



environmental
defence
INSPIRING CHANGE

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Assistant Deputy Minister
Ontario Growth Secretariat (OGS) - Ministry of Municipal Affairs and Housing
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Dear Ms. Clarke Julien,

The Growth Plan (2006) and Greenbelt Plan (2005) were introduced in response to curbing expensive low density development that was driving up municipal taxes and debt, increasing gridlock, paving over productive agricultural land leaving us with a legacy of failing infrastructure.

In 2017 in response to housing affordability challenges an updated, transparent, evidence-based municipal planning process was introduced to create more affordable housing options and work places in appropriate locations. The new Growth Plan specifies that a Land Needs Assessment (a calculation to budget for people and land) must be a key determinant of any plans to expand an urban growth area. If the province moves to allow urban expansion without using evidence based planning tools it will mark a return to a sprawl-dominated growth model that perpetuates gridlock, fails to address housing affordability, lowers productivity and increases property taxes.

Some large developers have expressed concerns that they can't afford to pay upfront for infrastructure associated with their preferred growth model and are seeking provincial and municipal subsidies. However, they continue to secure rights to build low-density housing with relatively higher infrastructure costs even while a homeowners' survey identified that 81% of homebuyers prefer transit friendly neighbourhoods...which are by necessity denser and cost less to service over the long term. Increasing urban and suburban density is an effective tool to manage infrastructure costs and reduce municipal debt by having more taxpayers living in a smaller area.

The 2017 Growth Plan provides a regional planning framework that supports a variety of housing choices by prioritizing investment in transit and supporting gentle density that makes transit affordable. The revised Growth Plan was the result of a comprehensive regional consultation process that achieved consensus among various interests.

To address Growth Plan implementation challenges we submit the following comments:

1. Employment area conversions

We agree the existing process may in some cases be too onerous and hinder good projects such as the redevelopment of mixed uses near the Kitchener ION. Employment area strategies to calculate employment land needs should be completed and made publicly available before any conversion process commences.

Employment area conversions could occur if:

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

2. 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. 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.

- a)** The province needs to lead on this file including developing a joint comparison/evaluative process with municipal and conservation authority mapping data.

2.2 Agricultural System Implementation

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

Recommendation:

- a)** There is a need to maintain fixed urban boundaries for existing urban settlement areas throughout the GGH. Create permanent growth boundaries where mapping shows a healthy agricultural system or natural heritage feature. Allowing boundaries of towns and cities to expand paves over productive farmland. Any

boundary expansions outside of the Greenbelt should occur only through an MCR process.

- b)** Ensure zoning of prime agricultural land is consistent with Provincial agricultural system mapping.
- c)** Land swaps in the Greenbelt 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.

3. 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.

Recommendation:

Ensure density and transit are complementary (subways, 200 pp/ha., light rail transit 160 pp/ha., Go trains 150 pp/ha., 50 pp/ha supports transit every 20-30 minutes. Increasing density beyond these numbers may create more congestion (e.g. Liberty Village).

- a)** Maintain existing density targets for mobility hubs.
- b)** Rezone lands around mobility hubs to support transit oriented development while reducing congestion (include a mix of more affordable housing including rental, mid-rise and low- rise).
- c)** Existing policies already have flexibility i.e. Municipalities can shift density along transit corridor with existing policies.

4. Settlement Boundary Expansions

Data produced to date indicates that there is more than enough land already allocated for growth within existing urban boundaries for planned growth to 2031 and likely 2041 if we follow the appropriate densities as required in the Growth Plan 2017. More housing options, such as townhouses and rental apartments are needed in our existing urban areas making it easy for people to get to work without clogging up our roads.

Recommendation:

- a)** Hold the line on urban boundary expansions to support appropriate forms of intensification to prevent sprawl and maximize the efficiency of existing infrastructure.
- b)** Urban boundary expansion should be considered only in settlement areas outside of the Greenbelt and only through a Municipal Comprehensive Review (MCR) process after a population projection based LNA has been completed and made publicly available.
- c)** No changes to the towns and villages or hamlet expansion policies in the Greenbelt Plan. Any expansions of these areas would occur at the expense of Greenbelt values.

5. Density and Intensification Targets

Density makes infrastructure and transit more affordable and sets the land-use stage for providing the diversity of housing that people want. The City of Calgary found that compact development saved 30 to 50% of life cycle infrastructure maintenance costs. And 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.

Recommendations:

- a) Keep existing 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.
- b) The 2017 Growth Plan hasn't been implemented yet. Clarity and transparency is needed. Monitor and report on implementation to better understand problems and find the best solution.
- c) Update growth projections based on the census and Ministry of Finance projections.

6. Recommendations to reduce red tape:

- a) 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.
- b) Keep the LPAT. The OMB process was too expensive and time consuming. The Board undermined plans developed and approved by democratically elected municipal councils and the intent of the provincial Growth Plan.
- c) Reduce duplication by enacting data sharing agreements between the Province, Municipalities and Conservation Authorities.

Thank you for this opportunity to comment on Growth Plan changes. Please keep us apprised of future Growth Plan or Greenbelt consultations.

Sincerely,



Tim Gray
Executive Director
Environmental Defence Canada