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**PROPOSED AMENDMENTS TO THE GROWTH PLAN  
FOR THE GREATER GOLDEN HORSESHOE**

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## INTRODUCTION

By 2041, an estimated 13.5 million people are expected to call the Greater Golden Horseshoe (“GGH”) home, with the number of jobs forecast to rise from 4.5 million to 6.3 million. This represents an increased population by 50 percent and an increase in the number of jobs by 40 percent.

During the first quarter of 2015, the Ministry of Municipal Affairs and Housing (“MMAH”), released the discussion paper *Our Region, Our Community, Our Home*<sup>2</sup> and initiated a coordinated 10-year review of four of Ontario’s land use plans (the “Coordinated Review”): the Growth Plan for the Greater Golden Horseshoe (the “2006 Growth Plan”); the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan (the “ORMCP”) and the Niagara Escarpment Plan (the “NEP”).

In December 2015, a provincially appointed Advisory Panel chaired by the Honourable David Crombie provided recommendations to the Province in its report entitled *Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015 – 2041*<sup>3</sup> (the “Crombie Report”). The Province received comments through stakeholder consultations during the spring of 2015. On May 10, 2016, MMAH released a guide to the proposed revisions to the four plans entitled *Shaping Land Use in the Greater Golden Horseshoe*<sup>4</sup> (the “Guide Document”). The public comment period on the proposed revisions ended on October 31, 2016. This paper provides a high level overview of the revisions to the 2006 Growth Plan.<sup>5</sup>

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<sup>2</sup> Ministry of Municipal Affairs and Housing, *A discussion document for the 2015 co-ordinated review*, online: Land Use Planning Review <<http://www.mah.gov.on.ca/AssetFactory.aspx?did=10759>>.

<sup>3</sup> Ministry of Municipal Affairs and Housing, *Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015 – 2041*, online: <<http://www.mah.gov.on.ca/Asset11110.aspx?method=1>>.

<sup>4</sup> Ministry of Municipal Affairs and Housing, *Shaping Land Use in the Greater Golden Horseshoe*, online: Land Use Planning Review <<http://www.mah.gov.on.ca/AssetFactory.aspx?did=14910>>.

<sup>5</sup> This paper does not include a summary of the applicable legislation for each of the four land use plans. See Leo Longo, *Provincial Plan Review – 2016 Update* (paper delivered at Ontario Bar Association’s Institute 2016 – Changing Landscapes in Municipal and Planning Law V. 2.0, 5 February 2016).

## **The Proposed Growth Plan<sup>6</sup>**

Pursuant to the *Places to Grow Act, 2005*<sup>7</sup>, the 2006 Growth Plan was approved by Order-in-Council and took effect on June 16, 2006. Since that time, it has been amended twice, with the amendments taking effect on January 19, 2012 and June 17, 2013, respectively.<sup>8</sup>

Municipalities in geographic areas subject to a provincial plan under the *Places to Grow Act, 2005* are required to amend their official plans to conform with applicable provincial plans within 3 years from the day the provincial plan comes into effect.<sup>9</sup> The Minister does have the ability to extend or determine an alternative date for conformity but we will have to wait and see whether that discretion is exercised with respect to the proposed Growth Plan.

## **The Crombie Report**

The Crombie Report identified 6 themes and contained 87 recommendations for changes to the four plans subject to the Coordinated Review. The 6 themes were:

- Building complete communities;
- Supporting agriculture;
- Protecting natural and cultural heritage;
- Providing infrastructure;
- Mainstreaming climate change; and
- Implementing the plans.

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<sup>6</sup> Where direct quotations from the proposed Growth Plan have been reproduced we have maintained the stylistic conventions of that document. Terms that are defined under the proposed Growth Plan are italicised in this paper but full definitions in respect of each of these terms is not necessarily provided herein. Reference should be made to the proposed Growth Plan document for the meaning of defined terms not included in this paper. See Ministry of Municipal Affairs and Housing, *Proposed Growth Plan for the Greater Golden Horseshoe, 2016* (May 2016), online: Lane Use Planning Review <[https://www.placestogrow.ca/content/ggh/Proposed%20Growth%20Plan%20for%20the%20Greater%20Golden%20Horseshoe%202016\\_2.pdf](https://www.placestogrow.ca/content/ggh/Proposed%20Growth%20Plan%20for%20the%20Greater%20Golden%20Horseshoe%202016_2.pdf)>.

<sup>7</sup> S.O. 2005, c. 13 [*Places to Grow Act*].

<sup>8</sup> Amendment 1 was approved by the Lieutenant Governor in Council through Order-in-Council No. 1702/2011; Amendment 2 was approved by the Lieutenant Governor in Council through Order-in-Council No. 767/2013.

<sup>9</sup> *Places to Grow Act*, *supra* note 7, s. 12(2).

The recommendations were divided into two categories: 56 of which were directions for revising the four plans and 31 were “complimentary recommendations”, which related to proposals for additional strategic planning and policy changes that were not specific to changing these plans.<sup>10</sup>

Although there were many recommendations they lacked specific direction as to how the four plans should be revised. While the Crombie Report suggested possible future directions, those directions only began to come into focus during the second quarter of 2016 with the release of the Guide Document and the proposed revisions to the four plans.

## **OVERVIEW INTRODUCTION AND GUIDING PRINCIPLES**

### ***Introduction***

The Introduction to the proposed Growth Plan is amended to include a list of challenges to the Greater Golden Horseshoe (the “GGH”). Not only do these challenges include concepts such as climate change, increased demand on infrastructure, traffic congestion and urban sprawl, they also speak to increased rates of obesity and associated health challenges and the aging population.

Generally, the proposed Growth Plan is a sort of maturing of the policies and land use planning concepts in the GGH. The 2006 Growth Plan originally focused on intensification, increased density, insufficient infrastructure, etc. The proposed Growth Plan takes that focus to the next stage moving to the next level of what should be accomplished under the relative categories and increases intensification and density targets. It is also a tightening up in the policies and concepts. The Province has taken the experience of the last decade; of litigation, debates and challenges and has focused the proposed Growth Plan to attempt to clarify the policies, to tighten up the language and to close the loops.

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<sup>10</sup> This paper does not include a detailed summary of the 87 recommendations. An overview of the recommendations can be found in Michael Melling & Kate Fairbrother, *The Crickets Speak (But Don't Say Much: An Update on the Co-ordinated Review of Provincial Plans* (paper delivered at the Ontario Bar Association's Institute 2016 – Changing Landscapes in Municipal and Planning Law V. 2.0, 5 February 2016).

