



ONTARIO CHAMBER OF COMMERCE SUBMISSION:

Co-ordinated Land Use Planning Review

October 31, 2016



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Land Use Planning Review
Ministry of Municipal Affairs
Ontario Growth Secretariat
777 Bay Street, Suite 425 (4th floor)
Toronto, ON M5G 2E5

Subject: Co-ordinated Land Use Planning Review

Minister Mauro,

Thank you for the opportunity to provide feedback to the government's Co-ordinated Land Use Planning Review, which encompasses the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan ("the Plans").

Over the next few decades, the Greater Golden Horseshoe (GGH) is expected to experience incredible growth. As outlined by the Advisory Panel on the Co-ordinated Review, the region's population is expected to grow by nearly 50 percent, from nine million to 13.5 million by 2041. Similarly, the number of jobs in the region is expected to grow from 4.5 million to 6.3 million, or nearly 40 percent. This expected growth is evidence of the high quality of life that the region currently experiences.

Growth in the GGH presents the province with a tremendous economic opportunity. For governments, however, accommodating this scale of growth will require navigating complex planning challenges. Challenges that already reduce the productivity of the region's economy, including congestion and the regulatory burden, have the potential to worsen as the region attempts to accommodate a growing population. The province must take this opportunity to create streamlined and integrated planning conditions to accommodate this population boom in the most beneficial way possible. In this regard, cross-ministerial alignment will be essential.

Undoubtedly, each community will have their own ideas for how to best position themselves to take advantage of the region's growth. We expect that businesses within the GGH will add or have already contributed their perspectives to local planning and development priorities. As the voice of Ontario business, the OCC's perspective is broader. With local chambers of commerce and boards of trade present in most communities throughout the region, the OCC's membership captures the scale, scope, and diversity of the region's business community. To maximize the economic growth potential of the province's long-term planning, business considerations should be incorporated into all aspects of this review process, and ultimately any decisions that are made.

To accomplish this objective, this submission defines a set of principles that the OCC believes the government should employ as it makes its final decisions regarding amendments to the Plans contained in this review.

First, the government must **consider the impact that proposed changes to the Plans will have on the province's economy.** By defining long-term land use planning and growth in the region, decisions coming out of this review have the potential to significantly impact the economic fortunes of the region. While some themes in the government's guide document mention the need to support the movement of goods and people, proposed changes to the Plans appear to lack a specific focus on the province's economy. From the perspective of the business community, this is essential. At the very least, before the government makes any final decisions regarding changes to the four land use plans under review, it should conduct and publicly release the results of economic impact analyses of these changes.

Second, Ontario's land use plans should **allow for flexibility in municipal and regional planning. While a GGH-wide framework to guide planning** decisions is essential, the ability of local communities to respond to this structure in ways that support their growth is equally important. For example, as currently presented, the Growth Plan for the GGH prescribes specific density targets around "Major Transit Station Areas"; targets that are attainable and prudent in some cases, but unreasonable when stations are surrounded by existing low density commercial usage. In addition, overly prescriptive rules can hinder economic growth opportunities, particularly if they deter the development of regional hubs or employment centres that cross multiple municipal boundaries. In such a connected region as the GGH, business and employment linkages need to be facilitated and not hindered.

Third, the business community and Ontarians would benefit from **greater transparency in land use planning decisions related to the Plans.** In this regard, we support the government's efforts to align the visions and terminology among the different plans, and clarify how they interact with each other and other planning documents. However, the Chamber Network has several outstanding questions, including: What models and assumptions are being used to calculate the ideal growth targets for each municipality? How are different intensity targets being developed? How often will the population targets get revised over the course of the plan? Are the density targets reflective of existing and projected demand in the real estate market for housing and employment? We agree with the Expert Panel that a different approach to forecasting is needed. Greater clarity is also needed regarding the assistance that municipalities will receive in order to meet their growth targets, especially in conjunction with the infrastructure priorities of the current federal government. Businesses are concerned about the potential for additional and disproportionate taxation in the form of revenue tools, at a time when the cost of doing business in the province is already high.

Fourth, the outcomes of proposed changes to the Plans should be **regularly monitored and publicly reported.** It is essential that any policy changes achieve the government's desired planning objectives, while minimizing adverse consequences to municipal planning and economic growth. Many municipalities across the GGH are still in the process of updating their local policies in response to the previous iteration of the provincial plans, with a number of proposals currently outstanding at the Ontario Municipal Board. Without an effective transition strategy, or a streamlined approval process to help develop the communities necessary for the anticipated growth, we fear the current review would only serve to increase the uncertainty for businesses and investors. The government's guiding document makes clear the need to monitor plan implementation and progress. To operationalize this need, the OCC supports the recommendation made by the Advisory Panel on the Co-ordinated Review that a monitoring program be developed to measure the outcomes of the policies in the Plans. The OCC prefers the creation of an arms-length body, made up of public and private sector partners, to conduct and oversee this program.

The Ontario Chamber of Commerce and its network of chambers and boards have been, and continue to be, willing participants in the government's province-wide review. We would encourage the government to actively involve the network and our membership in its consultations whenever possible. The OCC would also encourage the government to conduct chamber- or board-specific consultations, which we would be happy to facilitate.

This review is a critical opportunity to set the framework conditions for long-term economic success in the GGH region. To ensure that success, it is important that the considerations of the region's businesses are incorporated into the government's final policy decisions.

Sincerely,



Allan O'Dette
President & CEO
Ontario Chamber of Commerce

About the Ontario Chamber of Commerce

For more than a century, the Ontario Chamber of Commerce (OCC) has been the independent, non-partisan voice of Ontario business. Our mission is to support economic growth in Ontario by defending business priorities at Queen's Park on behalf of our network's diverse 60,000 members.

From innovative SMEs to established multi-national corporations and industry associations, the OCC is committed to working with our members to improve business competitiveness across all sectors. We represent local chambers of commerce and boards of trade in over 135 communities across Ontario, steering public policy conversations provincially and within local communities. Through our focused programs and services, we enable companies to grow at home and in export markets.

The OCC provides exclusive support, networking opportunities, and access to innovative insight and analysis for our members. Through our export programs, we have approved over 1,300 applications, and companies have reported results of over \$250 million in export sales.

The OCC is Ontario's business advocate.