



REPORT FOR ACTION

Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 – Preliminary City Comments

Date: February 12, 2019

To: Planning and Housing Committee

From: Chief Planner and Executive Director, City Planning

Wards: All

SUMMARY

This report provides staff preliminary comments and recommendations on Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 announced by the Province on January 15, 2019. Economic Development and Culture and Legal Services staff were consulted in the preparation of this report.

Proposed Amendment 1 to the Growth Plan will affect where the City will experience growth and development pressures and will require legislated updates to the City's Official Plan and Zoning By-law through a mandatory Municipal Comprehensive Review (MCR). Given the timing of the proposed amendments to the Growth Plan, the City's recommended requests to the Province described in this report, are in keeping with previous Council decisions and seek to ensure the integrity of the City's Official Plan.

Any major policy amendments to the Official Plan would require a consultative and extensive effort that is intended to take place during the City's next MCR. The Province's commenting deadline on Proposed Amendment 1 to the Growth Plan is February 28, 2019.

RECOMMENDATIONS

The Chief Planner and Executive Director, City Planning recommends that:

1. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to introduce language which clearly states the Province's intention to authorize municipalities to allow the conversion of lands designated *Employment Areas*, that are not identified as "Provincially Significant Employment Zones" in the Growth Plan, during the course of a municipally-initiated one-time window of opportunity only, as described on the Province's webpage at <http://www.mah.gov.on.ca/Page20926.aspx>.

2. City Council request the Province to revise Proposed Amendment 1 of the Growth Plan, 2017 policies and mapping to recognize and include additional "Provincially Significant Employment Zones" in the City of Toronto, (including the City's major office parks). The additional Provincially Significant Employment Zones will be identified in a report by the Chief Planner and Executive Director, City Planning Division, directly to City Council.
3. Further to Recommendation 2, the Planning and Housing Committee request the Chief Planner and Executive Director, City Planning Division, to report directly to City Council with regard to identifying the additional Provincially Significant Employment Zones at the February 26, 2019 City Council meeting.
4. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to recognize the Ontario Food Terminal as a Provincially Significant Employment Zone which plays a pivotal role in the provincial agri-food network.
5. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan by using the previous definition of "Office Parks" in the Growth Plan, 2017, in order for Office Parks to continue to be designated as *Employment Areas* in the Official Plan.
6. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to recognize all five of Toronto's "Office Parks" as "Provincially Significant Employment Zones".
7. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to:
 - a. Allow municipalities to require an applicant to retain space for employment uses, where employment uses had previously existed, as part of their development application, where the municipality has in-effect official plan policies indicating where and under what redevelopment criteria (location, size, use, phasing of development) such an employment replacement policy would apply, and
 - b. Allow municipalities to also set minimum employment space thresholds for new development in mixed use areas where no employment uses previously existed.
8. City Council advise the Province of its support to remove "Prime Employment Area" references from the Growth Plan, 2017.
9. City Council advise the Province of its support to change the Growth Plan, 2017, to remove the mandatory requirement that each municipality develop an employment strategy and replace this requirement with amended policies that require municipalities to adopt official plan amendments prescribing a number of employment related actions ensuring their protection.

10. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to reinstate the Growth Plan definition of a Major Transit Station Area by removing the reference to a proposed 500 to 800 metre radius range and reinstating the 500 metre radius requirement.

11. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, wording for Policy 2.2.4.4.b. by deleting the word "high" from the proposed policy so that "high ridership" is not a qualifier for lower density target consideration.

12. City Council request the Province to include a new policy in the Growth Plan to clarify that where an overlap occurs between the City's designated *Employment Areas* and potential Major Transit Station Areas, the Growth Plan's Employment policies take precedence and the established minimum density targets for *Employment Areas*, required by proposed policy 2.2.5.13.a would prevail over any other established density target, including those for Major Transit Station Areas and others, in order to ensure the protection and preservation of the City of Toronto's finite employment land base.

13. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to reinstate Growth Plan Policy 2.2.2.4.a. which makes reference to encouraging intensification to achieve the desired urban structure instead of Policy 2.2.2.3.c. proposed in Amendment 1 to the Growth Plan, 2017.

14. City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to reinstate Growth Plan Policy 2.2.1.4.e., which ensures the development of a high quality compact built form, an attractive and vibrant public realm through site design and urban design standards.

15. City Council request the Province modify O. Reg. 311/06 to add Official Plan Amendment 231 as a matter in process that was approved under the previous Growth Plan, 2006, as amended in 2013, but is currently under appeal at the Local Planning Appeal Tribunal.

16. City Council request the Province modify O. Reg. 311/06 to add any decision made by Toronto City Council on the day before the enactment of the proposed Growth Plan Amendment, except those matters (Official Plan Amendment 231) identified in Recommendation 15 above as matters in process that are subject to the current Growth Plan 2017, but are currently under appeal at the Local Planning Appeal Tribunal.

17. City Council forward this item, and any other related item on this matter, that is before City Council on February 26, 2019, to the Minister of Municipal Affairs and Housing by the Province's commenting deadline of February 28, 2019.

FINANCIAL IMPACT

The recommendations in this report have no financial impact.

DECISION HISTORY

Growth Plan, 2017

The Province released the Growth Plan for the Greater Golden Horseshoe in May 2017. The Plan came into effect on July 1, 2017, replacing the Growth Plan for the Greater Golden Horseshoe, 2006. Municipalities are required to come into conformity with the Growth Plan, 2017, by 2022, and will do so by conducting a MCR and subsequently adopting implementing zoning by-laws. A MCR may result in a new official plan or an official plan amendment that comprehensively applies all the policies of the Plan, which upon completion, will be submitted to the Ministry of Municipal Affairs and Housing (MMAH) for approval.