## ***Guiding Principles***

The guiding principles of the proposed Growth Plan at policy 1.2.1 introduce some new policy priorities that may have initially informed the 2006 Growth Plan but have now been pulled to the forefront. Two of these new guiding principles are reviewed below.

### **1. Ontario's Climate Change Strategy and *Net-zero Communities***

Although the 2006 Growth Plan did not include specific reference to “climate change” the amendments certainly include this focus. The Province officially released its climate change strategy in 2015<sup>11</sup>, but before the proposed Growth Plan was released the concept had not been introduced to the planning discussion and there was no specific policy direction that connected the goal of building *complete communities* with climate change.

Integrating climate change considerations into planning and growth management binds the building of *complete communities* into one of the component parts to reducing greenhouse gas emissions in accordance with the Province's commitment to meet long-term reduction targets for greenhouse gas emissions by 30 percent by 2030 and by 80 percent by 2050.

This guiding principle has resulted in a new defined term in policy 7; *net-zero communities*:

Communities that meet their energy demand through low-carbon or carbon-free forms of energy and offset, preferably locally, any releases of greenhouse gas emissions that cannot be eliminated. *Net-zero communities* include a higher density built form, and denser and mixed-use development patterns that ensure energy efficiency, reduce distances travelled, and improve integration with transit, energy, water and wastewater systems.

Specific climate change policies and achieving the goal of *net-zero communities* are discussed in more detail below.

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<sup>11</sup> Ontario, *Climate Change Strategy*, online: <<https://dr6j45jk9xcmk.cloudfront.net/documents/4928/climate-change-strategy-en.pdf>>.

## 2. Integrate Land Use Planning with Infrastructure Planning

Although not a new concept or focus, the proposed Growth Plan links the integration of land use planning with planning for and investing in infrastructure. Optimizing new and existing infrastructure to support growth in a compact and efficient form is a guiding principle of the 2006 Growth Plan.<sup>12</sup> This seems like an obvious guiding principle but the challenge that emerged, in addition to making use of existing infrastructure, is coordinating the complexity of expanding, maintaining existing infrastructure and undertaking new infrastructure development and investment with decision-making on land use planning matters at the municipal level.

The proposed Growth Plan continues to prioritize intensification, higher density and infrastructure. In addition it seeks to “improve the integration of land use planning with planning and investment in *infrastructure* and *public service facilities*<sup>13</sup>, including integrated service delivery through community hubs by all levels of government.”

### ***Relationship between the Provincial Plans***

Policy 1.2.3 – “How to Read this Plan” continues to address the relationship between the various provincial land use plans (including the Greenbelt Plan, the NEP, and the ORMCP, among others). The 2006 Growth Plan directed that the Plan “should” be read in conjunction with other provincial plans<sup>14</sup>; the proposed Growth Plan now directs that it “must” be read in conjunction with other provincial plans. It remains to be seen whether the standard of obligation has been altered along with the change in terminology.

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<sup>12</sup> Ontario, Ministry of Municipal Affairs, *Growth Plan for the Greater Golden Horseshoe, 2006*, (Ontario: Ministry of Municipal Affairs, 2008-2017), s. 1.2.2 [Growth Plan].

<sup>13</sup> The defined term “public service facilities” is now the same as that term is defined in the Ontario, Ministry of Municipal Affairs and Housing, *Provincial Policy Statement, 2014*, (Ontario: Ministry of Municipal Affairs and Housing, 30 April 2014) [Provincial Policy Statement]. “Public service facilities” means: “Lands, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs, and cultural services. Public service facilities do not include *infrastructure*.”; see policy 7 of the proposed Growth Plan. This term has replaced the defined term “community infrastructure” for the purposes of the proposed Growth Plan.

<sup>14</sup> Growth Plan, *supra* note 12, s. 1.4.

## ***Planning Horizon***

The proposed Growth Plan provides a time horizon of 2041 for the GGH and specifies that the goals and policies of this Plan are intended to be achieved within that horizon. Planning for *infrastructure* and *public service facilities* is not limited to the 2041 time horizon however the pattern for *infrastructure* is not to predetermine the settlement area boundary expansion.

## **FOCUSING GROWTH**

The population and employment forecasts in Schedule 3 for the GGH are to be used for planning and managing growth to the 2041 planning horizon for the proposed Growth Plan.

## ***Municipal Comprehensive Reviews***

Greater direction is now provided under the proposed Growth Plan in respect of *municipal comprehensive reviews*.

### **1. A New Definition**

The 2006 Growth Plan defined *municipal comprehensive review* as “an official plan review, or an official plan amendment, initiated by a municipality that comprehensively applies the policies and schedules of this Plan.”<sup>15</sup> That definition is proposed to be changed with respect to the initiatives to which it relates and specifying the level of municipal government responsible for undertaking the review. It reads as follows:

#### **Municipal Comprehensive Review**

A new official plan, or an official plan amendment, initiated by an upper- or single-tier municipality under policy 26 of the Planning Act that comprehensively applies the policies and schedules of this Plan.

Lower-tier municipalities are excluded from the definition of *municipal comprehensive review*. Upper-tier municipalities are to carry out the *municipal comprehensive review* at the upper-tier level to attempt a more comprehensive review.

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<sup>15</sup> *Ibid*, s. 7.

## 2. ***Municipal Comprehensive Reviews and the Provincial Policy Statement (2014)***

The proposed Growth Plan attempts to clarify the relationship between a *municipal comprehensive review* under the 2006 Growth Plan and a *comprehensive review* under the Provincial Policy Statement, 2014 (the “PPS”).<sup>16</sup> Policy 5.2.1.3 of the proposed Growth Plan reads: “A *municipal comprehensive review* that is undertaken in accordance with this Plan will be deemed to fulfil the requirements in the PPS to undertake a comprehensive review.” Notwithstanding this deeming provision, the definition of “comprehensive review” in the PPS is not identical to either the definition of *municipal comprehensive review* in the proposed Growth Plan nor does it appear to be consistent with new policies governing that analysis under the Plan.

