February 28, 2019

Cordelia Clarke Julien

Assistant Deputy Minister

Ontario Growth Secretariat (OGS)

Ministry of Municipal Affairs and Housing

777 Bay Street, Suite 2304, 23rd Floor

Toronto, ON M5G 2E5

growthplanning@ontario.ca

Re: Proposed Amendment to the Growth Plan, ERO 013-4504

Dear Ms. Clarke Julien,

The Ontario Greenbelt Alliance (OGA) supports the principles of the Growth Plan to curb expensive low-density development that drives up municipal taxes and debt, increases gridlock, degrades our water, paves over productive agricultural land and leaves us with a legacy of failing infrastructure, and transit starved cities across the Greater Golden Horseshoe (GGH). It is important that any changes to the Growth Plan support the ongoing shift in the regional growth model toward greater urban density and curbing of sprawl.

One of the key strengths of the Growth Plan is the requirement to use a Municipal Comprehensive Review (MCR) process to guide regional planning through an evidence-based framework that encourages efficient use of land. This provincial and regional guidance is key for smaller municipalities with few resources to enable them to move toward a consistent, public interest-based approach to growth management.

During the 2015 Growth Plan review it became clear that the MCR process had ensured that there is a sufficient supply of undeveloped greenfield land available to meet housing and employment needs as well as a supply of land within our urban areas to meet intensification targets. Proposed reductions to the designated greenfield targets (DGA) and allowing municipalities to ask for even lower targets is contrary to the goal of creating complete, compact communities. Gentle density and hard boundaries move us away from the wasteful low-density model of development.

In addition, holding the line on settlement area boundary expansions between MCR processes is key to creating complete communities, making expansions based on a complete package of evidence, maximizing infrastructure efficiency, limiting the loss of productive and precious farmland and maintaining our clean water resources.

On behalf of the 116 member groups of the Ontario Greenbelt Alliance I submit the following comments on Growth Plan Amendment one for your consideration.

Sincerely,

On behalf of the Ontario Greenbelt Alliance

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9. **Employment area conversions**

The existing MCR process may in some cases be too onerous and hinder the creation of mixed-use projects (e.g. the redevelopment of lands near the Kitchener ION). Employment uses are changing and work is becoming increasingly mobile. Economic development strategies are essential to understand local needs and employment trends and these strategies should inform any desired conversions.

Like all planning matters, conversions should be public and evidence based. Conversions should only occur if the employment lands are in excess of projected needs to 2041.

**Recommendation:**

The following conditions should apply to employment land conversions:

* 1. the proposed land designation conversion supports the objectives of the Growth Plan, in particular, the density targets for residents/jobs per ha are attained that support transit, 150 ppj/ha and 200 ppj/ha near subways and 80 ppj/ha for regular 10-15 minute bus service.
	2. the conversion is to mixed use, multi- storey buildings and prioritizes rental housing. Employment land is not converted to low-density single family housing.
	3. designated employment land within 500 m of a 400 series highway should be retained for employment uses and agriculture, not converted to housing or institutional uses due to health impacts from traffic pollution.
	4. conversions are evidence-based, a regional economic development strategy has been completed, the employment land retained by the municipality exceeds the need to 2041.
1. **Agricultural and Natural Heritage System Implementation**

**2.1 Natural Heritage System Implementation**

Mapping a natural heritage system provides clarity and reduces duplication between various levels of government. The current piecemeal approach to natural heritage protection is not working. Between 2000 and 2011, we lost 6152 hectares of wetlands in southern Ontario.[[1]](#footnote-1) Wetlands are valuable; they can reduce the financial costs of floods by up to 38 per cent and provide water and nutrient filtration services as well as critical wildlife habitat and recreational opportunities.

**Recommendation**:

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. Expand the Greenbelt to incorporate the provincial agricultural areas and natural heritage systems.
	2. The province needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.
	3. Where there is a conflict in mapping the more restrictive mapping should apply or an NHS comparison/evaluation process (as described in b above) should take place. Further, the proposed policies (5.2.2.3 and 4.2.2.5 and 4.2.6.9) which allow municipalities to seek technical changes to and refine the provincial NHS should be modified to include and expand on the same proviso as contained in the NHS refinement policy of the Greenbelt Plan (policy 3.2.2.5) which reads “may be refined, with greater precision, in a manner that is consistent with this Plan ….(in this case the Growth Plan) and the GGH Natural Heritage system map”. This language is important to ensure that local refinements or technical changes are not merely a way to revert to a smaller locally identified NHS.
	4. Natural Heritage mapping must be applied consistently across the Greater Golden Horseshoe, including whitebelt lands.

**2.2 Agricultural System Implementation**

Between 2011 and 2016 Ontario lost 319,700 acres of productive agricultural land (175 acres per day).[[2]](#footnote-2) Not only is this loss unsustainable from a food security perspective but it symptomatic of an unaffordable pattern of urban growth.

**Recommendation:**

1. 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. Maintain fixed urban boundaries for existing urban and rural settlement areas throughout the GGH. Create permanent growth boundaries where mapping shows a healthy agricultural system or natural heritage feature/system.
3. Ensure municipal official plan mapping and zoning of prime agricultural land is consistent with Provincial agricultural system mapping.
4. Land swaps of Greenbelt land 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.
5. **Major Transit Station Areas**

Transit and growth should be integrated to support transit that connects urban growth centres. This will relieve congestion for citizens and goods moving throughout the Greater Golden Horseshoe and within urban growth centres. A 2014 Ministry of Health study estimated that 154 premature deaths could be avoided and health benefits valued at $1 billion per year could be achieved by implementing the Big Move regional transit plan.

**Recommendation:**

Ensure density and transit are complementary and integrated (subways, 200 pp/ha., light rail transit 160 pp/ha., Go trains 150 pp/ha, 80pj/ha buses 10-15 minutes). Densities lower than 50 pp/ha make regular transit unsustainable.

