July 28, 2020

Ontario Growth Secretariat

Ministry of Municipal Affairs and Housing

777 Bay Street, 23rd Floor, Suite 2304

Toronto, ON

M7A 2J3

Attention: Sandra Bickford, Acting Director

Growth Management Strategic Policy, Innovation & Partnerships Branch

**Re: Comments on Proposed Amendment No. 1 to A Place to Grow:**

**Growth Plan for the Greater Golden Horseshoe**

**ERO 019-1680**

**Mayfield West Expansion Area (Alloa)**

**Town of Caledon, Region of Peel**

We are writing to you with respect to the above referenced matter on behalf of a group of landowners in the Mayfield West Expansion Area (Alloa Village Community) in south and west Caledon. The lands are situated north and west of the intersection of Chinguacousy and Mayfield Roads, east of Mississauga Road and south of Old School Road. This block of land is abutting the north boundary of the developing Mount Pleasant Secondary Plan Area in the City of Brampton and abutting the west boundary of the developing Mayfield West Phase 2 Secondary Plan Area in the Town of Caledon (see attached Context Plan). The subject Mayfield West Expansion Area (Alloa) is well positioned for future urban development on the immediate boundaries of developing greenfield areas in south central Caledon and northwest Brampton with direct access to full urban services and located near the Mount Pleasant GO Station in Brampton. Our clients want to secure their inclusion into the 2041 Settlement Area Boundary to be determined through the Peel Region 2041 MCR process.

We are writing to express our support for the proposals of the Minister of Municipal Affairs and Housing respecting Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (A Place to Grow). We are supportive of the intention to update the Schedule 3 forecasts for population and employment.

We also have the following comments with respect to proposed Amendment 1:

1. The province should state clearly that the 2051 horizon year be used in any current

Regional Municipal Comprehensive (MCR) review processes. This is essential to ensuring that the provincial goal of adequate housing supply is not undermined by municipalities phasing the planning for growth, “planning by numbers” versus complete communities and slowing the delivery of housing supply. Planning to the 2051 horizon should be required for all current MCR processes underway today with no interim year or phasing / staging

of the forecasts to prevent municipalities from strict adherence to the practice of “planning by numbers”.

1. We support the proposal to treat the Schedule 3 forecasts as minimums and permitting municipalities to adopt higher growth targets than the Growth Plan. Allowing greater local flexibility to recognize local context to achieving economic growth and an adequate supply of housing by adopting higher forecasts, is good planning and will advance provincial planning policy objectives.

There is some debate about whether the Province intends that the Schedule 3 forecasts be treated as “Minimums”. The Province should clarify this matter by inserting the words “as minimums” into the proposed policy 5.2.4.2 of the Growth Plan to then read as follows:

*“5.2.4.12. All upper and single tier municipalities will, through a municipal comprehensive review, apply the forecasts in Schedule 3, or such higher forecasts as established through the municipal comprehensive review,***as minimums** *for planning and managing growth to the horizon of this plan.”*

1. The Hemson background work shows a drop in annual immigration to the GTAH from about 145,000 per year in 2018 and 2019, down to just under 120,000 per year in 2024. After that, GTAH immigration rises slowly, only approaching the levels seen in 2018 and 2019 around the end of the forecast period in 2051. There is nothing in Federal Immigration Policy to support such a drop in immigration levels as the Federal Government has expressed continued commitment to current immigration levels and policy.

Applying that underestimate at 25,000 to 30,000 per year over a 30-year planning horizon results in forecasts that underestimate population by between 750,000 and 900,000 people in the Greater Golden Horseshoe (GGH) area based upon immigration alone. That would mean that the reference scenario forecast growth is 16% - 20% lower than what would occur using current immigration policy.

This shortfall of 750,000 to 900,000 people over the forecast period is greater than the difference between the Hemson reference and high scenarios of 638,000 people. The background Hemson work indicates that the different growth assumptions between low, reference and high are “based on different levels of migration, principally immigration, which remains the single most important component of growth in the GGH”.

In view of the above and the role of immigration in the different scenarios, it is clear that the Province should opt for the “high” scenario (Mock B) for the forecasts under Schedule 3. The choice of the “high” scenario will support greater housing supply, better affordability and increased economic growth resulting from greater housing construction.

1. As we have requested previously in comments on the various iterations of the Growth Plan, the built boundary must be updated as it is more than 10 years out of date. A lot of development has occurred since it was first established in 2006.
2. We support the proposed date for conformity as July 1, 2022 for upper-tier municipalities. Upper-tier municipalities currently undertaking a municipal comprehensive review should be required to apply Amendment 1 policies as part of their review, to give effect to provincial policy intentions.

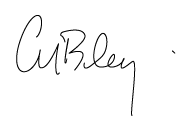
We recommend that lower-tier municipalities should be permitted to, following completion of Regional conformity exercises, adopt housing targets that exceed those established by the upper-tier municipality. This will help ensure an adequate supply of housing, aiding affordability in a manner that respects local autonomy and local circumstances including market demand.

1. The Province has introduced important policy changes through the Growth Plan, the Provincial Policy Statement for Land Use Planning and is set to do the same with the Land Needs Assessment Methodology.

However, Regional municipalities can effectively ignore these policy changes and other important policies because Official Plan Amendments resulting from Municipal Comprehensive Reviews cannot be appealed to LPAT. By restoring the right of landowners to appeal Municipal Comprehensive Reviews, the Province would restore balance and accountability to the planning system.

Thank you for the opportunity to comment and we kindly request your consideration of same as part of the public consultation process. Please feel free to contact the undersigned if you have any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Carl Brawley, MCIP RPP

Senior Associate

c. MWEA (Alloa) LOG