

February 28, 2019

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Ontario Growth Secretariat, Ministry of Municipal Affairs
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Toronto, ON M5G 2E5

OPPI's Response to Proposed Modifications to O. Reg. 311/06 (Transitional Matters – Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017 (ERO Number 013-4505)

Dear Charles,

On behalf of the Ontario Professional Planners Institute (OPPI), I am pleased to submit our response to the government's consultation on the proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe.

OPPI is the recognized voice of Ontario's planning profession and our over 4,500 members and grants the Registered Professional Planners (RPP) designation. RPPs are the skilled, professional and dependable navigators that are employed to help lead communities towards the Ontario of tomorrow. RPPs are the local experts that bring together differing points of view, consult and develop recommendations that provide informed choices for decision-makers and elected officials. RPPs act in the public interest as professionals who work to improve the quality and livability of communities in Ontario today and their sustainability long-term. OPPI is well-positioned to provide feedback on the proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (Growth Plan), as our members are the experts with respect to the implementation of the Plan's policies.

OPPI strongly supports the Growth Plan as it provides a sustainable land use planning framework for one of North America's largest urban populations. The Growth Plan is an important tool intended to enhance the global competitiveness of the region and improve the quality of life for people living and working in the Greater Golden Horseshoe, as well as for those future generations who will call this area their home.

Amendment 1 identifies several proposed policy changes. Our comments are organized around the following six areas:

1. Major Transit Station Areas
2. Employment Planning
3. Intensification and Greenfield Density Targets
4. Settlement Area Boundary Expansions
5. Rural Settlements
6. Natural Heritage and Agricultural Systems

1. Major Transit Station Areas

OPPI is generally supportive of the proposed changes to the Growth Plan's Major Transit Station Area (MTSA) policies which are intended to simplify the delineation of MTSA, including:

- The simplification of criteria required to demonstrate the need for an alternative target (Policy 2.2.4.4.a and b).
- The addition of Policy 2.2.4.5 which allows single and upper-tier municipalities to delineate MTSA in advance of their next Municipal Comprehensive Review.
- Revisions to the definition of MTSA which allow flexibility to define the area between 500 metres and 800 metres, allowing for harmonization with Metrolinx's Mobility Hub Guidelines (2011).

In addition to the above, we offer the following comments with respect to Amendment 1 Major Transit Station Area policies:

- With respect to Policy 2.2.4.3 it would be helpful to explain that the densities for MTSA are intended to be measured on a gross land area basis and to clarify that for benchmarking reasons the MTSA boundaries should be mapped in such a way to maximize the amount of the land area within a given MTSA.
- Former Policy 2.2.4.ii is proposed to be deleted. This policy provides some additional flexibility, acknowledging that an alternative density target for an MTSA may be required where the achievement of the "density target would be premature given the potential for redevelopment of existing built form within the horizon of this Plan". This policy in particular provides relief for MTSA which have a high proportion of established low-rise neighbourhoods where redevelopment may take decades to occur (or may never be desirable as the case may be). For this reason, we suggest Policy 2.2.4.ii be maintained.

2. Employment Planning

OPPI is generally supportive of the proposed amendment to the Growth Plan's employment lands policy framework, including:

- The removal of the MCR requirement for the development of an employment land strategy and the establishment of minimum employment density targets for employment areas.
- The inclusion of new policies to plan for appropriate interfaces between employment areas and adjacent non-employment areas to maintain land use compatibility (Policy 2.2.5.7.d, Policy 2.2.5.8).
- The inclusion of new policies for Provincially Significant Employment Zones (Policy 2.2.5.12) and the removal of the prime employment area policies.

In addition to the above, we offer the following comments with respect to Amendment 1 employment land policies:

- The Province should work closely with municipalities to refine the proposed Provincially Significant Employment Zone mapping to ensure that it accurately reflects Official Plan mapping. Also, the Province may wish to consider some alternative language for these features, as it implies there are no Provincially Significant Employment Zones outside of the Greater Golden Horseshoe (presumably there are other significant employment lands elsewhere in the Province which warrant protection). A suggested rewording of Policy 2.2.5.12 could read "The Minister may identify significant employment zones in the Greater Golden Horseshoe to support co-ordination of planning for jobs and economic development at a regional scale."
- With respect to the proposed employment land conversion policies, we suggest that this flexibility be limited to municipally initiated proposals or lands located within a MTSA where a

municipality proposes the conversion through a secondary plan process in consultation/coordination with the appropriate upper-tier municipality (as the case may be).

