

February 28, 2019

Mr. Charles O'Hara  
Ontario Growth Secretariat, Ministry of Municipal Affairs  
777 Bay Street, c/o Business Management Division, 17<sup>th</sup> floor  
Toronto Ontario M5G 2E5

Submitted via the Environmental Registry of Ontario at: <https://ero.ontario.ca/notice/013-4504#proposal-details>

**Re: Pembina Institute comments on the proposed amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 (ERO 013-4504); proposed framework for provincially significant employment zones (ERO 013-4506)**

Dear: Mr. O'Hara,

The Pembina Institute welcomes the opportunity to share our views on the government's proposed amendments to the 2017 Growth Plan for the Greater Golden Horseshoe ("the Growth Plan"), and the proposed framework for provincially significant employment zones.

## General Comments

As the government considers amendments to the planning policy framework, we encourage the province to hold steady on smart growth planning principles. Any forthcoming amendments to provincial planning legislation and policies, including the Growth Plan, should support a regional growth model whereby future population and employment growth continues to be concentrated in already built up areas and designated urban centres, with access to existing and planned public services and infrastructure such as transit. Indeed, our regional planning framework must be flexible and designed in a way that recognizes local context and conditions, but on the whole, must set bold policy direction to accommodate growth that does not inefficiently increase land consumption and does not result in higher municipal infrastructure and service delivery costs. Research has shown that low-density, car-oriented residential developments further away from community centres can hamper the cost-effectiveness of municipal service delivery, and can be more burdensome compared to housing development

that is closely connected to municipal infrastructure.<sup>1</sup> Instead, our region needs to be ambitious in its planning efforts that enables individuals and families to live near work, school, shopping and social services — all in close proximity to transit and civic infrastructure.

While it is reassuring to see that the proposed amendments to the Growth Plan maintain some provisions to advance smart growth management — for example, minimum density targets for *major transit station areas* — we have concerns that there are other areas in which the proposed policy amendments do not go far enough to help municipalities realize the full potential and benefits of taking an “intensification-first” and “transit-supportive development” approach to new residential and employment development. Growth Plan policies need to continue to prioritize efficient development in both urban centres as well as in small and rural communities, within the region’s existing urban boundaries. Creating “location-efficient” or “transit-supportive” communities is critical to creating vibrant communities, and achieving good planning outcomes such as a cleaner environment, economic prosperity, and social equity. Our comments below identify areas where we believe the province can strengthen its policy direction to better meet these objectives.

## Intensification Targets

### Transit Corridors and Station Areas

Transit-supportive development is a city-building tool that helps to create vibrant communities with a balanced mix of housing, jobs, shopping and services — all within walking distance to transit. In doing so, transit-supportive development helps municipalities meet growth management objectives, spur economic development in urban centres that leverages existing and planned investments in public transit. Transit-supportive development also enables municipalities to increase housing supply and choice around public transit and potentially reduce individual and household housing and transportation costs.<sup>2</sup> According to an Ipsos poll, when choosing a home, 56% of Greater Toronto Area residents value living in a neighbourhood that is in close proximity to frequent, convenient public transit, and 60% of residents also value being near health and social services, entertainment and shopping.<sup>3</sup> Residents in Ontario have indicated that they would give up a large house and yard and a long car commute in favour of location-efficient homes.<sup>4</sup> By creating places to live, work and play in

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<sup>1</sup> Environmental Defence. “The High Costs of Sprawl: Why Building More Sustainable Communities Will Save Us Time and Money” (2013) <https://d36rd3gki5z3d3.cloudfront.net/wp-content/uploads/2016/01/CostsofSprawl-FINAL.pdf?x83420>

<sup>2</sup> Kim, Carolyn. Pembina Institute “The Way to GO” (2019) <https://www.pembina.org/pub/way-go>

<sup>3</sup> Toronto Real Estate Board “Market Year in Review & Outlook Report (2019) [http://trebhome.com/market\\_news/hot\\_consumer\\_topics/report.htm](http://trebhome.com/market_news/hot_consumer_topics/report.htm)

<sup>4</sup> Pembina Institute. “Live Where You Go: Encouraging location-efficient development in Ontario.” (2012) <https://www.pembina.org/reports/live-where-you-go.pdf>

close proximity to existing public transit infrastructure, municipalities can increase transit use, walking and cycling, reduce traffic congestion, and realize other direct and indirect economic and environmental benefits.