1. Maintain existing density targets for mobility hubs within urban growth centres.
2. Rezone lands around existing mobility hubs (Metrolinx Plan) 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.
4. Avoid using transit to direct growth to greenfield areas or the edge of settlement areas, instead use transit to revitalize downtowns and support complete communities.
5. **Settlement Boundary Expansions**

Data produced to date indicates that there is more than enough land already allocated to accommodate expected population growth in the Greater Golden Horseshoe within existing urban boundaries to 2031.[[3]](#footnote-3) In some regions there is an excess of land, for example, York Region has a 23 year supply of land for housing and an excess supply of employment land.[[4]](#endnote-1)[[5]](#footnote-4) Simcoe County has a surplus of 53,596 units beyond what it needs to the year 2031 and yet its 2031-41 population growth is only 80,000 people.[[6]](#footnote-5)

If we build more missing middle housing we can reduce land consumption. For example, a recent study by Ryerson City Building Institute indicates that Mississauga can accommodate 174,000 mid-rise housing units within its existing urban footprint, 85% of Peel Region’s allocated growth.[[7]](#footnote-6) Missing middle family housing provides affordable housing where urban services exist reducing municipal costs and retaining precious farmland.

If urban boundary expansions proceed when there is excess land then land use is not maximized resulting in inefficiencies, such as lost revenue for municipalities from vacant land and costs for infrastructure expansions resulting in higher taxes. Of additional note is that exempting 40 hectare settlement boundary expansions from an MCR is a recipe for many smaller, unserviced settlements to expand incrementally and a signal for the development industry to speculate on farmland around these small settlements given this exemption.

Neptis Foundation has estimated there are over 25,000 ha of undeveloped greenfield land in these unserviced settlements and this proposal will simply escalate this situation given the Growth Plan appropriately directs the vast majority of growth to serviced settlements. At minimum, lower tier municipalities should not be allowed to pursue this type of settlement expansion if its upper tier takes the position that all settlement expansions should be part of its MCR.

**Recommendation:**

1. Clarity is required to understand 1) who can make a request for a boundary expansion, 2) the number of boundary expansions that can be requested outside of an MCR process and 3) how can there be an adjustment to a settlement boundary if there is to be no net increase in land within the settlement area?
2. Hold the line on urban boundary expansions to support intensification to prevent sprawl, farmland loss and maximize the efficiency of existing infrastructure.
3. No rounding out to rural settlement boundaries or the boundaries of towns and villages or hamlets in the Greenbelt Plan.
4. Do not proceed with allowing settlement boundary expansions of up to 40 hectares (the size of Yorkdale) or multiple expansions.
5. **Density and Intensification Targets**

There is an excess of land for housing in many communities due to the use of the 2006 Growth Plan market-based land assessment during MCR preparation. During the 2017 Growth Plan review there was consensus reached among the multi-sector stakeholder panel to move to a target of 80 pj/ha. At the time industry concerns about the stock of single-family homes was found to be unsubstantiated as municipalities had planned for 800,000 ground related housing units providing for 80% of the expected population growth. Changes were made to calculating density targets by excluding employment areas, freeways, railways, pipelines, hydro lines, and cemeteries. Those exemptions and the new lower targets proposed further reduce densities in some areas below 2006 levels to 1990 densities. (See Appendix 2, Envisioning Brantford study).

Housing trends and demographic shifts indicate a broader mix of housing is needed beyond tall condos and low density housing. A report by Ryerson’s City Building Institute indicates that most of our housing needs can be met through mid-rise (4-10 stories) missing middle development.[[8]](#footnote-7) And transit supportive densities reduce congestion estimated by the Toronto Board of Trade to be costing our economy up to $15 billion per year by 2031. Beyond economic costs, increased traffic congestion has many implications for commuters including health costs and a loss of family time. A recent study by CMHC indicates a longer commute also reduces the affordability advantage provided by lower housing costs on the edge of the GGH.[[9]](#footnote-8) As well, the Ministry’s own research shows that as of 2006 there were 700,000+ ground related units owned by older people – virtually all of which will come to market by 2041 as the youngest of these homeowners will 91 years old. Combined with the 800,000+ ground related units planned by municipalities already, these 1.5+ million units could accommodate at least 4.5 million people (using a conservative 3 persons per unit assumption). Excluding Toronto, this exceeds the forecast growth for entire GGH to 2041.

Density makes housing, schools, road and servicing infrastructure more affordable and sets the land-use stage for providing the diversity of housing that people want. In the Greater Toronto Area 81% 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.

The Growth Plans (2006 and 2017) have always allowed Regional and County governments to account for variations and infrastructure capability of lower tiers when allocating growth – and all have utilized this ability. Also 75% of the forecasted growth is in greenfield areas that are contiguous to urban areas and most areas are supported by the regional transportation plan. Allowing all municipalities to lower growth targets is contrary to the principals of compact transit supportive growth in the Growth Plan and will make it difficult to ever be able to provide appropriate levels of transit to low density areas in both the inner and outer ring. This particularly true for Durham and Halton Regions. While we support maintenance of the existing targets – should the Government proceed, Durham and Halton should have a density target of 60 pjh so that the entire GTHA has the same target – and a better opportunity to support our $50 billion regional transportation plan.

**Recommendations:**

1. Keep the 2017 Growth Plan density and intensification targets 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.
2. Do not allow alternative density or intensification targets for any municipalities within the inner ring or in municipalities with UGCs in the outer ring (ie. maintain the existing policy framework).
3. Provide clearer policies for outer ring municipalities that may seek an alternative target and require an increase for the 2031-41 period than they were permitted in the first round of Growth Plan conformity to 2031.
4. Clarity and transparency is needed to improve monitoring and reporting on implementation to better understand problems and find the best solution.
5. Update growth projections based on the census and Ministry of Finance projections.

