



To: Planning Advisory Committee

Agenda Section: Corporate Services

Division: Engineering, Planning and Environment

Department: Planning

Item Number: PAC - 2020-127

Meeting Date: April 14, 2020

Subject: Update on the County of Simcoe Municipal Comprehensive Review

#### Recommendation

That Item PAC 2020 – 127, dated April 14, 2020 regarding an update on the County's Municipal Comprehensive Review (MCR) process, be received; and

That the Planning Advisory Committee endorse the Municipal Comprehensive Review work plan as generally outlined in Item PAC 2020 – 127.

## **Executive Summary**

The Growth Plan for the Greater Golden Horseshoe, 2019 (Growth Plan) continues to require that the County undertake a Municipal Comprehensive Review (MCR). The responsibility for upper-tier municipalities to complete an MCR was introduced in the 2017 Growth Plan. An MCR is an integrated planning tool which results in a process to comprehensively bring Official Plans into conformity with the Growth Plan. Various policy matters are impacted and require updating in both the County and lower-tier official plans to complete the MCR. One key component relates to regional growth management of population and employment using targets established through the Growth Plan for the County until the year 2041.

Since the last update was provided to the Planning Advisory Committee (PAC) on March 27, 2018, changes relating to planning policy at the provincial level has occurred. Subsequently these changes have had an impact on the anticipated work plan that was initially being formulated relating to the MCR. While the potential changes were being proposed at the provincial level, direction was provided from the Minister of Municipal Affairs and Housing to consider putting a pause on notable projects. As a result, some of the components of the MCR were delayed through most of 2019 and now have been re-initiated in 2020. We have now received resolution from the Province in relation to matters such as the Growth Plan 2019 updates, Provincial Policy Statement updates and the Regional Government Review. Notwithstanding the project delays as a result of provincial updates and initiatives, the MCR is still to be completed by July 1 2022, which includes

the County Official Plan amendment to achieve conformity with the Growth Plan. With respect to lower-tier municipalities, their Official Plans are to be brought into conformity within one year of the County's update.

This report is intended to provide an overview of some of the changes that impact the MCR, outline the key principles which will shape the decisions made through the MCR, and offer a summary of the current project components.

## Municipal Comprehensive Review: Background and Principles of Project

## Background

A Municipal Comprehensive Review (MCR) is a planning instrument whereby upper and single-tier municipalities must bring their Official Plans into full conformity with the policies of the provincial Growth Plan. This exercise consists of background research, consultation, and policy formulation. An important part of the MCR includes long-term population and employment growth management until the year 2041. The MCR is a multi-year process and ultimately will result in a future County Official Plan Amendment, followed by Official Plan Amendments for all of the County's lower-tier municipal partners. The Province is the approval authority of County Official Plan Amendments, whereas the County is the approval authority of the lower-tier Official Plan Amendments.

The requirement for the County as the upper-tier municipality to complete an MCR was outlined within the Growth Plan (2017), and has been carried forward as a requirement within the Growth Plan (2019) which was brought into force and effect in May of last year. During the time that the current Growth Plan was under review and being consulted upon, there was uncertainty as to how the new Growth Plan may impact the requirement of the MCR. With the approval of the new Growth Plan we now know that generally the process remains the same. Certain elements however, have been removed in order to assist with streamlining the process. In addition, certain major technical guidance inputs necessary to complete the MCR are still under review by the Province. Timing to complete these key inputs (which include an update to population and employment allocation, and the method under which to assess land needs relating to these allocations) will greatly influence how and when the growth management component of the MCR can be completed. It is not expected that changes to these matters will be finalized by the Province until late spring or summer of this year. There are many components of the MCR however, that can proceed.

Despite updates to the Growth Plan 2019, and the need for the Province to finalize key inputs and direction documents relating to the MCR, it is known that the following overall matters will still need to be addressed as part of the MCR work plan:

- Provincial Agricultural System review and update;
- Provincial Natural Heritage System review and update;
- Employment Strategy;
- Urban Land Needs Assessment (Population and Employment);
- Water and Wastewater servicing review;
- Watershed planning;
- Climate Change Strategy.

The final outcome of the MCR will be to transition the background work into update amendments to the County of Simcoe Official Plan and the lower-tier municipal Official Plans so that these documents are in full conformity with the Growth Plan.

