

August 3, 2023

Attn: Growth Planning
Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON
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Canada

RE: Environmental Registry of Ontario Posting 019-6813: Review of *Provincial Policy Statement* and *A Place to Grow: A Growth Plan for the Greater Golden Horseshoe* to develop a new Provincial policy planning instrument

Please accept this letter in response to Environmental Register of Ontario (ERO) proposal 019-6813 which seeks input on a review of the in-effect *Provincial Policy Statement* (PPS) and *A Place to Grow: A Growth Plan for the Greater Golden Horseshoe* ('Growth Plan') to facilitate the creation of a new Provincial policy planning instrument referred to as a 'Provincial planning statement' (Pps).

Proposal Summary and General Comments

Staff understand that the Province is looking to introduce new planning legislation and planning policy in an effort to address the demand for a broader range of affordable housing options. The PPS and Growth Plan provide comprehensive direction on both land use and growth management matters as to protect the public interest and the environment by promoting compact built forms, complete communities (including jobs), and wise management of irreplaceable resources such as farmland or aggregate minerals. The proposed Pps seeks to consolidate these two documents to ensure that "the policy framework is housing-supportive" (ERO Proposal 019-6813 - Proposal Summary: Context, Paragraph 6) and facilitates the construction of 1.5 million new homes by 2031, as per the Province's Housing Supply Action Plan.

Upon review of the proposed Pps, the new Pps makes strides in certain areas, such as creating the right conditions to facilitate more intensification and protecting employment areas from encroachment by retail uses and sensitive land uses, many aspects related to comprehensive land use planning, particularly those around growth management, are being removed to addressing demand for housing.

The new Pps re-aligns almost all matters related to land-use planning in Ontario towards addressing the demand for housing. This is reflected in the five categories of policy in the new Pps, which are: *generate an appropriate housing supply; make land available for development; provide infrastructure to support development; balance housing with resources, and; implementation*. With this re-alignment, staff question whether such an approach is appropriate for two main reasons.

Firstly, policy planning requires a long-term horizon to ensure that, for example, a key hydrologic features or prime agricultural land are both protected for generations. The realignment of the entirety of the Provincial planning system

to address a short-term issue, being the lack of housing supply – short term in relation to the length of time it takes for soil on prime agricultural land to become fertile – is at odds with the principle of sustainable land use planning.

Secondly, it is unclear how it will facilitate the approval and construction of more homes. Regarding approvals, the removal of Provincial targets and requirements to follow a common methodology on how to quantify land need will result in inconsistent approaches to growth management. This will subsequently result in disagreements between developers (who will compete to prepare land for development), municipalities (who will seek to control pace and location of development – in particular tied to the community and infrastructure needs), and Regions/Counties (who control infrastructure servicing) about growth figures, leading to lengthy Ontario Land Tribunal hearings. This will result in delays and longer approval timelines and will not establish complete communities.

The proposed Pps is focused on facilitating development approvals by removing perceived barriers, whether they be numerous studies, plans and reports or prescriptive growth management policies and targets. However, the approval of development is not the principal cause of the housing crisis. Rather, it is the lack of housing being built. There is a healthy supply of approved housing units in the Greater Golden Horseshoe. At time of writing, approximately 19,000 homes are approved for development in Barrie, which is enough to address almost 10 years for population growth. The number of building permits, while increasing in recent years, historically has remained below the levels required to reach Barrie's growth forecast.

Increasing the supply of approved housing units is not the only issue involved in a lack of housing supply. Rather, tools are required to facilitate construction of housing units. Municipalities do not build homes – housing service providers excluded – so it is unclear how the proposed Pps will facilitate “meeting the target to construct 1.5 million new homes by 2031” (ERO Proposal 019-6813 - Proposal Summary: Context, Paragraph 6).

What follows are a series of comments related to specific policies in the proposed Pps. These comments are organized according to the six discussion questions asked in the ERO proposal.

Responses to ERO Questions

Q1: What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?

Staff are of the opinion that too few Growth Plan policies have been carried over. Specifically, it appears that only seven policies in the proposed Pps policies can be tied to/are carried over from the Growth Plan. Staff are particularly concerned with the removal of the following growth management policies:

2.2.1.1 – Establishes the Schedule 3 population and employment forecasts as well as their planning horizon.