**6. Recommendations to reduce red tape:**

1. 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.
2. Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.
3. **Other Recommendations:**
4. Raise the profile of Indigenous interests, treaty rights, consultation, and planning approaches and priorities.
5. Increase support for land securement as a tool for growth management and natural/agricultural/cultural heritage protection, including enabling severances/land subdivision for conservation purposes and associated incentives.
6. Retain a long-term sustainable approach to growth management that focuses on more than the number of houses built but the vibrancy and resiliency of our communities.
1. <https://ontarionature.org/wp-content/uploads/2016/11/GLWCAP_Highlights_2005-2010_EN.pdf> [↑](#footnote-ref-1)
2. <https://www.statcan.gc.ca/eng/ca2016> [↑](#footnote-ref-2)
3. <http://www.neptis.org/publications/update-total-land-supply-even-more-land-available-homes-and-jobs-greater-golden> [↑](#footnote-ref-3)
4. **Appendix 1 – Ontario Greenbelt Alliance Members**

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| Altona Forest Stewardship Committee  | Heritage Speed River Working Group  |
| Arocha Canada  | Hold the Line Waterloo Region |
| AWARE Simcoe  | Humber Valley Heritage Trail Association - Kleinburg Chapter |
| Belfountain Community Organization  | Innisfil District Association  |
| Better Growth In Brant | Iranian Society of Engineers and Architects |
| Blue Mountain Watershed Trust Foundation  | Kawartha Land Trust  |
| Bluebelt Protection Alliance  | Keep Vaughan Green |
| Brampton Environmental Community Advisory Panel  | Lakeridge Citizens for Clean Water |
| Bruce Peninsula Biosphere Association  | Land Over Landings |
| BurlingtonGreen  | Langford Conservancy  |
| Canadian Network for Respiratory Care  | Midhurst Ratepayers Association  |
| Canadian Parks and Wilderness Society - Wildlands League | NDACT- North Dufferin Agricultural Community Taskforce |
| Castle Glen Ratepayers Association  | New Tech Caledon King Citizens for Clean Water |
| Citizens Environment Alliance of Southwestern Ontario | Oak Ridges Moraine Land Trust |
| Clear the Air Coalition | Oak Ridges Trail Association  |
| Climate Action Niagara  | Oakville Green Conservation Association  |
| Coalition of Concerned Citizens of Caledon  | Ontario Farmland Trust |
| Coalition on the Niagara Escarpment  | Ontario Headwaters Institute |
| Concerned Citizens of Brant | Ontario Land Trust Alliance  |
| Concerned Citizens of King Township | Ontario Nature |
| Concerned Citizens of Ramara | Ontario Soil Regulation Task Force  |
| Conservation Development Alliance of Ontario  | Palgrave Residents Association |
| CRAND | Park People  |
| Credit River Alliance  | PERL  |
| Credit Valley Heritage Society  | Perservation of Agricultural Lands Society PALS |
| David Suzuki Foundation- Blue Dot  | PitSense Niagara Escarpment Group Inc.  |
| Durham Environment Watch | Pomona Mills Park Conservationists Inc. |
| Earthroots | Preston Lake Environmental Association (PLEA) |
| Ecological Farmers Association of Ontario  | Protect our Water and Environmental Resources (POWER)  |
| Ecosource  | Rare Nature Reserve |
| EcoSpark | Ratepayers Aurora Yonge South |
| Environment Hamilton  | Registered Nurses Assocation of Ontario |
| Environmental Defence  | Rescue Lake Simcoe |
| Evergreen  | Richmond Hill Naturalists |
| Federation of Urban Neighborhoods (Ontario) | Riversides  |
| Food and Water First  | Rural Burlington Greenbelt Coalition  |
| Food Forward  | Save the Maskinonge  |
| Friends of Boyd Park  | Save the North Gwillimbury Forest |
| Friends of East Lake Prince Edward County  | Save the Oak Ridges Moraine Coalition |
|   | Sierra Club Peel  |
| Friends of Fraser Wetlands  | Simcoe County Greenbelt Coalition  |
| Friends of Hope Conservation Group Inc.  | Smart Growth Waterloo Region |
| Friends of Luther Marsh | South Lake Simcoe Naturalists  |
| Friends of Rural Communities and the Environment (FORCE)  | South Peel Naturalists Club  |
| Friends of the Fraser Wetlands Inc.  | Sunfish Lake Association  |
| Friends of the Pittock | Sustainable Brant |
| Friends of the Rouge Watershed  | Sustainable Cobourg |
| Friends of the Twelve (FOTT) | Sustainable Urban Development Association  |
| Glen Williams Resident's Association Inc.  | Sustainable Vaughan  |
| Grand River Environmental Network  | The Humane Society of Canada  |
| Gravel Watch- FORCE | The Lakewater Society  |
| Green Durham | Toronto Environmental Alliance |
| Greenlands Center Wellington  | Urban Green Environmental Organization  |
| Greenpeace Canada  | Wellington Water Watchers  |
| Halton - Peel Woodlands and Wildlife Stewardship Council  | West Oro Ratepayers Association  |
| Halton Environmental Network  | York Durham Ontario Woodlot Association  |
| Help Our Moraine Environment (HOME) | York Region Environmental Alliance  |
| Henderson Forest Aurora Ratepayers Association  | York Simcoe Nature Club |

**Appendix 2 – Excerpt from Housing submission, Environmental Defence Canada**

Increasing Housing Supply in Ontario, ERO #013-4190

	1. **There is enough land**.There is 310,000 acres or 125, 560 hectares of unbuilt land within existing urban boundaries. This is sufficient supply for housing needs from now until 2031. If Growth Plan density targets are followed the land set aside to 2031 can last to 2041. Opening up the whitebelt for development will only add unnecessarily to developable land supply and do nothing to change the housing supply mix or alleviate housing prices.

	1. **Is there a housing supply issue?**The Provincial Policy Statement, 2014 (PPS) requires municipalities to maintain a three year supply of registered and draft approved housing, as well as a 10 year supply of lands designated for residential development. Municipalities are planning for 2041 now. Increasing the supply of land beyond 2041 will do nothing to increase the supply of housing today even if constrained land supply was a current limiting factor, which it is not.

When we project housing allocation it is important to consider existing housing. An estimated 700,000 resale homes are coming on the market in the Greater Toronto Area over the next 20 years as baby boomers move on. Most of this housing is single family homes. Assuming 2.9 people per home these houses could accommodate over 2 million people. Allowing secondary units in existing housing or allowing conversions of large homes to multiplexes increases our ability to provide needed housing. When forecasting our future housing needs it is important to consider how to make better use of our existing housing stock.

