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Greenbelt Council

Conseil de la
ceinture de verdure

February 28, 2019

Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Re. Greenbelt Council Report #3

Dear Minister Clark,

It is my pleasure to send you the Greenbelt Council's third progress report as we proceed through our work program.

Recognizing the vital importance of Ontario's Greenbelt to the prosperity of the Greater Golden Horseshoe, let me congratulate you on the government's commitment to withdraw Schedule 10 from Bill 66. Council welcomes Premier Ford's assurance that the government would not approve anything that would jeopardize the Greenbelt, water quality or public health.

Sincerely,

A handwritten signature in black ink, appearing to read "David Crombie".

David Crombie
Chair, Greenbelt Council

Copies to:

Laurie LeBlanc, Deputy Minister
Greenbelt Council Members
Friends of the Greenbelt Foundation CEO Ed McDonnell
Ontario Federation of Agriculture President Keith Currie
Golden Horseshoe Food and Farming Alliance Executive Director Janet Horner
Environmental Defence Executive Director Tim Gray
Hemson Consulting Partner Russell Mathew
Greater Golden Horseshoe Stakeholders

Greenbelt Council for the Greater Golden Horseshoe Report #3 (February 2019)

Continuing its practice of distributing progress reports after each meeting, this is the third report of the Greenbelt Council. It communicates our work in considering matters of public interest with respect to Ontario's Greenbelt and the implementation of the *Growth Plan for the Greater Golden Horseshoe*.

At its meeting January 23, Council met with representatives of the Ontario Federation of Agriculture, Golden Horseshoe Food and Farming Alliance, Friends of the Greenbelt Foundation and Environmental Defence to talk about Bill 66, and some preliminary thoughts about the proposed amendments to the *Growth Plan for the Greater Golden Horseshoe*.

At its meeting February 20, Hemson Consulting Partner Russell Mathew presented on the Growth Plan population and employment forecasts, and Council member and Metropole Consultants Principal Pamela Blais presented research and facilitated a discussion of the structural changes happening in Ontario's employment sector.

Council offers the following advice with respect to Bill 66 and the proposed Growth Plan Amendment 1. Note that Greenbelt Council recommendations are presented in italics.

Bill 66

Consistent with most municipalities and stakeholder groups, there was a solid consensus among Council members that Schedule 10 of Bill 66 needs to be removed from the draft legislation. Council is pleased to see that this action is now being supported by the Provincial Government.

Council also agrees with many stakeholders that sufficient supply of urban designated land to achieve the provincial growth targets for both residential and employment land is not the issue. Rather it is the process and timing by which land already designated for urban uses is brought onto the market that is of on-going concern. Resolving this processing challenge needs to be a key focus for the government in ensuring proper implementation of the Growth Plan policies.

The Ontario Federation of Agriculture suggests a number of ways the Provincial Government can reduce red tape while protecting farmland and supporting the prosperity of rural Ontario and the significant job base of the agri-food sector. One of its recommendations is to adhere to designated Greenfield Density Area (DGA) targets of not less than 80 residents and jobs combined per hectare. The federation also suggests helping municipalities to update their zoning by-laws in a timely manner. The federation feels this could help eliminate any barriers inherent within specific policies and that in some instances appropriate pre-zoning might be helpful.

Council agrees with many stakeholders that public consultation is fundamental to an effective planning process and a prosperous province.

Council strongly recommends that the requirement to consult with a broad spectrum of residents and other stakeholders not be undermined.

Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe*

Council congratulates the government for acknowledging municipal concerns regarding a number of Growth Plan implementation challenges. These include, for example, increasing the area of delineation associated with Major Transit Station Areas, permitting some activity in advance of the municipal comprehensive review (MCR) process, simplifying the phase-in of density and intensification targets, and permitting minor rounding-out of rural settlement areas. While these proposed changes help to resolve some of the issues experienced in the implementation process to date, some are not without pitfalls that could be addressed through relatively simple policy changes, which have been recommended in this report.