The removal of this policy will allow municipalities, developers, and other organizations to set their own growth forecasts without a common/shared methodology. Should growth projections differ, which is to be expected as different organization have different growth aspirations, assumptions, data sources, and use different methods to establish growth forecasts, there will be lengthy OLT hearings that will delay implementation of policy and will ultimately delay development approvals and construction of housing. It is recommended that the Province maintain the in-effect growth targets as minimums that must be implemented by local municipalities vs. disseminated by upper-tiers/approval agencies. To simplify the process, the new Pps could provide a range of housing units, rather than population forecasts, that a municipality should plan to achieve by a given date, similar to the Housing Pledge.

It is recommended that the prohibition of establishing new settlement areas be maintained or establish new settlement area boundaries only if it is required to support an economic development opportunity (e.g. new manufacturing plant) or tied to a Provincially strategic initiative. While creating more housing is a Provincially

strategic initiative, it should not be the impetus for establishing new settlement areas. The need for consistency in planning for and forecasting growth is paramount in order to reduce conflicts, over designation of land, allow for smooth implementation of the new Pps.

2.2.1.5 – The establishment of a Land Needs Assessment Methodology (LNAM) and requirement for municipalities to use the LNAM to determine land needed to accommodate the forecasted growth as well as justify settlement area boundary expansions.

By preserving a standardized approach to calculating land needed to accommodate minimum growth forecasts, as established by the Province, it will not only maintain consistency in approach to growth management across Ontario, but will also reduce OLT appeals as all parties will be using the same approach. It is recommended that the Province require, at minimum, that large and fast-growing municipalities be directed to follow a simplified LNAM to determine land needed to accommodate their growth targets and, if required, justify a settlement area boundary expansion (discussed below). At the very least, a new LNAM should be used by large and fast-growing municipalities to determine their land need for the minimum 25 year planning horizon, introduced by policy 2.1.1 of the proposed Pps, and beyond.

- *2.2.2.3 – The requirement for municipalities to establish minimum intensification targets and strategies to achieve same.*

This policy should remain as it underpins many 'intensification first' oriented growth management strategies for many municipalities in Ontario, including Barrie's. General intensification, being intensification that is not focused towards SGAs, can help alleviate demand for housing in established neighbourhoods. Furthermore, intensification strategies can help facilitate intensification in a context sensitive manner, resulting in few appeals and more housing units being built. It is recommended that the Province revamp the general/built-up area focused intensification policies to require municipalities to accommodate a portion of their forecast growth outside SGAs. In addition to facilitating context sensitive intensification (e.g. along intensification corridors), these policies would support and facilitate, politically and through land use policy, the creation of additional dwelling units permitted by Bill 23.

- *2.2.3 – Policies that identify Urban Growth Centres (UGC) as the primary focus of intensification as well as removal of density targets.*

It is recommended that the new Pps re-enforce UGCs as primary areas of intensification as well as maintain their growth targets, similar to those proposed for Major Transit Station Areas (MTSA).

- *2.2.8 – Settlement Area Boundary expansions.*

The settlement area boundary expansion policies in the Growth Plan are comprehensive and a critical instrument in preventing unnecessary expansions and protecting irreplaceable natural heritage resources and prime agricultural land. Furthermore, it is unclear what will be achieved by removing these policies given the healthy supply of approved housing units. It is recommended that the Province continue to tie settlement area boundary expansions to Provincially established growth targets and results of a LNAM. Without this, municipalities will be inundated with site specific 'pocket expansion' requests applications that will be appealed by developers seeking their own pocket expansion as well as advocacy agencies looking to protect farmland, natural heritage resources, or ratepayer groups seeking to limit impact of development on their communities. Furthermore, if municipalities are already planning for 25 years' worth of growth, pocket expansions are not necessary. It is unclear why there is a need for settlement area boundary expansions to occur at any time and be initiated by any party for any reason.

