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Ontario Growth Secretariat (OGS)
Ministry of Municipal Affairs and Housing
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Dear Ms. Clarke Julien,

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

Thank you for the opportunity to comment on this ERO posting regarding amendments to Ontario's Growth Plan for the Greater Golden Horseshoe (Growth Plan). The Oak Ridges Moraine (ORM) Partnership is comprised of EcoSpark, Ontario Nature, Save the Oak Ridges Moraine Coalition (STORM) and Earthroots - four committed environmental non-government organizations that have collaborated successfully since 1991 for long-term protection of the Oak Ridges Moraine. The ORM Partnership was actively involved in all stages of the recent Coordinated Land Use Planning Review.

We understand that the goal of the proposed amendments is to "streamline growth management planning the Greater Golden Horseshoe (GGH)" to provide greater flexibility and autonomy for municipalities in implementing the Growth Plan, to increase land availability for housing, and to provide a more flexible framework for transit infrastructure development. We note with concern that desired outcomes include neither the protection of natural heritage and farmland nor curbing urban sprawl.

There is much to be learned from the years of public consultation that resulted in the new Growth Plan in 2017. Originally introduced to curb expensive, low-density development that was resulting in a loss of natural heritage and farmland, increasing gridlock, and higher municipal taxes and debt, the Growth Plan was updated in 2017 to provide a transparent, evidence-based municipal planning process for the region. Cornerstones of the updated plan

include firm settlement boundaries, consistent density targets across the region sufficient to support public transit, the requirement for municipalities to conduct an evidence-based Land Needs Assessment when planning for urban growth, and policies to protect regional natural heritage and agricultural systems. These elements are crucial to curbing urban sprawl, maintaining productive farmland, and protecting water resources and natural heritage features across the GGH.

Overall, we recommend that the government retain all elements of the 2017 Growth plan that will serve to limit expensive low-density development that is paving over natural areas and productive farmland, increasing gridlock and driving up municipal taxes and debt.

1. Natural Heritage and Agricultural Systems

Ontario's Growth Plan must fully address the provincial interest in protecting natural heritage and farmland. Between 2011 and 2016 Ontario lost 319,700 acres of productive agricultural land (175 acres per day).¹ Similarly, between 2000 and 2011, the Province lost 6,152 hectares of wetlands in southern Ontario.² We simply cannot afford patterns of growth that result in such losses. They are unsustainable from many perspectives, including biodiversity conservation, climate resilience and food security. Amendments to the Growth Plan must not come at the expense of protecting these vital provincial interests.

In the Growth Plan area, regional natural heritage and agricultural systems have now been defined. These mapped systems provide clarity about priority land uses and are needed to help stem the ongoing loss of natural areas and farmland. We agree that the regional natural heritage and agricultural systems for the GGH should be augmented and refined in light of local mapping, where available. However, efforts to integrate such mapping must not be used as an excuse to reduce the areal extent of the systems or to delay implementation. We do not support the proposal to delay the application of these systems until they've been implemented into upper- and single-tier official plans. The Province must ensure that policies for these designated areas are implemented immediately and that these systems are off-limits to development while it works with municipalities to further refine mapping.

Recommendations:

1. Use recently completed Ministry of the Natural Resources and Forestry mapping for the natural heritage system as a baseline and incorporate more refined conservation authority mapping, where available, to expand the system and to more accurately characterize the mapped features or functions.
2. Ensure municipal zoning of prime agricultural land is consistent with provincial agricultural system mapping.

¹ From the 2016 agricultural census. <https://www.statcan.gc.ca/eng/ca2016>

² https://ontarionature.org/wp-content/uploads/2016/11/GLWCAP_Highlights_2005-2010_EN.pdf

3. Implement without delay the Growth Plan policies for the regional agricultural and natural heritage systems, ensuring that designated areas are off-limits to development while the Province works with municipalities to further refine mapping.
4. Support the provincial Agricultural System to consistently protect farmland across the Greater Golden Horseshoe. Farming is a business and the agri-food sector is a key economic sector in Ontario.

2. Settlement Area Boundary Expansions

The Growth Plan sets out a transparent, evidence-based municipal planning process to create more affordable housing options and work places in appropriate locations. It specifies that a Land Needs Assessment (a calculation to budget for people and land) must be a key determinant of any plans to expand an urban growth area. We fully support this requirement that underpins evidence-based decision-making.

We do not support the Province's proposal to put in place a system that would enable municipalities in the region to expand settlement area boundaries outside the Municipal Comprehensive Review (MCR) process. It would result in a piecemeal approach to land-use planning and decision-making, leaving communities vulnerable to the whims of changing councils and influential developers. In contrast, the Growth Plan establishes a fair and coherent system that upholds the long-term public interest.

There is no demonstrated need to “unlock land faster for residential and commercial development.” On the contrary, there is more than enough land already available for this purpose in the GGH, as confirmed in a recent Neptis report and other studies.³

Further, the assumption that unnecessary regulatory requirements and approvals are the cause of delays is unfounded. At the MMAH multi-stakeholder consultation on January 14th regarding the Provincial Policy Statement and the Planning Act, MMAH staff were unable to provide any information about the extent or nature of the delays. In fact, a major cause of delay in the Growth Plan area is appeals of municipal official plans by developers seeking more land for housing. For example, as the table below indicates, appeals of the official plans of the six largest upper tier municipalities resulted in an average delay of over three years. The appeals, all of which were eventually dismissed by the Ontario Municipal Board, resulted in further delays with lower tier conformity exercises and cost municipalities tens of millions of dollars in legal and planning costs.