That is why the minimum density targets for *major transit station areas* (MTSAs) should be maintained and become more stringent over time (e.g., 150 residents and jobs combined per hectare for those served by the GO Transit rail network) to accommodate the expected growth in the region. With the expansion to the definition of MTSAs in terms of its spatial area - a range of 500 to 800 metres from major transit stations — it will be even more critical for municipalities to provide active transportation infrastructure to help facilitate first and last-mile connections to transit.

### Maintain intensification targets for Designated Greenfield Areas and Delineated Built-up Areas

The proposed Growth Plan amendments seek to relax the minimum density targets for *designated greenfield areas* and *delineated built-up areas* for certain municipalities. For *designated greenfield areas*, the minimum density target of 80 residents and jobs per hectare has been replaced with a range of 60 to 50 for more urbanized areas, and a minimum of 40 in less urbanized areas. The blanket intensification requirement that 60% of all residential development occur within the *delineated built-up area* now ranges from 60% to 50% for more urbanized areas with a requirement that existing targets be maintained or improved for less urbanized areas. The proposed lower targets are framed as recognizing that a one-size-fits-all approach does not work and that communities are growing and intensifying at a different pace.

While flexibility must be considered in the planning framework, weakening such targets may result in unintended consequences such as environmental and economic impacts in our communities. For example, from a municipal service delivery perspective, allowing municipalities to develop at lower densities may result in increased difficulties to provide appropriate levels of transit in dispersed areas in both the inner and outer ring of the region. Low-density and car-oriented development also lends itself to people living further away from work and increasing their commute times. This would in turn, have environmental impacts, as more cars on the road yields higher greenhouse gas emissions and air pollution. A recent study by the Canada Mortgage and Housing Corporation indicates that a long commute reduces the affordability advantage provided by lower housing costs on the edge of the GGH.<sup>5</sup>

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<sup>5</sup> Canadian Mortgage and Housing Corporation. “Housing Market Insight: GTA Location and Commuting Choices: The Effect of Commutes on Lower Priced Suburban Housing.” (2018). <https://www.cmhc-schl.gc.ca/en/housing-observer-online/2018-housing-observer/drive-until-you-qualify-is-commute-worth-it>

Density makes housing, schools, road and servicing infrastructure more affordable and sets the land uses for providing the diversity of housing that people want. Even in greenfield areas, there is still a significant opportunity for communities to capture the benefits of location-efficient development. Taking an intensification-first approach to new development strengthens Ontario’s environmental stewardship, protection of the Greenbelt, and potential fragmentation of natural heritage systems that all contribute to our access to clean air and safe drinking water. Research has demonstrated that smart growth strategies such as transit-supportive development have benefits at the household level. Smart growth housing developments can generate greater household wealth in comparison to housing in low-density and car-oriented developments.<sup>6</sup> There is significant opportunity to provide a diverse range of affordable housing options where urban services exist, and that allows individuals and families to live near work and/or commute by transit.

## Recommendations

We recommend the government maintain the existing 2017 Growth Plan targets for *designated greenfield areas* and *delineated built-up areas*. Instead of creating variable targets across the region, the province should ramp up its support for municipalities to develop context-sensitive solutions to meet these visionary policy directives over time. In order to realize the full value and benefits of the province’s multi-billion dollar investments in public transit across the region, the province should play a greater role in providing municipalities with the support, resources and capacity they need to undertake the necessary planning and policy development work to achieve the intended outcomes. Moreover, the province should establish accountability structures and monitor and assess performance to ensure growth management objectives are achieved over time. Based on what the Ministry of Municipal Affairs and Housing heard from its stakeholder and public engagement work over fall/winter 2018-19, we encourage the province to provide complementary tools and resources that help municipalities implement provincial planning policies (e.g., bulletins that provide technical assistance, practical solutions, best practices etc.).

## Settlement Area Boundary Expansions

Adjust settlement area boundaries, as part of a municipal comprehensive review (MCR) process

We recommend that the government maintain its existing comprehensive and evidence-based planning process for determining settlement area boundary expansions — through the MCR process. One of the key strengths of the Growth Plan is the requirement to use a MCR process

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<sup>6</sup> U.S. Environmental Protection Agency. “Smart Growth and Economic Success: Investing in Infill Development” <https://www.epa.gov/smartgrowth>

to guide regional planning through an evidence-based framework that encourages efficient use of land. Provincial and regional guidance is important for smaller municipalities with few resources to enable them to move toward a consistent, public interest-based approach to growth management. Any adjustments to settlement area boundaries should consider maximizing efficiencies in infrastructure and service delivery, protecting productive farmland and maintaining our clean water resources.