Municipal Comprehensive Review (MCR)

Upon the Province's approval of any amendments to the Growth Plan, 2017, the City will be required to bring its Official Plan into conformity with the Growth Plan, 2017, as amended, through a Municipal Comprehensive Review (MCR) by 2022. The City's first MCR was adopted by Council through Official Plan Amendment 231 (OPA 231) in 2013 and approved by the Minister of Municipal Affairs and Housing in 2014. OPA 231 contains policies for the economic health of the City as well as policies, designations, and mapping for *Employment Areas*. Portions of the amendment have been approved including policies pertaining to the designations, the land use designations and mapping and multiple citywide and site specific settlements. A portion of the amendment remains before the Local Planning Appeal Tribunal (LPAT), for a hearing on the remaining matters. Council's decision on OPA 231 can be accessed at this link: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.PG28.2>.

COMMENTS

Purpose of the Report

This report responds to Proposed Amendment 1 to the Growth Plan, 2017, announced by the Province on January 15, 2019. The Growth Plan, 2017, is one of the guiding policy documents to which all official plans in the Greater Golden Horseshoe area must conform. The Growth Plan, 2017, sets the regional framework that informs planning decisions across the region and covers several policy matters, related to employment, housing, transportation, environment, and others. Upon the Province's amendments to the Growth Plan coming into effect, municipalities must update their official plans and zoning by-laws. These conformity exercises will require meaningful consultation with affected residents, businesses, and other stakeholders before Council considers any changes to the City's Official Plan and Zoning By-law. In the absence of a more thorough analysis of the impacts that the proposed Growth Plan amendments may have across the City, this report provides several recommendations that help to ensure the current policy objectives of managing sustained growth are reinforced, while at the

same time balancing varied community interests with matters related to the economy and the environment.

Background

Ministry of Municipal Affairs and Housing staff hosted working group sessions in late 2018 with respect to the implementation of the Growth Plan, attended by several stakeholders and municipal representatives including City Planning staff. Based on the input received and the new Government's mandate, the Ministry proposed a series of amendments to the Growth Plan, 2017, including changes to the existing transition regulation, O. Reg. 311/06. The Province's stated goals that have helped to inform their proposed amendments include: a more streamlined planning process; addressing barriers to increasing the region's housing supply; promoting more jobs and housing near transit; and providing municipalities with increased autonomy and flexibility to determine context appropriate growth strategies.

The Province describes the proposed amendments to apply to six broad categories for municipalities within the Greater Golden Horseshoe area. The categories include: Employment Planning; Settlement Area Boundary Expansions; Small Rural Settlements; Natural Heritage and Agricultural Systems; Intensification and Density Targets and Major Transit Station Areas. These categories and staff comments, as they pertain to the City of Toronto, are described below.

Employment Planning

The Province's stated intent for the proposed Growth Plan amendments to the employment planning policies are to ensure certain employment lands are protected while others are unlocked for non-employment uses, which may include residential development.

Employment Land Conversions

The Province's webpage at <http://www.mah.gov.on.ca/Page20926.aspx> states that the proposed amendment includes, "A new policy that creates a one-time window to allow municipalities to undertake some conversions between the effective date of the proposed amendments and their next municipal comprehensive review, where appropriate and subject to criteria. Includes requirement to maintain a significant number of jobs on those lands."

The conversion of lands designated *Employment Area* would allow the introduction of a use not permitted in the Official Plan, such as residential, places of worship or other sensitive land uses. Staff recommend that the Province introduce additional policy language, which clearly states that the conversion of lands designated *Employment Areas* that are not identified as "Provincially Significant Employment Zones" can only occur during a municipally-initiated one-time window of opportunity. Without explicit policy language, Council may be faced with numerous and ongoing conversion requests. During the previous Municipal Comprehensive Review in 2013, Council considered over 100 site and area specific requests and continues to receive ongoing requests.

Employment Land Conversions Recommendation (No. 1)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to introduce language which clearly states the Province's intention to authorize municipalities to allow the conversion of lands designated *Employment Areas*, that are not identified as "Provincially Significant Employment Zones" in the Growth Plan, during the course of a municipally-initiated one-time window of opportunity only, as described on the Province's webpage at <http://www.mah.gov.on.ca/Page20926.aspx>.

Provincially Significant Employment Zones

The Province has identified a new approach to protecting key employment areas, through the introduction of 29 "Provincially Significant Employment Zones" (PSEZs), ten of which are (partially or wholly) situated in Toronto. The proposed PSEZs would not be subject to conversions outside of a municipally initiated MCR. Attachment 1 to this report maps the ten PSEZs proposed by the Province for the City. They account for 5,465 hectares (67% of the total *Employment Area* land base) and approximately 236,041 jobs (57% of jobs located in all *Employment Areas*) in the City. Conversely, the resulting non-PSEZs include 1,653 hectares (33% of the total *Employment Area* land base) and approximately 181,432 jobs (43% of jobs located in all *Employment Areas*) in the City. These proposed non-PSEZs could be subject to conversions in advance of the next MCR and, as such, may potentially destabilize an affected *Employment Area*, without the citywide due diligence and economic analysis undertaken during an MCR.

While the proposed new Provincial approach provides status quo land use protections on 67% of the total *Employment Area* land base, it has the consequence of providing land use uncertainty for the remaining 33% of *Employment Areas* across the City, which accommodates over 180,000 jobs. Land use certainty is important for business owners to remain competitive and be able to expand their operations with the knowledge that sensitive land uses will not be introduced nearby to negatively impact current and future operations. In their report entitled, "Economic Value of the City's Employment Lands", the General Manager of Economic Development and Culture and Chief Planner and Executive Director, City Planning Division, describe the merits of and benefits to the preservation of *Employment Areas*. The report can be accessed at: <https://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-64931.pdf>.

Staff and Council through the adoption of OPA 231, have held the consistent view that employment land conversions are not needed to achieve the Growth Plan, 2017, population targets. The next MCR should afford staff an opportunity to conduct its due diligence and analyze any opportunities for conversion judged both against the local context and citywide considerations. This approach brought stability and land use certainty to Toronto's land market and supported employment growth across the City.