³ See <http://www.neptis.org/publications/update-total-land-supply-even-more-land-available-homes-and-jobs-greater-golden>. For example, York Region has a 23 year supply of land for housing and an excess supply of employment land (<https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES>). Mississauga can accommodate 174,000 mid-rise housing units within its existing urban footprint, 85% of Peel Region's allocated growth (<https://www.citybuildinginstitute.ca/portfolio/missing-middle/>).

Timelines of Municipal Growth Plan Conformity Exercises					
	Council Adoption	Ministry Approval	Date of OMB Approval (Time at OMB)	Delay caused by industry appeals to OMB	Total Time between adoption and OMB Approval
Niagara	May 28, 2009	N/A (Exempt from MMAH approval)	Aug 8, 2014	5 yrs/3 mths	5 yrs/3mths
Durham	Jun 3, 2009	Oct 27, 2010 (1yr/4 mths)	Jan 2013	2 yrs/3 mths	3 yrs/7 mths
Waterloo	Jun 16, 2009	Dec 22, 2010 (1 yr/6 mths)	Jun 18, 2015	4 yrs/6 mths	6 yrs/2 mths
Hamilton	Jul 9, 2009	Mar 16, 2011 (1 yr/8 mths)	Aug 16, 2013	2 yrs/5 mths	4 yrs/1 mth
York	Dec 16, 2009	Sept 7, 2010 (9 mths)	Apr 1, 2014	3 yrs/7 months	4 yrs/4 mths
Halton	Dec 16, 2009	Nov 24, 2011 (1 yr/11 mths)	Aug 24, 2016	4 years/9 months	6 years/8 mths
Peel*	Apr 22, 2010	Sep 23, 2011 (1 yr/5mths)	Nov 30, 2012	1 yr/2 mths	2 yrs/7 mths
Average Time		1 yr/5 months		3 yrs/5 mths	4 yrs/7 mths

*The delay in Peel was much shorter since it did not include any urban expansions. Its subsequent urban expansions amendments, however, were all appealed to the OMB by industry. (Information based on MMAH data compiled by professional planner and former MMAH employee Victor Doyle)

Recommendations:

5. Hold the line on settlement boundary expansions. We can't afford to lose more woodlands, wetlands, wildlife habitat and precious farmland. To prevent further sprawl and maximize the efficiency of existing infrastructure, ensure that settlement area boundary expansions occur only through the MCR process set out in the 2017 Growth Plan.

6. Uphold the evidence-based planning process and requirement for a Land Needs Assessment set out in the Growth Plan.

3. Intensification and Density Targets

Density targets are key to addressing the issue of cost. Increasing urban and suburban density is an effective way to manage infrastructure costs and reduce municipal debt by having more taxpayers living in a smaller area. For example, the City of Calgary found that compact development saved 30 to 50 percent of life cycle infrastructure maintenance costs.

In 2017, the Province increased Growth Plan density targets from 50 to 80 persons/jobs/hectare, based on its Transit Supportive Guidelines. This increase had the unanimous support of the Crombie Advisory Panel which conducted extensive public consultations across the region. Reducing density targets, as now proposed, is a step in the wrong direction, taking us back about 20 years in terms of planning for growth, and will result in increased sprawl and gridlock. Low density sprawl costs us all in higher taxes, more traffic congestion, longer commutes and impacts our health (e.g., traffic related air pollution)

If municipalities in the Greater Golden Horseshoe adhere to existing density targets, there will be more than enough land for growth within existing urban boundaries until at least 2031. The MCR process provides any required flexibility. To ensure that affordable housing is available, it is imperative that the Province uphold the 2017 density and intensification targets and make them mandatory.

The Growth Plan provides a regional planning framework that supports a variety of housing choices by prioritizing investment in transit and supporting gentle density that makes transit affordable. More housing options, such as townhouses and rental apartments, are needed in existing urban areas to make it easy for people to get to work and avoid gridlock. In the Greater Toronto Area, 81 percent of respondents to a home-buyers survey prefer a smaller house or condo in a walkable transit friendly neighbourhood over a large house and a long commute.

Recommendations:

7. Uphold existing 2017 Growth Plan density targets and make them mandatory.
8. Allow municipalities to exceed provincial targets.

Summary of Recommendations

In summary, we recommend that the Province:

1. Use recently completed Ministry of the Natural Resources and Forestry mapping for the natural heritage system as a baseline and incorporate more refined conservation authority mapping, where available, to expand the system and to more accurately characterize the mapped features or functions.
2. Ensure municipal zoning of prime agricultural land is consistent with provincial agricultural system mapping.

3. Implement the Growth Plan policies for the regional agricultural and natural heritage systems, ensuring that designated areas are off-limits to development while the Province works with municipalities to further refine mapping.
4. Support the provincial Agricultural System to consistently protect farmland across the Greater Golden Horseshoe. Farming is a business and the agri-food sector is a key economic sector in Ontario.
5. Hold the line on settlement boundary expansions. We can't afford to lose more woodlands, wetlands, wildlife habitat and precious farmland. To prevent further sprawl and maximize the efficiency of existing infrastructure, ensure that settlement area boundary expansions occur only through the MCR process set out in the 2017 Growth Plan.
6. Uphold the evidence-based planning process and requirement for a Land Needs Assessment set out in the Growth Plan
7. Uphold existing 2017 Growth Plan density targets and make them mandatory.
8. Allow municipalities to exceed provincial targets.

Thank you again for the opportunity to comment on proposed amendments to the Growth Plan. We trust that you will take our comments and recommendations into consideration.

Yours truly,



Dr. Anne Bell
Director of Conservation and Education
Ontario Nature



Debbe Crandall
Save The Oak Ridges Moraine Coalition



Paul Mero
Interim Executive Director
EcoSpark

A handwritten signature in black ink, appearing to read 'Amber Ellis', with a stylized, cursive script.

Amber Ellis
Executive Director
Earthroots