



February 27, 2019

ATTENTION: Charles O'Hara
Ontario Growth Secretariat, Ministry of Municipal Affairs
777 Bay Street - c/o Business Management Division, 17th floor
Toronto ON CANADA M5G 2E5

RE: Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017, and associated proposals (ERO #013-4504, ERO #013-4505, ERO #013-4506, & ERO #013-4507)

Dear Mr. O'Hara,

Please accept this submission as Environment Hamilton's formal input on proposed Amendment No. 1 to the Growth Plan for the Greater Golden Horseshoe (2017) and associated proposals as referenced above.

First, I would like to state upfront that Environment Hamilton strongly supports the role the Province of Ontario has been playing to bring some regional level order to how communities in the Greater Golden Horseshoe (GGH) are evolving and growing. Too many years of sprawl development have led to loss of valuable prime agricultural land and gridlock on our highways. Efforts to address these challenges were long overdue and the province needs to continue to stand firm to ensure that GGH municipalities plan in a manner that creates truly inclusive, resilient and sustainable communities. We are very engaged in efforts here in Hamilton to make such a vision reality. We believe there is huge potential to make even more efficient use of urban lands through 'missing middle' housing – a gentler approach to intensification that can, cumulatively make a huge difference as far as accommodating growing populations. This approach also opens the door to more housing options – including more truly affordable housing options. The Ryerson City Building Institute has done some incredibly useful work on this front – see their case study of the potential for missing middle housing in Mississauga: <https://www.citybuildinginstitute.ca/portfolio/missing-middle/>.

We have carefully reviewed the proposed changes to the Growth Plan set out in Amendment No. 1. We believe there are both helpful and problematic changes being proposed in this amendment. Our detailed input is provided in the sections below.

We would also like to note that Environment Hamilton is an organizational member of the Ontario Greenbelt Alliance and has a seat on the Alliance's Steering Committee. We support the detailed submission made on behalf of OGA members. Environment Hamilton's submission provides Hamilton-specific comments on the proposed changes to the Growth Plan.

Review & update of Growth Plan in 2017

We believe it is important to point out that the Growth Plan for the GGH was very recently reviewed and updated through an extensive public consultation process. Based on this reality, we find it surprising that such significant amendments are being proposed so soon after the completion of the ten year review process.

Having said this, we support several of the proposed changes and are extremely concerned about a number of the other changes.

Movement Away From Intensification First Approach to GGH Planning

We are concerned that changes to the Growth Plan for the GGH are **generally taking us away from its intended purpose – an ‘intensification first’ approach to planning.** In Hamilton, it is critically important that the municipality is required to stay the course and continue to work to realize higher densities within the existing urban boundary. This means that the municipality must be required to plan to use land more efficiently whether it be intensification within the built-up area or new development within the greenfield area.

Proposed Changes Make Urban Boundary Expansions Easier & Less Planned

We are extremely concerned about the proposed changes to urban boundary expansions that are set out in Amendment No. 1. Our understanding is that the proposal would enable 40 hectare parcels of land to be added to an urban area, outside of the more holistic municipal comprehensive review (MCR) process.

We are strongly opposed to any proposal that would enable urban boundary expansions outside of an MCR and associated land needs assessment process. Further, we are concerned that the proposed change does not provide enough detail regarding the number of 40 ha parcels that could be added outside of this process, and who has the power to initiate an urban boundary expansion to see these 40 ha parcels added.

We know that, here in Hamilton, our city planning staff expressed strong concern that this proposed change would create challenging circumstances for them to be able to plan Hamilton’s growth in a managed manner. We believe managing growth is challenging enough and this change does not bring any benefits for the public good that we can see. Instead, we believe the province should continue to require municipalities to be the entities empowered to propose urban boundary expansions, and only when a municipality can justify the need for new land after having demonstrated that it has met or exceeded minimum density and intensification targets within the urban boundary.

Proposed Changes Weaken Greenfield Density Targets and Strengthen Urban Intensification Targets

The proposed amendment to the Growth Plan would reduce the density target for any new lands (urban boundary expansions) incorporated into the greenfield area from 80 down to 60 jobs & people per hectare. We are strongly opposed to this change and our own City Council is also opposed to this proposed change.

We urge the Ministry of Municipal Affairs and Housing to stick with the density target set out in 2017 – 80 people & jobs per hectare for any new lands added into the greenfield area.

The proposed amendment also fast tracks the phasing in of an increased intensification target for the urban built-up area in Hamilton from 50% to 60% by the completion of the city’s municipal comprehensive review. We support this proposed fast tracking of the increase in this target mainly because we know that Hamilton’s LRT is moving ahead and that this new higher order transit service will facilitate higher density housing opportunities along the entire east west route across the lower city. It makes sense to set the bar higher in anticipation of the arrival of this new transit service.