## 3. **Planning For Growth through *Municipal Comprehensive Reviews***

In addition to these changes, the proposed Growth Plan contains new policies at policy 2.2.1.4 that direct upper- and single-tier municipalities to develop an integrated approach to planning and managing growth to be implemented through a *municipal comprehensive review* and “other supporting documents” and will:

- a) be based on forecasted growth to the horizon of this Plan and the other policies in this Plan;
- b) consider the entire existing supply of land designated for development within the municipality;
- c) identify a hierarchy of *settlement areas*, or of areas within *settlement areas*, where forecasted growth to the horizon of this Plan will be accommodated based on:
  - i. *strategic growth areas* as the primary focus for accommodating growth;
  - ii. the amount of growth that can be accommodated in *built-up areas* and existing *designated greenfield areas* based on an assessment of land needs; and
  - iii. integrated planning for *infrastructure* and *public service facilities* that considers the full life cycle costs of these assets and identifies options to pay for these costs over the long-term;
- d) identify areas where development is to be prohibited; and
- e) where applicable, provide direction to lower-tier municipalities on how to implement this approach.

There are several changes within these policies that should be highlighted. The first is the new defined term *strategic growth areas*. It seems to be a term for a higher-order category of lands that captures a

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<sup>16</sup> Provincial Policy Statement, *supra* note 13, s. 6.0.



number of sub-categories of land, some old, some new. Policy 7 of the proposed Growth Plan defines the term as follows:

#### **Strategic Growth Areas**

Within *settlement areas*, nodes, corridors and other areas that have been identified by municipalities or the Province to be the focus for accommodating *intensification* and higher-density mixed uses in a more *compact built form*. *Strategic growth areas* include *urban growth centres*, *major transit station areas*, *mobility hubs* and other major opportunities that may include infill, *redevelopment*, *brownfield sites*, the expansion or conversion of existing buildings, or *greyfields*. Lands along major roads, arterials or other areas with existing or planned *frequent transit service* or *higher order transit corridors* may also be identified as *strategic growth areas*.

The second matter relates to identifying *settlement areas* where forecasted population and employment growth will be accommodated based on, among other things, “an assessment of land needs”. As a “supplementary direction” under policy 5.2.2.1(c) of the proposed Growth Plan, the Minister of MMAH “will, where appropriate, identify, establish or update a standard methodology for land needs assessment.” That methodology has not yet been released nor is it clear whether it will be subject to the same public consultation process under the Coordinated Review. In the meantime, while we await MMAH’s release of the methodology, policy 5.2.2.3 states:

Where this Plan indicates that supplementary direction will be provided for implementation but the direction has not yet been issued, all relevant policies of this Plan continue to apply, and any policy that relies on supplementary direction should be implemented to the fullest extent possible.

Furthermore, there is no direction provided to municipalities as to how they are to identify “hierarchy” within *settlement areas*. The definition of *settlement areas* in policy 7 states, in part, that they are “built-up areas where development is concentrated and which have a mix of land uses...”<sup>17</sup> The proposed Growth Plan is silent as to how upper- and single-tier municipalities are to plan for variations in this concentration of development.

Furthermore, if no further revisions to the proposed Growth Plan are forthcoming and the Province intends for upper- and single-tier municipalities to exercise discretion in the implementation of policy

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<sup>17</sup> “Built up areas” in the definition for *settlement areas* is not italicized thereby raising additional interpretative questions.

2.2.1.4(d), which requires municipalities to identify areas where development is prohibited, increased litigation regarding the criteria to be used will likely follow.

### ***Excess Lands***

Policy 2.2.1.4.6 of the proposed Growth Plan requires all upper- and single-tier municipalities in the *outer ring*<sup>18</sup> to identify any *excess lands* in their official plans and prohibit development on those lands to the horizon of the proposed Growth Plan. *Excess Lands* are defined in policy 7 as:

Lands within a *settlement area* that are in excess of what is required to accommodate forecasted growth to the horizon of this Plan.

*Settlement areas* are “designated in an official plan for development” (policy 7) but the policy directs no development on *excess lands*. *Excess lands* cannot therefore be both within a *settlement area* but beyond the reach of development without revisions to the applicable official plan.

The implications of this policy are troubling. Presumably it is intended to direct upper- and single-tier municipalities to reassess existing but dated land use permissions for lands that have little or no chance of being built-out, for any number of reasons. It is also intended to address scenarios where if build-out were to occur, development of those lands would not be required in order to conform with the forecasted growth under the proposed Growth Plan given the availability of other lands for development in the *settlement area*. Many landowners will find significant prejudice, potentially requiring legal action, in the event their lands are designated *excess lands*. Furthermore, without additional direction in respect of this policy, the appearance of selective designation of *excess lands* may lack justification when analysed in terms of what constitutes “good planning”.

### ***Increases to Intensification and Designated Greenfield Area Density Targets***

Both the 2006 Growth Plan and the proposed Growth Plan require upper- and single-tier municipalities to implement, through official plan policy, mandated residential development targets for *built-up areas* (i.e., the limits of the developed urban area as defined by MMAH in consultation with the affected municipality

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<sup>18</sup> The *outer-ring* continues to include the geographic areas consisting of the cities of Barrie, Brantford, Guelph, Kawartha Lakes, Orillia and Peterborough; the Counties of Brant, Dufferin, Haldimand, Northumberland, Peterborough, Simcoe, and Wellington; and the Regions of Niagara and Waterloo; see policy 7 of the 2006 Growth Plan and the proposed Growth Plan.

or, if not delineated, the entire *settlement area* (policy 7)). These targets mean a minimum percentage of all residential development on an annual basis will be directed to occur within the developed urban boundary of a given municipality.

This minimum *intensification* target is currently at 40 percent.<sup>19</sup> Policy 2.2.2.3 of the proposed Growth Plan would increase the target to 60 percent. This increase means that upper- and single-tier municipalities must, as a part of the next *municipal comprehensive review*, increase their annual residential development intensification targets by 20 percent. It is not clear whether the intention is for *municipal comprehensive reviews* to occur within 3 years of the proposed Growth Plan effective date (or an alternative date assigned by the Minister) or whether the 10-year official plan review requirements of section 26 of the *Planning Act*<sup>20</sup>, which mandates a *municipal comprehensive review*, would provide an additional 7 year grace period in respect of the proposed Growth Plan.

Alternative minimum *intensification* targets are still permitted for upper- and single-tier municipalities located in the *outer ring*, which do not have an *urban growth centre*. Councils of these municipalities may request an alternative target at the time of each *municipal comprehensive review* (policy 2.2.2.4(a)).

The Province also proposes to increase minimum density targets for *designated greenfield areas*. *Designated greenfield areas* are those urban and rural settlement areas in the upper- and single-tier municipalities that are not a part of a municipality's *built-up area*.<sup>21</sup> By and large, they consist of unserviced or underserviced lands (*i.e.*, little to no storm water services, waste water services, water services and/or roads, are available).