Staff have conducted a preliminary review of all 19 proposed PSEZs outside of Toronto against their applicable official plans and found that the employment lands designated in Mississauga, Oakville and Milton almost all received the PSEZ protection. Approximately 80% of employment designated lands in Burlington, Markham, Richmond Hill, Brampton, and Vaughan received the PSEZ protection. Staff recommend that additional *Employment Areas* designated lands within the City be identified as PSEZs in

order to receive the land use protections that come with this proposed (new) Growth Plan identification.

The Province has applied a number of locational and economic criteria in identifying the proposed PSEZs, which are listed in Attachment 2 to this report. Staff will apply this provincial criteria, including the sectoral analysis, to identify additional eligible PSEZs and report directly to Council with this information.

Provincially Significant Employment Zones Recommendation (No. 2)

City Council request the Province to revise Proposed Amendment 1 of the Growth Plan, 2017 policies and mapping to recognize and include additional "Provincially Significant Employment Zones" in the City of Toronto, (including the City's major office parks). The additional Provincially Significant Employment Zones will be identified in a report by the Chief Planner and Executive Director, City Planning Division, directly to City Council.

Provincially Significant Employment Zones Recommendation (No. 3)

Further to Recommendation 2, the Planning and Housing Committee request the Chief Planner and Executive Director, City Planning Division, to report directly to City Council with regard to identifying the additional Provincially Significant Employment Zones at the February 26, 2019 City Council meeting.

Agri-Food Network

The Province makes special mention of the agri-food network, which includes agri-food businesses that, if converted to other uses may critically impact the food sector. Attachment 3 to this report maps out food processing and warehousing establishments that play an important role in the agri-food network, of which some sites may be vulnerable to residential encroachment. The Ontario Food Terminal located in South Etobicoke is the largest wholesale fruit and produce distribution centre in Canada and plays a very important role in the agri-food network. The proposed amendments do not identify the Ontario Food Terminal as a proposed PSEZ. In 2012, Council requested that the Province identify the Ontario Food Terminal as a provincially significant employment area. The 2012 Decision document and letter from then Mayor Ford requesting these protections can be accessed at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2012.CC28.5>
<https://www.toronto.ca/legdocs/mmis/2012/cc/bgrd/backgroundfile-52344.pdf>.

Agri-Food Network Recommendation (No. 4)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to recognize the Ontario Food Terminal as a Provincially Significant Employment Zone, which plays a pivotal role in the provincial agri-food network.

Office Parks and Office Replacement

The Province is proposing to change the definition of "Office Parks" so that they are no longer designated *Employment Areas* in an official plan. This proposed amendment would have the effect of allowing the introduction of residential and other non-permitted uses in the City's major office parks located along the Don Valley Corridor and Liberty Village. Only one of the City's 5 major office parks are proposed to be a PSEZ. The remaining 4 (Don Mills, Consumers, Lesmill, and Liberty Village) accommodate over

65,000 jobs in strategic locations across the City and allow commuters to live close to where they work. This proposed Growth Plan policy amendment runs counter to Council's previous decision to preserve these lands as protected *Employment Areas*, which in the case of the Consumers Business Park, was recently confirmed through Council's adoption of the ConsumersNext Secondary Plan in 2018. Council's decision regarding the Consumers Business Park can be found at:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PG27.2>.

Staff have conducted a preliminary review of how neighbouring municipalities treat office/business parks and while each official plan uses a different term, staff found that a majority of these office/business parks were provided the protection of a proposed Provincially Significant Employment Zone, while Toronto's four (of five) major business/office parks, were not provided the same identification.

Staff recommend that the Province retain the original Growth Plan, 2017 definition for Office Parks and that they be identified as PSEZs, so that Toronto's office parks receive the PSEZ protections. If Toronto's Office Parks are no longer protected, employment uses in these areas will be jeopardized due to significant land price increases, given speculative activity around residential use permissions. Allowing residential uses in Toronto's office parks may destabilize an important employment base.

Office Parks Recommendation (No. 5)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan by using the previous definition of "Office Parks" in the Growth Plan, 2017, in order for Office Parks to continue to be designated as *Employment Areas* in the Official Plan.

Office Replacement Recommendation (No. 6)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to recognize all five of Toronto's "Office Parks" as "Provincially Significant Employment Zones".

Employment Replacement Policy

The Province is proposing a new policy that would apply to the redevelopment of employment lands outside of *Employment Areas* which suggests that such lands should retain space for a similar number of jobs to remain accommodated on site. This proposed new policy is helpful in development applications where the City is seeking mixed used developments that replace substantial office or other commercial uses on the lower floors and residential uses above. The proposed policy does not specifically address the issue of encouraging municipalities (from the provincial employment policy perspective) of setting minimum employment space thresholds in mixed use areas where there was no existing employment.

Staff recommend that wording be introduced in the amended Growth Plan that specifically speaks to municipalities having the option to require applicants to retain space for employment uses for a similar number of jobs as part of any redevelopment application where the municipality has official plan policies indicating where and under what redevelopment criteria (size, location, use, phasing of development) the employment replacement policy would apply. Staff also suggest that provincial policy

wording be expanded to include reference to municipalities being encouraged, where appropriate, to set minimum employment space thresholds for new developments in mixed use areas where no employment previously existed.

Continued economic success depends on the ability to balance non-residential and residential growth. To achieve this, the City has adopted policies that limit residential uses in mixed-use areas that are important employment clusters, including the Downtown and portions of Yonge-Eglinton and North York Centres.

To encourage the creation of jobs in mixed use developments, the City also requires, where appropriate, a development phasing strategy which provides that the non-residential component of the development be built prior to permitting the development of the residential component. Council currently prescribes the provision of employment space as a condition for the construction of housing in certain locations. This phasing ensures that there will be a supply of jobs and aligns the planning, design and development of mix-use projects to ensure that the employment and residential uses are mutually supportive of each other.

