Provincial Policy Statement be included in the *Growth Plan* performance indicators. The OGS should measure BOTH the designated supply of land as well as the serviced supply of land in upper and lower tier municipalities throughout the GGH. This indicator should be sensitive of local/regional market areas and servicing.
- Land Price: OHBA recommends that a land price indicator by lower and single-tier municipality be included in the *Growth Plan* performance indicators (low, medium and high density). Detailed data is available through RealNet.

Suggestions to Improve Places to Grow Implementation

OHBA has a number of recommendations regarding potential amendments to the *Growth Plan* as part of the upcoming 10-year review to improve implementation:

- That the *Growth Plan* be amended to recognize challenges with the 40 per cent intensification target and change the intensification planning horizon from 2015 to 2020 in light of the fact that most Regional Official Plans in the GTA were not fully approved until recently;
- That the *Growth Plan* be amended to eliminate/disconnect employment lands from the density target of 50 people and jobs per hectare;
- That the Province clarify policy 2.2.7.3 to:
 - exclude all Natural Heritage System take-outs (i.e. lands that due to OP policy are prohibited from being developed for all urban uses),
 - exclude major infrastructure (i.e. power plants, highways, transmission corridors, rail lines, pipelines),
 - exclude “permanent” existing uses (i.e. cemeteries, estate subdivision) from the land base subject of density target calculations for Greenfields and Urban Growth Centres; and,
 - have a vacancy allowance in their land budgets.
- That the *Growth Plan* be amended to define “Major Retail”, and that it clearly identify retail as a use that must be comprehensively planned;

- That the 40 per cent intensification target be modified to enable a lower target for municipalities on the outer fringes of the GTAH;
- That the *Growth Plan* be amended to clearly define the white-belt, and to state the intention that these lands constitute the GTAH's land reserve for future urban growth when planning for the creation of complete communities;
- That Schedules 2, 5 & 6 be amended to better reflect refined alignments for major highway infrastructure (the Bradford link between Highways 404 and 400, the GTA West-Corridor and the committed extensions of Highways 404 and 407), as well as to reflect consistency with transit plans as they evolve;
- That the regional municipalities be mandated as part of the next five-year review of their Official Plans to prepare horizon-free Urban Structure Plans defining the structure of uses for white-belt lands, including employment reserves, arterial roads, nodes and corridors as well as assessing long term servicing and transportation alternatives;
- That the *Growth Plan* be amended to enable good planning to guide the locations of 20-year settlement boundaries (e.g., arterials, mid-block lot lines, open space edges) versus a strict adherence to land budget calculations;
- That the *Growth Plan* be amended to clearly enable the provision of lands to accommodate required medium and high density uses over a longer planning horizon;
- That planning for major office development recognize the continuing role of business parks in accommodating this use, and that such parks receive greater consideration in planning for transit;
- That planning for transportation and transit networks in the GGH give better consideration to the needs of population and employment growth;
- That the Province establish, through Infrastructure Ontario, an investment fund for the GTA aimed solely at building/improving water, sanitary and road capacity at appropriate design standards. It is recommended that these monies are to be spent on bringing planned new urban growth areas to market and those projects that implement the *Growth Plan* intensification objectives.

Establish a Task Force to Define a Standard Land Budget Methodology

OHBA continues recommend that a Task Force be established comprised of provincial, regional and municipal planners, industry land economists, and development industry representatives to develop for all of Ontario, a standard methodology for residential and employment land budget and supply guidelines, and that this approach include land vacancy factors. Clear direction and guidance on how municipalities should undertake a land budget and provide for a balance of growth between greenfield and intensification would serve to reduce delays in conformity.

Tools to Support Intensification and Complete Communities – “Making it Happen”

The members of OHBA and the 11 local home builders associations (including BILD) in the GGH are an integral partner with the provincial government in implementing the *Growth Plan* through the creation of complete communities that improve the range of opportunities for people to live, work, and play in the GGH. The challenge to increase densities and intensify development requires additional financial and policy tools to support intensification from the province and municipalities. Tools such as pre-zoning / pre-designating lands or implementing a Development Permit System along intensification corridors and UGCs would facilitate mixed-use complete communities at higher densities. Furthermore infrastructure standards and design criteria should be reviewed by the province to ensure they are modernized to acknowledge new conservation techniques and are built at appropriate capacity levels. It is critical that pro-active measures are taken by the province and municipalities to reduce the barriers to intensification.

Parkland Dedication

OHBA remains very concerned that some municipalities have excessive parkland dedication fees that continue to discourage high-density projects and curtail housing affordability. The cash-in-lieu of parkland fees, often charged at the maximum allowable amount under the *Planning Act*, significantly adds to the cost of medium and high density projects without drastically improving or adding park facilities within the area of the new development. The increased cost to builders is passed onto new home buyers which decrease the affordability of housing within UGCs and intensification corridors. OHBA and BILD recommended significant changes to the provincial standards for calculating parkland dedication as part of our joint submission to the Ministry of Municipal Affairs and Housing's recent consultation on the *Development Charges Act* and other municipal development-related tax, charges and fees.

Transit Investment / Parking Requirements

Investment in public transit is necessary to ensure the creation of higher density compact pedestrian transit-oriented communities. Revisions to parking standards that are often extremely onerous can assist to reduce the costs associated with underground and structured parking facilities. Current parking requirements in many municipalities discourage intensification and transit ridership. Policy revisions to reduce municipal parking requirements in residential projects would improve housing affordability while supporting transit ridership. OHBA recommend that the province implement policies that support public transit by reducing municipal parking requirements in UGCs and intensification corridors.

Conclusion

OHBA appreciates the leadership position taken by the province in developing the *Growth Plan for the Greater Golden Horseshoe*. While generally supportive of the goals and objectives of the *Growth Plan*, OHBA remains concerned by the slow pace of conformity, lack of clarity on the "white-belt" lands and an emerging public policy gap in terms of support for intensification. OHBA supports the release of performance indicators and our additional recommended performance indicators to assist with the legislated 10-year review of the *Growth Plan*.

Furthermore, the Provincial Government should expand the use of performance indicators beyond a tool to be utilized for the 10-year review of the *Growth Plan*. The performance indicators offer an important communication opportunity for the provincial government to reach a wider public and stakeholder audience with respect to land-use planning in Ontario, the *Growth Plan* and the evolving nature of our communities. OHBA however remains cautious with respect to the accuracy of some of the data being considered and notes that consideration must be given to the differences between inner and outer ring municipalities. OHBA is also concerned that due to the slow conformity process and lengthy land-use planning and approvals timelines that the performance indicators may not accurately measure the success or failures of actual public policy implementation of the *Growth Plan*.