

# **HAZEL McCALLION** *C.M., LL.D., BA.Sc.*

*Ex-officio Advisor to the Premier on issues within the Greater Toronto and Hamilton Area*

November 28, 2016

Dear GTHA Mayors and Chairs,

**RE: GTHA Mayors and Chairs Report on the Government of Ontario's Co-ordinated Land Use Planning Review**

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Once again, thank you for participating in the September 30, 2016 GTHA Mayors and Chairs Summit and for sharing your municipality's perspective on the Co-ordinated Land Use Planning Review including the Proposed Growth Plan and Proposed Greenbelt Plan.

As promised, as the Ex-officio Advisor to the Premier on Issues within the Greater Toronto and Hamilton Area, I have prepared a Report capturing the discussion of the issues and recommendations of the Summit participants, which I will be submitting to the Premier. The Report captures the audio recording of the Summit, minutes taken at the Summit, presentations to the Summit, as well as the municipal reports and correspondence submitted to the Province.

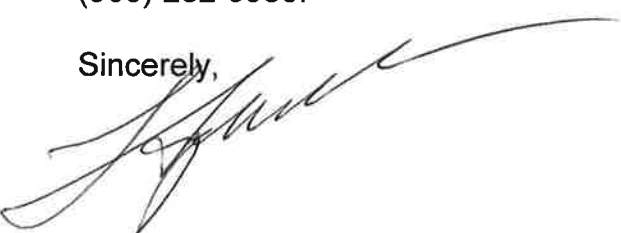
Please find attached the Report (without the appendices), for your endorsement. As a reminder, a motion was put forward at the Summit and was carried unanimously, that the Report and all documents be circulated for endorsement to the GTHA Mayors and Chairs. All documents including minutes, presentations and audio USB were all previously circulated in October.

As time is of the essence, I am respectfully requesting that you please reply to this email indicating your Region's or Municipality's endorsement of the Report at the earliest opportunity. The deadline for all responses to be submitted is by Monday, December 5, 2016. I would like to ensure that the Report is submitted to the Premier in early December 2016.

The draft amendments to the Proposed Plans will have a profound effect on communities within the GTHA and so it is my hope that all the GTHA Mayors and Chairs will endorse the Report. The Premier has demonstrated that she wants to hear from municipalities and all stakeholders and I trust that she will seriously consider the Report's information, issues and recommendations resulting from the Summit.

Should you have any questions or comments on the Report, please contact me directly at (905) 282-9980.

Sincerely,



Hazel McCallion  
C.M., LL.D., BA.Sc.

**Greater Toronto & Hamilton Area (GTHA)  
Mayors and Chairs Summit September 30, 2016**

**Report on the Government of Ontario's  
Co-ordinated Land Use Planning Review including  
the Proposed Growth Plan for the Greater Golden  
Horseshoe and the Proposed Greenbelt Plan**

**Hazel McCallion  
Ex-officio Advisor to the Premier on  
Issues within the Greater Toronto and Hamilton  
Area**

December 2016

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## **INTRODUCTION:**

This Report of the Greater Toronto & Hamilton Area (GTHA) Mayors and Chairs Summit (the Report) regarding the Government of Ontario's Co-ordinated Land Use Planning Review, including the Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (Proposed Growth Plan) and the Proposed Greenbelt Plan (2016) (Proposed Greenbelt Plan), summarizes the discussion of the issues and recommendations of the participants at the Greater Toronto & Hamilton Area (GTHA) Mayors and Chairs Summit (the Summit). The three and a half hour Summit was held on September 30, 2016 at York Region. Almost every Municipality in the GTHA was represented either at the Summit or by way of submitted report.

The Summit was a direct result of the widespread and consistent concerns expressed by the GTHA Municipalities with regard to the Co-ordinated Land Use Planning Review and the Proposed Growth Plan and the Proposed Greenbelt Plan. While the Advisory Panel for the Co-ordinated Land Use Planning Review Report included 87 recommendations was generally well received, the amendments proposed by the Province went well beyond the recommendations of the Advisory Panel, and are cause for serious concern among the Municipalities.

At the Summit, a motion was moved by Mayor Rob Burton and seconded by Mayor John Henry that the meeting be audio recorded. The motion passed. The recording of the Summit, minutes taken at the Summit, municipal reports and correspondence submitted to the Province, as well as the presentations to the delegates of the Summit were used to prepare this Report.

Additionally, Mayor Gordon Krantz presented a motion that was seconded by Mayor Frank Scarpitti that the comments and documents provided at the GTHA Mayor and Chairs Summit be circulated to the GTHA Mayors and Chairs and that the final report also be circulated for endorsement and then submitted to the Premier and Minister of Municipal Affairs. This motion was carried unanimously and as such, the Report and all documents have been circulated for endorsement to the GTHA Mayors and Chairs. Due to timing, the signatures of the GTHA Mayors and Chairs were not compiled, but [will add number] of the Mayors and Chairs have provided written confirmation of their endorsement of this Report, as it was important to the GTHA Mayors and Chairs that a unanimous voice and position be put forward to the Province.

Despite the diversity among the municipalities of the GTHA, the Summit participants shared consistent concerns and recommendations with regard to the following:

- a) There must be a balance between the prescriptiveness of each of the Plans' policies and the flexibility required in order to address local concerns and conditions.
- b) While Municipalities support the Growth Plans' goal to build complete communities, the density target and intensification number proposed by the Province are overly prescriptive with insufficient consideration of each municipalities existing transit, infrastructure, community soft services and the corresponding financial investments required to support the intensification of existing communities. Every Municipality in the GTHA has an obligation to accept growth, but each municipality is different and realistically requires the latitude to manage growth in a manner that corresponds with the capacity and character of the community.
- c) Transportation Master Plans and servicing infrastructure mapping and considerations are incomplete and are insufficient to support the proposed density target and intensification number.
- d) The relationship between the supply of land for residential uses and how it relates to affordability issues, housing built form, tenure and housing options for families.
- e) The lack of transition in the Growth Plan for planning applications in process or approved between the policies of the current Growth Plan and the new Growth Plan, leading to years of work lost and significant funds expended by both Municipalities and stakeholders, further delaying housing starts and the meeting of growth targets and ultimately increasing the cost of housing in the GTHA.
- f) There is no consideration to the financial and economic implications of the Proposed Provincial Plans for Municipalities and Regions and how the Plans will be financed.
- g) The Proposed Growth Plan density targets are not well thought out and have unintended consequences as it relates to the Province's Climate Change Action Plan.
- h) The lack of an open and transparent review process with clear criteria to review Greenbelt lands and boundary adjustments, refinements and/or removals and opportunities to address lands outside the Greenbelt that could be added.
- i) The permitted uses in the in Greenbelt Plan's Protected Countryside area should be expanded to include additional uses.

