

February 26, 2019

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor (Business Management Division)
Toronto, ON M5G 2E5

Attention: Charles O'Hara
Director, Growth Policy, Planning and Analysis

**RE: PROPOSED AMENDMENTS TO THE GROWTH PLAN
FOR THE GREATER GOLDEN HORSESHOE, 2017
ENVIRONMENTAL REGISTRY OF ONTARIO POSTINGS
013-4504 THROUGH TO 013-4507**

By way of introduction, since 1972 Paradise Developments have spent over four decades developing communities and building homes across the Greater Toronto Area, ranging from Whitby in the east to Brampton in the west and everywhere in between. We have remained committed to our roots and over 13,000 exquisitely built homes stand testimony to our passion.

Before we put nails to wood and pen to paper, extensive research and planning goes into building every one of our homes and communities. Our master plan for each community carefully takes into account the location, access to amenities and developing a sense of place. We strive every day to provide better environments, contribute to better schools, and support the communities we develop and build in with a sense of social consciousness- this is our plan for putting people first.

We never forget that our purchaser's home is the single most precious and expensive investment in their life. While planning, developing and building our communities we do not overlook the big picture, which is why the recent proposed amendments to the Growth Plan for the Greater Golden Horseshoe, 2017, are in forefront in our minds at this time.

Please accept our submission related to the proposed amendments to the Growth Plan for the GGH, 2017, and what we believe to be critically important to our purchasers, the building and land development industry and Ontario as a whole:

Housing needs Should Meet the Market Demand and the Projected Needs of Current and Future Residents:

Although there are many positive changes in the latest proposed revisions to the Growth Plan, we remain concerned that the proposed policies will not necessarily deliver the amount or type of housing the market is looking for in the near or long-term. We can improve on policies that currently stipulate levels of intensification in greenfield areas that are not market-based and not necessarily in demand, with forms that are in line with the needs and wants of people in the GGH. The goal should be to supply the types of housing that match the preferences of the population.

Remove the Requirements for using the Provincial Land Needs Methodology (LNM):

The industry and some municipalities have repeatedly expressed concerns with the one size fits all approach of the LNM, which does not adequately take into account the different circumstances in municipalities across the GGH. It is our experience that the current methodology is overly complicated and creates convoluted policy interpretations. These interpretations have the effect of ignoring market demand and oversimplifying residential unit requirements by treating every residential unit as the same, rather than differentiating between structure types (e.g. Single and semi-detached, townhouse, apartments). By abandoning the current LNM we give local municipalities the power to define the future character of their neighbourhoods, which we believe creates more naturally vibrant communities.

Removing all References to “Excess Lands”:

The notion of excess lands was created in 2017 by imposing arbitrary (and overly high) intensification and density targets. Amendment 1 to the Growth Plan sought to remove the cumbersome procedures related to excess lands, unfortunately, not all of the policies were captured. By removing the balance of the policies there will be greater consistency and clarity leading to a smoother and more rapid implementation of the Plan.

Change the Implementation Device from a “Municipal Comprehensive Review (MCN)” to a “Comprehensive Review (CR)”:

We submit that the reliance of the Growth Plan to be implemented using the MCN process puts many municipalities in a position where they are forever trying to catch up to ever evolving Provincial planning policy. By moving to implementation through the Comprehensive Review process (outlined in the PPS) it will allow municipalities to respond to changes more expeditiously. We recommend removing references to Ministerial approvals and requests for alternative targets. This rightly puts the responsibility back in the hands of the upper and single-tier municipalities who can establish their own alternative targets. This would be a positive change that takes the Province out of the role of policing municipalities and gives the municipalities the ability to implement their plans when it is most appropriate to do so.

Regional Adjustments to Intensification Targets:

Further to our comments above, we believe the following adjustments to the Regional intensification targets would be appropriate and would correct the one size fits all approach of the current Growth Plan.

a. Hamilton, Peel, York and Waterloo:

The intensification target should be moved from 60% to 45%. We believe that a slight increase in intensification in these municipalities from 40% is warranted given the transit investments and observed rates of building/intensification within the built-up area.

b. Barrie, Brantford, Guelph, Orillia, Peterborough, Durham, Halton, Niagara:

The intensification target should be moved from 50% to 40% on the basis that these municipalities have yet to demonstrate that the 40% rate can be achieved and then maintained for a prolonged period of time.

A re-examination and change to the intensification targets across the GGH are necessary as only some of the municipalities (typically within the inner ring) were able to comply with the 40% intensification target as of 2015. Moreover, the 60% rate imposed in 2017 was derived not from observed or achievable rates but taken from the Pembina institute’s report “Driving Down Carbon” which was not informed by land use planning, observed facts, or economic/market realities. It is our observation that the lack of services like rapid transit and proper regional connectivity are exacerbating the lag that peripheral GGH municipalities are suffering when trying to obtain the intensification targets set out in the plan.