Employment Replacement Policy Recommendation (No. 7)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, to:

- a. Allow municipalities to require an applicant to retain space for employment uses, where employment uses had previously existed, as part of their development application, where the municipality has in-effect official plan policies indicating where and under what redevelopment criteria (location, size, use, phasing of development) such an employment replacement policy would apply, and
- b. Allow municipalities to also set minimum employment space thresholds for new development in mixed use areas where no employment uses previously existed.

Employment Strategy

Staff support the Province's proposal to remove the discretionary ability of municipalities to identify Prime Employment Areas, given that stand-alone offices were not included as a use in the prime employment area definition. The Province is also proposing to remove the requirement for each municipality to develop an employment strategy as part of a MCR and replaces this requirement with amended policies that require municipalities to adopt official plan amendments prescribing a number of employment related protections for municipalities to implement.

Land use compatibility is one such proposed protection measure that is in keeping with Council's recent adoption of a settlement between appellants on the Compatibility/Mitigation phase of the OPA 231 proceedings at the LPAT. The Decision document can be accessed at this link:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.CC43.11>

Another protection measure for municipalities to implement is the designation and preservation of lands near major goods movement facilities and corridors, including

major highway interchanges, as areas for manufacturing, warehousing and logistics. Staff will apply this particular protection measure when identifying the City's additional PSEZs to the Province.

The Province is also requiring municipalities to establish minimum density targets for all *Employment Areas* that will: be measured in jobs per hectare; reflect the type of scale of employment intended for the area; and identify opportunities for employment intensification. These policy measures will be determined as part of the next MCR and implemented by way of the City's Official Plan and zoning by-laws.

Employment Strategy Recommendation (No. 8)

City Council advise the Province of its support to remove "Prime Employment Area" references from the Growth Plan, 2017.

Employment Strategy Recommendation (No. 9)

City Council advise the Province of its supports to change the Growth Plan, 2017, to remove the mandatory requirement that each municipality develop an employment strategy and replace this requirement with amended policies that require municipalities to adopt official plan amendments prescribing a number of employment related actions ensuring their protection.

Major Transit Station Area (MTSA)

The Province's stated intent for the proposed amendments is to provide a streamlined approach that enables the determination of MTSA's to happen faster so that zoning and development can occur sooner. Attachment 4 to this Report outlines the approximately 160 potential MTSA's across the City. The number of potential MTSA's will increase as Environmental Assessments are approved on additional priority transit corridors.

MTSA Radius and Delineation

Prior to the proposed amendments, the Growth Plan, 2017, required that the City update its Official Plan, through a MCR, to delineate Major Transit Station Areas (MTSA's) and have a development framework in place to plan for prescribed minimum density targets (200 residents and jobs per hectare for subways; 160 residents and jobs per hectare for light rail transit; and 150 residents and jobs for GO Transit rail). MTSA's are the lands around transit stations generally defined as the areas within an approximate 500 metre radius of a transit station, representing about a 10-minute walk.

Proposed Amendment 1 to the Growth Plan increases the 500 metre radius to allow for a range from 500 metres up to an 800 metre radii. The Proposed Amendment also allows municipalities to delineate MTSA's in advance of a MCR, provided that a very detailed implementation framework is brought into effect in accordance with Section 16(15) of the Planning Act. Such a framework must identify the number of residents and jobs per hectare, permitted uses and minimum densities with respect to buildings and structures in the area. This level of detail would be advanced through an implementing Zoning By-law for a given study area.

Staff are supportive of the proposed streamlined approach that would allow the delineation of MTSAs in advance of the next MCR. However, staff are concerned that the increased radius may signal increased intensification that may create additional capacity issues on the existing transit network without a detailed capacity analysis. Although more suited for municipalities outside Toronto, where lands around stations are more expansive (for example, parking lots surrounding GO train stations), the proposed 800 metre radius may pose further infrastructure pressures on schools, water and sanitary sewers, and other municipal services.

An increased radius change may put pressure on municipalities to include lands that were not previously intended for intensification, such as in the City's established low-rise *Neighbourhoods* or its *Employment Areas*, where potential MTSAs overlap with *Employment Areas*. This intensification pressure will be further exacerbated by the proposed removal, from the Growth Plan, of Policy 2.2.4.5, which had allowed municipalities to average minimum density targets for MTSAs along the same priority transit corridor.

In the absence of detailed planning and understanding of local context, the 500 metre radius would generally provide more than enough opportunity - in a Toronto context - to achieve intensification.

MTSA Radius Recommendation (No. 10)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to reinstate the Growth Plan definition of a Major Transit Station Area by removing the reference to a proposed 500 to 800 metre radius range and reinstating the 500 metre radius requirement.

Lower Density Targets

The Growth Plan, 2017, set minimum density targets for MTSAs, which remain in place. However, the Province is now proposing that the Minister may approve the use of lower density targets for particular MTSAs where a municipality demonstrates that the target cannot be achieved because development is prohibited by provincial policy or severely restricted on a significant portion of the affected lands, or there are a limited number of residents and jobs associated with the built form, but a major trip generator or feeder service will sustain high ridership at the station or stop.

The "major trip generators" definition in the Growth Plan, as amended by Proposed Amendment 1, includes urban growth centres and other downtowns, major office and office parks, major retail, employment areas, community hubs, large parks and recreational destinations, post-secondary institutions and other public service facilities and other mixed-use areas.

Staff are generally supportive of these proposed changes, given that the criteria would alleviate development pressures on particular subway stations, such as Old Mill TTC station which is atop the ravine, or the future Humber station on the Finch West LRT, which is situated in a low density area, but which is expected to have high ridership, given student enrollment at Humber College.