The GTHA Mayors and Chairs call on the Province to work closely with Municipalities and other stakeholders to find a balance in the Proposed Plans to ensure that the projected increase of 4,000,000 people within the GTHA over the next 25 years can be accommodated in an affordable and practical manner to achieve complete, financially responsible, sustainable, livable communities.

## **REPORT:**

This Report is organized to reflect the conversations around the Summit's ten themes. Detailed comments and recommendations are provided under each issue. As well, there is a summary of the key areas of concern in the Conclusion of this Report.

## **ISSUES AND PARTICIPANTS:**

The GTHA Mayors and Chairs Summit discussion focused on the following ten agenda items at the Summit:

1. The proposed increase in the Greenfield density minimum from 50 people and jobs per hectare to 80 people and jobs per hectare.
2. The proposed increase in the intensification minimum from 40% to 60% of annual residential growth.
3. Increased densities and alignment with Transportation Master Plans (roads & transit).
4. The Proposed Provincial Plans impact on housing affordability and choice.
5. Transition policies for all applications in process between the current Growth Plan and the new Growth Plan.
6. The financial implications of the Proposed Provincial Plans to Municipalities and Regions.
7. The absence of any direction or planning for economic growth in the Proposed Provincial Plans.
8. Effectiveness of Proposed Provincial Plans and Climate Change
9. Process, criteria and timing for Greenbelt boundary and designation adjustments.
10. Expanded list of permitted uses in the Greenbelt Plan.

The following elected officials participated in the discussions at the Summit:

- Gary Carr, Regional Chair, The Regional Municipality of Halton
- Justin Altmann, Mayor, Town of Whitchurch-Stouffville
- Rick Bonnette, Mayor, Town of Halton Hills
- Rob Burton, Mayor, Town of Oakville
- Geoff Dawe, Mayor, Town of Aurora
- Adrian Foster, Mayor, Municipality of Clarington
- John Grant, Mayor, Township of Brock
- Virginia Hackson, Mayor, Town of East Gwillimbury
- John Henry, Mayor, City of Oshawa

- Gordon Krantz, Mayor, Town of Milton
- Margaret Quirk, Mayor, Town of Georgina
- Don Mitchell, Mayor, Town of Whitby
- Steve Parish, Mayor, Town of Ajax
- Frank Scarpitti, Mayor, City of Markham
- Blair Lancaster, Deputy Mayor, City of Burlington
- Vito Spatafora, Deputy Mayor, Town of Richmond Hill
- John Taylor, Deputy Mayor, Town of Newmarket
- Johanna Downey, Regional Councillor, Town of Caledon
- Pat Saito, Councillor, City of Mississauga
- Debbie Schaefer, Councillor, Township of King

The following municipal staff participated in the discussions at the Summit:

- Dan Tovey, Manager Planning Policy, on behalf of Chair Carr, Region of Halton
- John MacKenzie, Deputy City Manager, Planning and Growth Management, City of Vaughan
- Valerie Shuttleworth, Chief Planner, The Regional Municipality of York
- Catherine Rose, Chief Planner, City of Pickering
- Christine Drimmie, Policy and Research Advisor, The Regional Municipality of Durham
- David Szwarc, CAO, Region of Peel
- Harry Schlange, CAO of Brampton
- David Crone, Policy Advisor to the Mayor, City of Hamilton
- Kevin Heritage, Director of Development Services, Town of Scugog

Formal presentations to the Summit were made by:

- Don Given, MCIP, RPP – President, Malone Given Parsons Ltd.
- Valerie Shuttleworth, MCIP, RPP Chief Planner, The Regional Municipality of York - Member of the Regional Planning Commissioners of Ontario (RPCO)
- John MacKenzie, M.Sc. (PI) MCIP, RPP - Deputy City Manager, Planning and Growth Management, City of Vaughan Member of the Advisory Panel for the Co-ordinated Land Use Planning Review
- Frank Scarpitti, Mayor, City of Markham - Former Municipal Chair of the Places to Grow Summit

Each of the presenters was invited to participate based on their broader roles, knowledge and expertise of planning and growth management:

- Don Given, President of Malone Given Parsons, is an independent professional planning consultant with extensive knowledge of the Provincial Plans and current experience implementing the current Provincial Plans.
- Valerie Shuttleworth presented in her role as Chair of the Regional Planning Commissioners of Ontario, GTHA Caucus.
- John MacKenzie offered perspective as a member of the Advisory Panel for the Co-ordinated Land Use Planning Review (the Panel) and provided insight into the methodology and reasoning behind the Panel's work and the 87 Recommendations, which were unanimously supported by the Panel members.
- Mayor Frank Scarpitti was the Municipal Chair of the Places to Grow Summit 2007/08, which included all GTHA Municipalities.

Also in attendance at the Summit:

- Representatives from the Office of the Premier
- Representatives from the Office of the Minister of Municipal Affairs
- The Deputy Minister of the Ministry of Municipal Affairs
- The Deputy Minister from the Ministry and Natural Resources and Forestry
- Staff from the Ontario Growth Secretariat.