One of the lenses through which Council reviewed the proposed amendments is their expected effectiveness in promoting prosperity. If a regional context is not ingrained in the policy framework the amendments could harm long-term prosperity, prosperity that is dependent on the sustainability of bio-diverse natural areas, agricultural system and complete communities, as well as a healthy economy.

Provincially Significant Employment Zones

Council supports the development and use of Provincially Significant Employment Zones (PSEZs) as a broad policy framework for the protection of important areas and as a focus for continued investment. However, Council recommends that PSEZs be delineated with greater precision and policies be included in the Growth Plan to support the competitiveness and ability of these areas to attract investment in a changing Greater Golden Horseshoe economy.

Council believes that the proposed use of PSEZs to identify areas for one-time conversions conflates one-time conversion with policies to support economic development. While related, these are not the same. Each initiative should have separate criteria to identify relevant zones and policies.

To promote economic development, the Minister may wish to employ the PSEZ concept to identify areas that are truly of provincial economic significance, using criteria suited to this purpose. Policies should be included in the Growth Plan to protect these lands where necessary, but also to enhance the attractiveness of these areas to meet the needs of business; integrate development with public investments, especially transit; and provide mechanisms to coordinate planning where these zones cross municipal boundaries.

Conversion of Employment Lands Outside of the MCR process

Council recommends that any one-time conversions prior to the completion of the MCR only be allowed in exceptional circumstances, pursuant to provincial criteria, such that the proposed non-employment use clearly represents significant public benefit and is demonstrated to be occurring on land not otherwise required to accommodate forecasted employment uses.

In this time of rapid growth, change and disruption in the region's economy, removing the requirement to consider the potential need for the land for future employment uses or to meet forecast municipal employment growth may actually harm local and regional economic development.

Absence of Critical Employment Lands Information

Council recommends the Province review the geography of employment across the Greater Golden Horseshoe.

Council believes that Growth Plan amendments should be crafted in the context of an understanding of region-wide economic change, economic restructuring, and the changing economic geography of the region. In this way the Province can ensure the needs of the evolving economy are met while sustaining healthy natural systems and supporting vibrant liveable communities.

As the nature of employment changes, so do the needs of employers seeking land in the Greater Golden Horseshoe. Data are needed to inventory the size, scale and characteristics of employment lands across the region.

Tiered Approach to Intensification and Density

Council supports a tiered approach if it is based on proper criteria and meets, where appropriate, transit supportive densities.

Council supports the Provincial Government's recognition that one size does not fit all, thus the need for flexibility in some policy areas. For example, Council agrees that rural settlements are not the same as urban ones, and supports a tiered approach to intensification and density targets that separates out rural settlements. However, municipalities should not be permitted to designate land at lower than transit supportive densities.

Density and Intensification Targets

Council recommends that the effective density targets for residential areas be maintained, as a minimum, at the 2006 Growth Plan level.

In an assessment undertaken by Council members it became clear that the changes proposed in Amendment 1 would likely reduce the effective DGA density applicable to residential development by more than 10 residents and jobs combined per hectare in 13 out of 20 municipalities below that applicable to residential development in the implementation of either the 2006 or the 2017 Growth Plans. In particular, Council sees no basis for the differentiation of Durham and Halton regions, from Waterloo Region and the City of Hamilton with respect to DGA density.

The proposed reduction in density targets in Amendment 1 would significantly reduce the potential to implement sustainable transit services within Durham and Halton regions. This concern also applies to other municipalities such as Niagara Region and the cities of Guelph, Barrie, Peterborough and Brantford.

Boundary Adjustments

Council recommends that where boundary adjustments are occurring no net increase in developable land within the settlement area be permitted.

While it makes sense to finalize long-term boundaries in logical locations, such a policy should not be used as a tool for small-scale creep of boundaries. A municipality should not be able to take undevelopable floodplain out of a settlement area designation and replace it with agricultural land, for example.