Research has shown that there is more than enough land already allocated to accommodate the expected 2031 population growth within existing urban boundaries of the region. In some regions there is an excess of land. For example, it has been determined that York Region has a 21 to 23 year supply of land for housing.<sup>7</sup> As another example, a study conducted by the Ryerson City Building Institute finds that the City of Mississauga can effectively accommodate 85% of Peel Region’s allocated growth, all within its existing urban footprint.<sup>8</sup> These are illustrative examples of the significant opportunity to provide a diverse range of affordable housing options within the existing settlement urban boundary, where municipal services exist, allowing individuals and families to live near work and/or commute by transit.

## Recommendations

We recommend that the government maintain the existing settlement urban boundary expansion process whereby adjustments are determined as a part of the MCR process. This is to support location-efficient development and mitigate the loss of productive farmland as a result of urban boundary expansions.

## Planning for the future of employment

### Provincially significant employment zones

The government is proposing a new framework for employment zones that identifies “provincially significant employment zones” (which would be protected from conversion except at MCR periods) from among the region’s employment zones (where conversion would be permitted outside of MCR periods), and eliminates the *prime employment areas* designation established in the 2017 Growth Plan. The intent of the “provincially significant employment zones” is to support the province’s economy and maintain its global competitiveness including protecting a robust inventory of strategic lands for employment to meet the diverse needs of current and future employers in this region.

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<sup>7</sup> York Region. “Committee of the Whole report: 2016 York Region Housing Supply.” <https://www.york.ca/wps/wcm/connect/yorkpublic/88c32857-5865-466a-9b42-7a2b6749f9bb/may+18+housing+ex.pdf?MOD=AJPERES>

<sup>8</sup> Ryerson City Building Institute. “Finding the Missing Middle in the GTHA: An Intensification Case Study of Mississauga.” (2018). <https://www.citybuildinginstitute.ca/portfolio/missing-middle/>

A dual planning approach for employment lands may be merited, and conversion may in some cases be appropriate in order to leverage major investments in transit infrastructure, for example. However, additional policy direction is required on the evidence-based method for determining “provincially significant employment zones” as well as the criteria/approach for determining when conversions of employment lands would be appropriate. The demand for employment lands in the future will depend on projected growth and anticipated evolutions in the nature of work. Furthermore, the location of employment lands must be assessed in relation to the existing and planned transportation network (considering both passenger and freight access).

## Recommendations

As a part of this Growth Plan update, there is an opportunity to fill an information gap by conducting or commissioning a region-wide assessment of employment land needs to 2041 (examining area and location in relation to the transportation system) in order to determine whether current supply and location adequately meets future projected needs and adjust the designations accordingly. Based on this information, a regional economic development strategy could then be developed.

Planning for employment also requires long-term thinking on freight solutions. As such, we encourage the government to include strong policies in its Growth Plan and implementation strategies to move goods more efficiently across the region. This means advancing solutions that reduce gridlock, improve freight delivery reliability and reduce fuel use - solutions that could lead to cost savings for business, improved safety and reduced greenhouse gas emissions. In Ontario, almost 40% of the provincial economy is generated by freight-intensive industries.<sup>9</sup> The development of strong municipal and regional goods movement strategies (for example, the forthcoming Ministry of Transportation’s Multimodal Transportation Plan for the GGH) and stakeholder partnerships designed to address the problems associated with freight will allow our communities to remain attractive places to live and work.<sup>10</sup>

## Conclusion

Strong growth management policies are needed to create healthy and vibrant communities within the region’s existing urban boundaries that offer affordable housing and attractive

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<sup>9</sup> Ontario Ministry of Transportation, *Freight Supportive Guidelines* (2016), 6.  
<http://www.mto.gov.on.ca/english/publications/freight-supportive-guidelines.shtml>

<sup>10</sup> 4 J. Allen, G. Thorne and M. Michael Browne, BESTUFS, *Good Practice Guide on Urban Freight Transport* (2007).  
[http://www.bestufs.net/download/BESTUFS\\_II/good\\_practice/English\\_BESTUFS\\_Guide.pdf](http://www.bestufs.net/download/BESTUFS_II/good_practice/English_BESTUFS_Guide.pdf)

employment opportunities to Ontarians, and support efficient municipal and provincial government spending. We would be pleased to discuss these comments further with you.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Carolyn Kim". The signature is fluid and cursive, with a prominent initial "C".

Carolyn Kim, RPP MCIP  
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Pembina Institute