The 2006 Growth Plan requires upper- and single-tier municipalities to include policies in their official plans to achieve a minimum density target for *designated greenfield areas* of 50 residents and jobs combined per hectare.<sup>22</sup> The proposed revisions under policy 2.2.7.2 of the proposed Growth Plan would

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<sup>19</sup> Growth Plan, *supra* note 12, s. 2.2.3.1. Where an upper- or single-tier municipality is either achieving an intensification target greater than 40 percent at the time the 2006 Growth Plan came into effect or has official plan policies mandating a higher target, then that increased standard is the "minimum" target for the purposes of the Plan; See policies 2.2.3.2 and 2.2.3.3.

<sup>20</sup> R.S.O. 1990, c.P.13, as amended.

<sup>21</sup> Growth Plan, *supra* note 12, s. 7.

<sup>22</sup> *Ibid*, s. 2.2.7.2.

require municipalities to adopt official plan policies that would achieve a minimum density target of 80 residents and jobs combined per hectare. *Excess lands* are excluded for the purpose of this calculation (policy 7 – definition of *designated greenfield area*). Policy 2.2.7.4.(b) requires councils of municipalities in the *outer ring* without an *urban growth centre* to make their request for an alternative density target at the time of each *municipal comprehensive review*. It would appear that conformity with this increased target is subject to the 3-year requirement (or an alternative date assigned by the Minister) under the *Places to Grow Act, 2005* as, unlike the policies in respect of the increased *intensification* target, there is no indication that the mandated increase may be implemented at the time of the next *municipal comprehensive review*.

Policy 2.2.7.3 provides a list of the exclusions permitted for the calculation of the minimum density target for *designated greenfield areas*. Previously exclusions included natural heritage features provided the features were identified in an applicable official plan or provincial plan and the applicable provincial plan or a provincial policy statement prohibited development in these areas.<sup>23</sup> This criteria remains in the proposed Growth Plan but an applicable provincial plan or policy statement need no longer identify prohibitions on development. Also excluded from *designated greenfield area* calculations are: rights-of-way for electricity transmission lines, *energy transmission pipelines*, freeways as defined by and mapped as a part of the Ontario Road Network, and railways; and *prime employment areas*<sup>24</sup> that have been designated in official plans in accordance with the proposed Growth Plan.

#### ***Density to be directed to Major Transit Station Areas***

Policy 2.2.4 requires that *priority transit corridors* be delineated in official plans and that planning be prioritized for *mobility hubs* associated with *priority transit corridors*. The Province may also identify additional *priority transit corridors* and planning requirements for these corridors and associated *mobility hubs*.

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<sup>23</sup> *Ibid*, s. 2.2.7.3.

<sup>24</sup> This is a new concept under the proposed Growth Plan the meaning and impact of which will be discussed below.

New policies would establish minimum density targets for *major transit station areas*; the size, shape and boundaries of which will be established by municipalities in official plans (by upper- and single-tier municipalities, in consultation with lower-tier municipalities).

*Major transit station areas* are defined in policy 7 as:

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 500 m radius of a transit station, representing about a 10-minute walk.

By 2041 or earlier, the proposed revisions would require that *major transit station areas* be planned to achieve minimum gross density targets of:

- 200 residents and jobs combined per hectare for areas serviced by subways;
- 160 residents and jobs combined per hectare for areas that are served by light rail transit or bus rapid transit; and,
- 150 resident and jobs combined per hectare for lands that are served by express rail service on the GO Transit network.

For many GGH municipalities, regional transportation planning has long promoted “park and go” use of public transit through the provision of surface parking at Metrolinx stops. Hitting these prescribed targets may be at odds with these “no density” surface parking lots at the stations. Accordingly, the proposed policies will have to reconcile the targets for existing and planned stations with the need for surface parking required for transit users.

### ***Changes to Employment Area Policies***

The proposed Growth Plan also contains new policies in respect of lands designated for employment uses. Municipalities are required to designate “suitable lands” in official plans within *settlement areas* that are adjacent to, or in the vicinity of, major goods movement facilities and corridors, including major highway interchanges as *prime employment areas* (policy 2.2.5.3). These areas are to be protected for appropriate employment uses over the long-term by prohibiting residential and other *sensitive land uses*, institutional, retail, commercial and office uses that are not ancillary to the “primary employment use” and planning for *freight-supportive* land use patterns (policy 2.2.5.5). The Minister may also identify other

*prime employment areas* (policy 2.2.5.4). Municipalities would have the discretion to identify other existing employment areas (a category of land use already contemplated under the 2006 Growth Plan) within *settlement areas* as *prime employment areas*.

Of central concern with these policies is *prime employment areas* result in lower densities, extensive land use, and do not permit major office uses. These constraints limit the range of opportunities for employment uses in *prime employment areas*. In the event future “primary employment uses” do not materialize, the conversion of lands within *prime employment areas* to non-employment uses is prohibited (policy 2.2.8.8). The conversion of lands within *prime employment areas* to *employment areas* would need to occur as an intermediary step however in order to convert lands within *prime employment areas* to *employment areas* or to convert lands from *employment areas* to non-employment use a *municipal comprehensive review* is required.

The proposed Growth Plan policies also speak to the development of *active transportation* networks and *transit-supportive* built form when planning for employment, as well as reducing surface parking.

The new term *office parks* is introduced and defined as “*Employment areas* designated in an official plan where there are significant concentrations of offices with high employment densities”(policy 7). The policies speak to improving transit connectivity and active transportation networks; providing for an appropriate mix of amenities and open space to serve the workforce; planning for intensification of employment uses; and transportation demand management that reduces reliance on single-occupancy vehicle use for existing *office parks* (policy 2.2.5.10).

### ***Affordable Housing***

Although the 2006 Growth Plan spoke to affordable housing, the proposed Growth Plan focused on the concern directly. Policy 2.2.6 requires upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province and other appropriate stakeholders, to develop housing strategies that align with applicable housing and homelessness plans under the *Housing Services Act, 2011*<sup>25</sup>; identify policies

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<sup>25</sup> S.O. 2011, c. 6, Sched. 1.

for official plans to address the needs of all residents (through affordable ownership housing and rental housing) and include affordable housing targets; and plans for a diverse range of housing types and densities, including secondary suites, to support the achievement of minimum intensification and density targets.