## **Land Needs Assessment Methodology**

The Land Needs Assessment Methodology is the guidance tool that all upper-tier and single-tier municipalities need to follow in order to properly assess whether additional lands for settlements will be required to accommodate the forecasted population and employment growth identified in Schedule 3 of the Growth Plan.

Provincial staff are currently in the process of updating and revising the Land Needs Assessment Methodology in order to bring it into conformity with the recently approved Growth Plan 2019. It is anticipated that this document will be made available for upper-tier and single-tier municipalities to use in their MCR work by late spring 2020.

# **Growth Plan Schedule 3 Updates**

On February 6<sup>th</sup>, 2020 the Minister of Municipal Affairs and Housing announced that a review and update of the Schedule 3 population and employment forecasts for the Greater Golden Horseshoe and all municipalities affected by the Growth Plan 2019 has been initiated, refer to attachments.

The Schedule 3 population and employment forecast of the Growth Plan exists so that upper-tier and single-tier municipalities have parameters in place for planning and managing long-term growth. Schedule 3 presently forecasts population and employment growth out to the year 2041. County and local official plans currently only accommodate growth to 2031.

The Growth Plan requires that all upper-tier and single-tier municipalities will apply the forecasts in Schedule 3 through the MCR. As such, the growth management component of the MCR project cannot be advanced until such time as the review and update of the Schedule 3 population and employment forecast for Simcoe County has been completed by the Province. It is anticipated that a final updated Schedule 3 will be available by early summer 2020.

### **Principles Directing the MCR Project**

Since the MCR is a prescribed planning exercise, there are certain outcomes and objectives which must be completed. Ultimately, the overall objective is to bring the County and lower-tier municipal Official Plans into conformity with the Growth Plan. In order to achieve the purpose and fundamental tasks of the MCR, it is key to understand the foundational principles of the project which are established through the Growth Plan itself.

A summary of certain key principles of the Growth Plan and other provincial direction which will shape the MCR project are as follows:

a) The Growth Plan for the Greater Golden Horseshoe 2019 requires that an MCR be completed by the County of Simcoe as the upper-tier municipality.

Notwithstanding that the MCR is an upper-tier responsibility, the County must collaborate with lower-tier municipal partners to implement various growth related matters which will be necessary to achieve a desired outcome. Elements of the MCR which will require this collaboration include:

- Consideration of alternative intensification and/or density targets:
  - These variables will influence <u>how</u> a municipality will grow when planning for the population and employment that they are allocated through the MCR. For example, increasing intensification and density targets will create a more compact urban form, whereas keeping things status quo or even reducing these targets will necessitate using more greenfield land, and possibly result in settlement area boundary expansion(s).

## Consideration of where to grow:

- Should it be demonstrated that additional land will be necessary to accommodate growth allocation, the lower-tier municipality will need to provide direction to the County in regard to where this growth should take place in their community;
- Decisions on where to grow must be justified in accordance with the policies of the Growth Plan:
- Growth decisions must be informed by municipal infrastructure planning, which
  in the circumstance of the County of Simcoe is the responsibility of the lower-tier
  municipalities. As a result it is expected that lower-tier municipalities must
  include servicing rationale as a foundation for their justification of where the
  community will grow.

## Employment Strategy:

- In order to plan for employment allocation and make determinations about employment land needs and densities, it is expected that a joint effort between the County and the lower-tier municipalities would produce the most beneficial results.
- > Refinement of the provincial Agricultural and Natural Heritage Systems:
  - Obtaining knowledge from the lower-tier municipalities and incorporating this into the mapping that the Province will consider for their updates to the agricultural and natural heritage systems will be critical in producing system maps that reflect on the ground realities.

### Policy Implementation:

- As the MCR background work is concluded, and is then used to create updated policy for the County Official Plan, input on draft language will be vetted to the lower-tier municipal planning staff for review and comments;
- Using this approach should allow for the lower-tier municipalities to use the same or similar policy language when their local official plans are being individually updated as the final stage of the overall MCR project.
- b) It is the Schedule 3 forecasts of the Growth Plan which relate to growth until the year 2041 and that is the schedule which forms the basis of the MCR. The 2041 forecasts must still be

distributed to all the lower-tier municipalities by the County, and this will occur through the MCR in conformity with the policies and requirements of the Growth Plan.