Proposed Changes Facilitate Higher Density at Major Transit Stop Areas

Given the fact that Hamilton has a plan approved to build an east-west LRT system across the lower city, **we are pleased to see the added opportunity for municipalities to be able to expand the radius around MTSAs within which higher densities can be established.** This flexibility means that, for MTSAs where it is appropriate to do so, the municipality can include that larger radius within which higher density development

may be planned. **We also support a requirement that the zone of higher density be at least 500m around an MTSA. We do not support provisions that would enable a municipality to apply for a lower density target around an MTSA.** Again, higher order transit like LRT is costly and areas around MTSA's must be planned to accommodate more people so that the higher order transit line is readily accessible by more people.

Proposed Changes Protect Some Employment Lands & Make Others More Vulnerable

The proposed changes also include a 'Proposed Framework for Provincially Significant Employment Zones'.

We support the introduction of the PSEZ designation as it ensures that key employment lands will be protected from conversion to non-employment uses. It is essential that we ensure municipalities across the GGH have adequate employment lands available to be able to build communities that are truly supportive of live/work/play options for residents. Hamilton needs more employment opportunities in Hamilton to eliminate the need for a growing number of residents to have to travel outside of the city every day to work. We therefore support the proposal to designate certain employment areas in Hamilton as PSEZs. The proposal identifies portions of the Airport Employment Growth District, portions of the Red Hill Industrial Park and the 'Portlands' – an area that includes Hamilton's industrial waterfront and the industrial lands that run along the QEW from around Centennial Parkway through to Winona. City of Hamilton planning staff have indicated that the full Airport Employment Growth District and all of the Red Hill Industrial Park should be included in the PSEZ designation and we concur. Further, city planners are requesting that you designate a list of other employment areas in the city as PSEZs to protect these lands from potential conversion to non-employment uses. **We concur with the call from city planners to ensure these identified areas are protected, again, because we recognize that building a sustainable, resilient community also means ensuring that there are jobs available within that community.**

Proposed Changes Dilute References to Climate Crisis in Profoundly Problematic Ways

We are deeply troubled by the manner in which the Growth Plan for the GGH has been stripped of any meaningful reference to climate change and the importance of effective growth planning from a climate resilience perspective. It is unfortunate that the Ford Government's decision to wipe out the progress made by the previous provincial government has included eliminating legislation and plans that were having an impact where the climate crisis is concerned. This erasing of legislation and policies has meant that references to these efforts had to be eliminated from the Growth Plan. If we could have it our way, those elements would still be in place and the references to them still meaningful.

But the dilution goes deeper. The Guiding Principles section of the Growth Plan explains that (T)he policies of this Plan regarding how land is developed, resources are managed and protected, and public dollars are invested are based on the following principles' including the following climate-crisis focused principle:

Integrate climate change considerations into planning and managing growth such as planning for more resilient communities and *infrastructure* – that are adaptive to the impacts of a changing climate – and moving towards low-carbon communities, with the long-term goal of net-zero communities, by incorporating approaches to reduce greenhouse gas emissions.

The proposed changes include the elimination of reference to 'low-carbon communities' with 'environmentally sustainable communities' and the complete elimination of reference to 'moving towards low-carbon communities'. The modification and elimination of these references is extremely troubling to us, because these changes communicate a lack of commitment to tackling the climate crisis through commitment to building compact, sustainable cities. We hope we are wrong about this, but we are left drawing this conclusion because we cannot imagine why else it would be proposed to modify these words in this manner.

Proposed Change Do Nothing Meaningful to Address Housing Affordability

We would also like to speak to the important issue of housing affordability and express our concern that there do not appear to be any changes in Amendment No. 1 that are designed to address affordability. While the changes focus a great deal on opening up more land to development and fast tracking the development approvals process, these changes offer no guarantees where housing affordability is concerned. In fact, opening up more land to development more quickly only serves to work against affordability as outward growth generally does not pay for itself. In Hamilton, for instance, we have learned that new growth on the edges is subsidized to the tune of about 30%. We urge MMAH and the province to pursue policies and initiatives that will support housing affordability in meaningful ways by taking into account the need to consider income levels and the significant shortage of social housing in GGH municipalities – including Hamilton.

This quote from Susan Lloyd Swail from Environmental Defence nicely summarizes our concerns:

*We know from research undertaken by the Neptis Foundation that there is enough land available for new housing within the boundaries of our towns and cities to meet our growth needs for the next decade and beyond if we grow smarter. So, as we begin planning our housing needs to 2041, we should ask these questions: **will the housing industry, developers, provincial government and municipalities work together to provide the supply of housing that people need and can afford within their communities? Or will they bow to the pressure from land speculators to build more single family homes on our dwindling supply of productive farmland in the GGH?***

-Susan Lloyd Swail, Senior Manager, Liveable Communities, Environmental Defence

We thank you for the opportunity to provide input on these proposed changes to the Growth Plan for the Greater Golden Horseshoe.

Yours truly,



Lynda M. Lukasik, PhD
Executive Director
Environment Hamilton
www.environmenthamilton.org
TEL: (905) 549-0900
EMAIL: llukasik@environmenthamilton.org

cc Environment Hamilton Board of Directors