We need policies that encourage developers to build the type of housing we need, more rental housing for seniors and young people and smaller homes that allow seniors to downsize.

**2.1 Housing Supply Case Study - York Region**

A 2016 Housing report from the Region of York identified a good supply of housing with 15,930 registered and 26,980 draft approved units by structure type in the Region as of mid-year 2016. Together, the Region’s registered and draft approved supply is an estimated 42,910 units. The forecast demand is (9,000 units/year) indicating a five year supply of housing ready to be built.

York Region has regional water and wastewater capacity for 227,700 people or 82,600 units. Given that the Region’s 42,910 units of registered and draft approved supply account for only 52% of this total, there is sufficient servicing capacity at the regional level to accommodate more than the five years of registered and draft approved units for future growth. Housing supply today is clearly not an issue in York Region.

There is enough housing in the supply pipeline but the housing is being built slowly to keep demand and prices high.

**2.2 The Type of Housing we need**

At a recent Board of Trade meeting in Bradford a real estate firm stated there is an oversupply of high end housing and not enough affordable housing. He claimed the 2017 market surge was due to a demand issue that lasted about 3 months. Housing issues today he blamed on developers holding onto supply waiting for prices to rise and sellers expecting 2017 prices on resale homes. His solution, let the market correct itself.

The median household income in the GGH is about $78,000. Given the household income distribution in the region, based on income alone (i.e. not including other equity), less than 50% of households could afford (or obtain a mortgage for) a house costing $350,000 without spending more than 30% of their gross income (assuming 25% down payment, at 5% interest over a 25 year period). Clearly, the shift in the type of housing completions in the region from single-detached to multi-residential housing forms and apartments which began in 2001 is a trend directly related to the ability of the population to pay for housing.

The type of housing built needs to meet the housing need. In York Region alone there is an inventory of 17,870 singles, 1480 semi’s, 8270 row houses and 15,290 condos and apartments. Rental housing is in demand and supply has been decreasing. A land needs assessment and subsequent housing strategy can identify what type of housing is needed.

According to CMHC, improving economic conditions in the GTA including employment growth and a low unemployment rate are drawing immigrants and temporary workers to the area and therefore increasing rental demand. Purpose built rental and low income housing needs to be created with functional and affordable access to public transportation options.

**Recommendation:** Find ways to support development of purpose built rental housing near transit stations in urban areas. Encourage a mix of affordable housing types.

**2.3 If we designate more land for housing will it reduce housing prices?**

The rules for calculating of land needs within a MCR process that were specified by the 2006 Growth Plan used a methodology that based predictions of future growth on past housing trends rather than requiring an inventory of the land, including vacant land then developing a municipal housing strategy. As a result there was an excess of land designated for housing and employment uses. Despite having over 125,000 hectares of excess land designated for housing, house prices rose significantly over the last 5 years.

During a 2011 Waterloo OMB hearing planners in municipalities and at the province realized the market based projection methodology for determining land needs was problematic. Subsequently, during the 2015 review of the Growth Plan the planners at the province in consultation with stakeholders developed a new Land Needs Assessment methodology. This methodology provides a more reliable and valid method for forecasting housing and land needs.

**Recommendation**: Continue using a land needs assessment rather than a market-based approach methodology. Don’t allocate more land for housing until it is needed and not before an assessment of the success of the recently revised LNA approach at the next 10 year review of the Growth Plan.

	1. **It takes too long to bring housing to market**As noted in section 2.0 above there is enough land and housing to meet needs until at least 2031 and it could last to 2041. Many changes were made in the last 5 years to streamline the housing process. Perhaps the most effective was changing the OMB.

MMAH data shows that delays in bringing housing to market we caused more by developers than by governments. This occurred because developers challenged Regional Official Plans and approvals at the OMB. The result was an average delay of 3 years/5 Months across the GGH. These appeals were all aimed at seeking more land for ground related housing (single family homes) and all were dismissed by the OMB given data that confirmed abundant existing land supply.

The OMB appeals in turn delayed all the lower tier conformity exercises within these upper tiers – which were in turn further delayed by even more industry appeals to the OMB. The overall cost to municipalities was in the tens of millions of dollars in legal and planning costs. (See Appendix I attached)

It is these industry driven delays which directly led to the recent OMB/LPAT streamlining reforms prohibiting industry appeals of Growth Plan conformity amendments, provincial plan conformity amendments and new/revised official plans where the Province has issued an approval. These reforms also provide a two year restriction on appeals of new secondary plans (unless supported by a municipal council) and a 5 year restriction on Community Planning Permit System by-laws as it was clear that industry was launching appeals before new municipal policies and by-laws were adopted.

Almost all 110 municipalities in the GGH have amended their official plans to conform with the Growth Plan. As the chart below shows, the six largest upper tiers

in the region and the City of Hamilton approved their conformity exercises within provincial timeframes while the Ministry of Municipal Affairs and Housing issued approvals within an average of 1 year and 5 months.

Reducing “red tape” by seeking efficiencies in land use planning approval and permitting processes is a valid and worthy goal. It is important to continue such efforts while keeping in mind that land use planning should be a transparent and accountable public process and serve the public interest

**Recommendation:** 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 five year restriction on Community Planning Permit System by-laws. 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. **Employment area conversions**We agree the existing process may in some cases be too onerous and hinder good projects (e.g. the redevelopment of mixed uses near the Kitchener ION). To move forward, employment area strategies to calculate employment land needs should be completed and made publicly available before any conversion process commences.

It is also clear there is an excess of employment land. Ontario is enjoying a period of stable employment. The unemployment rate has remained below 6% since 2017. In the recent Neptis Foundation report, Planning the next GGH, a slowing trend in employment growth in the 905 is revealed. With stable employment, a slowdown in employment growth and an aging population employment land needs are decreasing. It is unclear what projections the province is using to propose allowing employment land growth anywhere in Ontario. At the same time as the province is consulting on Bill 66, the [Growth Plan Consultation](https://ero.ontario.ca/notice/013-4504) was released which identifies provincially significant employment areas.