## **OVERVIEW:**

At the GTHA Mayors and Chairs Summit, it was unanimously agreed that the Proposed Growth Plan and the Proposed Greenbelt Plan would have a detrimental impact on the planning for growth of the constituent Municipalities. There was widespread concern that the Proposed Growth Plan and Proposed Greenbelt Plan will have negative impacts on the affordability and livability of the GTHA through policies and restrictions that will force significant financial costs on Municipalities, as well as other levels of government, and influence the price of land and ground related housing, and the types of housing built, further limiting housing choice. Additionally, the proposed Plans will not achieve the high level objectives of the Province, which according to the guide to the Proposed Changes titled *Shaping Land Use in the Greater Golden Horseshoe* include:

- Building Complete Communities;
- Supporting Agriculture;
- Protecting Natural Heritage and Water;
- Growing the Greenbelt;
- Addressing Climate Change;
- Integrating Infrastructure;
- Improving Plan Implementation;
- Measuring Performance, Promoting Awareness and Increasing Engagement.

While all of the Municipalities support density and growth, they all agreed that there must be a meaningful balance between prescriptive policies and flexibility. The Municipalities are clearly aligned in the view that one size does not fit all, and a degree of local direction is required to achieve Province's overarching goals. The realities and challenges of each municipality need to be recognized and acknowledged in the Province's policies. Each municipality has its own way of growing and the Province needs to recognize this and remove unnecessary prescriptiveness and add flexibility in implementation.

What was made clear at the Summit was that every Municipality in the GTHA will accept growth and density, but it must be in the right locations. Municipalities are concerned with the blanket approach taken in the proposed Plans, as the municipalities in the GTHA are each distinct, having different geographies, existing transit service levels, servicing infrastructure, community soft services and the corresponding financial investments required to support growth.

The Municipalities have significant and serious concerns about the magnitude of the proposed increases in the density target and intensification minimum, and the fact that there has been no meaningful consultation with municipal staff and political

representatives about these proposed policies or how they were decided upon by the Province and if they can be even be implemented.

The municipalities feel that the policy targets are without basis and arrived at without meaningful consultation with the Municipalities who are tasked with achieving the targets and who have the required data, knowledge and experience to assess if implementation can occur or is occurring in accordance with the Plans. The 5 month commenting period, granted to Municipalities after the Proposed Plans were released, was insufficient for Municipalities to truly understand the impacts of the policies and determine whether the policies are realistic and can feasibly be implemented.

More collaboration is required with Municipalities and stakeholders on the ground, before the Proposed Plans can be finalized and adopted. In order for the Proposed Plans to be successfully implemented, it is necessary that there be a strong working relationship with Municipalities to ensure that the Province has the necessary support and cooperation to meet the growth demands in the GTHA.

## **THE TEN ISSUES:**

The full presentations, submitted reports and minutes of the Summit are attached as appendices. This Report identifies the major issues of concern, along with key points and recommendations made by the Summit's participants, based on the Summit's agenda, as this was how participants organized their comments.

### **1. (A) The proposed increase in the Greenfield density minimum from 50 people and jobs per hectare to 80 people and jobs per hectare**

While all municipalities agree that intensification and density are part of the equation to growth, it was unanimously agreed that the Province's draft amendments to the Growth Plan are *too much too soon*, and present an *unachievable one-size fits all* approach. It was also made clear by the professional planners in attendance, that both the proposed density and intensification targets lack the analysis and justification to support them and are problematic in their current form. For example, John MacKenzie noted that the Province's proposed density of 80 people and jobs per ha was surprising, and the proposed increases are beyond what was recommended in the Advisory Panel Report.

The proposed minimum density target appears to be based on a misuse of Ministry of Transportation data and an incorrect assumption about existing and planned transit infrastructure and services that are required to support this density in the Designated Greenfield Area (DGA).

The proposed minimum density target is proposed to be increased from 50 to 80 people and jobs per ha and to be applied as an average across the Designated Greenfield Areas. DGA is defined as:

*"the area within a settlement area that is required to accommodate forecasted growth to the horizon of this Plan and is not built-up area. Designated greenfield areas do not include excess lands."*

The Ministry of Municipal Affairs (MMA) took the proposed density target of 80 people and jobs per ha from the Ministry of Transportation's (MTO) Transit Supportive Guidelines document. These Guidelines state that there must be Frequent Transit Service (1 bus every 10-15 minutes) to support the 80 residents and jobs per ha target. It is important to note that the MTO document (page 24) includes a footnote that states:

*"The table ...illustrates suggested minimum density thresholds for areas within a 5-10 minute walk of transit capable of supporting different types and levels of transit service. The thresholds [inc.80 people and jobs per*

*ha] presented are a guide and not to be applied as standards. Other factors such as the design of streets and open spaces, building characteristics, levels of feeder service, travel time, range of densities across the network and mix of uses can also have a significant impact on transit ridership.”*

As such, the Province’s blanket application of this number is a misuse of its own (MTO) research and does not consider the spatial relationship between the location of DGAs and existing and planned transit, infrastructure and services required to support the density.

Further, in correspondence dated July 13, 2016 from the Ontario Growth Secretariat through the Ministry of Municipal Affairs to Hazel McCallion, provincial staff provided the justification for the proposed increase in the DGA density target of 80 people and jobs per ha using the Pembina Institute’s report “Driving Down Carbon.” That report proposes increasing the DGA density target to 70 people and jobs per ha, not 80 people and jobs per ha, as a result of being the median from two pieces of research. Pembina’s research:

*“...shows that 60 people/jobs per hectare is the minimum threshold to require reconfiguration of road patterns to accommodate transit, while 80 people/jobs per hectare is the minimum threshold to accommodate 15-minute wait times for transit, the threshold for transit use.”*

It was important to include this research in this Report, as the Province’s proposed density target of 80 people and jobs per ha uses a blanket application of research for all GTHA Municipalities and assumes that there is existing transit infrastructure available to accommodate the proposed density. Setting minimum density targets around major transit stations is logical, but Frequent Transit Service does not exist nor is it planned for in most of the Designated Greenfield Areas, as these areas are on the outer edges of the municipalities.