The Growth Plan forecasts in Schedule 7 represent a distribution of population and employment to the County and each of the individual lower-tier municipalities (as well as the cities of Barrie and Orillia) to the year 2031. The Schedule 7 forecast is already reflected in the County's Official Plan. Distribution of the population and employment forecasts of Schedule 7 was conducted by the province, not the County.

- c) The County must develop in a way that models the vision for growth as established in the Growth Plan. The Growth Plan 2019 outlines key components of this vision that includes:
  - ➤ The achievement of "complete communities", which are defined as follows.

Places such as mixed-use neighbourhoods or other areas within cities, town, and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. Complete communities are age-friendly and may take different shapes and forms appropriate to their contexts.

- Access to transit networks;
- Protection of employment lands;
- ➤ An increase to the amount and variety of housing available;
- Protection of the natural environment;
- Protection of agricultural lands;
- Support climate change mitigation and adaptation.
- d) The Growth Plan provides specific direction about "Where and How to Grow" which must be incorporated into decisions relating to the MCR.

As noted, the Growth Plan is founded upon the concept of accommodating forecasted growth in complete communities. It is expected that complete communities are developed in such a way that land consumption is minimized through compact built form by directing new growth to settlement areas, and prioritizing intensification.

The Growth Plan provides specific direction that existing urban land supply should be used efficiently to avoid over-designating land for future urban development, to take an intensification first approach to development, and to rely less on continuously expanding the urban areas.

- e) Managing growth will in large part be a function of planning for the population and employment forecasts in Schedule 3 in very specific ways, as outlined in Growth Plan policies.
  - ➤ The "vast majority" of growth will be directed to certain types of settlement areas.

- They must have a delineated built boundary;
- o Have existing or planned municipal water and wastewater systems; and
- Can support the achievement of complete communities.
- In Simcoe County specifically, the Growth Plan directs that the growth forecasts of Schedule 3 will be allocated to lower-tier municipalities in such a way that a <u>"significant portion"</u> of population and employment growth is directed to lower-tier municipalities that contain primary settlement areas.
- ➤ The primary settlement areas of Simcoe County as established by the Growth Plan are the Town of Collingwood, the Town of Midland together with the Town of Penetanguishene, and the communities of Alcona, Alliston and Bradford.
- ➤ The terms "vast majority" and "significant portion" are not defined by the Growth Plan, however planning staff consider these terms to be used as equivalents. In addition, County Council will be asked to confirm numeric parameters to associate with these terms as a way to shape future decisions on growth allocation by the County, and growth options from the lower-tier municipalities.
- Lower-tier municipal partners must consider proposed allocations of population and employment and confirm that their municipal infrastructure is capable of accommodating the allocations.
- f) The MCR can be completed in phases, rather than in one single amendment update.

In a letter dated November 12, 2019 Minister Clark clarified that municipalities may choose to take a phased approach to complete their MCR through multiple official plan amendments, refer to attachments. The purpose of this approach is to help ensure that the provincial government can deliver on its commitment to bring more homes to the market faster.

In accordance with the Growth Plan and the Provincial Policy Statement (PPS), it is necessary to ensure that an appropriate supply of homes are available. It is also important that these homes come in a variety of formats and prices, and also that they are located strategically so that the they can be serviced affordably and efficiently, address market needs and market demand, and support the achievement of complete communities.

Accordingly, the County should consider how a phased approach can contribute to achieving the policy objectives of the Growth Plan in an efficient manner. In regards to the growth allocation and growth management of population and employment forecasts, implementing this component of the MCR in phases would allow initial efforts to be focused on the areas of the County that have already been pre-determined by provincial policy through the Growth Plan to accommodate a significant portion of forecasted growth. Official Plan amendments relating to growth management would initially include the primary settlement areas, and then transition to separate amendments for other areas of the County.

Phasing the MCR will also allow for other components of the work plan to operate in parallel with one another, so that all efforts are not focused on one particular task, and so that all stakeholders, including lower-tier municipal partners, remain actively involved throughout the process. Overall, phasing the MCR offers a flexibility to the work plan which could be advantageous for a variety of reasons.