The Municipalities are currently undertaking studies as part of the Growth Plan requirements to determine land needs for employment uses. This data is essential for responsible planning. Many areas in the Greater Golden Horseshoe such as Simcoe County have completed the calculations to determine they have an excess of employment land.

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| **Employment Land by Regional Municipalities in the GGH (2015-2017)** |
| **Region (hectares)** | **Total Vacant Emp. Lands**  | **Total # Emp. Lands** | **% Total Emp. Lands**  |
| York | 2588 | 7759 | 33% |
| Halton | 2800 | 6099 | 46% |
| Peel (exl. Caledon) | 2070 | 10772\* | 19% |
| Durham | 3147 | 5611 | 56% |
| City of Hamilton | 918 | 4554 | 20% |
| Simcoe | 2919 | 6527 | 45% |
| Niagara  | 2300 | 6895\* | 33% |
| Brantford  | 349 | 1451 | 24% |
| **Total hectares** | **16742** | **48217** | **35%** |
| York = [https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar+22+vacant+ex.pdf?MOD=AJPERES](https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar%2B22%2Bvacant%2Bex.pdf?MOD=AJPERES)Halton = <http://beta.halton.ca/repository/Halton-Competitiveness-Study-2016>Peel = <http://www5.mississauga.ca/research_catalogue/N_12_2016_VacantLands_Profile.pdf>(Mississauga)<http://www.brampton.ca/EN/City-Hall/meetings-agendas/PDD%20Committee%202010/20151207pis_Full%20Agenda.pdf> (Brampton) Durham= <https://www.durham.ca/en/living-here/resources/Documents/EnvironmentalStability/EAServicing_Durham.pdf> |
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| Hamilton = <https://www.hamilton.ca/mapping-business-reporting/activity-reports/employment-area-inventory>Simcoe= [https://www.simcoe.ca/Planning/Documents/SimcoeCountyLandBudget\_DataCollectionandAnalysis\_PhaseEmployment\_HemsonConsulting\_June17.pdf](https://www.simcoe.ca/Planning/Documents/Simcoe%20County%20Land%20Budget_Data%20Collection%20and%20Analysis_Phase%202%20Employment_Hemson%20Consulting_20%20June%2017.pdf) Niagara = <https://niagararegion.ca/council/Council%20Documents/ICP%208-2014.pdf>Brantford-https://www.brantford.ca/en/business-and-development/resources/Documents/Official-Plan/Municipal-Comprehensive-Review-Part-1.pdf\*Indicates total employment land measured on Neptis Geoweb |
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Peel Region had an excess of employment land as evidenced through the recent plan review (MCR process) which converted three employment land areas in Mississauga and 13 in Brampton to residential. Experience indicates if too much employment land is designated it puts pressure on municipalities to convert those lands to residential.

Some municipalities such as York Region (which has 2588 ha of vacant employment land), have identified surplus lands for new employment uses but it is important that these excess lands not be automatically converted to residential uses. Typically these same communities with excess employment lands also have an excess of residential lands. A land needs assessment, as part of a Municipal Comprehensive Review, allows municipalities to identify and allocate the appropriate quantity of lands based on projected needs. It is essential that municipalities use the data obtained through a land needs assessment to understand whether there is a need to expand settlement boundaries.

In cities like Kitchener and Hamilton where factories have shut down there may be an excess of serviced employment land in the inner city near existing and proposed transit lines where conversion to mixed use residential and live work spaces may be appropriate.

In some newer greenfield communities developers own unserviced employment lands they want to build subdivisions on. Conversion of greenfield employment lands to housing requires extension of expensive infrastructure which will be costly, take time and not address immediate housing needs. In the Bradford area, farmland costs $50,000 an acre, whereas development land is $400,000 an acre. There is a $350,000 incentive per acre to allow conversion of farmland for development.

Converting employment land to housing and then opening up settlement area boundaries for employment uses will result in farmland loss. There is no need to open up the countryside to employment uses. Municipalities should use the surplus employment lands in towns and cities across the region for future job growth.

**Recommendation:** Employment area conversions would be appropriate if:

**a)** if 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.

**b)** if the changes are evidence-based, and a regional employment lands strategy has been completed.

**Appendix 2- Envisioning Brantford Analysis for Langford Conservancy- by Kevin Eby, RPP**

Envisioning Brantford - Municipal Comprehensive Review Part 1: Employment Strategy, Intensification Strategy, Housing Strategy and Land Needs

Review of the Conformity of the Recommended Alternative Density with Growth Plan for the Greater Golden Horseshoe Policy 2.2.7.6 (a)

Kevin Eby, RPP

Eby Growth Management Planning Services February, 2019

EXECUTIVE SUMMARY

2017 Growth Plan Policy 2.2.7.6 (a) requires that any alternative DGA density target "maintain or improve on the minimum density target in the official plan that is approved and in effect as of July 1, 2017; ..."

Direct comparisons of the Designated Greenfield Area (DGA) density requirements between the 2006 Growth Plan and the 2017 Growth Plan are not appropriate without adjustments first being made to equate the two policy requirements as noted in this report. The Envisioning Brantford document attempts to directly equate the 50 residents and jobs combined DGA density contained in the 2006 Growth Plan, and reflected in Brantford Official Plan Policy 15.4.2, with the DGA density target provided for in the 2017 Growth Plan. This is a good example of comparing apples and oranges. They may both be fruit - or in this case densities - but they are completely different things.

The 2006 DGA density was a blend of densities applicable to both residential and employment areas. Municipalities could plan for less than the minimum density in portions of the DGA, but any shortfalls in densities in one area were required to be compensated for in others. The 2017 DGA density only applies to what are primarily residential areas - and associated commercial and institutional land uses - and is based on the exclusion of a much broader range of environmental features, infrastructure and land uses than the 2006 Growth Plan DGA.