Generally, there is support by all the Regions and Municipalities for growth and increased densities in the right locations. It was made clear at the Summit, that the 80 people and jobs per ha target cannot be applied uniformly across the GTHA and should not be measured across the entire DGA lands, as much is already built, approved and soon to be built, or already well underway in a planning process.

In the Province’s Growth Plan Indicators Report (2015), it states approximately 5% of the DGA is built out or planned. Malone Given Parsons (MGP) planning consultants analyzed the actual level of growth that has taken place since 2006. Using satellite mapping via Google, GIS imagery and the subdivision status reports from the Regions to determine which lands are already built, reviewing all approved applications to determine which

lands are approved but not yet built, and those lands that are currently in a public planning process, MGP estimated that approximately 50% of the DGA land is built on, or planned to be built in the short term. This is a significantly different number than what was put forward by the Province. This discrepancy is problematic, as this would mean that the remaining land in the DGA available for development is less than 50%, rather than the Province's number of 95%. The Province must review its information and update it to ensure there is evidence to support the Government's policy direction. Before implementing any new proposed density target, the Province needs to go back and work with the Municipalities to ensure the accuracy of the data being used for the baseline information. In making policy decisions of the magnitude proposed, there should be little room for arguing about facts.

Understanding the true quantity of available DGA land is important. The limited DGA land for development results in much higher densities being applied to new communities on the outer edges of municipalities where transit does not exist, will be limited, or will require further infrastructure and services to support the density. For example, York Region would need to plan the DGA area at 180 people and jobs per ha and Peel Region would need to plan the DGA at 140 people and jobs per ha, in order to meet the Province's proposed policy of 80 residents and jobs per hectare DGA wide average.

The increase in the density target is a serious concern, as not all the Regions in the GTHA have the ability to accommodate the same density or rates of growth. The GTHA's Regions have different geographies, including the size of DGA and Built-up Area, as well as differing numbers of Urban Growth Centres and Rapid Transit Corridors. All of which means that municipalities have unique circumstances that leave some better suited for higher intensification and density targets than others. Further, transit infrastructure and investments are not being made at the same rate across the GTHA. Some Regions are not well served by transit. Within many Municipalities, transit is limited or not available and if there is transit, it is not in the DGA where the density is currently being proposed.

Finally, the proposed density target of 80 people and jobs per ha would have profound consequences to the GTA's future housing mix and affordability. The planners at the Summit discussed the logic behind the 2006 Growth Plan numbers and the Hemson Consulting forecast with regard to demographics and market, which had a specific mix of housing types. The current 50 people and jobs per ha density target provides an appropriate and desirable mix of housing types, but a shift to the proposed 80 people and jobs per ha will have a detrimental impact on housing mix. Further, the 80 density target averaged across the DGA (which for example in York Region, results in an average density target of 130 people per ha) would dramatically shift the housing mix away from freehold ground related housing to mid and high rise condominiums and stacked townhouse product. The density target increases dramatically if the jobs or employment lands are included in the calculation, and could lead to a density target of over 250 people

and jobs per ha within DGAs to offset lower densities in employment areas. If the density target is implemented as proposed, this Government would impact housing by mandating the elimination of new freehold ground related family housing from the future housing stock, and directly impact the affordability and accessibility of family oriented housing.

The Province's proposed density increase from 50 people and jobs per ha to 80 people and jobs per ha is a target that is intended to apply to all Municipalities' Designated Greenfield Areas, regardless of their ability to support such density. Generally, there is support by the Regions and Municipalities for increased growth and density in the right locations, but it was made clear at the Summit, that this target cannot be uniformly applied across the GTHA and should not be measured across the entire DGA lands.

The GTHA Summit concluded that one density target being applied to all Regions and Municipalities in the GTHA will not work and will not be accepted. Density needs to be looked at more broadly, not just as a policy that must be complied with. Especially one that imposes an unachievable one-size fits all approach, which does not realistically consider individual city building processes and the very different realities across the GTHA Regions.

#### **Recommendations:**

The following recommendations were provided at the GTHA Summit:

##### **A. Do not increase the minimum density target for Designated Greenfield Areas (DGA) and remain at 50 people and jobs per ha:**

The minimum density target must remain at 50 people and jobs per ha, as the proposed density target of 80 people and jobs is inaccurately based on MTO's Transit Supportive Guidelines document. The Province's blanket application of this number is a misuse of its own (MTO) research and does not consider the existing and planned transit infrastructure and services that is required to support this density in Municipalities DGA.

Further, the Province's information needs to be reviewed and updated to ensure there is evidence to support the Government's policy direction. The Province needs to go back and work with the Municipalities to ensure the accuracy of the data being used for the baseline information, before implementing any new proposed density target. It is especially important as the proposed density target of 80 people and jobs would have profound consequences to the GTA's future housing mix and affordability.

##### **B. Transition:**

Do not increase density at the time of the implementation of the new Growth Plan. Increased density targets should be phased in over time to improve plan

implementation, collaboration and guidance. The increased density target should begin in 2031, moving forward to 2041.

**C. Decouple employment (jobs) from the density target:**

Municipalities have little ability to influence employment density. Densities can be specified for residential development through built form etc. so the population to meet the density targets can be generated. Employment density varies with built form and function, for example warehouses typically require a large land area and generate a lower density of jobs per ha, while offices require lower land area with corresponding higher density of jobs per ha. Municipalities do not want to regulate employment densities as they are looking to attract investment and do not want to hinder attraction by mandating employment densities. This is why it was recommended that employment (jobs) be removed from the density target.

**D. Add additional density take-outs:**

In determining the land supply, additional lands should be excluded from being considered developable. Examples of these take-outs include storm water management ponds, arterial road right of ways, cemeteries, utility corridors and other uses that cannot be actively used to house people.

**E. Update the built boundary from 2006 to 2016:**

The Province must update the built boundary to 2016 to reflect the true built condition of the municipalities. It is recommended in the Proposed Growth Plan that this occur (Section 5.2.2.) but the Province has not yet done so. This must occur before the implementation of the new Plan.