# MCR Work Plan: Key Tasks Summary

The Growth Plan outlines various requirements that must be completed in order to have enough background information available to inform the Official Plan Amendment so that conformity with the Growth Plan 2019 policies can be achieved. County Council provided authority for planning staff to proceed with preparing RFP's for the multiple projects for the MCR work to begin through report CCW 17-269, provided as a reference document.

With the approval of the Growth Plan 2019, it is now anticipated that the MCR background work will need to address the following matters, and will require that the appropriate consultant(s) are secured:

## **Land Budget Updates**

The Simcoe County land budget is a tool which is used to provide information on population and employment growth relative to available land supply and the relevant forecast from the Growth Plan. Land budgets have already been created to inform growth for the Schedule 7 forecast to the year 2031. The land budgets must be updated as part of the MCR in order to make growth management decisions using Schedule 3 of the Growth Plan for allocation of population and employment to the year 2041. Hemson Consulting has already been retained and is presently working on this task.

### **Provincial Agricultural System Refinement**

The Growth Plan requires that the provincial prime agricultural areas are identified in Official Plans. The Province has produced a map of the prime agricultural system throughout the Growth Plan area. The Growth Plan 2019 allows for a refinement of this mapping to be considered prior to implementation into Official Plans at the time of an MCR. Differences between the provincial mapping and the municipal mapping will need to be identified, and then work conducted to rationalize and justify refinements to account for any differences using methodologies outlined by the Province.

### **Provincial Natural Heritage System Refinement**

Similar to the agricultural system, the Province has produced a natural heritage system (NHS) map which applies to lands that are outside of the existing settlement areas. The Growth Plan requires that the provincial NHS is identified in Official Plans as a policy overlay, and develop appropriate policies relating to this system. The Growth Plan 2019 allows for a refinement of this mapping to be considered prior to implementation into the Official Plans at the time of the MCR, and differences rationalized and justified as part of the approval by the Province.

#### **Employment Strategy**

The Employment Strategy will examine employment needs for the County and make recommendations on how to accommodate these needs from a land use planning perspective. Determining location and quantity of new employment land, densities at which to develop employment land, potential for conversion of existing employment land, and determining whether employment area or settlement area expansions will be necessary are all components expected to be explored through this process.

## **Growth Management and Land Needs Assessment**

Building off of the population and employment land budget work completed, a land needs assessment will be completed in accordance with a standard provincial methodology. As noted earlier in this report, that methodology is presently being updated in order to meet the needs of the new Growth Plan 2019.

Factors pertaining to population and employment forecast allocation, a density target and intensification target will be used to determine the additional land needs for each partner lower-tier municipality to the year 2041. Settlement area boundary expansions may be necessary for certain municipalities, and it will be through this process that this will be determined. If necessary a preferred growth option will be required from the lower-tier municipality in order to confirm the manner in which any expansions should be accommodated. Decisions on expansions to meet the identified land needs would then be implemented as part of the Official Plan Amendments of the upper-tier and lower-tier municipalities.

# **Transportation Master Plan Update**

The County has previously completed a Transportation Master Plan (TMP) which was developed to clarify a future vision for transportation in Simcoe County. The transportation system is viewed as a significant variable when determining and shaping how the County should grow. Recent changes to the County transportation system network which include the LINX public transit service, purchase of the Lake Simcoe Regional Airport, and the future development of a new Metrolinx GO station in Innisfil must all be considered in an update to this TMP in order to assess potential implications on future growth management.

# **Climate Change Strategy**

The Growth Plan directs that the County will need to develop policies to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals. These policies must support numerous Growth Plan related priorities and include the achievement of complete communities as well as intensification and density targets, support transit and active transportation, protect natural heritage and the agricultural land base and the use of green infrastructure and low impact development. As a result, all growth management decisions, including where and how the County grows must be justified based on climate change policy objectives of the Growth Plan.

## Other Key Tasks for Consideration

There are a number of tasks related to the overall background work described above which will be necessary, and may be addressed either as part of the overall tasks, or dealt with directly by planning staff at the County in conjunction with the lower-tier municipal partners, as applicable. It is anticipated at this time that outside consulting services to obtain appropriate levels of information relating to these other key tasks may not be necessary. It is acknowledged however, that as the work plan evolves this assessment may change, and if it does, then planning staff will coordinate any necessary outside expertise.