Some major transit station areas, however, while fitting within the exceptions criteria, will not meet the high ridership test. It is important to view all MTSA's along major transit corridors as being an integral part of the transit network which ensure access to important destinations including these post-secondary institutions, parks, and recreation facilities. Some will not be able to meet the high ridership. High ridership (an undefined term in the Growth Plan) should not be the qualifier that allows for the consideration of lower density targets for a particular MTSA. Staff recommend deletion of the word "high", so that the exception policy reads: "there are a limited number of residents and jobs associated with the built form, but a major trip generator or feeder service will sustain ridership at the station or stop."

Lower Density Targets Recommendation (No. 11)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017, wording for Policy 2.2.4.4.b. by deleting the word "high" from the proposed policy so that "high ridership" is not a qualifier for lower density target consideration.

MTSA's Overlap with Employment Areas and PSEZs

There are between 69 to 93 potential MTSA's in the City of Toronto that overlap with lands currently designated as *Employment Areas* in the City's Official Plan and between 30 to 38 potential MTSA's that would overlap with the City's proposed Provincially Significant Employment Zones, as currently identified by the Province in Proposed Amendment 1 to the Growth Plan (see Attachment 4 to this Report). It is staff's opinion that provincial policy primacy should be weighted towards the protection and preservation of lands designated *Employment Areas*, (inclusive of the PSEZs that the Province has identified in the City, and any additional PSEZs that the Province may consider identifying as part of the consultation process), in instances where potential MTSA's overlap with these areas. Staff recommend that a new policy be added to the Growth Plan to clarify that where an overlap occurs between the City's designated *Employment Areas* and potential Major Transit Station Areas, the Growth Plan's Employment policies take precedence and the established minimum density targets for *Employment Areas*, required by proposed policy 2.2.5.13.a would prevail over any other established density target, including those for Major Transit Station Areas and others.

MTSA's Overlap with Employment Areas Recommendation (No. 12)

City Council request the Province to include a new policy in the Growth Plan to clarify that where an overlap occurs between the City's designated *Employment Areas* and potential Major Transit Station Areas, the Growth Plan's Employment policies take precedence and the established minimum density targets for *Employment Areas*, required by proposed policy 2.2.5.13.a would prevail over any other established density target, including those for Major Transit Station Areas and others, in order to ensure the protection and preservation of the City of Toronto's finite employment land base.

Intensification and Density Targets

The Growth Plan, 2017 currently defines "Delineated Built-Up Areas" as the limits of the developed urban area for the purpose of measuring minimum intensification targets. Clarification from the Province is required on this policy application, given that Toronto is the only Greater Golden Horseshoe municipality that is fully within the Delineated

Built-Up Area and does not include any Greenfield areas or substantial Greenbelt areas. As such, all of Toronto's growth is through intensification.

Proposed amendments require that all municipalities develop a strategy to achieve intensification and identify appropriate types and scales of development with built form transition. The proposed amendments also encourage intensification generally throughout the delineated built-up area, but remove the Growth Plan policy reference to anchoring growth management and intensification policies within an urban structure framework, in Toronto's case, for example the Official Plan's Map 2 (Urban Structure).

Intensification and Density Targets Recommendation (No. 13)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to reinstate Growth Plan Policy 2.2.2.4.a. which makes reference to encouraging intensification to achieve the desired urban structure, instead of Policy 2.2.2.3.c. proposed in Amendment 1 to the Growth Plan, 2017.

Intensification, Site Design and Urban Design Standards

Compact Built Form, Complete Communities and Complete Streets are defined in the Growth Plan, 2017, and premised on the use of site design and urban design standards to promote well-designed buildings, encourage a sense of place and provide for public spaces that are of high quality, safe, accessible, attractive and vibrant. Site design and urban design standards are important matters to be considered in municipal efforts to achieve consensus with regard to intensification and managing growth.

Under the heading of "Managing Growth", wording has been proposed to be deleted in the Growth Plan, 2017, which currently envisions that complete communities be of high quality built form through the use of site design and urban design standards (Growth Plan Policy 2.2.1.4.e). The proposed removal of this language erodes the link between intensification, compact built form and the pressure that this kind of built form places not only on the supply and quality of the spaces between buildings (i.e., the public realm), but on the overall quality of housing and the built environment in general.

Well-designed development assists municipalities in their intensification efforts. Incorporating site design at the front-end of the development approval process ensures that buildings and the spaces between them are well-designed, functional, sustainable and barrier-free. Site design and urban design standards help ensure that a "good fit" exists between new development and the existing and/or planned context. Well-designed development can improve market demand for the product and improve consensus building (reduce appeals) during the municipal development approval process. Placemaking through design is a key component of building a healthy city and supporting economic competitiveness.

Site Design and Urban Design Standards Recommendation (No. 14)

City Council request the Province to revise Proposed Amendment 1 to the Growth Plan, 2017 to reinstate Growth Plan Policy 2.2.1.4.e., which ensures the development of a high quality compact built form, an attractive and vibrant public realm through site design and urban design standards.

Housing and Housing Supply

The Province is proposing to remove the requirement to develop a "housing strategy". Matters that were previously identified to be part of a housing strategy will continue to be undertaken by the City of Toronto either through other requirements of the Growth Plan, including completion of a land needs assessment to support the next Municipal Comprehensive Review, or through implementation of the Growth Plan's Housing policies, by way of the City's Official Plan and zoning by-laws and 10-year Housing Action Plan, to provide for a range and mix of housing types and support the provision of affordable housing.

Climate Change

The proposed changes to the Growth Plan reference the Province's revised 2030 target for reduction of greenhouse gas (GHEG) emissions. The revised target and the lack of a 2050 target do not align with the City's priorities. For example, the recently updated Toronto Green Standard has been incorporated into the City's development approval process since 2010, sets out a framework to achieve Toronto's goal of reducing GHEG emissions by 80% against 1990 levels by 2050.

