Thank-you for the opportunity to express my concern regarding the potential for provincial policy and legislative changes that could exacerbate, not relieve, the issues associated with urban sprawl and the mismatch of housing cost and variety to needed housing type, location and quantity as the province deals with the aging boomers and under-employed gig-economy youth.

I’m most supportive of the comments & recommendations of Environmental Defence Canada. Those recommendations being:

1. Find ways to support development of purpose-built rental housing near transit stations in urban areas.
   1. Encourage a mix of affordable housing types.
2. Continue using a land needs assessment rather than a market-based approach methodology.
   1. Don’t allocate more land for housing until it needed and not before an assessment at the next 10-year review of the Growth Plan.
3. Keep policies that prohibit industry appeals of Growth Plan conformity amendments, provincial plan conformity amendments and new/revised official plans where the Province has issued an approval, secondary plans and a 5 year restriction on Community Planning Permit System by-laws.
   1. Keep the Local Planning Appeals Tribunal (LPAT) as it is a quicker, less expensive dispute resolution process compared to the Ontario Municipal Board (OMB).
      1. I have personal experience with the LPAT. It works, enabling local councils and citizens to participate with developers in a non-adversarial manner to expeditiously resolve planning disputes.
4. Employment area conversions would be appropriate if:
   1. The proposed land designation conversion supports the objectives of the Growth Plan (in particular, the density targets for residents/jobs per ha), and the creation of complete communities that are mixed-use and transit-supportive.
   2. The changes are evidence-based, and a regional employment lands strategy has been completed.
5. We urge the province to use recently completed Ministry of the Natural Resources and Forestry mapping as a baseline and incorporate more refined conservation authority mapping if it is available and can be shown to more accurately characterize the mapped features or functions.
   1. The province needs to lead on this file including developing a joint comparison/evaluative process with First Nations, municipalities and conservation authorities.
6. There is a need to maintain fixed urban boundaries for existing urban settlement areas throughout the GGH. Create permanent growth boundaries where mapping shows a healthy agricultural system or natural heritage feature. Allowing boundaries of towns and cities to expand paves over productive farmland. Any boundary expansions outside of the Greenbelt should occur only through an MCR process.
   1. Ensure zoning of prime agricultural land is consistent with Provincial agricultural system mapping.
   2. Land swaps in the Greenbelt are not acceptable. The Greenbelt permanently protects land. Opening lands in the Greenbelt for development would signal the end of the Greenbelt Plan to millions of Ontarians.
7. Ensure density and transit are complementary (subways, 200 pp/ha., light rail transit 160 pp/ha., Go trains 150 pp/ha., 50 pp/ha supports transit every 20-30 minutes. Increasing density beyond these numbers may create more congestion (e.g. Liberty Village).
   1. Maintain existing density targets for mobility hubs.
   2. Rezone lands around urban mobility hubs to support transit-oriented development while reducing congestion (include a mix of more affordable housing including rental, mid-rise and low- rise).
   3. Existing policies already have flexibility i.e. Municipalities can shift density along transit corridor with existing policies.
8. Hold the line on urban boundary expansions to support appropriate forms of intensification to prevent sprawl onto farmland and maximize the efficiency of existing infrastructure.
   1. Urban boundary expansion should be considered only in settlement areas outside of the Greenbelt and only through a Municipal Comprehensive Review (MCR) process after a population projection based LNA has been completed and made publicly available.
   2. No changes to the towns and villages or hamlet expansion policies in the Greenbelt Plan. Any expansions of these areas would occur at the expense of Greenbelt values.
9. Keep existing density and intensification targets and the land needs assessment process and make them mandatory, there is already flexibility with expansion criteria through MCR process. Hold the line on density targets to develop the type of housing supply needed.
   1. Follow the MCR process in the Growth Plan. Clarity and transparency is needed. Monitor and report on implementation to better understand problems and find the best solution.
   2. Update growth projections based on the census and Ministry of Finance projections.
10. Address housing affordability by getting rid of the right red tape (Section 37). Section 37 is a negotiation process that takes time and resources away from planning, reduces transparency in the planning process and inspires NIMBY’s.
    1. Keep the LPAT. The OMB process was too expensive and time consuming. The Board undermined plans developed and approved by democratically elected municipal councils and the intent of the provincial Growth Plan.
    2. Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.
    3. Make it easier to build low income housing and rental housing especially near transit stations in urban centres.