**F. The Province must confirm baseline data:**

In the 2006 Growth Plan, the Province indicated that it would monitor growth. This has not occurred in a manner that can be relied on for future planning in the GTHA. As such, the information being used to support the proposed policies is not accurate. The Province must go back and work with the Municipalities to ensure the information being used is accurate before implementing any new proposed density target. This has been included in the Proposed Growth Plan (Section 5.1) and the municipalities support this going forward.

**G. Standard Methodology for Land Needs Assessment:**

It is recommended in the Proposed Growth Plan that this occur (Section 5.2.2.) but the Province has not yet done so. The Province must release the standard land needs assessment methodology, before the implementation of the new

Growth Plan in order to allow Municipalities to move forward with efficient implementation.

## **(B) New proposed targets for Major Transit Station Areas**

The new proposed target range for Major Transit Station Areas from 150-200 persons and jobs per ha was not on the Summit agenda, but was brought forward for discussion, as the policy is an additional concern for the GTHA Municipalities. The definition of Major Transit Station Area is proposed as follows:

*The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500m radius of a transit station, representing about a 10-minute walk.*

The concern lies in the fact that the proposed definition of Major Transit Stations includes density targets for all transit stops including subways, light rail transit or bus rapid transit and express rail service on the GO Transit network. The target does not recognize different roles of what could be generally defined as a Major Transit Station Area and treats all stations under each category (listed above) as the same. The application of this density target at smaller stations in stable neighbourhoods is not appropriate and further clarification is required.

The GTHA Summit concluded that, a blanket density target being applied to all Major Transit Station Areas is not appropriate.

### **Recommendations:**

The following recommendations were provided at the GTHA Summit:

#### **A. Remove bus rapid transit from the Major Station Areas Definition:**

Including bus rapid transit in the definition is too general of a policy as it would apply to each bus stop. There cannot be a blanket approach to density targets.

#### **B. Municipal flexibility:**

Municipal flexibility is required in applying Major Transit Station Area policies and densities. This will allow the local municipality to adjust the density target to match the planning and infrastructure context of the area.



## **2. The proposed increase in the intensification minimum from 40% to 60% of annual residential growth**

The proposed increase in the intensification minimum to 60% from 40% was a major discussion issue at the GTHA Summit. The 40% intensification minimum was previously accepted by Municipalities, as it appeared that it could be achieved. Recent experience has proven that the minimum of 40% intensification has not been achieved by most municipalities, which is very concerning as the rationale and justification for the increase in the intensification rate by 50% has not been provided.

As per the correspondence received from the Ontario Growth Secretariat through the Ministry of Municipal Affairs on July 13, 2016 to Hazel McCallion, provincial staff cited that the increase in the minimum intensification target to 60% came from the Pembina Institute's report "*Driving Down Carbon*." The Pembina report does recommend a 60% intensification target, and no other justification was provided to support this recommendation. The recommendation is not well thought out or justified and as such, there is no substantiation for this *one size fits all* intensification minimum.

As stated previously, not all regions in the GTHA have the same opportunities for growth. Municipalities have unique circumstances making some better suited for higher intensification than others. All have different development constraints and historic development patterns, specifically the size of the DGA and Built-up Area, as well as differing numbers of Urban Growth Centres and Rapid Transit Corridors. Transit infrastructure and investments are not the same across the GTHA, as some Regions are not well served. Further, market conditions, along with development charges, Section 37 of the Planning Act, and parkland requirements have restricted the growth of high-density development at the pace and scale that the existing Growth Plan has contemplated through the minimum 40% intensification. Increasing the intensification minimum to 60% ignores these realities and simply cannot be achieved. Considering the market and financial realities, the Municipalities will not be able to achieve the minimum targets set for the high-density growth and as a result, the GTHA will not grow to the levels expected in the Proposed Growth Plan.

Further, significant concerns were voiced at the Summit regarding the requirement for increased infrastructure capacity and public services and the correlated costs to the Municipalities that come with the higher intensification minimum. Due to the differences among the Municipalities, the financial implications and the infrastructure and servicing requirements to accommodate the intensification targets, are all different but this has not been acknowledged by the Province.

For example, traffic congestion is a major issue for many municipalities and the proposed intensification minimum of 60% will put more cars on existing roads that were not

designed to accommodate the level of increased traffic. This intensification number will require dedicated funding from the Province for transit within each municipality. This funding is critical to the implementation of a higher intensification minimum.

Intensification is costly and the financial impact to the Regions, Municipalities and taxpayers has not been addressed by the Province. The Province must recognize that one intensification number cannot be applied uniformly across the GTHA, with an expectation of each Municipality achieving it.

### **Recommendations:**

The following recommendations were provided at the GTHA Summit:

#### **A. Intensification minimum remain at 40%:**

The intensification target must remain at 40%, as no justification or rationale has been provided for the increase to the intensification number by the Province. The Municipalities have requested the justification for the proposed 60% intensification number, but this has not been provided. The Province cannot increase the minimum intensification number until there is a clear understanding of the financial impact on Municipalities (including roads, transit, parks, schools, storm water, sewers, water supply, electrical supply, libraries, community centres etc.). All infrastructure and services need to be built, maintained and expanded on to provide and support the proposed level of intensification.

#### **B. Transition:**

If an increased intensification minimum is to be implemented, it should be phased in over time to improve plan implementation, collaboration and guidance with Municipalities. The increased intensification minimum must begin in 2031, moving forward to 2041 and only be measured at the upper-tier municipal level.

### **3. Increased Densities and Alignment with Transportation Master Plans (roads & transit)**

The Summit participants were in agreement that planning for density and intensification go hand in hand with transportation planning, and that providing transit is the key to the Growth Plan being successfully implemented. The Province cannot mandate a one size fits all density target and intensification minimum across all of municipalities, as municipalities cannot plan for transit-supportive densities in the absence of a financial plan to fund the required transportation and transit to support this increased growth.

The Province must ensure that transit infrastructure is not only aligned with growth, but that it also has the required dedicated funding to support growth. The Province must find ways to empower and enable Municipalities to deliver on intensification through municipal revenue tools.