Proposed changes also delete the term "net zero emissions" replacing it with "environmental sustainability". The term "net zero emissions" is a specific measurable goal and its replacement with a less definitive term, "environmental sustainability", will not support efforts to benchmark emission reduction in order to measure success in making communities more sustainable and resilient. Without setting a specific goal it will be difficult to meet and evaluate progress towards reducing GHEG emissions, as identified in TransformTO (Climate Action for a Healthy, Equitable and Prosperous Toronto). The Decision History can be accessed at this link:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.PE19.4>

Success in incorporating environmental sustainability into the development approval process is dependent upon meeting quantifiably strong, consistent, predictable and transparent GHEG emission reduction targets. This is good business practice and the City of Toronto will continue to work towards achieving its 2050 reduction goal. The proposed provincial changes to the Growth Plan do not preclude the City from striving to achieve its emission reduction targets.

Natural Features and Functions

The proposed changes delete the requirement for municipalities to "designate and apply policies" for long term protection of key hydrologic features, key hydrologic areas and their functions. In the absence of this requirement, these features will most likely not be protected. This will undermine the long term protection of these key features and the resiliency of the natural heritage system. This proposed change is not "good for business" as it provides less certainty to developers who would have benefited from advance knowledge of where these features are located.

Growth Plan Transition Regulation (O. Reg. 311/06)

The Province is seeking feedback on proposed changes to the Growth Plan transition regulation and in particular, if there are any specific planning matters in process that should be addressed through the transition regulation. Official Plan Amendment 231 (OPA 231) was approved by Council in 2013, approved by the Minister in 2014, and subsequently received 178 appeals to the Local Planning Appeal Tribunal (LPAT) in 2015. OPA 231 was approved under the previous Growth Plan, 2006. Including OPA 231 in the proposed transition regulation would have the effect of streamlining the current proceedings before the LPAT. Addressing these matters in the transition regulation will greatly assist the City in managing its resources to effectively implement the amended Growth Plan policies in a timely fashion.

Streamlining the current OPA 231 proceedings at the LPAT would provide some policy certainty to the City and its approximately 100 remaining appellants, help bring the City's first MCR to conclusion, and ultimately facilitate the timely commencement of the next MCR. The commencement of the next MCR will allow the City to implement the policies of the Growth Plan, 2017, as amended.

Growth Plan Transition Regulation Recommendation (No. 15)

City Council request the Province modify O. Reg. 311/06 to add Official Plan Amendment 231 as a matter in process that was approved under the previous Growth Plan, 2006, as amended in 2013, but is currently under appeal at the Local Planning Appeal Tribunal.

Growth Plan Transition Regulation Recommendation (No. 16)

City Council request the Province modify O. Reg. 311/06 to add any decision made by Toronto City Council on the day before the enactment of the proposed Growth Plan Amendment, except those matters identified in Recommendation 15 above, as matters in process that are subject to the current Growth Plan 2017, but are currently under appeal at the Local Planning Appeal Tribunal.

Growth Plan Amendments Not Applicable to Toronto

There are a number of proposed amendments to the Growth Plan, 2017, pertaining to Settlement Area Boundary extensions; rural settlements; agricultural systems; minimum intensification targets; Designated Greenfield Areas; and others, that do not appear to directly affect the City of Toronto. However if it is determined that, upon a more detailed review of Proposed Amendment 1, there are significant impacts, staff would appreciate the opportunity to bring these impacts to the Province's attention through a supplemental report.

Next Steps

City Planning, Economic Development and Culture, and Legal Services staff will continue their review and analysis of the proposed amendments to the Growth Plan and forward any additional comments and recommendations in a supplementary report for City Council's consideration.

Upon the Province's enactment of any changes to the Growth Plan, 2017, City Planning staff will report to the Planning and Housing Committee on a work program describing the necessary projects, timelines and resource requirements to accomplish the next Municipal Comprehensive Review (MCR) and achieve conformity with the amended Growth Plan by 2022.

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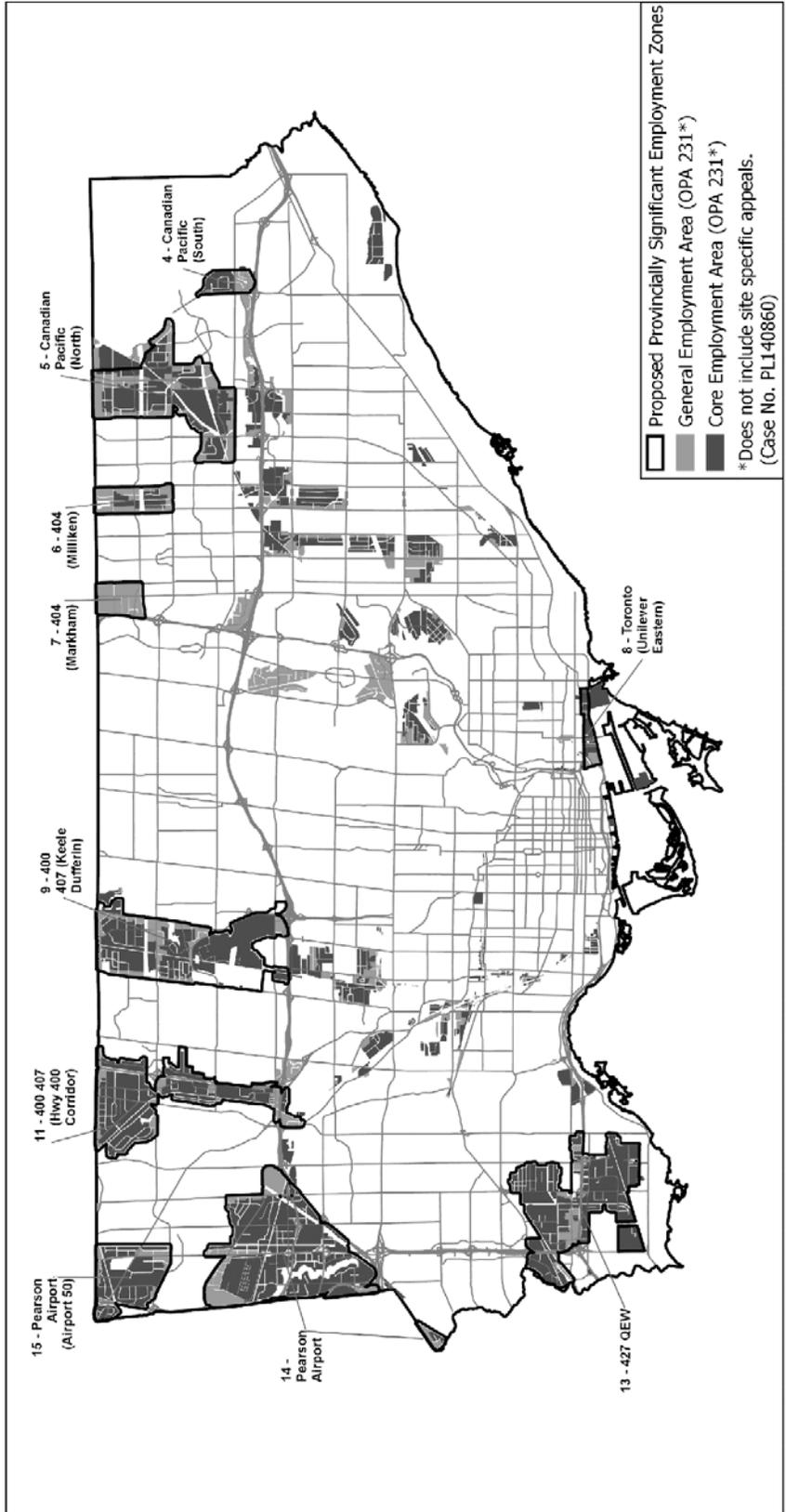
Gregg Lintern, MCIP, RPP
Chief Planner and Executive Director
City Planning Division

