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**Review of A Place to Grow and Provincial Policy Statement**

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**Repeal of the Growth Plan for the Greater Golden Horseshoe**

Overview:

The Growth Plan for the Greater Golden Horseshoe should be maintained as a provincial plan under the Places to Grow Act, 2005.

The proposed Provincial Policy Statement simply abandons virtually all the content and key goals, objectives and vision of the Growth Plan and in no way replicates the regional planning framework provided by the Growth Plan.

To address concerns of duplication and clarity, any Provincial Policy Statement (PPS) policies not currently covered by the Growth Plan – which covers the vast majority of them – should be incorporated into the Growth Plan and the PPS no longer apply to the Greater Golden Horseshoe. Further streamlining can be readily achieved by combining the other provincial plans covering the geography of the Greater Golden Horseshoe into a single provincial plan – a relatively straightforward exercise given the proposed repeal of the Parkway Belt West Plan and the Central Pickering Community Plan.

Context:

Based on decades of efforts led by provincial administrations of all political stripes, and recipient of national and provincial Awards of Excellence from the Canadian Institute of Planners and Ontario Professional Planners Institute, as well as the first plan outside the United States to win the American Planning Association’s Daniel Burnham Award, A Place to Grow is Ontario’s globally recognized growth management framework and economic strategy for the Greater Golden Horseshoe.

Created to work in an integrated manner with the Greenbelt Plan and the Regional Transportation Plan, it provides the overarching and specific policy direction for managing urban growth in one of the largest and fastest growing city-regions in North America – with a population approaching 10 million people and expected growth of another 5 million by 2051. It is designed to address planning and resource management challenges across 115 municipalities with a suite of mutually supportive elements which minimize the impacts of urban sprawl while optimizing the health, environmental, social and economic benefits of more compact, transit supportive, complete communities and urban form.

Current Status:

The Growth Plan has been instrumental and working as intended in driving the planning to provide the long-term mix, range and supply of housing units to accommodate the needs of existing and future residents in the most affordable manner as its density and intensification targets are essential in planning for the types of housing people can afford – as the following evidence demonstrates.

In January 2022, the Government’s own Housing Task Force concluded “a shortage of land isn’t the cause of the (housing) problem. Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts.”

In March 2023, Kevin Eby, RPP published a report compiling the planned housing supplies in the GGH from the land needs analyses of the 21 upper and single tiers. This revealed there were 2 million units planned – without considering any of the additional urban expansion lands approved since last fall. This validates the Task Force’s conclusions and the extensive, multi-year investment and community consultation undertaken by municipal planners and governments – specifically those at the regional level.

<https://yourstoprotect.ca/wp-content/uploads/sites/3/2023/02/REVIEW-OF-EXISTING-HOUSING-UNIT-CAPACITY-IDENTIFIED-IN-MUNICIPAL-LAND-NEEDS-ASSESSMENTS-R.pdf>

In April 2023 the Regional Planning Commissioners of Ontario concluded that, of the 2 milllion planned units, there were about 1.4 million units in the GGH under construction, approved or in process – offering further support of the effectiveness of the Growth Plan and the strong efforts municipalities have been embracing to provide for the region’s long-term housing needs. <https://yourstoprotect.ca/wp-content/uploads/sites/3/2023/03/RPCO-News-Release-Inventory.pdf>.

In Toronto, there were 213 active cranes in Spring 2023– more than the other largest 13 North American markets combined – while its official plan would allow for about 1.3 million units – or almost double that needed to accommodate its population growth to 2051.

Commentary:

Supported by its own legislation (the Places to Grow Act) and its “conform with” standard, the Growth Plan provides the specificity and standard of decision-making necessary for effective implementation. This is particularly important in regard to housing given the generic policies and lesser standard of “consistency” found in and governing the Provincial Policy Statement (PPS).

The Growth Plan is critical and integral to managing growth in the Golden Horseshoe as this region is not like other parts of Ontario and cannot and should not be woven into a province wide policy document. Home to roughly 70% of Ontario’s population while generating about the same percentage of the province’s GDP, it needs and warrants its own specific growth management framework as that provides the most strategic long term economic plan.