Density Target Revisions – From 60 People/Jobs Per Hectare to 50 People/Jobs Per Hectare:

The proposed Growth Plan Amendment is advocating a density target of 60 people/jobs per hectare. Given the difficulty many municipalities are having achieving the current density targets, we believe that 50 people/jobs per hectare across GGH is a reasonable and achievable goal. We also submit that 50 people/jobs per hectare would be acceptable throughout the entire GGH.

Modify Major Transit Station Area Policies to Encourage Intensification and Direct Intensification Appropriately:

We agree in principal with the direction that Amendment 1 to the Growth Plan is headed. It is important to ensure that spaces around Major Transit Station Areas are densified appropriately, because it is density that increases ridership and location/access that creates new transportation habits in people (thus reducing automobile usage). That said, a refined definition of Major Transit Station Area should be produced which seeks to protect established, stable, local communities, while encouraging intensification by directing it to corridors and focussing higher densities closer to the stations.

Generally, we believe that any changes to policies should look to provide greater municipal autonomy affording municipalities the ability to decide how intensification should proceed at Major Transit Station Areas, based on local circumstances and situations.

Maintaining a 20 Year Supply of Lands:

It is our perspective that policies should be added to the Housing section of the Plan to require municipalities to maintain a 20-year supply of lands that are designated and available for development. This would allow for 10 years to complete policy work under the 30-year horizon of the plan and a 10-year supply of residential units through lands zoned for intensification or in draft approved or registered plans. Further, municipalities should be required to zone lands within 3 years of completing a comprehensive review, without exception. These requirements move planning away from a just-in-time model of housing delivery (which often creates associated shortfalls in supply), to a priority for keeping a sufficient amount of land supply at all times.

Defining what uses are Included in Density Calculations

The method for calculating densities must be corrected. Policy 2.2.7.3 of the Plan stipulates what land uses can be excluded from the density calculation in delineated areas, generally limited to important public infrastructure such as natural heritage features, rights-of-ways for electricity transmission, freeways, cemeteries, etc. Although we agree with the exclusion of those uses, there are other uses that could also be added to the exclusion list. Some of these uses include Regional roads and stormwater management facilities (which can vary widely in size).

The Maximum Interim Settlement Area Boundary Expansion Changed to Approximately 100 Hectares in Size:

We strongly agree with the intent of Amendment 1 to the Growth Plan in-so-far as the Province is looking to correct an ongoing problem where illogical or irregular Settlement Area Boundaries cannot be rounded out because of caps on population targets. However, it is our experience that 40 Hectares is insufficient to capture many of the situations across the GGH where these 'holes' in urban boundaries occur. However, if the maximum interim settlement area boundary expansion size were moved up to approximately 100 hectares, municipalities would be able to more adequately capture many of the problem areas that currently exist spread throughout the GGH.

We agree that interim settlement adjustments and expansions should not occur within the Greenbelt Plan's Protected Countryside

Identifying the Inner-ring "Whitebelt" as a Future Greenfield Area:

We submit that there needs to be stronger language in the Growth Plan clarifying that whitebelt lands are critical to land budgeting and are required to accommodate long-term growth needs. By delineating and clearly preserving whitebelt lands as future growth areas, it will give municipalities the ability to focus their long-term planning activities, especially related to major infrastructure investments. With the restrictions that result from the Growth Plan, we often find it very unclear where long term growth will occur and in what form. For municipalities, this creates uncertainty around the ability to finance infrastructure and makes decisions related to timing more difficult.

Schedule Updates to the Growth Plan:

Finally, we have observed that there are several updates that should be reflected in the Growth Plan amendment which are currently missing, misleading or do not provide the readers with an adequate picture of the current and planned infrastructure within the GGH. We recommend adding/revising the following:

Include a 2018 Built Boundary Plan:

The plan should reflect the current limit of the Built Boundary Area and speak to opportunities for intensification.

Revised and Update Mapping to Include Missing Transportation Elements:

Please change the mapping to include both planned and existing major infrastructure such as (the EA approved) Highway 404 corridor, GTA west corridor, Yonge Street Subway extension and locally identified priority transit corridors. All of these are critical pieces of infrastructure and should be reflected accordingly.

Identify the Future Greenfield Area:

Please denote the Future Greenfield Areas "whitebelt" within the inner Greater Golden Horseshoe.

Include 2051 Population and Employment Forecasts in Schedule 3:

Currently the Growth Plan only includes population projections out to 2041. Given that the Growth Plan is a 30-year planning document (and based on the length of time it takes to be approved and implemented), we ask that this amendment include the 2051 population projections.

Overall, we believe that the proposed changes to the Growth Plan for the GGH represent a positive step in the right direction. However, we feel that there still remains more that can be done to ensure policies are put in place that grow the economy, create jobs, and deliver a greater supply, selection and affordability factor for housing to the people of Ontario.

We look forward to continuing our dialog on this matter.

Yours very truly,
PARADISE DEVELOPMENTS

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