### ***Settlement Area Boundary Expansions***

A two-step process is refined for *settlement area* boundary expansions; the first focusing on the need for the expansions and the second the criteria to be considered in determining where the expansion should occur.

*Settlement area* boundary expansions continue to only be permitted through a *municipal comprehensive review* that demonstrates sufficient opportunities to accommodate forecasted growth are not available through *intensification* and in *designated greenfield areas* within the upper- or single-tier municipality, or the applicable lower-tier municipality (policy 2.2.8.1(a)). The reference in the 2006 Growth Plan policy to Schedule 3 is replaced in the proposed Growth Plan with the 2041 planning horizon. Also, the *regional market area* is removed as the geographic area of consideration, with the geographic area for consideration being the upper- or single-tier municipality. The expansion must also minimize land consumption.

Where a boundary expansion is justified through the *municipal comprehensive review* the process must now involve a feasibility analysis of the most appropriate location for the expansion based on a variety of considerations, including:

- “Existing or planned *infrastructure* and *public services facilities* to support the proposed growth and the development of *complete communities*” (policy 2.2..8.2(a));
- “The *infrastructure* and *public service facilities* needed would be financially viable over the full life cycle of these assets, based on mechanisms such as asset management planning and revenue generation analyses” (policy 2.2.8.2(b));

- “the proposed expansion aligns with a water and wastewater master plan or equivalent that has been completed in accordance with the policies in subpolicy 3.2.6” (policy 2.2.8.2(c));
- “the proposed expansion aligns with a *stormwater master plan* or equivalent that has been completed in accordance with the policies in subpolicy 3.2.7” (policy 2.2.8.2(d));
- “a *subwatershed plan* or equivalent has demonstrated that the proposed expansion, including the associated servicing, would not negatively impact the *water resource system*, including the *quality and quantity of water*” (policy 2.2.8.2(e));
- “*key hydrologic areas* and *natural heritage systems* should be avoided where possible” (policy 2.2.8.2(f));
- “for *settlement areas* that receive their water from or discharge their sewage to inland lakes, rivers or groundwater, a completed environmental assessment for new or expanded services has identified how expanded water and wastewater treatment capacity would be addressed in a manner that is fiscally and environmentally sustainable” (policy 2.2.8.2(g));
- “*prime agricultural areas* should be avoided where possible. Where *prime agricultural areas* cannot be avoided, an *agricultural impact assessment* will be used in determining the location of the expansion based on minimizing and mitigating the impact on the *agricultural system* and evaluating alternative locations across the upper or single-tier municipality in accordance with the following:
  - the lands do not comprise *specialty crop areas*;
  - there are no reasonable alternatives that avoid *prime agricultural areas*; and
  - there are no reasonable alternatives on lower priority agricultural lands in *prime agricultural areas*” (policy 2.2.8.2(h));



- “the *settlement area* to be expanded is in compliance with the *minimum distance separation formulae*” (policy 2.2.8.2(i));
- “any impacts on agricultural operations and on the *agricultural support network* from expanding *settlement areas* would be avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated as determined through an *agricultural impact assessment* (policy 2.2.8.2(j))”;
- the proposed expansion is to meet any applicable requirements of the Greenbelt Plan, ORMCP, NEP and Lake Simcoe Protection Plan and any applicable source protection plan (policy 2.2.8.2(l)); and
- within the Protected Countryside in the *Greenbelt Area* the *settlement area* to be expanded is identified in the Greenbelt Plan as a Town/Village and the proposed expansion would be modest in size; would be serviced by *municipal water and wastewater systems*; and expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited (policy 2.2.8.2(m)).

In the *outer ring settlement area* expansion is even more complicated and undoubtedly aimed to reduce leapfrogging. Policy 2.2.8.3 outlines a maze of steps that upper- or single-tier municipalities must undertake. These municipalities, provided they have designated *excess lands* in their “in effect” official plans, may undertake a boundary expansion at the time of a *municipal comprehensive review* so long as it is demonstrated that

- the area to be expanded has been identified as the primary focus for growth under a “*settlement area hierarchy*”, and
- the expansion will be contiguous with the existing *settlement area* boundary and entirely identified as *designated greenfield area*.

In addition, the overall quantum of *excess lands* would need to be reduced or redesignated to remove development permissions from the *excess lands* and the upper-tier municipality will have to ensure that any applicable lower-tier official plans are amended accordingly. Development would be prohibited on all *excess lands* to the 2041 horizon of the proposed Growth Plan.

Where appropriate, municipalities are to use additional tools to reduce the land that is available for development, through consideration of lapsing provisions in draft plans of subdivision and deeming draft plans of subdivision that have been registered for eight or more years but do not meet the growth management objectives of the proposed Growth Plan as not registered under section 50(4) of the *Planning Act* (policies 5.2.8.2 and 5.2.8.3, respectively).

It is not clear from the policy whether an *excess lands* identification process can occur at the same time as the *settlement area* expansion. If not, then the “two-step” official plan amendment process of first identifying and designating *excess lands* and then proceeding with a *settlement area* expansion prefaced by a *municipal comprehensive review* may be an even more drawn out and costly undertaking.

The policies continue to be different from the *settlement area* expansion policies of the Provincial Policy Statement. This will undoubtedly add to confusion.

### ***Rural Areas***

The *rural area* policies are expanded and require that *public service facilities* in rural *settlement areas* be co-located and integrated in community hubs, and priority should be given to maintaining and adapting existing *public service facilities* in community hubs to meet the needs of the community. *Public service facilities* are defined as “lands, buildings and structures for the provision of programs and services provided or subsidized by a government or other body” and include social assistance, recreation, police and fire protection, health and educational programs, and cultural services but do not include infrastructure (policy 7). This term has replaced the defined term “community infrastructure” under the 2006 Growth Plan. When making decisions regarding the location of new *public service facilities*, the proposed Growth Plan directs that preference should be given to sites “easily accessible by *active*

*transportation* (i.e., human-powered travel including motorized wheelchairs and other power-assisted devices) and transit, where available (policy 3.2.8.6).

The policies continue to permit development outside of *settlement areas* on rural lands, if necessary for the management or use of resources, resource-based recreational uses, or other rural land uses that are not appropriate in *settlement areas* (policy 2.2.9.3). However, the policies also indicated that resource-based recreational uses should be limited to tourism-related and recreational uses that are compatible with the scale, character and capacity of the resource and the surrounding rural landscape, and may include: commercial uses to serve the needs of visitors; and resource-based recreational dwellings for seasonal accommodation, where appropriate (policy 2.2.9.4).