The Growth Plan contains many detailed metrics, policies and maps that are specific to the Greater Golden Horseshoe (GGH). The vast majority are simply being abandoned as they are not incorporated into the proposed revised Provincial Policy Statement. For instance, there is no longer any mention of the GGH – despite that geography continuing to be the focus of the Regional Transportation Plan (RTP) and Greenbelt Plan. The entire “intensification first” vision of the Growth Plan has been jettisoned including metrics for intensification targets. The efficient use of land framework for designated greenfields is discontinued – including the density targets.

Both of these foundational metrics/targets have been central to reducing the urban footprint and planning densities to create ridership to support fiscal sustainability of the $60 billion RTP. All references to complete communities have been scrapped with a singular focus on housing. Yet, all references to *affordable housing* and *low-medium income households* are being deleted despite the Government’s overarching focus on housing and the fact the metrics attached to these terms have been in use across Canada for almost 50 years – providing a standard for designing, implementing and monitoring the provision of these housing forms. Abandonment of these terms is akin to the Harper government’s abolition of the long form census in terms of a continuous data source for all sectors.

The entire role of upper tiers in managing growth has been revoked despite the upper tiers being responsible for major sewer, water, transportation, social housing and various other responsibilities. Allocating growth to upper tiers is now replaced with local municipal driven population forecasting – which has proven to be highly unrealistic in the past and was one of the key drivers in the design of upper tier growth allocation framework in the Growth Plan. The focus on 29 “large and fast growing” municipalities ignores the remaining 90+ municipalities in the GGH and will lead to even more uncoordinated and unrealistic growth and infrastructure forecasts and aspirations – exacerbated by the abandonment of watershed planning mandates of the conservation authorities and requirements of the Growth Plan.

None of the Growth Plan maps are being replicated in the PPS leaving major holes in linkages with the Regional Transportation Plan. The Agricultural and Natural Heritage System maps are being tossed aside which will result in greatly decreased awareness of these systems and further loss and degradation as virtually all the policies associated with them are being abandoned as well.

The repeal of the Growth Plan together with the abandonment of regional/upper tier planning in the Greater Golden Horseshoe makes no sense on many levels and will lead to worsening health, environmental, social and economic results while doing nothing to address the housing challenges being used as justification for these regressive actions.

If there is an argument to be made in relation to duplication of policies, then any outlying PPS policies not included in the Growth Plan should be placed in it and the PPS only apply to areas outside the GGH. This makes eminent sense since the Growth Plan already contains most of/or covers the PPS policies. In the name of efficiency, the provincial plans for the GGH could be woven into a single plan which would achieve a more manageable, user friendly and implementable planning framework for the region.

With respect to governance, rather than abandoning regional (ie. upper tier) planning – both in the Growth Plan and under the Planning Act – then consider the move to single tiers. This has proven successful in the recent move to this governance framework in Hamilton, Ottawa, Sudbury and Kawartha Lakes – where governance efficiencies are maximized and the benefits of regional growth, environmental management and inter-municipal community programming are optimized in a single level of municipal government. This, while avoiding the internecine disputes amongst local municipalities being witnessed in Peel – and the prospect of simply recreating regional government functions through a multitude of inter-municipal special purpose bodies with far less accountability than those of regional elected representatives.

Recommendations:

The Growth Plan for the Greater Golden Horseshoe should be maintained as a provincial plan under the Places To Grow Act.

All geographic specific policies and metrics relating to urban growth should be maintained within the Growth Plan including the population/employment forecasts and allocations, the intensification and density targets (for both greenfields and built-up areas).

The policies and schedules of the Natural Heritage and Agricultural Systems should also be maintained as should policies pertaining to watershed planning and integrated infrastructure planning.

In summary, the evidence has proven that the Growth Plan has been doing exactly what it was intended to and doing it well – particularly with respect to planning for long-term housing requirements. Merging it with the province-wide, generic Provincial Policy Statement is ill-conceived, lacking any evidence, and easily out ranked by other options described above with respect to better coordination and efficiency of planning and governance.