# **Servicing and Infrastructure Review to Support Growth**

Unlike many other upper-tier municipalities, the County of Simcoe does not have the delegated responsibility of planning for, or implementing strategy and development of water and wastewater servicing. Since the carriage of managing municipal servicing is vested with the lower-tier municipalities, the consideration of this variable within the MCR process is more limited for the County.

It is acknowledged however, that long-term growth management should be considered in conjunction with the best available information about servicing infrastructure and future plans for it. Accordingly, it is expected that any direction provided from the lower-tier municipalities in regards to where they want to expand communities (if applicable) to accommodate forecasted growth, must be justified based on the realistic opportunity to service this growth in keeping with the policies of the Growth Plan. It will be necessary that through the sharing of information between the County and its lower-tier municipal partners that servicing considerations are confirmed and factored into the growth management exercise of the MCR.

## **Watershed Planning**

It is necessary in accordance with the Growth Plan that watershed planning is undertaken to support protection, enhancement, or restoration of the quality and quantity of water. The Growth Plan directs that watershed planning or equivalent is to be used to inform decisions on allocation of growth, amongst other matters.

Recent extensive work has been completed and is ongoing by the Lake Simcoe Region Conservation Authority and the Nottawasaga Valley Conservation Authority in regard to watershed management planning. The County of Simcoe has actively participated in this work, and as a result it is believed that there is sufficient information available that will be integrated into the MCR decision making process.

#### **Conclusion and Next Steps**

This report is being provided to PAC in order to offer an update on the MCR and to ensure that the principles and general work plan are accepted so that the exercise can continue to proceed.

To advance the work plan forward, the next priority will be to continue with the background work and research necessary to gather information required for future policy recommendations and decisions. Accordingly, the Request for Proposals for the work plan tasks will be drafted and issued to secure the necessary consultants to complete this work.

In addition, the County consultation program will be implemented. Initially this will entail establishing an information portal set up on the County website exclusive to the MCR project. As new information is generated it will be made public through the website, and offer an opportunity for public input to be gathered.

## **Financial and Resource Implications**

Funds for these projects have been allocated in the 2020 Operating Budget.

# **Relationship to Corporate Strategic Plan**

This Item may support the following strategic initiatives from the County of Simcoe's 2015-2025 Strategic Plan: A) Growth Related Service Delivery, B) Strengthened Social, Health and Educational Opportunities, D) Environmental Sustainability and F) Responsive and Effective Governance.

#### **Reference Documents**

**CCW 17-269** (September 12, 2017) Overview of Growth Plan, 2017 and the Potential Impacts on County and Local Municipal Planning Matters

#### **Attachments**

- Schedule 1 Ministry of Municipal Affairs and Housing Correspondence re: Schedule 3 of the Growth Plan 2019 (February 6<sup>th</sup> 2020)
- Schedule 2 Ministry of Municipal Affairs and Housing Correspondence re: Phased Approach for MCR (November 12<sup>th</sup> 2019)
- Schedule 3 General Timeline for MCR work program.

# Prepared By Dan Amadio, MCIP RPP Manager of Planning

Approvals	Date
David Parks, Director of Planning, Economic Development	March 24, 2020
& Transit	
Debbie Korolnek, General Manager, Engineering,	March 26, 2020
Planning & Environment	
Trevor Wilcox, General Manager, Corporate Performance	April 7, 2020
Mark Aitken, Chief Administrative Officer	April 7, 2020

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234-2020-177

February 6, 2020

Dear Head of Council:

As you know, the Greater Golden Horseshoe is a critical economic driver in the province and one of the fastest growing regions in North America. By 2041, the region is expected to accommodate approximately 13.5 million people and 6.3 million jobs.

To help accommodate this anticipated growth over the coming decades, our government released A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow) in May 2019. This new Plan will help manage growth so communities in the region can develop in ways that expand economic opportunities, build more housing, attract investments and create jobs all while maintaining protections for our cultural heritage assets, key employment and agricultural lands and environmentally sensitive areas, including the Greenbelt.

A key part of the successful implementation of A Place to Grow is understanding the future population and employment trends in order to put in place the housing and reliable employment we will need as the region grows. The population and employment forecasts in Schedule 3 of A Place to Grow are established at the upper-and single-tier municipal level and are central to stable, coordinated long-term growth management across the region. They help municipalities assess, plan for and integrate housing, infrastructure, economic, environmental and land needs to support future growth.