Likewise, the minor rounding-out provision for rural settlements may be appropriate ahead of the MCR process. However, there should be a one-time only provision, with guidance as to what constitutes a minor rounding-out.

Settlement Area Boundary Expansions

Council recommends no settlement area boundary expansions be permitted outside of the MCR.

Council believes that future settlement boundary expansions should only be considered with proper justification through the MCR process. Any additional acreage, including the proposed 40 hectares, has the potential to undermine the fair and rationale process set up through the MCR to assess appropriate growth parameters. Allowing certain property owners to move ahead of other property owners has the potential to create conflicts, and lengthy appeal processes, drawing resources away from the more unified MCR exercise.

Population and Employment Forecasts

Council recommends that any amendments to the Growth Plan include or be coincident with updates to the population and employment forecasts.

Council is concerned that the Province has yet to undertake the five-year review of the population and employment forecasts contained in Schedules 3 and 7 of the Growth Plan as required by Policy 5.2.4.7. Evidence is mounting that these population and employment forecasts are not being consistently realized, and that the shortfalls in many municipalities—particularly those in the Outer Ring and Durham Region—are not simply associated with cyclical fluctuations, but represent underlying challenges with how the distribution of population and employment growth was determined in the forecasting process.

Council is also concerned that the Growth Plan population and employment forecasts need to be reviewed in light of the structural change in employment distribution that has been demonstrated through recent studies (i.e., Planning the Next GGH, by Metropole Consultants principal Pamela Blais in collaboration with the Neptis Foundation).

Without a review of the population and employment forecasts, the potential exists for significant over-designation of land in some municipalities through the upcoming MCR processes, projected revenues from development needed to fund infrastructure failing to appear, and the potential failure to align investments with growth.

Land Needs Assessment

Council recommends the complexity and costs associated with the process of preparing Land Needs Assessments be reduced.

Municipalities have noted that the provincial Land Needs Assessment Methodology is unnecessarily onerous and expensive to complete given both the relative uncertainty of any long-term population and employment forecasts and the requirement that such processes be updated several times before their horizon year.

A simple change in the wording of Policy 2.2.2.1 to make the intensification targets applicable to “per cent of population forecast to occupy new residential dwellings units” rather than “per cent of all residential development” would dramatically reduce the complexity and the cost associated with the process of preparing Land Needs Assessments, with minimal change in the final results. It would also make such reports considerably easier to review and defend should appeals occur, thereby saving considerable time and resources for municipalities, the Province, the development industry and the public. A recalibration of the actual proposed densities may be required to reflect this change.

Agricultural System and Natural Heritage System Mapping

Stakeholders have expressed concern about the provincial Agricultural System and Natural Heritage System mapping. The Provincial Government needs to ensure the mapping is accurate through local ground truthing. If municipalities can do it best, then they should be mandated to do so, provided it is monitored by the Provincial Government for consistency.

Complementary Recommendations

Council recommends, as part of the government's Growth Plan review that consideration be given to the "Complementary Recommendations" in the December 2015 report of the Advisory Panel on the Coordinated Review of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan.

Among others, the Province should give consideration to implementing the following recommendations:

- "2. Develop guidance on alternative development standards that identify and promote innovative ways to build more compact, transit-supportive complete communities in Greenfield developments and intensifying areas.
5. Ensure the Province's Long-Term Affordable Housing Strategy supports the goals of the four plans, including measures to support purpose-build rental housing, remove barriers to secondary suites and use zoning or other planning tools to ensure that developments support a mix of incomes and housing types in locations that are transit-friendly with short commute times and options for active transportation.
57. Through reviews of the *Municipal Act* and *City of Toronto Act* and other provincial initiatives, enable municipalities to pilot new approaches and remove barriers to the inclusion of climate change resilience in upgrades to existing infrastructure and building new infrastructure. Consider including green infrastructure, low-impact development, stormwater management, water and wastewater management, transportation systems and energy facilities."