## **INFRASTRUCTURE**

*Infrastructure* is now a defined term under the proposed Growth Plan and is consistent with the term in the PPS. Policy 7 defines *infrastructure* as

Physical structures (facilities and corridors) that form the foundation for development. *Infrastructure* includes: sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications, transit and transportation corridors and facilities, oil and gas pipelines and associated facilities.

Policies of the proposed Growth Plan are meant to “provide a framework to guide and prioritize *infrastructure* planning and investments” to support and accommodate forecasted growth (policy 3.1). To that end, the Province proposes changes in respect of the integration of *infrastructure* planning, transportation planning and investment, the use and supply of water, and investment in *public service facilities*.

### ***Integration of Infrastructure Planning***

As directed by the “guiding principles”, new policies require the integration of planning for new and expanding existing *infrastructure* through “evaluations of long-range-based land use planning and financial planning, and will be supported by *infrastructure* master plans, asset management plans,

community energy plans, *watershed planning*, environmental assessments and other relevant studies where appropriate.” (policy 3.2.1). The “community energy plan” requirement, when planning for new infrastructure, is entirely new. The proposed changes provide no guidance as to the criteria, contents or goals for such plans.<sup>26</sup> The only guidance provided in respect of the various plans required for integrated *infrastructure* planning comes in respect of municipal asset management planning. It says that “municipalities will assess infrastructure vulnerability and identify priority actions and investments to increase *infrastructure* resilience and adapt to a changing climate” (policy 3.2.1.4).

### ***Transportation***

Policy 3.1 – “Context” identifies transit as the first priority for transportation planning and investment. “Transit” is not a stand-alone defined term and, notwithstanding the use of “public transit” elsewhere in the document, it is not clear whether the two terms are meant to be synonymous.

Policy 3.2.2.3 speaks to a complete streets approach being adopted when designing and planning street networks, that ensures the needs and safety of all road users are considered and appropriately accommodated, including pedestrians, cyclists, transit-users and operators, and drivers of cars and trucks.

Transportation planning and land use planning are integrally connected. The proposed Growth Plan also recognizes this relationship but may inadvertently prioritize “movement” over “use”. For example, the general transportation policies in policy 3.2.2.4 direct municipalities to implement “transportation demand management” policies in their official plans or “other planning documents or programs” to:

- a) reduce trip distance and time;
- b) increase the *modal share* of alternatives to the automobile, which may include setting *modal share* targets;
- c) prioritize *active transportation*, transit and goods movement over single-occupant automobiles; and
- d) target significant *trip generators*.

The setting of *modal share* targets, addressed in policy 7, being “the percentage of person-trips or of freight movements made by one travel mode, relative to the total number of such trips made by all

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<sup>26</sup> We note that “community energy plans” are not an entirely new concept. The City of Toronto has started requiring the creation of such plans on an ad hoc basis when developing some of its secondary plans.

modes” would likely escape review by the Ontario Municipal Board on appeal if not included in official plans. Likewise, the targeting of significant *trip generators*, being “destinations with high population densities or concentrated activities which generate a large number of trips (e.g., *urban growth centres*, and other downtowns, *major office and office parks, major retail, employment areas*, community hubs and other *public service facilities* and other mixed use areas)” carries significant implications for the planned urban structure of municipalities, which are established through official plan policies.

In respect of “Moving People”, the proposed Growth Plan requires that all decisions on transit planning and investment align with and support the priorities identified in Schedule 5 – “Moving People – Transit” (policy 3.2.3.2(e)). Policy 3.2.3.3 directs municipalities to work with Metrolinx and the Province to support “transit service integration” within and across municipal boundaries. However, given the fact that Schedule 5 does not show the planned Yonge Street Subway extension from the City of Toronto to Highway 7, the proposed Growth Plan appears to be out of step with the Metrolinx priorities, in at least some respects.<sup>27</sup> The policies also require that provincial greenhouse gas emissions reduction targets be considered when making decisions regarding transit planning and investment (policy 3.2.3.2.g).

The Moving Goods policies speak to linking *major goods movement facilities and corridors*, international gateways and *prime employment areas*.

A new subsection pertaining to infrastructure corridors introduces *planned corridors* which are defined as:

Corridors or future corridors which are required to meet projected needs, and are identified through this Plan, preferred alignment(s) determined through the Environmental Assessment Act process, or identified through planning studies where the Ministry of Transportation, Ministry of Energy, Metrolinx or Independent Electricity System Operator (IESO) or any successor to those Ministries or entities, is actively pursuing the identification of a corridor. Approaches for the protection of *planned corridors* may be recommended in guidelines developed by the Province.

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<sup>27</sup> Metrolinx, *The Big Move – Transforming Transportation in the Greater Toronto and Hamilton Area* (November 2008), online: The Big Move <[http://www.metrolinx.com/thebigmove/Docs/big\\_move/TheBigMove\\_020109.pdf](http://www.metrolinx.com/thebigmove/Docs/big_move/TheBigMove_020109.pdf)>. See also Metrolinx, *The Approved Changes to The Big Move* (14 February 2013), online: The Big Move <[http://www.metrolinx.com/en/regionalplanning/bigmove/The\\_Big\\_Move\\_Approved\\_Changes\\_EN.pdf](http://www.metrolinx.com/en/regionalplanning/bigmove/The_Big_Move_Approved_Changes_EN.pdf)>.

The policies require that when planning for development, optimization or expansion of existing and *planned corridors* and supporting facilities, the Province, other public agencies and upper- and single-tier municipalities: encourage the co-location of linear *infrastructure* where appropriate (policy 3.2.5.1(a)).

Existing and *planned corridors* are to be protected, to meet current and projected needs and in accordance with the transportation and *infrastructure* corridor protection policies in the PPS (policy 3.2.5.1(b)).

Also any impacts to the *agricultural system* are to be avoided and an environmental assessment, informed by an *agricultural impact assessment* or equivalent is to be carried out to show that impacts have been avoided or, if avoidance is not possible, minimized and mitigated, to the extent feasible (policy 3.2.5.1(c)). A similar requirement is included for *key natural heritage features* in *natural heritage systems*, *key hydrologic features* and *key hydrologic areas* (policy 3.2.5.1(d)).

### ***Water, Wastewater Systems, and Stormwater Management***

The policies speak to what must be included in comprehensive water or watershed master plans including the need to demonstrate that the system will not negatively impact the quantity and quality of ground and surface water; the preferred option for servicing growth and development; and the full life cycle costs of the system and options to pay for these costs over the long-term.