After compensating for a reduced employment area DGA density as required under the provisions ofthe 2006 Growth Plan and Brantford Official Plan Policy 15.4.2, and then adjusting the density to make it comparable to the 2017 Growth Plan requirements, the required density for residential DGA in Brantford is 71.4 residents and jobs combined per hectare. The Envisioning Brantford document proposes a density applicable to the same lands of 52 residents and jobs combined per hectare based on the 2017 Growth Plan exclusions.

Applying a 52 residents and jobs combined per hectare density to lands that are currently subject to a directly comparable required density of 71.4 residents and jobs combined per hectare does not conform with the requirement to "maintain or improve on the minimum density target in the official plan that is approved and in effect as of July 1, 2017" as required by 2017 Growth Plan Policy 2.2.7.6 (a).

Implementing a minimum average residential DGA density of 71.4 over the entirety of the DGA in Brantford as required to conform to the provisions of Growth Plan Policy 2.2.7.6 (a) is not practical, but is required by policy in a conform with policy environment.

The Province has recently proposed Amendment No. 1 to the 2017 Growth Plan. As part of this amendment, the Province is proposing changes that would directly impact the required densities in Brantford's DGA. It is the recommendation of this report that the completion of the Envisioning Brantford process be deferred until such time as Amendment No. 1 is in force and effect. This would allow the City and members of the public to participate fully in the

processing of Amendment No. 1 to ensure appropriate DGA density requirements for Brantford are established through that process. It may also provide the opportunity to incorporate any changes arising from the upcoming update to the population forecasts mandated by 2017 Growth Plan Policy 5.2.4.6.

REPORT

1.0 Scope of the Assignment

Eby GMPS was retained by the Langford Conservancy to perform a scoped review of the Envisioning Brantford - Municipal Comprehensive Review Part 1: Employment Strategy, Intensification Strategy, Housing Strategy and Land Needs (Envisioning Brantford document). This assignment was to review whether the alternative Designated Greenfield Area (DGA) density recommended in the Envisioning Brantford document conforms to 2017 Growth Plan Policy 2.2.7.6 (a). Policy 2.2.7.6 (a) states:

"For upper- and single-tier municipalities in the outer ring, council may request an alternative to the target established in policy 2.2.7.2 through a municipal comprehensive review where it is demonstrated that the target cannot be achieved and that the alternative target:

a) will maintain or improve on the minimum density target in the official plan that is approved and in effect as of July 1, 2017; ..."

2.0 Comparing the 2006 and 2017 Growth Plan Minimum DGA Density Targets

2.1 2006 Growth Plan DGA Density

The 2006 Growth Plan DGA density of 50 residents and jobs combined per hectare applies to all areas outside the built boundary, except for the following environmental features, which are excluded from the calculation:

"wetlands, coastal wetlands, woodlands, valley lands, areas of natural and scientific interest, habitat of endangered species and threatened species, wildlife habitat, and fish habitat"

The list of exclusions from the DGA density calculations in the 2006 Growth Plan was definitive: they were all environmental features. As a result, the density calculations undertaken in accordance with the 2006 Growth Plan had to include lands such as roadways, utility corridors, golf courses and cemeteries, as well as any environmental features not contained in the list above. This would include buffers, linkages and floodplains not part of valley lands or other features listed.

The 2006 DGA density was a blend of densities applicable to both residential and employment areas. Municipalities could plan for less than the minimum density in portions of the DGA, but any shortfalls in densities in one area were required to be compensated for in others.

2.2 2017 Growth Plan DGA Density

The 2017 Growth Plan DGA density applies to all areas outside the built boundary, except for the exclusions permitted under the 2006 Growth Plan, and the following:

• employment areas

• rights-of-ways for electricity transmission lines and energy transmission pipelines

• freeways and railways

• cemeteries

• floodplains, environmental linkages, and potentially key hydrological areas, sand barrens, savannahs, tall grass prairies, alvars, federal and provincial parks, conservation reserves, lands that have been restored or have the potential to be restored to a natural state, associated areas that support hydrological functions, and working landscapes that enable ecological functions to continue

In the City of Brantford, the required DGA density as required by the 2017 Growth Plan is 80 residents and jobs per hectare. The 2017 DGA density only applies to what are primarily residential areas - and associated commercial and institutional land uses - and is based on the exclusion of a much broader range of environmental features, infrastructure and land uses than the 2006 Growth Plan DGA. An alternative DGA density may be approved by the Province, subject to the provisions of 2017 Growth Plan Policy 2.2.7.6.

2.3 Use of the Term "Residential DGA" in this Analysis

The Envisioning Brantford document interchangeably uses "DGA Developable Areas", "Existing DGA" and "Community Areas" when referring to existing DGA currently within the settlement area boundary in the Brantford Official Plan. These areas are the functional equivalent of the term "residential DGA" used in the 2006 Growth Plan analysis to differentiate between residential and employment area DGA, and as such, will be referred to as "residential DGA" consistently throughout the remainder of the analysis. Residential DGA includes all lands typically associated with residential areas, including associated small scale commercial and institutional uses such as schools, recreational facilities, cemeteries and places of worship.

Where necessary, the residential DGA in this analysis will be specifically identified as having been calculated based on the 2006 or 2017 Growth Plan exclusions.

3.0 Brantford Minimum DGA Density Targets (in effect on July 1, 2017)

Policy 15.4.2 of the Brantford Official Plan provides policy direction related to the DGA density requirements. Policy 15.4.2 states:

"It is the intent of this Plan to achieve a minimum gross density target of SO residents and jobs combined per hectare in the Greenfield Areas. The density target is measured over the entire designated Greenfield Areas, excluding natural heritage features identified in provincial plans and this Plan that prohibit development: wetlands, woodlands, valley lands, areas of natural and scientific interest, habitat of endangered and threatened species, wildlife habitat, and fish habitat."

This policy was adopted and approved under the provisions of the 2006 Growth Plan. It is important to note that like the DGA density target provided for in the 2006 Growth Plan, the density target in the Brantford Official Plan is a blended target for residential and employment uses. As a result, any reduction in the densities applicable to one type of land use need to be compensated for with corresponding increases in the other.

