



July 27, 2020

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Submitted electronically

RE: Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe, ERO 019-1680

We would like to thank the Ministry of Municipal Affairs and Housing (MMAH) for inviting the Residential Construction Council of Ontario (RESCON) to comment on the consultation documents related to proposed changes to the Growth Plan, including changes to population and employment forecasts; change to the forecast horizon year (from 2041 to 2051), a new Land Needs Assessment methodology, adjustments to the aggregates policy framework and new policies to address Major Transit Station Areas within Provincially Significant Employment Zones.

We appreciate the engagement by the Ministry on this issue.

RESCON supports the changes to the Growth Plan contained in Amendment 1. We believe that these changes represent continued improvement of the Growth Plan Act. The changes are encompassing and would work together to provide more foresight to municipalities into demographic, employment and housing affordability trends in the region. This clarity is important now more than ever especially with the uncertainty around COVID-19.

We thank you for the opportunity to provide input into the proposed amendments and look forward to our continued engagement on this and other housing related matters.

Best regards,

A handwritten signature in blue ink, appearing to read "Richard Lyall", is written over a light blue circular stamp.

Richard Lyall
President



SPECIFIC COMMENTARY

New Plan Horizon Year, 2051

RESCON support the proposed plan horizon year extension from 2041 to 2051. We agree with the Ministry's justification that this would allow municipalities sufficient land to support the fostering of complete communities, economic development and housing affordability.

Regarding the Provincial Policy statement, it requires a 20-year planning horizon. If the Growth Plan horizon had not been extended from 2041 to 2051, then municipalities who are required to update their official plans by July 2022 as part of their conformity exercises, would have exceeded their 20-year time horizon. Therefore, extending the new Plan horizon for the Growth Plan to 2051 avoids this conflict with the provincial policy statement.

RESCON notes that the population employment projections in the new Schedule 3 continue to include a reference to the same population projections as were included in the 2019 Growth Plan (with different assumptions that were used by Hemon for the new Schedule 3). These 2041 projections no longer serve any purpose and therefore the 2020 Schedule 3 should remove any reference to the 2041 projection (identical to those in the 2019 Schedule 3) to avoid confusion.

We believe that the challenge for projections to 2051 will be to accurately anticipate in a quantitative way the impact of assumptions about some recent events and emerging trends that we are currently aware of. These trends can impact the allocation of population growth within the Greater Toronto Hamilton Area (GTHA) and the outer geographic ring. Some examples of relevant trends that may push growth in different and sometimes opposite directions:

1. Reduced urban community land needs for housing because of telecommuting – multiple factors may change the relationship between the workplace and the home. These include:
 - A. the aging population (more retirees);
 - B. the possible emergence of the four-day work week;
 - C. greater reliance on the working remotely, videoconferencing, etc.;
 - D. post COVID-19 changes in work habits.

The result may be to favour work arrangements that rely more on telecommuting thereby increasing flexibility to live in non-urban, suburban or exurban locations and commuting to work or to the city office, only once or twice per week or month.

2. More transit-oriented development (TOD), which is a potential contrary trend to one listed above. If public private partnerships, proposed by the government are successful in fast tracking and increasing the availability of new mass transit projects, this can add to the supply of new residential and mixed-use developments near transit station areas. This would be an attractive housing option for downsizing retirees and young professionals starting families. This mass transit renaissance will help push TOD near new subway and GO stations. As a result, trend 1 and 2 can push development in quite



opposite directions – or perhaps they will converge into outer tier communities with GO rail access.

3. Employment land needs – new employment Office clusters that provide common meeting and work areas for employers rather than separate spaces for employers will have an impact on the demand for office space. COVID-19 may also disproportionately affect small and medium sized employers who account for the bulk of employment growth, so their demand for employment lands will be reduced at least in the short term.
4. International immigration – the Hemson report that was part of the literature on the proposed changes, incorporates increased international immigration levels under the Federal government. About one third of that international immigration typically goes to the GGH. If international immigration levels change in the future or change under a different federal government, that could also impact GGH population projections for 2051.

RESCON appreciates the fact that Schedule 3 projections will be updated every five years so adjustments can be made to assumptions as new circumstances present themselves.

Other proposed changes in Amendment 1

Regarding the proposed legislative changes to mineral aggregate operations and major transit station areas in provincially significant employment areas, RESCON supports the changes to both those elements in Amendment 1.