It is recommended that the settlement expansion policies in the proposed Pps be revised as to:

- o Require an LNAM to be completed every five years (tied to timing of official plan update) to determine if an expansion is warranted;
- o Permit expansion only once intensification potential has been maximized;

- Identify location of expansion to be determined according to comprehensive land use planning and scientific criteria, such as the criteria provided in the current Growth Plan, although simplified, rather than developer interest or a developer's willingness to pay for new infrastructure, and;
- Require expansions to be sustainable from an infrastructure and financial perspective.

These simple criteria will allow enough land to be continually available for development without lengthy OLT hearings, pocket expansions, and loss of irreplaceable prime agricultural land and other significant natural heritage resources.

Q2:

What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?

- Staff are of the opinion that the concept of a *large and fast-growing municipality* (LFGM) is appropriate given the trend towards urbanization in Ontario and globally. Policies which support LFGMs, as well as empower them to attract and control growth, are critical to addressing the housing crisis. At the same time, however, development of LFGMs should not permit the development of isolated predominantly residential communities, created through pocket settlement area boundary expansions. LFGMs need to be planned to grow as complete communities that are characterized by compact build forms. Given this, it is recommended that policies which speak to planning completed communities, being the Vision section and policy 2.1.4, be revised to speak to LFGMs being planned to grow as complete communities. Specifically, policy 2.1.4. can be revised to include language that planning authorities of LFGMs to be *required* to plan and support achievement of complete communities; language similar to policy 2.4.1., which states "and large and fast-growing municipalities shall", could also be used in policy 2.1.4.
- Similar to points made in response to Q1 above, it is recommended the LFGMs be provided with minimum growth targets and be required to complete a land needs assessment, according to a provincially established LNAM, to determine land need to achieve targets.
- The proposed minimum density targets for LFGMs in policy 2.3.5 of the proposed Pps is too low. Barrie, being a mid-sized city that is part of the GTAH mega-region, can easily achieve and exceed this target. It is recommended that LFGMs be required to establish their own targets, with targets being required to be 10% higher than densities already being achieved on developing designated greenfield area lands.
- Policy 2.4.1 of the proposed Pps should be expanded to required LFGMs to direct a portion of their forecast growth to already built-up areas, similar to Growth Plan policies that require a portion of the forecast growth to be directed to the built-up area. LFGMs should be able to delineate their own built-up areas and expand them at the time of an Official Plan update to reflect its expansion as development occurs.
- As stated in response to Q1, the role of UGCs needs to be strengthened, particularly in LFGM. It is recommended that the in-effect minimum density targets be maintained.

Q3:

What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?

- The introduction of a definition for the term 'housing options' is supported as it sets the expectation that municipalities are to plan according for a continuum of housing options, which may mean introducing new housing types in a municipality. Further, by requiring municipalities to plan for housing options, municipalities may begin to introduce different built form types within establish neighbourhoods that are dominated by one housing type (e.g., single detached), providing more equitable access to these neighbourhoods as well as improving their social resiliency and creating opportunities to age in place.
- Requiring LFGMs to conduct land needs assessments to accommodate the forecast growth will facilitate an evaluation of the housing options required to accommodate same. As such, a land needs assessment is more than just a tool to quantify land need. Rather, they are tools through which municipalities determine

the mix of housing required for accommodate the forecast growth. This creates demand and opportunity for the introduction of a broader range of housing types. It is recommended that proposed Pps policy 2.1.2 be expanded to require a quantitative assessment of housing options be completed as part of a broader growth management strategy required to accommodate Provincially mandated growth forecasts. At minimum, this should be a requirement for all LFGMs.

- The proposes Pps appears to shift intensification from the Built-Up Area (BUA) towards Strategic Growth Areas (SGA). While the BUA concept was imperfect, the requirement for municipalities to direct a portion of their forecast growth to lands in the BUA helped municipalities build more compact communities, facilitate re-development of underutilized land, and efficiently use lands with existing infrastructure, all of which is good planning. It is recommended that the proposed Pps be amended to direct a portion of their forecasted growth to lands outside SGAs, but within self-identified built-up areas. This should be required, at a minimum, in LFGMs to support density targets established in 2.4.1.1.a).

Q4:

What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?

