

December 23, 2022

390-21

Via Email

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

Provincial Land Use Plans Branch
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**RE: MTSA Designation – Request for Changes to the Growth Plan
ERO No. 019-6177**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) provides expert land use planning advice and assists proponents secure the required municipal approvals for a variety of development projects throughout southern Ontario and would like to thank you for the opportunity to comment on the proposed amendment to A Place to Grow; Growth Plan for the Greater Golden Horseshoe (Growth Plan) via ERO No. 019-6177. We represent the landowner of the property municipally known as 63 Albany Street, Oshawa, which is located directly west of the future Central Oshawa GO Station, opposite Front Street (Appendix A).

As the Province works to address the housing crisis currently facing Ontario, it will become even more critical for Major Transit Station Areas (MTSAs) to achieve their role as strategic growth areas to be the focus of higher densities and intensification across the various regions of the Greater Golden Horseshoe. Given their connectivity within and across municipalities, MTSAs are strong candidates for high density mixed use development to facilitate the creation of complete, transit-oriented communities. The purpose of this submission is to provide comments and recommendations with regard to the Major Transit Station Area (MTSA) population target policies within the Growth Plan as they relate to the City of Oshawa and Greater Golden Horseshoe.

In November of 2019, Council directed Region of Durham Planning staff to accelerate the preparation of Major Transit Station Area policies, including delineations and density targets as a part of the broader 'Envision Durham' municipal comprehensive review process. In response, the Region adopted Regional Official Plan Amendment 186 (ROPA 186) on December 22, 2021, which establishes a policy framework and delineations for seven (7) Protected Major Transit Station Areas (PMTSAs) across the Region; including the 'Central Oshawa' PTMSA in which the subject lands reside (Appendix B). The Amendment also prescribes a minimum density target of 150 people and jobs per gross hectare within these areas

(Section 8A.2.14) in accordance with the Growth Plan. ROPA 186 is currently under review by the Minister of Municipal Affairs and Housing and within a 60-day public commenting period via ERO No. 019-5147, ending February 3, 2023. As such, this Letter will be accompanied by a forthcoming submission through the ERO process, providing comments and recommendations with regard to the PMTSA policies proposed by ROPA 186.

The above-noted property is designated 'Residential' within the 'Main Central Area' as well as the 'Central Oshawa Transportation Hub' boundary in the City of Oshawa Official Plan and is zoned R2 (Single/Semi Detached); R3-A.F5.5 (Townhomes); R6B(2) and R6-C(11) Apartments, LT, Nursing h-7 (Site Specific) Zone in the City of Oshawa Zoning By-law No. 60-94. On May 20, 2022, an Official Plan and Zoning By-law Amendment application was submitted to facilitate the development of a 15-storey, 286-unit multiple dwelling and eighteen (18) townhouse dwellings on the subject lands having a density of 478 units per hectare.

Major Transit Station Areas

As stated in Section 2.1 of the Growth Plan, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas including urban growth centres and MTSA's. Development in these areas provide a focus on investment in transit as well as other infrastructure to support forecasted growth and a diverse range and mix of housing options. In Section 2.2.4.3 of the Growth Plan, MTSA's are prescribed to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. This intensification target is insufficient given the anticipated scale of development in MTSA's.

As previously noted, ROPA 186 includes a number of policy changes including the establishment of a minimum density target of 150 people and jobs per hectare within PMTSA's in accordance with the Growth Plan. The Amendment notes that PMTSA's, Urban Growth Centres, and Regional Centres are intended to serve as focal points of urban development and intensification in the Region (Section 8.1.10). Although the City of Oshawa Official Plan has not yet been updated to include PMTSA specific policies, it does set a target density range of 150 to 550 units per hectare for lands designated 'High Density Residential II' within the Downtown Oshawa Urban Growth Centre. As such, increasing the prescribed densities for MTSA's in the Growth Plan would in turn improve those established in Regional and Municipal Official Plans, as they must conform to and implement the objectives of the Growth Plan. It can therefore be concluded that the Growth Plan's prescribed MTSA density of 150 residents and jobs per hectare should be increased to 500 residents and jobs per hectare to better align with the anticipated scale and density of development within a strategic growth area like an MTSA/PMTSA.

Given that the majority of regional and municipal growth will need to be directed to strategic growth areas like MTSA's/PMTSA's, the prescribed rate of 150 residents and jobs per hectare established by Section

2.2.4.3 of the Growth Plan (and consequently, Section 8A.2.14 of ROPA 186) is in need of an increase to better represent the intensification needed to facilitate the targeted growth. As it is anticipated that many other sites will be developed and a majority of those sites located within MTSA/PMTSA areas will contain high density development, it is clear that there is a disconnect between the provincial growth targets and the level of density constructed within these areas in reality.

Recommended Changes to the Growth Plan

MTSAs require a consistent, suitable policy framework to realize their vital role in realizing the Province's intensification targets. As such, UrbanSolutions recommends the following change to the Growth Plan to achieve the Province's vision for transit-oriented communities that MTSAs/PMTSAs emphasize:

1. Modify Policy 2.2.4.3 to increase the proposed density target from 150 to 500 residents and jobs per hectare for Major Transit Station Areas served by the Go Transit rail network to accurately reflect the planned built form envisioned by the MTSA/PMTSA.

As proposed, the aforementioned change will strengthen the policy framework to provide clarity of implementation, ensure the goals and objectives of the MTSAs/PMTSAs are realized and align with realistic growth and development outcomes. The balance of the Growth Plan contains the appropriate range of policies to protect matters of provincial interest while also ensuring sufficient transportation and infrastructure requirements of any residential intensification development are secured.

Kind Regards,

UrbanSolutions



Matt Johnston, MCIP, RPP
Principal



Matthew LeBlanc, MPL, BA (Hons)
Planner

cc: Mr. David Horwood, Albany Street Investments Ltd. (via email)

Appendix A: Subject Lands in Proximity to Future Oshawa Central GO Station



Appendix B: Subject Lands within the Central Oshawa Protected Major Transit Station Area