3.1 Existing Employment Area DGA Densities - 2006 Growth Plan Exclusion-Based Calculation

The Envisioning Brantford document assumes an average density of 25 jobs per hectare (page

73) on the 390.4 hectares of existing employment area DGA (Table 9.1). This would result in a total of 9,760 jobs within the existing employment area DGA upon full build-out.

It is important to note, however, that the 390.4 hectares of existing employment area DGA identified in Table 9.1 is net of exclusions permitted by the 2017 Growth Plan and needs to be adjusted to permit comparisons to the 2006 DGA density. Table 9.1 also identifies 76 hectares of major infrastructure that appears, based on Figure 9, to be located directly adjacent to or running through employment area DGA. This infrastructure was not permitted to be excluded as part of the DGA density calculations under the 2006 Growth Plan. Combining the infrastructure (76 hectares) with the 390.4 hectares of employment area DGA from Table 9.1 results in a total of 466.4 hectares of employment area DGA based on the 2006 Growth Plan exclusions. Recalculating the employment area DGA density using this combined total, as would have been required by the 2006 Growth Plan, results in an average DGA density for employment areas of 20.9 jobs per hectare.

This is consistent with the proposed 20 jobs per hectare employment area DGA density originally recommended in the 2016 Draft Brantford Official Plan as noted in the Envisioning Brantford document (page 72) that would have been based on the 2006 Growth Plan exclusions.

3.2 Existing Residential DGA Densities - 2006 Growth Plan Exclusion-Based Calculation

3.2.1 Calculating the Compensation Resulting from the Employment Area DGA as Required to Conform to the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2

In order to achieve the average 50 residents and jobs combined per hectare as required by the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2, any shortfall in density resulting from the 20.9 jobs per hectare density applicable to the employment area DGA needs to be compensated for within residential DGA. This compensation would be calculated as follows:

Required Compensation for Shortfall in Density Target on Employment Area DGA Required to be Applied to the Residential DGA = (466.4 hectares of employment DGA based on 2006 Growth Plan exclusions x 50 residents and jobs combined per hectare as required by Brantford Official Plan Policy 15.4.2)- (9,760 jobs in employment areas within the existing DGA upon full build-out)= 13,560 combined residents and jobs

3.2.2 Calculating the Residents and Jobs Combined Required on the Existing Residential DGA to Conform to the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2

There are 664 hectares of residential DGA identified on Table 9.1 based on exclusions permitted by the 2017 Growth Plan. Table 9.1 identifies another 12.7 hectares of cemetery that appears, based on Figure 9, to be surrounded by residential DGA. This cemetery was not permitted to be excluded as part of the DGA density calculations under the 2006 Growth Plan. Combining the cemetery lands (12.7 hectares) and the 664 hectares of residential DGA from Table 9.1 results in a total of 676.7 hectares of residential DGA based on the 2006 Growth Plan exclusions. This is the area to which the DGA density requirements under both the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2 would apply.

The number of residents and jobs that would need to be located on the above noted 676.7 hectares to comply with the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2 would be calculated as follows:

Residents and Jobs Combined Required to be Accommodated within the Existing Residential DGA to Comply with the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2 = (676.7 hectares of residential DGA based on 2006 Growth Plan exclusions x the Policy 15.4.2 DGA density target of SO residents and jobs combined per hectare)+ the 13,560 residents and jobs required as compensation for the shortfall in the density target on employment area DGA = 47,395 residents andjobs

3.2.3 Calculating the Residential DGA Density Required to Conform to the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2

Dividing the required 47,395 residents and jobs by the 676.7 hectares of residential DGA calculated using the 2006 Growth Plan exclusions, results in a required residential DGA density of 70 residents and jobs combined per hectare. This is the residential DGA density that Brantford had to be planning for to conform with the requirements of Brantford Official Plan Policy 15.4.2 and the 2006 Growth Plan.

3.2.4 Adjusting the Residential Density to Permit Direct Comparison with the Requirements of the 2017 Growth Plan

To provide a direct comparison between the residential DGA density requirement of Brantford Official Plan Policy 15.4.2 and the density requirements of the 2017 Growth Plan, the 47,395 residents and jobs would be divided by the 664 hectares of DGA using exclusions from the 2017 Growth Plan (removing the 12.7 hectare cemetery from the calculation). This results in a residential DGA density of 71.4 residents and jobs combined per hectare.

4.0 Anticipated Growth on Existing Residential DGA

Based on the Envisioning Brantford document (Table 10.18), the proposed 2041 residential DGA density on the existing residential DGA lands using the 2017 Growth Plan exclusions is 47.2 residents and jobs combined per hectare.

5.0 Proposed Alternative Density

The Envisioning Brantford document proposes a settlement area expansion of 460 hectares for residential DGA purposes and provides for a density of 60 residents and jobs combined per hectare on these lands. This would result in an overall density for the proposed residential DGA following expansion of the settlement area of 52 residents and jobs combined per hectare.

This is the alternative density proposed by the Envisioning Brantford document.

6.0 Conformity of the Proposed Alternative Density Target to 2017 Growth Plan Policy 2.2.7.6 (a)

Policy 2.2.7.6 (a) of the 2017 Growth Plan states that alternative densities will maintain or improve on the minimum density target in the official plan that is approved and in effect as of July 1, 2017. In responding to this requirement, the Envisioning Brantford document states:

"The minimum density target in effect in the City's current Official Plan is 50 residents and jobs combined per hectare. However, It Is not reflected in what has been built to date in the DGA, largely due to the addition of Tutela Heights, but it is being achieved In current registered and draft approved plans of subdivision. The in-effect density will increase as the remaining vacant lands in the current Settlement Area boundary (i.e. the Existing DGA) are planned to achieve a higher density of 55 residents and jobs combined per hectare. In addition, the density on new Community Area DGA lands (i.e. the New DGA) will be planned achieve 60 residents and jobs combined per hectare, which also improves the in- effect density target. [emphasis added]"

The Envisioning Brantford document directly equates the 50 residents and jobs combined DGA density contained in the 2006 Growth Plan, and reflected in Brantford Official Plan

Policy 15.4.2, with the DGA density target provided for in the 2017 Growth Plan. This is a good example of comparing apples and oranges. They may both be fruit - or in this case densities - but they are completely different things.

