

February 28, 2019



Cordelia Clarke Julien
Assistant Deputy Minister
Ontario Growth Secretariat (OGS)
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 2304, 23rd Floor
Toronto, ON M5G 2E5
growthplanning@ontario.ca

Re: Proposed Amendment to the Growth Plan, ERO 013-4504

Dear Ms. Clarke Julien,

BurlingtonGreen supports the Growth Plan in principle as a guiding tool in shaping growth in the Greater Golden Horseshoe Area. Planning direction that supports transit-oriented development, protects valuable farmland and promotes job creation is needed to ensure our communities remain competitive and resilient in the years to come. Long gone are the days of planning for suburban sprawl that taxes residents with expensive infrastructure and results in densities that do not support effective transit.

Climate change is the biggest threat facing Ontarians. Choosing where and how to grow our cities is a key component of effective climate action. Planning policy must prioritize the shift in the regional growth model towards greater urban density that supports job creation, effective transit services, and is less costly and more efficiently maintained.

The Growth Plan has been in place for a number of years, and municipalities have taken concrete steps in meeting their targets and writing policies that support its goals. Introducing amendments at this late stage causes confusion and will undo much of the work already underway in many communities. Under the Growth Plan, a Municipal Comprehensive Review (MCR) process is required to guide regional planning through an evidence-based framework that encourages efficient use of land. The 2015 Growth Plan review revealed that the MCR process has ensured that there is a sufficient supply of undeveloped greenfield land available to meet housing and employment needs, as well as a supply of land within urban areas to meet intensification targets across the Greater Golden Horseshoe.

Employment Land by Regional Municipalities in the GGH (2015-2017)

Region (hectares)	Total Vacant Emp. Lands	Total # Emp. Lands	% Total Emp. Lands
York	2588	7759	33%
Halton	2800	6099	46%
Peel (exl. Caledon)	2070	10772*	19%
Durham	3147	5611	56%
City of Hamilton	918	4554	20%
Simcoe	2919	6527	45%
Niagara	2300	6895*	33%
Brantford	349	1451	24%
Total hectares	16742	48217	35%

York = <https://www.york.ca/wps/wcm/connect/yorkpublic/faa33468-b3c9-464a-9676-10be05613f20/mar+22+vacant+ex.pdf?MOD=AJPERES>

Halton = <http://beta.halton.ca/repository/Halton-Competitiveness-Study-2016>

Peel =

http://www5.mississauga.ca/research_catalogue/N_12_2016_VacantLands_Profile.pdf (Mississauga)

http://www.brampton.ca/EN/City-Hall/meetings-agendas/PDD%20Committee%202010/20151207pis_Full%20Agenda.pdf (Brampton)

Durham = https://www.durham.ca/en/living-here/resources/Documents/EnvironmentalStability/EAServicing_Durham.pdf

Hamilton = <https://www.hamilton.ca/mapping-business-reporting/activity-reports/employment-area-inventory>

Simcoe =

https://www.simcoe.ca/Planning/Documents/SimcoeCountyLandBudget_DataCollectionandAnalysis_PhaseEmployment_HemsonConsulting_June17.pdf

Niagara = <https://niagararegion.ca/council/Council%20Documents/ICP%208-2014.pdf>

Brantford = <https://www.brantford.ca/en/business-and-development/resources/Documents/Official-Plan/Municipal-Comprehensive-Review-Part-1.pdf>

*Indicates total employment land measured on Neptis Geoweb

Introducing amendments that make urban boundary expansions easier and weakens greenfield density targets is unnecessary and does not address the critical issues of climate change mitigation, affordable housing, and complete communities in the Greater Golden Horseshoe

Area. We urge the Province to maintain a hard line on intensification targets and urban boundaries, and advance policies that promote a diverse mix of housing; including rental and gentle intensification, sending a strong message to the development community of a shift in the type of housing demand.

We appreciate the opportunity to participate in this consultation process, and trust that our concerns will be duly considered by the Ontario government.

Sincerely,

Marwa Selim

On behalf of the BurlingtonGreen Advocacy Team
Program Manager & Advocacy Coordinator
BurlingtonGreen Environmental Association

CC: Jane McKenna, MPP, Burlington