- As stated above, the removal of growth targets, the LNAM, and requirement for expanding settlement area boundaries will put unnecessary pressure on Ontario's prime agricultural land, natural heritage resources, as well as aggregate minerals. Proposed Pps policy 4.3.2.5 allows for the creation of additional dwellings units on prime agricultural areas. The need for this policy, as well as other permissive lot creation policies, such as proposed Pps policy 4.3.3.1, is questionable.

Q5:

What are your thoughts on the proposed policies regarding planning for employment?

- It is recommended that the proposed Pps include a definition for the term 'employment use'. This definition is implied in the definition for employment area, but a separate definition, one that is referenced in the definition of employment area, is recommended.
- The removal of Growth Plan employment forecasts will require municipalities to establish their own targets. This may be appropriate given there is less demand for employment area land than land for residential development. The proposed Pps does not provide sufficient direction on how municipalities are to plan for non-employment uses, so there is a very real possibility that all land within a municipality's settlement area(s) may be quickly consumed by non-employment uses. It is strongly recommended that the proposes Pps policy 2.8.1.a) include provisions on how municipalities are to provide for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs. This process should be similar to quantifying land need. Without some quantitative process of evaluating demand for employment area land, municipalities will be unprepared to accommodate employment growth and will not be able to meet policies 2.8.1.b)-d).
- Similar to the comment above, additional guidance on how municipalities are to plan for, protect, and preserve lands within employment areas is required. Specifically, additional direction is required for municipalities to quantify future need (2.8.2.1.a)) and employment area uses over the long term (2.8.2.2.a)) While Provincially prescribed employment targets may not be required, a process for establishing targets or quantifying need is recommended.
- The provision of a narrow definition of 'employment area' is supported as well as the provision of policies that outline the uses that are appropriate within employment areas (2.8.2.2). Employment areas, as presently defined, are constantly under pressure to encroachment by non-employment uses, such a retail or residential uses.
- It is recommended that, similar to comments above, the Province provides criteria for determining whether "there is a need for the removal [of employment area land] and that the land is not required for employment area uses over the long term", as required under policy 2.8.2.4.a). Without a prescribed process

municipalities will be under pressure to convert employment area land to non-employment area uses by developers of same. This may lead to lengthy OLT hearings which will neither lead to creation of more housing units or allow for municipalities to remain poised to be economic competitive.

Q6:

Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?

- As stated throughout this letter, staff are of the opinion that the removal of growth management polices and targets which allow municipalities to appropriately and comprehensively plan for growth in a sustainable way will ultimately result in delays in implementation, which is at odds with the Province's desire to address the housing crisis. Deregulation for the sake of removing perceived barriers to growth is not a solution to the housing supply and affordability crisis.

Transition Matters

Staff strongly support the Province's approach to transitioning away from the Growth Plan. Of particular importance is the need for the 2041 and 2051 targets, where reflected in an in-effect Official Plan, continue to be applied. These targets are the basis for comprehensive master planning exercises and provide municipalities with a stable environment in which to plan for future growth.

It is recommended that the Province shelter from appeal Official Plan Amendments which implement the Province's new definition of employment areas. Sheltering these amendments will allow municipalities to make the right decision for the community, without having to make decisions due to the threat of appeal to the OLT. Finally, it is recommended that a conformity date be provided to give municipalities a clear target date to implement the employment area changes.

Other Comments

- Proposed Pps policy 2.8.1.2 is unclear and requires revision.
- It is recommended that policy 1.1.3.5 of the in-effect PPS be maintained and be re-aligned with policies that target intensification in built-up areas, as recommended above.
- Policy 1.1.3.6 & 1.1.3.7 of the in-effect PPS is proposed to be removed. This policy is important in ensuring new development on designated greenfield area land is well integrated with developed areas. Further, this policy supports the logical and progressive development of land. This is important as without this policy 'leap frog' development could occur, particular if 'pocket' settlement area boundary expansions are permitted.

Thank you for providing the opportunity to comment on this proposal.

Respectfully,



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Director of Development Services

cc: Michael Prowse, CAO, City of Barrie
Bala Aranyasundaran, P.Eng, PMP, General Manager of Infrastructure and Growth Management, City of Barrie
Wendy Cooke, Clerk, City of Barrie