An arbitrary density target and intensification minimum, without parallel adjustments to transit funding and service expansion across the GTHA is problematic. Roads are already grid-locked and residents are frustrated with existing conditions. Adding increased intensification and density without the necessary transit will only exacerbate the problem. For example increasing the DGA target to 80 people and jobs per ha average, will require a higher density on the outer edges of the municipalities than within existing built up areas. Higher densities in locations with limited to no existing or planned transit infrastructure is not good planning.

**Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Upgrade and dedicate more Provincial funding to transit:**

Transportation infrastructure is required to be increased and funded, before increases in density can be mandated by the Province.

**B. Coordination of infrastructure and growth by the Province:**

Municipalities are required to coordinate long term infrastructure planning with growth planning, as such so should the Province. The Province must acknowledge and fund the transportation initiatives required to address growth (and targets) to 2041.

**C. The Growth Plan's transportation schedules and policies must be refined and updated:**

There is a need to precisely identify infrastructure corridors in schedules and policies. Specific infrastructure projects mentioned at the Summit include:

1. Yonge Subway to Richmond Hill Centre must be put back into the Growth Plan as a priority transit corridor;
2. Move forward on GTA West Corridor planning;
3. The planned 404 highway extension;
4. Recognize the new 407 East and 412 highway that is now open;
5. Include the multi-modal Port in Oshawa.

**D. Harmonize the Growth Plan with the Metrolinx Big Move Update:**

The Proposed Growth Plan does not align with the Province's Big Move Plan. The Province must harmonize the Growth Plan with Metrolinx's the Big Move Transportation Master Plan Update. This is critical to ensuring the right density

of growth is taking place where transit is planned for, and the Growth Plan should not be finalized until the Metrolinx Plan is finalized.

#### **4. The Proposed Provincial Plans has an impact on housing affordability and choice**

The Province must balance the considerations of housing affordability with the Government's climate change mandate. Current homebuyer patterns do not indicate that high-rise condominium developments are what all consumers want. Families tend to want freehold ground related housing. Unfortunately, the price of this form of housing in much of the GTHA is growing out of reach of most families.

Creating a housing supply dominated by condominium high rises, is not consistent with the demographics of the GTHA, according to the work undertaken for the Province by Hemson Consulting, which was the basis for the population and housing forecast supporting Amendment 2 to the Growth Plan.

The Proposed Growth Plan does not promote housing affordability by encouraging a mix of housing types. It proposes to promote housing affordability by promoting a higher density housing product. The effect of this policy will take ground related housing out of reach for the majority of families in the GTHA and will negatively impact housing affordability. The Proposed Growth Plan will create housing for the upper class (ground related) and housing for the middle-lower class (higher density apartments/condominiums). This will undermine the Province's ability to achieve the growth anticipated by the Growth Plan, as people will tend to move to areas where there is desirable housing, which will likely require the use of cars. The reality is, homebuyers will drive until they can afford to purchase a home, further increasing the use of individual vehicles and congestion on roads.

The Province should not set policies that only promote a single type of housing form (higher density) to be built in the future, which is essentially what the Proposed Growth and Greenbelt Plans do. There must be a range and mix of housing types and tenures to create opportunities for all levels of income. As presented, housing choice will be taken away by the Proposed Plans.

#### **Recommendations:**

The following recommendation was provided at the GTHA Summit:

##### **A. Do not implement the proposed density target and intensification minimum as currently proposed :**

Implementing the proposed density target and intensification minimum will have a significant impact on land and housing prices in the future, as such the

Government will be contributing to the increased price of ground related housing and limiting housing choices in the future to predominantly high density housing forms.

**B. Municipalities require flexibility to provide a range and mix of housing types and densities:**

The Provincial Policy Statement (PPS) states that the Province is to provide for an appropriate range and mix of housing types and densities required to meet projected requirements of current and future residents of the regional market area. This is what the PPS requires, yet the effect of the Proposed Growth Plan would not be consistent with the PPS, as it would not allow Municipalities to provide for an appropriate range and mix of housing types, tenures and densities.

**5. Transition policies for all applications in process between the current Growth Plan and the new Growth Plan**

The GTHA Summit discussed the lack of clarity on transition measures between the implementation of the current policies of the Growth Plan and the Proposed Growth Plan. John MacKenzie noted that the Crombie Panel did not deal with transition in its Report, but it is important and needs to be addressed prior to the implementation of the new Plan.

Currently, the policies of the Proposed Growth Plan would apply as of the effective date of the new Growth Plan's implementation. All policies would then apply to all planning matters in process as of the effective date of the new Growth Plan.

At a minimum, transition policies must be implemented for all applications in process between the current Growth Plan and the new Growth Plan. There are municipal studies that are in progress and well underway to implement the 2006 Growth Plan. Municipalities require certainty from the Province that they will be permitted to complete the work started, so as to provide housing supply and set the stage for successful infrastructure delivery.

It was agreed at the Summit that the implementation of the new Growth Plan without transition measures will delay processes currently underway by at least 3-5 years, which will have unintended consequences including a direct impact on housing supply and prices, and place many municipalities in contravention of the Planning Act and PPS.

**Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Include transition provisions for in-progress planning:**

Applications in process within the DGA should proceed under the 2006 Growth Plan policy framework. This work should not be required to be redone. For example, there are secondary plans that are well underway and if the Growth Plan came into effect without transition, the plans would have to stop and restart resulting in a loss of 3-5 years of planning work and millions of dollars spent by all stakeholders including the municipalities.

**B. Phase in density target and intensification minimum:**

One proposal for transition is to phase in the increased density target and intensification minimum. The increased targets should begin in 2031, moving forward to 2041.

**6. The financial implications of the Proposed Provincial Plans to Municipalities and Regions**

The Proposed Plans do not include an associated financial plan and do not consider the economic impacts on Municipalities and Regions. The Proposed Plans contain significant policy changes without seriously contemplating how the implementation of these policies will be funded. For example, the Proposed Growth Plan requires significant capital and operating funding to support the growth and growth infrastructure must be funded by all levels of Government. The Province must pace intensification and density with the ability of Municipalities and other levels of government ability to pay for growth.