ATTACHMENTS

Attachment 1: Proposed Provincially Significant Employment Zones (PSEZ)
Attachment 2: Provincially Applied Criteria in Identifying Proposed PSEZs
Attachment 3: Food Processing and Warehousing Establishments
Attachment 4: Potential Major Transit Station Areas (MTSAs)

Attachment 1: Proposed Provincially Significant Employment Zones (PSEZ)

TORONTO Proposed Provincially Significant Employment Zones



Toronto City Planning, Research and Information - January 29, 2019

Attachment 2: Provincially Applied Criteria in Identifying Proposed PSEZs

Source:

Proposed Framework for Provincially Significant Employment Zones

<https://ero.ontario.ca/notice/013-4506>

The Province has identified the following criteria for proposed provincially significant employment zones would apply to employment areas that:

- Are designated employment areas and are inside existing settlement area boundaries (i.e., no Greenbelt lands are included in provincially significant employment zones);
- May be vulnerable to conversion pressures (e.g. to residential conversion);
- May be facing encroachment by sensitive land uses that could threaten the existing employment uses; or
- Are needed in the region to attract new investment and retain existing industries.

Additional criteria related to site use may include:

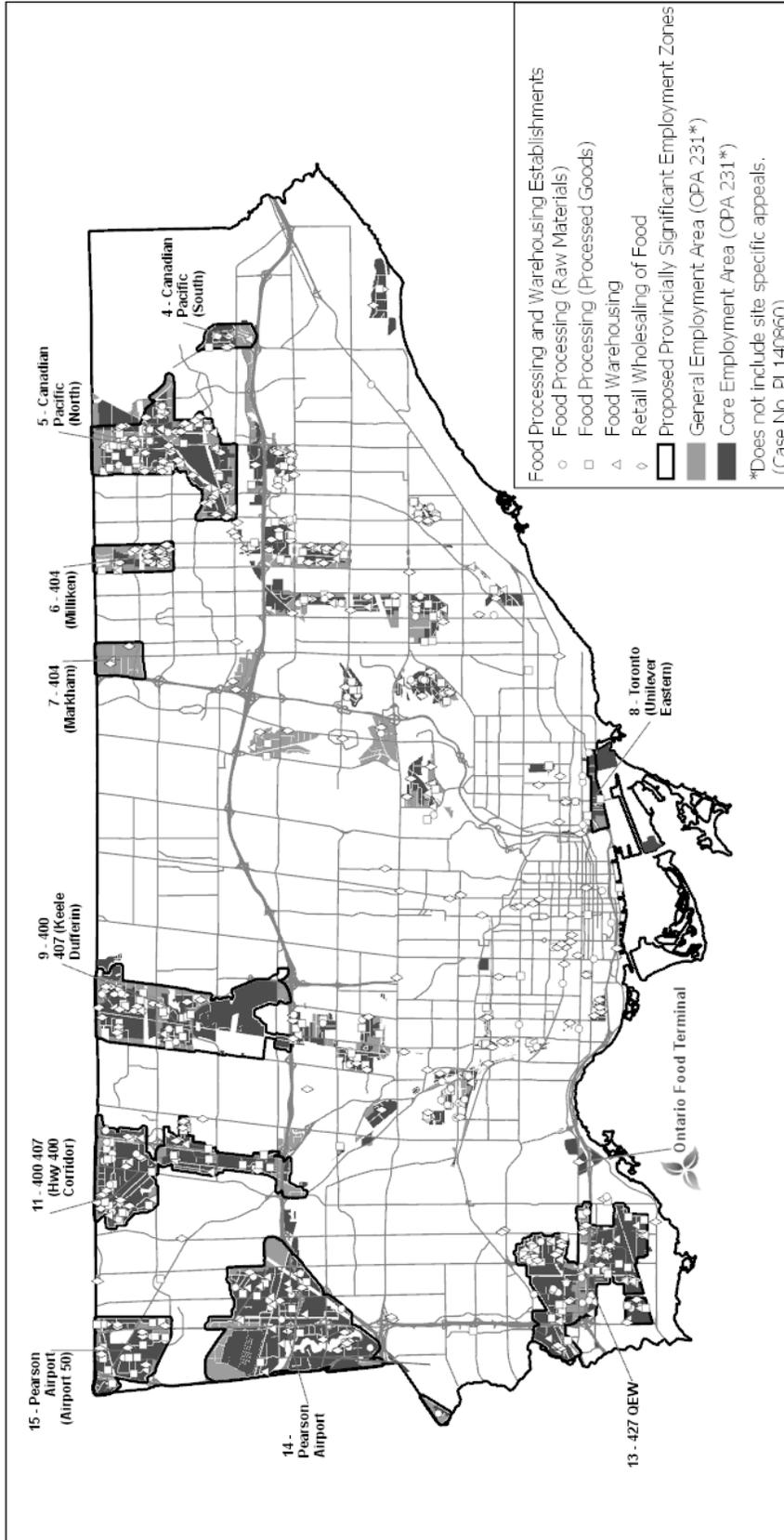
- Located near highways, railways, intermodal facilities, transit and/or other major transportation infrastructure to support the movement of people and goods;
- High concentration of employment and/or economic output, and play an economically strategic role to the region;
- Support industrial uses, which are sensitive to encroachment; or
- Contiguous zones and contain large continuous developable, constraint-free lands (e.g. >10 acres).