As a fundamental component of the A Place to Grow framework, it is imperative that the forecasts, be accurate and up-to-date to incorporate the best available data and reflect changes to the region's economy, housing supply and employment landscapes.

With that said, I am pleased to announce that the Ministry of Municipal Affairs and Housing (MMAH) has initiated a review and update of the Schedule 3 forecasts. To assist with this undertaking, MMAH has procured the services of Hemson Consulting.

As part of this work, the Ministry will be consulting with municipalities and key stakeholders through a series of advisory groups and technical workshops to provide insight on forecast-related issues, including potential revisions to the forecast methodology and an appropriate timing structure for updated forecasts to take effect.

The Ministry is working to complete this review no later than summer 2020.

If you have questions about the review and update of the forecasts, please feel free to contact Cordelia Clarke Julien, Assistant Deputy Minister, Ontario Growth Secretariat, Ministry of Municipal Affairs and Housing at <u>cordelia.clarkelulienontario.ca.</u>

I look forward to continuing to work together in the months ahead.

Sincerely,

Steve Clark

Minister

c:

Chief Administrative Officer

Stew Blank

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November 12, 2019

#### Dear Head of Council:

Earlier this year, our government introduced *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* as part of the **More Homes, More Choice: Ontario's Housing Supply Action Plan** to increase housing supply, create more jobs, attract business investments and better align our infrastructure. Today, I am writing to provide further clarity on two specific provisions in *A Place to Grow* as your municipality undertakes its work to meet conformity with the growth plan by July 1, 2022. This clarity is with respect to the government's position on the municipal comprehensive review process and the policy permitting settlement area boundary expansions of up to 40-hectares outside of the municipal comprehensive review.

As you will recall, *A Place to Grow* provides municipalities with greater flexibility in local planning decision-making. Notably, *A Place to Grow* helps ensure intensification and density targets better reflect growth rates, local realities and market conditions; allows municipalities to make changes to their settlement area boundaries more quickly and easily, while continuing to provide protection for employment and agricultural lands as well as natural areas; and provides policies that direct intensification around transit to increase the supply of housing and jobs near transit hubs.

To ensure that we continue to meet our commitment to build more homes faster, our government has taken the position that municipalities may choose to take a phased approach to their municipal comprehensive review through *multiple* official plan amendments. We recognize that one size does not fit all and that the current and potential changes in provincial and regional planning frameworks can make it challenging to do planning in a timely, efficient, and effective manner. As such, providing municipalities with the choice of phasing their municipal comprehensive review or achieving conformity as part of one single new official plan or plan amendment is responsive to the needs of local communities.

In addition to the flexibility provided in the approach to the municipal comprehensive review, our government has also taken the position that, so long as they meet applicable policies in *A Place to Grow*, there is no limit to how often a municipality can undertake the settlement boundary expansions of up to 40-hectares that take place outside of the municipal comprehensive review. The up to 40-hectare expansion, which

can either be municipally or privately initiated, supports our government's growth management objectives of allowing communities to develop in ways that expand housing and economic opportunities while maintaining protections for our environmentally sensitive areas, including the Greenbelt, cultural heritage assets, and key employment and agricultural lands.

While there are several other requirements in *A Place to Grow* that support our increased housing supply objectives, I wanted to bring clarity to these two specific planning provisions given their immediate impact on getting supply online faster. These policies, along with policies that allow for employment area conversions that facilitate the introduction of residential uses, provide opportunities for local decision makers to put forward plans that address housing supply goals in a timely manner. By ensuring that municipalities do not have to wait until the next municipal comprehensive review to implement planning changes, our government aims to get shovels in the ground quicker and to have development happen sooner.

It is anticipated that additional information on the implementation of *A Place to Grow* will be forthcoming. In the interim, if you have any questions and/or concerns, please feel free to contact Cordelia Clarke Julien, Assistant Deputy Minister, Ontario Growth Secretariat at <a href="mailto:cordelia.clarkejulien@ontario.ca">cordelia.clarkejulien@ontario.ca</a>. Thank you for your time.

Sincerely,

Steve Clark

Steve Blank

Minister of Municipal Affairs and Housing

c: Stephen Hamilton
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