After compensating for the reduced employment area DGA density as required under the provisions of the 2006 Growth Plan and Brantford Official Plan Policy 15.4.2, and then adjusting the density to make it comparable to the 2017 Growth Plan requirements, the required density for residential DGA in Brantford is 71.4 residents and jobs combined per hectare. The Envisioning Brantford document proposes a density applicable to the same lands of 52 residents and Jobs combined per hectare based on the 2017 Growth Plan exclusions.

Applying a 52 residents and jobs combined per hectare density to lands that are currently subject to a directly comparable required density of 71.4 residents and jobs combined per hectare does not conform with the requirement to "maintain or improve on the minimum density target in the official plan that is approved and in effect as of July 1, 2017" as required by 2017 Growth Plan Policy 2.2.7.6 (a).

7.0 Populatf on Projections

2017 Growth Plan Policy 5.2.4.7 requires the Province to review the Growth Plan population forecasts every five years. The last update to the forecasts was in 2013, so an update should be underway at this time or in the immediate future.

In reviewing the most recent population projections by the Ministry of Finance (Spring 2018), it is noted that the 2041 population projection for the Brant Census Division - which includes Brant County and the City of Brantford - is 185,100. This compares to a corresponding Growth Plan 2041 population forecast - attained by combining the City Brantford and the County of Brant forecasts in Schedule 3 - of 220,000. This 34,900 projected population difference to 2041 between the Spring 2018 Ministry of Finance projections and the Growth Plan forecasts prepared in 2013 is of serious concern as it can affect both the amount of land required to accommodate growth and the corresponding development related revenues generated to pay for infrastructure, usually required in advance, to provide for such growth.

As noted in the document "A Review of the Residential Land Needs Assessment Process Associated with Implementation of the Growth Plan for the Greater Golden Horseshoe" released by the Friends of the Greenbelt Foundation in July 2016:

"The annual Ministry of Finance population projections are trends-based extrapolations of demographic, immigration, and migration data available at the time they are prepared. They do not reflect policy-based assumptions or preferences for the distribution of growth. The Growth Plan population forecasts reflect the same basic demographic, immigration, and migration assumptions as the MOF projections for the Greater Golden Horseshoe as a whole, but the population is distributed across the Greater Golden Horseshoe based on the policy objectives

of the Growth Plan, aligned where possible with the growth aspirations of individual municipalities."

In the background document "Greater Golden Horseshoe -Growth Forecasts to 2041, Technical Report (November 2012) Addendum" prepared by Hemson Consulting Ltd. as justification for the most recent update to the Growth Plan population forecasts, the reference scenario - the scenario used in the Growth Plan - projected a 2016 population for the City of Brantford of 104,000. The 2016 Census population, including assumed undercount, for the equivalent area - prior to the boundary adjustment - as reported in the Envisioning Brantford document (page 9) was 100,525. This represents a shortfall in the Growth Plan population forecast of 3,475 or 43 percent of the growth projected by Hemson Consulting Ltd. for the City of Brantford in just the first five years of the forecast (2011 to 2016).

It would appear based on these early findings that the population for the City of Brantford may be trending closer to the Ministry of Finance projection than the Growth Plan forecast. It is unclear what policy levers either the Province or the City of Brantford has available to it to ensure the Growth Plan forecasts are achieved.

8.0 Conclusions/ Recommendation

Direct comparisons of the DGA density requirements between the 2006 and 2017 Growth Plans are not appropriate without adjustments first being made to equate the two policy requirements as noted in this report. The authors of the Envisioning Brantford document have failed to properly apply Policy 2.2.7.6 (a) of the 2017 Growth Plan. The alternative density of 52 residents and jobs combined per hectare as proposed by the Envisioning Brantford document does not conform to 2017 Growth Plan Policy 2.2.7.6 (a).

Using the minimum required density of 71.4 residents and jobs combined per hectare resulting from the application of Policy 15.4.2 in the Brantford Official Plan as required by 2017 Growth Plan Policy 2.2.7.6 (a), an expansion of only 161 hectares for residential DGA can be justified, as opposed to the 460 hectares proposed by the Envisioning Brantford document. The permitted expansion is calculated as follows:

{58,916 residents and jobs combined required to be accommodated in the residential DGA - 47,395 residents and jobs required to be accommodated in the existing residential DGA at a density of 71.4 residents and jobs combined per hectare)/ 71.4 residents and jobs combined per hectare = 161 hectares

Implementing a minimum average residential DGA density of 71.4 over the entirety of the DGA in Brantford as required to conform to the provisions of Growth Plan Policy 2.2.7.6 (a) is not practical, but is required by policy in a conform with policy environment.

The Province has recently proposed Amendment No. 1 to the 2017 Growth Plan. As part of this amendment, the Province is proposing changes that would directly impact the required densities in Brantford's DGA.

It is the recommendation of this report that the completion of the Envisioning Brantford process be deferred until such time as Amendment No. 1 is in force and effect. This would allow the City and members of the public to participate fully in the processing of Amendment No. 1 to ensure appropriate DGA density requirem ent s for Brantford are established in the Growth Plan through that process. It may also provide the opportunity to incorporate any changes arising from the upcoming update to the population forecasts mandated by 2017 Growth Plan Policy 5.2.4.6.

Respectfully Submitted [↑](#endnote-ref-1)
5. [https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES](https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may%2B18%2Bhousing%2Bex.pdf?MOD=AJPERES) [↑](#footnote-ref-4)
6. <https://www.simcoe.ca/dpt/pln/growth> [↑](#footnote-ref-5)
7. <https://www.citybuildinginstitute.ca/portfolio/missing-middle/> [↑](#footnote-ref-6)
8. <https://www.citybuildinginstitute.ca/portfolio/missing-middle/> [↑](#footnote-ref-7)
9. <https://www.cmhc-schl.gc.ca/en/housing-observer-online/2018-housing-observer/drive-until-you-qualify-is-commute-worth-it> [↑](#footnote-ref-8)