The GTHA Municipalities understand that the government has dedicated funding to GTHA transit projects, but it is not enough. If the Province wants to successfully implement the Proposed Growth Plan, stable predictable funding is needed for all infrastructure projects to support the proposed growth (including water and wastewater, electric and gas, transportation, hospitals, schools, police, fire, community services etc.). The Province must find ways to empower and enable Municipalities to deliver on intensification through existing and new municipal revenue tools.

**Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Changes to Development Charges Act (DC Act):**

Changes to the DC Act are required for full recovery of all growth related costs to the municipalities.

**B. Upgrade and dedicate more Provincial funding for transit infrastructure:**

Transportation infrastructure is required to be increased and funded, before increases in density can be mandated across the GTHA by the Province.

**7. The absence of any direction or planning for economic growth in the Proposed Provincial Plans**

Ontario's economy has not recovered from the recession of 2008 and the Growth Plan must be used as a tool to support the economy. However, the Proposed Provincial Plans do not provide measures that would be supportive of economic growth and have not considered the economic implications of the proposed policies.

It is imperative that the Province recognize that there is an opportunity specifically through the Growth Plan to support planning that would strengthen the economy. This is not being done through the Proposed Growth Plan and instead, it is being used as a development control plan. This one size fits all approach will have a negative impact on economic growth, as it does not recognize the uniqueness of each municipality and region in the GTHA.

More serious consideration is required by the Province on how to bolster economic development and growth in the Proposed Plans. As part of this, the Province must work with Municipalities to not only attract economic development, but to ensure that Municipalities have the required infrastructure and servicing capacity to attract jobs and growth.

Specifically mentioned at the Summit was the lack of consideration to the financial viability of agricultural and rural areas in the Greenbelt. Rural and agricultural lands are highly regulated in the Greenbelt, which has limited opportunities to support and advance economic growth on these lands. In order for the Greenbelt Plan to work effectively, the Province must do more to ensure the viability of agricultural operations, especially those near urban areas. This cannot simply be a land use planning exercise with additional land use regulations. It must also look at the financial tools required and provide incentives that will allow agricultural lands in the Greenbelt to be financially viable and sustainable in the long term.

**Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Agricultural viability in the Greenbelt:**

The Province needs a more accurate approach to identify viable agricultural lands in the Greenbelt. Just because lands are labeled "agricultural", does not mean they are viable for that use. One suggestion was to further expand the

list of non-agricultural uses permitted in certain areas of the Greenbelt and provide financial tools and incentives. It was mentioned that there are a number of complementary recommendations to support agricultural viability proposed by the Advisory Panel that have not been acknowledged or discussed by the Province at this time.

**B. Major Office included in the Prime Employment Areas definition:**

The current definition is not supportive of promoting office uses in Municipalities. Major Office must be included in the definition of Prime Employment Areas. Office uses typically offer higher paid jobs and property taxes and are sought after employment that the Municipalities want and work hard to attract.

**C. Establish an independent Provincial Secretariat:**

An independent Provincial Secretariat should be established to oversee the implementation and coordination of the Plans. These plans impact more than just the Ministry of Municipal Affairs, and as such, must also include but is not limited to the Ministries of: Finance, Transportation, Natural Resources and Forestry, Infrastructure, Environment and Climate Change, Agriculture, Food and Rural Affairs, Energy, Economic Development and Growth, Housing.

## **8. Effectiveness of Proposed Provincial Plans and Climate Change**

The proposed density target is not well thought out and will have many unintended consequences as it relates to the Province's Climate Change Action Plan. The Proposed Growth Plan is contrary to the Province's initiatives to take people out of cars and put promote the use of transit to minimize environmental impacts. The Proposed Growth Plan forces density in the Designated Growth Areas in the outer edges of municipalities with limited or no existing or planned transit options other than the car to absorb the highest density and amounts of growth. This results in putting more cars on the roads, exceeding the planned capacity, increasing traffic congestion and ultimately contributing to climate change through the increase of greenhouse gas emissions.

### **Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Do not implement proposed density target of 80 people and jobs per ha averaged across the Designated Greenfield Areas:**

The proposed density target is flawed and does not contribute to complete, walkable, transit-oriented communities. It contributes to dense communities on the outer edge of municipalities, putting more people into cars on already congested



roads, increasing traffic congestion and contributing to climate change through the increased greenhouse gasses.

**B. Additional Funding Tools:**

Municipalities also need additional funding tools to collect funds to meet policies on climate change.

**C. Provincial Funding for Municipalities to implement Climate Change Action Plan:**

Provincial policy needs to be backed up with provincial funding for municipalities to implement climate change resilient infrastructure.

**D. Consult and release guidance materials:**

With respect to climate change targets and strategies, the Province must provide more information and guiding implementation materials. For example, the definition of what a net zero community is and how it can be implemented is unclear.

**9. Process, criteria and timing for Greenbelt boundary and designation adjustments**

It is legislated and it is expected by Municipalities and the public that the 10 year review of the Greenbelt Plan is the opportunity to review the Greenbelt boundary and Greenbelt designations that have been frozen for almost 12 years for adjustments, refinements and/or removal. This is also the opportunity to grow the Greenbelt and add environmentally significant lands and urban river valley systems to the Greenbelt.

It must be the intention of the Province to review lands that have been included in the Greenbelt that should not have been included in the Greenbelt, through an open and transparent review process with clear criteria (i.e. lands that are serviced, are adjacent to servicing and/or along transportation and transit corridors). This process must be in consultation with and include the support of the Regions and Municipalities.

This is the opportunity to correct the errors of the past and to ensure the sustainability and credibility of the Greenbelt. The review of the Greenbelt Plan will be a complete waste of time unless the Province implements an open and transparent process with clear criteria, in consultation with the Municipalities affected, to determine boundary and designation changes and to determine which lands should be added and/or removed from the Greenbelt.