New policies will not permit the extension of water or wastewater services from a Great Lakes source to *settlement areas* serviced by non-Great Lakes sources except for reasons of public health and safety and capacity of the water or wastewater services provided in these circumstances will be limited to that required to service the affected *settlement area*, including capacity for planned development within the approved *settlement area* boundary (policy 3.2.6.3(b)).

This standard will not apply to upper- and single-tier municipalities with *urban growth centres* outside the Greenbelt. Instead, there must be a demonstrated need for the extension and a requirement that it will service only the growth allocated to the *settlement area* within the *urban growth centre* and that it has been approved under an environmental assessment (policy 3.2.6.3(b)).

Municipalities are required to develop *stormwater master plans* for serviced *settlement areas* that among other things are informed by *watershed planning*; examine the cumulative environmental impacts of stormwater from existing and planned development; incorporate appropriate *low impact development* and *green infrastructure*; identify the need for stormwater retrofits; and identify the full life cycle costs of the *stormwater infrastructure* (policy 3.2.7.2).

Large-scale *development* proposals proceeding by way of secondary plans, plans of subdivision and vacant land plans of condominium, and proposals for resort *development*, are to be supported by a *stormwater management plan* or equivalent, that: is informed by a *subwatershed plan*; uses an integrated approach that includes *low impact development* and *green infrastructure*; establishes planning, design and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion and impervious surfaces; and aligns with the *stormwater master plan* for the *settlement area* (policy 3.2.7.2).

## **PROTECTING WHAT IS VALUABLE**

Policy 4 of the proposed Growth Plan deals with a range of matters including *water resource systems*, *natural heritage systems*, *key hydrologic features*, *key hydrologic areas*, public open space, the *agricultural system*, *cultural heritage resources*, *mineral and aggregate resources*, conservation and climate change. There is an obvious attempt to maintain consistency with the other three provincial plans, particularly the Greenbelt Plan, as well as the PPS. A considerable portion of this policy is new to the proposed Growth Plan and appears to duplicate much of the regulatory field already occupied by the PPS.

Given so much of these policies appear to depend on Provincial mapping exercises that have yet to occur (addressed in the “implementation and interpretation” policy below) it is difficult to comment in detail on the implications of these policies. For example, the Province will identify the *agricultural system* and designate or map *prime agricultural areas* including *specialty crop areas*. In addition, the policies protecting *water resource systems* require that municipalities, together with appropriate conservation authorities, undertake *watershed planning*, as mentioned above. Municipalities are also required to identify *natural heritage system*.

In addition, and directly related of the Province's climate change agenda, the proposed Growth Plan requires upper- and single-tier municipalities to develop official plan policies to "identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with the Ontario Climate Change Strategy, 2015 and Action Plan" (policy 4.2.10).

This policy also requires that municipalities develop:

- strategies to reduce greenhouse gas emissions and "improve resilience to climate change through land use planning, planning for *infrastructure*, including transit and energy, and the conservation objectives" (policy 4.2.10.2(a));
- greenhouse gas inventories for transportation, buildings, waste management and municipal operations (policy 4.2.10.2(b)); and
- municipal interim and long-term greenhouse gas emission reduction targets that support provincial targets and reflect consideration of the goal of *net-zero communities* (policy 4.2.10.2(c)).

Municipalities are required to monitor and report on the progress made in achieving these targets (policy 4.2.10.2(c)).

## **IMPLEMENTATION AND INTERPRETATION**

### ***Lack of Appropriate Transition Policies***

Unfortunately the proposed Growth Plan does not include any transition policies. The implications for fairness and transparency for the land use planning process, particularly for complete development applications under the *Planning Act* and municipally-initiated official plan amendments that are not yet approved, cannot be stressed enough. Without clear direction in respect of transition, municipalities will face an enormous challenge in bringing their official plans into conformity with the proposed Growth Plan



within the required period.<sup>28</sup> Many municipalities have completed *municipal comprehensive reviews* in the not so distant past and some are still ongoing. Most are still getting used to the “new normal” that came out of that process and to implement more change will be taxing on municipal resources.

Policy 1.2.2 – “Legislative Authority” says that the proposed Growth Plan will replace the 2006 Growth Plan, at a yet to be determined effective date. All decisions made on or following that effective date must conform with the proposed Growth Plan. As was the case with the amendments to the *Planning Act* brought with the enactment of *The Smart Growth for Our Communities Act, 2015*<sup>29</sup> (Bill 73), the Province may intend on proclaiming a “transition regulation” to address this issue. If that is the Province’s intention, the release of the draft “transition regulation” as a part of the Coordinated Review, for public consultation, would have been helpful to stakeholders.

Municipalities are encouraged to amend official plans to bring them into conformity with the proposed Growth Plan “as expeditiously as possible” (policy 5.1). In the meantime, municipalities are to consider the impact of planning decisions on the policies of the proposed Growth Plan. The reality of such an approach will undoubtedly be challenging for municipalities and stakeholders.

### ***Increased Top Down Planning***

In some respects, the proposed Growth Plan “turns back the clock” on land use planning in Ontario to a time when the Province played a much more dominant role in the implementation process. Over the past 3 decades much of the planning process was delegated to municipalities. The proposed Growth Plan outlines a tightening of the focus in the planning process. Policy 5.1 puts the implementation burden on upper- and single-tier municipalities and calls for “strong leadership” at that level to provide planning direction through *municipal comprehensive reviews*.

In addition, the “other implementation” policies at policy 5.2.8 appear to tread upon the decision-making authority of local municipalities. Policy 5.2.8.2 of the proposed Growth Plan directs that draft plans of

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<sup>28</sup> Bill 73 recently amended section 26 of the *Planning Act* to require municipalities to review their official plans every 10 years from the day they come into effect. Given the proposed Growth Plan definition of a *municipal comprehensive review* references section 26 of the *Planning Act*, is official plan conformity with the proposed Growth Plan now on a 10-year timeline?

