

February 28, 2019



GEORGIAN TRIANGLE DEVELOPMENT INSTITUTE

Hon. Steve Clark | Minister
Municipal Affairs and Housing
College Park 17th Flr
777 Bay St,
Toronto, ON M5G 2E5

Dear Hon. Clark,

RE: Response Letter to Proposed Growth Plan Amendments

Please accept this as comments on Amendment 1 to the Growth Plan 2019.

The Georgian Triangle Development Institute (GTDI) was incorporated in 1992 to ensure that the private sector Development Industry remains a strong, healthy and viable economic sector within the Region of South Georgian Bay (generally the communities of Collingwood, Wasaga Beach, Town of the Blue Mountains and Township of Clearview). This is accomplished by:

- Advocating the interest of the local development industry;
- Identifying and tackling relevant common interests;
- Reinforcing the economic significance of the development industry;
- Acting as a unified voice for the Development Industry;
- Fostering positive communication with all levels of government and the public.

Our members include companies in the Development, Building, Supply, Construction, Marketing, and Consulting sectors. Our membership is diverse and collectively forms one of the largest employment groups in the Region of South Georgian Bay.

We would like to thank the Minister for the thought process which precipitated the revisions to the current Growth Plan. Many of the changes have the opportunity to increase the supply of housing, create jobs, and attract investment. We would like to provide the following comments which, in our opinion, will further aid in achieving these goals.

1. Remove the “excess lands” policy of Section 2.2.1.6 entirely

It is submitted that this policy is counter to the stated goals of the Province. The effect of the policy, should excess lands be determined by the upper tier will:

- freeze lands for development within Settlement Areas simply because they may not meet the forecasted growth as determined by the Growth Plan's required land needs assessment analysis,
- decrease housing supply, including opportunities for affordable or attainable housing, through constraining the housing supply,
- force the upper tier to determine which lands should be frozen, and which can be developed thus potentially politicizing the planning and development process,
- Constrain investment by reducing interest in viable development land within settlement areas,
- Increasing the cost of infrastructure as less viable development land will be available to share the cost of existing or planned infrastructure should it be frozen through the process,
- Undermining the planned function of settlement areas as articulated throughout the Growth Plan.

2. Retain the choice introduced related to Settlement Expansions as identified in Sections 2.2.8.4 – 2.2.8.6

This amendment is supported by GTDI as it allows municipalities to consider logical, albeit small, settlement expansion without the lengthy and costly process of a municipal comprehensive review.

3. Revise the Natural Heritage policies of Section 4.2.2.7 (c) related to Settlement Expansions to have the PPS policies apply.

It is requested that the Natural Heritage policies of the PPS apply within expanded Settlement Areas. It is submitted that the Growth Plan policies may act to reduce the planned function of settlement areas, require more land for settlement expansions and lead to unnecessary expansions of infrastructure if some areas of settlement areas are treated differently from a natural heritage perspective than any proposed expansion areas. The PPS has proven to be an effective means for natural heritage protection within settlement areas and this should continue through any expansion. Suggested policy wording is as follows:

4.2.2.7 (c) – If a settlement area is expanded to include the Natural Heritage System for the Growth Plan in accordance with the policies in subsection 2.2.8, the portion that is within the revised settlement area boundary will:

- ~~a. be designated in official plans;~~
- ~~ab. no longer be subject to policy 4.2.2.3; and;~~
- ~~bc. continue to be protected in a manner that ensures that the connectivity between, and diversity and functions, of the natural heritage features and areas will be maintained, restored, or enhanced. be excluded from the Natural Heritage System and;~~
- c. be subject to the policies of 4.2.2.6

4. Remove the requirement for job retention on employment lands of Section 2.2.5.14

It is submitted smaller or standalone “employment lands” should not be afforded a greater or the same level of protection as larger clustered “employment areas”. There are many standalone “employment lands” parcels that are underutilized and unviable for their planned function that could assist in increasing the available housing supply. The effect of this would also allow municipalities to increase their employment areas through the MCR process in appropriate locations rather than maintaining a supply of standalone, potentially unviable employment lands thus unduly constraining the viable employment opportunities.

5. Revise the requirement for an upper tier municipality to determine what locations are appropriate when taking into consideration the Agricultural System (2.2.8.3 f) during the process of a settlement adjustment (2.2.8.4) or settlement expansion (2.2.8.5)

It is suggested that should a municipality choose to undertake a nominal settlement expansion that they should not need to evaluate alternative sites within a different municipal jurisdiction. The current policy framework requires the upper tier to determine where settlement expansions should occur, even if it is not with the “host” municipality:

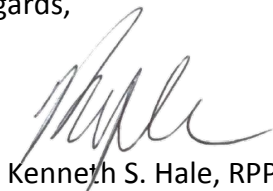
Suggested policy wording is as follows:

2.2.8.3 (f) – *prime agricultural areas* should be avoided where possible. To support the *Agricultural System*, alternative locations across the upper- or single-tier municipality or in the case of 2.2.8.4 (c) and 2.2.8.5 (b) across the lower-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the *Agricultural System* and in accordance with the following:

- i. expansion into *specialty crop areas* is prohibited;
- ii. reasonable alternatives that avoid *prime agricultural areas* are evaluated; and
- iii. where *prime agricultural areas* cannot be avoided, lower priority agricultural lands are used;

We thank you for your consideration of these matters and would be pleased to make representatives from GTDI available for further discussion on the matter.

Regards,



Kenneth S. Hale, RPP, MCIP
President, GTDI



Kory Chisholm, BES, M.Sc
Chair, Provincial Planning Review
Committee, GTDI