## **Recommendations:**

The following recommendations were provided at the GTHA Summit:

### **A. The Province implement an open and transparent Greenbelt review process with criteria in collaboration with municipalities and stakeholders:**

An open and transparent process is required to review and examine Greenbelt boundaries and designations in collaboration with Municipalities and stakeholders. This process must include clear criteria by which to assess Greenbelt land requests.

### **B. Timeframe for review process:**

This review of the Greenbelt lands, outer boundary and designations must occur as part of this 10 year review. Now is the opportunity to revisit, review and adjust the Greenbelt boundary, as a significant amount of land has already been proposed to be added to the Greenbelt.

### **C. Municipal review of outer boundary of the Greenbelt:**

The use of lands within the Greenbelt and its boundary cannot remain stagnant for the next 10 years. Municipalities should be permitted to have an ongoing process to more precisely define the outer Greenbelt boundary within the municipality's urban boundary to reflect studies and real conditions on the ground, (i.e. built form as a result of previous approvals prior to the Greenbelt Plan being enacted). This can be done through the Official Plan Amendments and/or Secondary Plan review process.

### **D. Greenbelt lands with infrastructure:**

The Province needs to open up non-environmentally sensitive Greenbelt lands that are serviced and or are adjacent to servicing for economic growth. For example, there are lands along Hwy 404, Hwy 407 and other highway corridors that are within Settlement Areas that are within the Greenbelt. These lands should be put to better use to attract future economic growth, based on their prime location and historic infrastructure investments made.

### **E. Growing the Greenbelt:**

There is a need to implement a clear, consistent, and timely process that is science based to grow the Greenbelt. The Province must not ignore the Municipalities on where to grow the Greenbelt, as they are critical partners in meeting Provincial objectives. Municipalities have the "on the ground" knowledge of where green space abutting the existing Greenbelt (confirmed by municipal studies as being worthy of protection) could be included to ensure a net gain in protected areas.

**F. Permit Greenbelt Transition policies for all Municipalities:**

When the Greenbelt Plan (2005) was approved, it included clause 3.4.4.1 titled *Additional Policies for Settlement Area Expansion*, which outlined criteria which, if met, permitted municipalities who had initiated a settlement area expansion prior to the enactment of the Greenbelt Plan, to complete the planning process. This was permitted to all Municipalities except for those lands in the geographic boundary in Pickering and Markham. It is only fair that the same transition policies be provided to all Municipalities in a new Greenbelt Plan, as was provided for in the Greenbelt Plan (2005).

**10. Expanded list of permitted uses in the Greenbelt Plan**

The Greenbelt Plan should allow for an expanded list of permitted uses in the Protected Countryside designation of the Plan. The Province has added additional land use permissions in the Plan, but they are currently not helpful. Specifically, the Summit participants recommended that the Province allow Municipalities to use Greenbelt lands in the Protected Countryside and adjacent to urban areas to be used for a variety of recreational uses, including active parks.

**Recommendations:**

The following recommendations were provided at the GTHA Summit:

**A. Recreational Uses:**

The Greenbelt Plan must be revised to specifically state that Greenbelt lands in the Protected Countryside may be permitted to be used for recreational uses such as a broader range of active uses including community parks.

**B. Agricultural Uses:**

Expand the list of non-agricultural uses permitted in certain areas of the Greenbelt and provide financial tools and incentives

## **CONCLUSION:**

The participants of the GTHA Summit spoke loudly and clearly about their positions, on the Co-ordinated Land Use Planning Review including the Proposed Growth Plan for the Greater Golden Horseshoe and the Proposed Greenbelt Plan. It is widely believed that there needs to be more discussion and consultation with the individual Municipalities on the Proposed Plans'. While the Municipalities differ in various ways, the viewpoints presented at the Summit were remarkably consistent and this Report outlines what is a united position of the GTHA Municipalities in five key areas:

- 1. Do not implement the proposed density target and intensification minimum.**
- 2. Consider both the financial capacity to support the Proposed Plans and the resulting economic impacts of the Plans, including affordability of housing and livability of communities.**
- 3. Align growth with existing and planned transportation infrastructure to avoid additional traffic congestion and negative impacts on climate change.**
- 4. Implement transition measures from the current Growth Plan to the new Growth Plan.**
- 5. Implement a clear and transparent process for Greenbelt adjustments, refinements, removals and additions to boundaries and designations.**

There is an overwhelming belief amongst the Summit participants and other stakeholders, that the Ontario Government's Proposed Growth Plan and Proposed Greenbelt Plan go far beyond the recommendations of the Panel, and that the draft amendments are "*too much, too fast*" with an unachievable "*one size fits all*" approach, that will negatively impact the affordability and livability of the GTHA.

The impact of the draft amendments to the Proposed Plans, would have a detrimental impact on the Municipalities in terms of financial costs, and would not achieve the results intended by the Province. The Province needs to seriously reconsider the Proposed Growth Plan and work with its willing municipal partners to determine appropriate, reasonable and achievable density targets and minimum intensification rates. The Province must delay setting new density targets and intensification rates, until they engage and consult meaningfully with Regions and Municipalities in the GTHA. The Province should also work with the Regions and Municipalities to develop a definitive land needs methodology, before moving forward with the new Growth Plan.

Municipal government is the government that is closest to the people. Each municipality has its own approach to growth management and as such, the Province must remove unnecessary prescriptiveness and allow more flexibility in the Plans in order for them to be implemented not just in spirit, but in reality.

The Municipalities believe the Province needs to hit the reset button on the Proposed Plans. It is their hope that when this Report (along with all of the municipal submissions) are read by Government officials and staff, that a meeting of the GTHA Mayors and Chairs be called to discuss these issues, concerns and recommendations before any final Plans are released.

The consensus is clear and strong, and the GTHA Mayors and Chairs respectfully call on the Premier to consider the comments and recommendations contained within this Report and direct the Government to work with the Municipalities to achieve complete, financially responsible, sustainable, livable and affordable communities for generations to come.