<sup>29</sup> S.O. 2015, c. 26.

subdivision will include a lapsing date under subsection 51(32) of the *Planning Act*. The Bill 73 amendments to that statute still provide municipalities with a permissive authority to impose a lapsing date on draft plans of subdivision. Furthermore, if a plan of subdivision has been registered for 8 years or more and does not meet the objectives of the proposed Growth Plan, municipalities are “encouraged” to deem the plan to be unregistered under subsection 50(4) of the *Planning Act* (policy 5.2.8.3). These policies were likely added to enable municipalities to undertake *settlement area* boundary expansions without offending the objectives of the proposed Growth Plan. The implementation of these policies will be controversial. There are also concerns over how the mapping will be carried out and its accuracy in reflecting the on the ground realities. If the mapping will be carried out at a high level overview this will pose many more challenges to development and for stakeholders. Furthermore, given the role these maps may play in the implementation of the proposed Growth Plan policies, it would have been preferable for these maps/guidance documents to be made available through the Coordinated Review. Without them, we are left to only speculate as to what is to come and question whether the objectives of the Coordinated Review could have been more efficiently achieved.

In addition to mapping the Minister or the Province, as the case may be, will (where appropriate), identify, establish or update:

- the *built boundary* (policy 5.2.2.1(a));
- the size and location of the *urban growth centres* (policy 5.2.2.1(b));
- a standard methodology for land needs assessment (policy 5.2.2.1(c));
- *prime employment areas* (policy 5.2.2.1(d));
- data standards for monitoring implementation of this Plan (policy 5.2.2.1(e));
- priority transit corridors and planning requirements for priority transit corridors (policy 5.2.2.2(a));
- mapping of the *agricultural system* for the *GGH* (policy 5.2.2.2(b));

- mapping of the *natural heritage system* for the *GGH* (policy 5.2.2.2(c));and
- guidance on *watershed planning* (policy 5.2.2.2(d)).

In other words, we're not done yet. In the meantime, while we await the additional direction, the policies are to apply, once approved, and "any policy that relies on supplementary direction should be implemented to the fullest extent possible" (policy 5.2.2.3).

## **STAKEHOLDER RESPONSE**

### ***Implementation Challenges to Regional and Local Municipalities***

With few exceptions, Staff of upper-, lower- and single-tier municipalities have been near unanimous in their recommendations to locally elected representatives in respect of comments to be delivered to the Province on the Coordinated Review. Many municipalities (including York Region and its lower-tier municipalities of Aurora, Markham, Newmarket and Vaughan, together with Hamilton and Durham Region) are of the view that the impacts of proposed changes, particularly increased intensification targets and minimum densities for *designated greenfield areas*, have either not been properly assessed by MMAH or are simply unachievable given population growth forecasts to 2041.

At the root of this concern is that MMAH has not fully appreciated the contextual realities for many municipalities and is instead "planning by numbers" which results in a "one-size-fits all" approach to land use planning. For example, to achieve the minimum density target of 80 combined people/jobs per hectare in *designated greenfield areas* in some cases development at a rate of 150 to 200 combined people/jobs per hectare will be required because the proposed density target does not account for existing draft plan approval of subdivisions. Achieving the *designated greenfield areas* wide density targets would in large part result in significantly increasing density on the outer fringes of existing communities in comparison to the densities in the centres and along the corridors of those municipalities.

Intensification of built-up areas at a rate of 60 per cent will also be challenging given that population growth forecasts are not proposed to change by 2041. There is a sense among municipal planning Staff

that MMAH has not achieved an equilibrium between intensification and minimum density targets for *designated greenfield areas* and that the increases cannot both be satisfied; achieving the minimum *designated greenfield areas* density target, particularly if that target is actually much higher than 80 combined people/jobs per hectare, will mean less residential intensification of built-up areas and vice versa.

There is also the concern that the proposed changes are not sufficiently flexible in respect of employment lands designations. Of central concern is the fact that *prime employment areas* presume lower densities, extensive land use and do not permit major office uses. These constraints limit opportunities for future employment uses in these areas.

The proposed policies that support higher density at transit stops have also been identified as problematic. As referred to above, for many GGH municipalities, regional transportation planning has long promoted “park and go” use of public transit through the provision of surface parking at Metrolinx stops. Hitting the prescribed density targets is at odds with the provision of “no density” surface parking at close proximity to stations. Accordingly, municipalities are asking that the proposed policies provide them with discretion in establishing density targets for transit stations.

Compounding many of these issues is the lack of transition or “phase-in” policies in the proposed Growth Plan. In essence, municipal conformity with the various revised plans may be required the day they come into effect notwithstanding the fact that, for many municipalities, conformity with the in-effect plans has not yet been achieved.

Finally, there is the issue of the funding gap. Many municipalities have raised the concern that the proposed policies require significant infrastructure funding from the Province if they are to be realized. Significant infrastructure investment is needed to support today’s growth, never mind growth at the rate proposed by the new targets.

## ***The Development Industry Response***

Although rare at times, the development industry has echoed municipalities over the concerns identified with the proposed Growth Plan, especially those related to the increased growth targets. Not only has the industry expressed that the targets are too high but it has also pointed out that they should not be applied to *designated greenfield areas* that have already been developed or to undeveloped land that has been committed for development through approved Secondary Plans or draft plans.

The development industry has also identified that certain land uses or features should be excluded from *designated greenfield areas* calculations; stormwater management ponds, cemeteries, schools, employment lands, arterial roads, public parks and public open spaces, employment areas, etc.

The development industry is supportive of *major transit areas* being delineated and given specific density targets. It also supports the notion of *strategic growth areas* but is concerned that planning by numbers applies a “one size fits all” approach and does not consider infrastructure and transit capacity or the diversity of municipalities and communities.

The development industry has pointed out that if MMAH proposes to increase minimum *designated greenfield areas* density targets and residential intensification targets for built-up areas but continues to restrict growth to land outside the Greenbelt then the built boundary must be updated to 2016 and the Province must reaffirm the whitebelt lands as the long-term urban reserve. The industry is also asking the Province to consider evidence-based rather than number-based planning and to implement transition policies to acknowledge the challenges represented by a sudden change in policy. There is also concern that the targets are proposed to apply across all *designated greenfield areas* without adjusting for the 2016 built boundary to account for the built-up area since 2006 as well as lands already approved for development.

The development industry has identified that it is critical for the provincial, local and regional governments, the public and stakeholders to find common ground to better align public policy and focus on creating the necessary housing supply to accommodate growth, employment centres to help attract

jobs and support economic competitiveness, and the necessary environmental protections and agricultural policies to support a diverse economy and quality of life in Ontario.

With the expected implementation of the proposed Growth Plan being early 2017, it remains to be seen whether the Province will further revise the proposed Growth Plan in an attempt to provide guidance and clarity in the pursuit of its integrated climate change, infrastructure and land use planning agenda.