- With respect to Policy 2.2.5.10.b, the Province should define what constitutes a “significant number of jobs.”
- The inclusion of Policy 2.2.5.13 which states that municipalities will establish minimum density targets for all employment areas within settlement areas should be refined to delete references to zoning by-laws (Item D). While it is understood that employment density targets are needed to develop land needs calculations through the MCR process, it is unclear how and/or why the proposed policy is to be implemented at the site level. Municipalities typically limit regulation of employment uses to the size of the operation, permitted uses and other site development aspects. Attempts to regulate employment density through zoning could prove challenging and counter-intuitive to the economic development objectives of the Growth Plan.

3. Intensification and Density Targets

OPPI is generally supportive of the proposed amendment to the Growth Plan’s density and intensification policy framework, including:

- Proposed changes to Policy 2.2.7.2 which reduces the greenfield density target from 80 residents and jobs per hectare to 60 residents and jobs per hectare for Hamilton, Peel, Waterloo and York; 50 residents and jobs per hectare for Barrie, Brantford, Guelph, Orillia, Peterborough (City), Durham, Halton and Niagara; and 40 residents and jobs per hectare for Brant, Kawartha Lakes, Dufferin, Haldimand, Northumberland, Peterborough (County), Simcoe and Wellington.
- Proposed changes to Policy 2.2.7.4 which provide a more simplified approach to alternative target setting.

In addition to the above, we offer the following comments with respect to Amendment 1 intensification target policies:

- Proposed changes to Policy 2.2.2 should be revised to allow for a phasing of intensification over time. The previous version of the Growth Plan allowed municipalities to steadily plan for increases in the annual intensification rate over time (from 40% to 50% and from 50% to 60%). The previous approach to phasing of intensification targets should be maintained.
- It may be helpful to maintain policy 2.2.7.3.a.i which states that the “density target will continue to be measured across all lands that were subject to the original target that is approved and in effect,” as well as any new greenfield lands being contemplated as part of the MCR process (as per Policy 2.2.8.2.a).

4. Settlement Area Boundary Expansions

OPPI is generally supportive of the proposed modifications to Policy 2.2.8.3 which are intended to provide some flexibility in the scope of technical studies required to make decisions on settlement area expansions. Also, we offer the following comments with respect to the proposed amendments to the Growth Plan’s settlement area boundary expansion policies:

- Policies 2.2.8.4, 2.2.8.5 and 2.2.8.6 allow for settlement area boundary expansions where there is no net impact on land need or where the proposed expansion is less than 40 hectares to occur outside of the MCR process.
- OPPI is generally not supportive of these policies in their current form; however, should the Province determine that the objectives of the Growth Plan are best met by keeping these policies in place, we offer the following recommendations:

- Settlement area boundary expansions undertaken outside of the MCR process shall be municipally led and are a one-time occurrence per single tier/upper-tier municipality.
- In two-tiered systems, this shall be led by the upper tier municipality.
- The lands are immediately adjacent to the existing settlement area.
- Guidance should be provided with respect to how the 40-hectare calculation is to be determined should be included (presumably a reference to Policy 2.2.7.3.a, b and d).

5. Rural Settlements

OPPI is generally supportive of the proposed policy changes to the Growth Plan's rural settlement area policies which exclude rural settlements from the designated greenfield area calculation. It is suggested that the definition of small rural settlement be refined to include settlement areas that are serviced with partial services, as a number of hamlets may have municipal water systems and private wastewater system. Given that rural settlements are not intended to be the focus of growth it is suggested that proposed policy 2.2.9.7 be removed or modified to limit how "minor rounding out" of settlement areas is proposed to occur (i.e. municipally led, upper-tier/single tier, one-time only, supported by appropriate technical studies, etc.).

6. Natural Heritage and Agricultural Systems

OPPI is generally supportive of the proposed changes to the Growth Plan's Natural Heritage and Agricultural Systems policies which are intended to clarify the intent of the Natural Heritage and Agricultural Systems mapping in the Growth Plan and also allows for refinement of mapping through implementation exercises. It is suggested that the Province release the mapping and supporting data in GIS format so that materials can be easily reviewed and adopted through the MCR process.

OPPI is happy to work with the government and consult further on this amendment. We would welcome the opportunity to meet with provincial staff to discuss our submission and broader legislative changes, and answer any questions you may have. Should you have any questions regarding our submission, please feel free to contact me at 416-483-1873 or by email at executivedirector@ontarioplanners.ca.

Sincerely,



Mary Ann Rangam
Executive Director, Ontario Professional Planners Institute