Finally, in identifying the proposed provincially significant employment zones the province reviewed and included the agri-food support network and mapped important employment hubs identified by the Ontario Ministry of Agriculture, Food and Rural Affairs. Conversions of agri-food businesses to other uses within these hubs could critically impact the sector.

The mapping also takes into account the Greenbelt and specialty crop areas to ensure they are excluded from provincially significant employment zones.

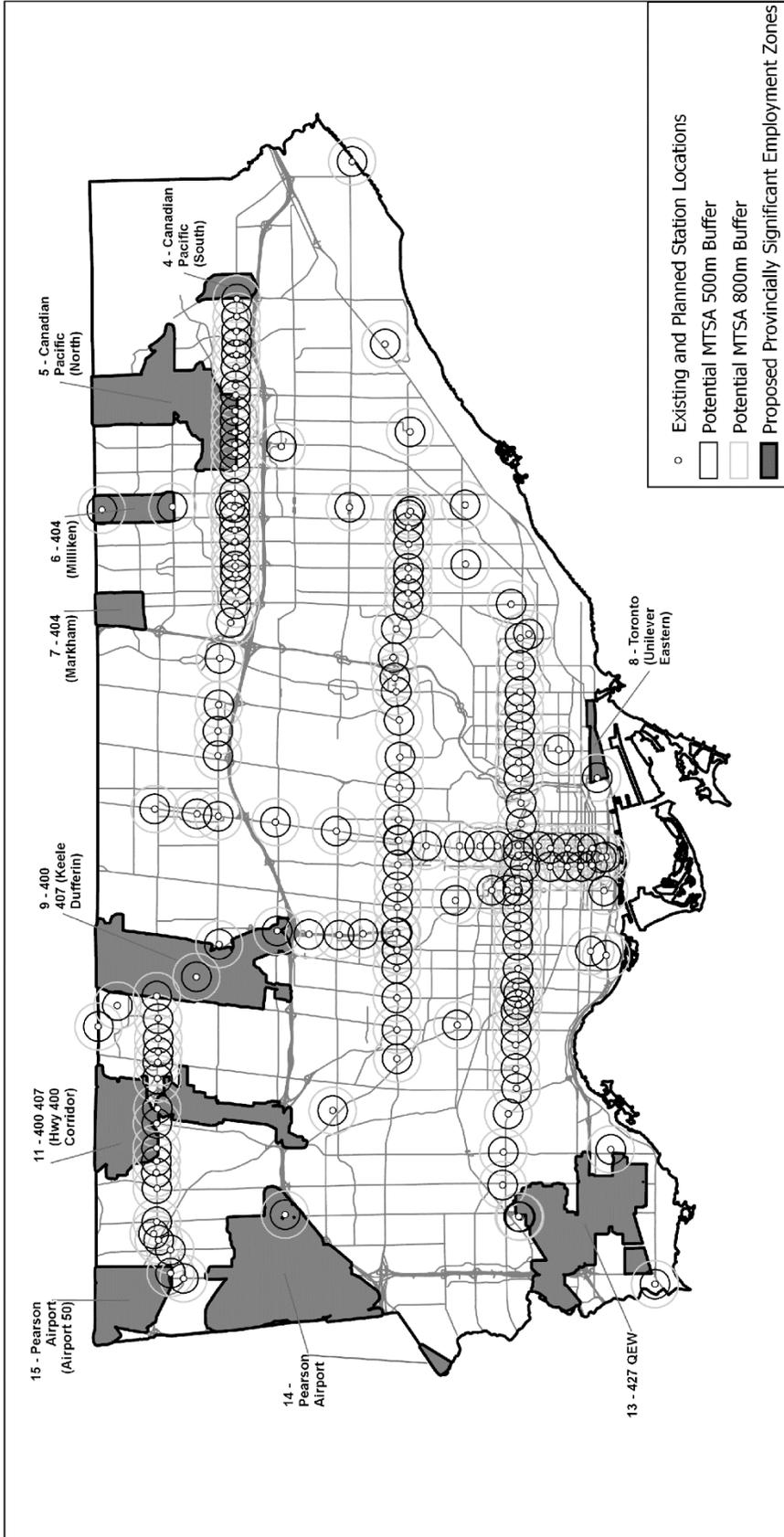
Attachment 3: Food Processing and Warehousing Establishments

TORONTO Agri-Food Uses in Toronto



▲ Data Sources: Ministry of Municipal Affairs and Housing, Toronto Employment Survey 2018 Toronto City Planning, Research and Information - January 29, 2019

Attachment 4: Potential Major Transit Station Areas (MTSAs)



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