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City of Toronto Growth Plan Conformity & Municipal Comprehensive Review: What You Need to Know to Get Ready

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A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) (the Growth Plan) was brought into effect on May 16, 2019, and municipalities are required to revise their official plans to ensure they conform thereto. The Minister of Municipal Affairs and Housing has established a deadline of July 1, 2022 to complete the required conformity exercise. While that date may seem far off, the work involved with undertaking a Growth Plan conformity exercise and Municipal Comprehensive Review (MCR) is no modest task. Municipalities across the province are in various stages of review and implementation, and the City of Toronto has now taken the first steps to initiate its official plan review. It is critical that landowners, developers, and other interested persons monitor and participate early to ensure their views are heard, and that they understand the potential impacts.

On June 16, 2020, the Minister announced proposed changes to the Growth Plan, “including updates and policy changes to the population and employment forecasts, a change to the Plan horizon year, 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.” The consultation period will close on July 31, 2020, and municipalities will need to incorporate these changes into their MCRs and conformity exercises. The proposed amendments can be found online:

- Proposed Amendment to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*: 019-1680
- Proposed Land Needs Assessment Methodology for *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*: 019-1679
- Proposed Amendment to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe on Ontario’s Regulatory Registry*: 20-MMAH006

City of Toronto

On June 15, the City of Toronto’s Planning and Housing Committee approved Planning Staff’s recommendation to make amendments required to align the City’s Official Plan with the Growth Plan (Item History here, and Staff Report here). Staff also recommended that Council authorize the commencement of

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the City's next MCR on August 4, 2020.

The Growth Plan requirements for MCRs fall into four thematic categories: managing forecasted growth through intensification, protecting employment lands, considering requests to convert employment areas, and updating environmental policies. The Staff Report outlines Planning Staff's proposed approach in its MCR with respect to each of these themes, and the highlights are summarized below. There may be changes required to the City's intended approach in order to conform to the revised Growth Plan.

Major Transit Station Areas

MTSAs are defined in the Growth Plan as areas within an approximate 500-800 metre radius of a transit station and representing a 10-minute walk. The Growth Plan prescribes minimum density targets for MTSA's as follows:

- 200 residents and jobs per hectare for subways
- 160 residents and jobs per hectare for light rail transit
- 150 residents and jobs for GO Transit rail

As part of the MCR, the City is required to individually delineate the boundaries for the 180+ MTSA within the City and to demonstrate that each MTSA is planned for the established minimum target. The City will perform local area studies to inform MTSA delineation where necessary, but also rely upon recently completed planning studies in an effort to avoid duplicating work. The Keele – St. Clair study has been expedited in order to support MTSA delineation in that area.

Delineated Protected MTSAs (PMTSA) are intended to form a subset of all 180+ MTSAs that the City delineates before the MCR is concluded. Those MTSAs prioritized for PMTSA candidacy are those enabling Transit Oriented Development, facilitating larger scale revitalization, implementing inclusionary zoning, and building upon recently completed planning studies where significant detailed work has been conducted. Two PMTSAs are already being advanced following the completion of the Keele-Finch study.

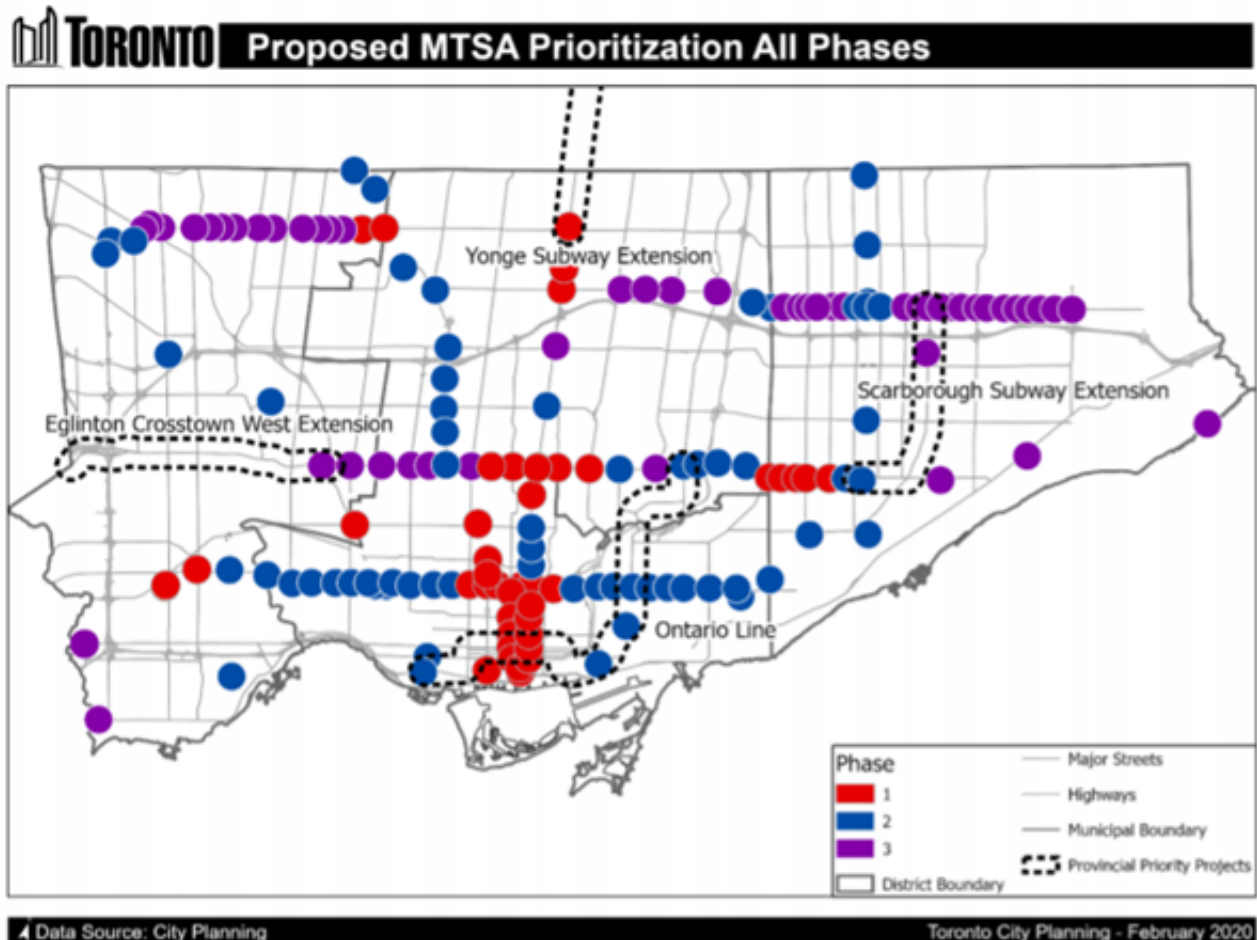
Attachment 2 to the report, sets out the recommended prioritization of delineation of each MTSA, which follows the phasing structure as follows:

- Phase 1 (approximately 40 MTSAs) – do not require local area studies, but do require that the station area already meets or exceeds the required minimum density targets and inclusionary zoning can be applied.
- Phase 2 (approximately 65 MTSAs) – Council may request the Minister to approve a lower density target. Any MTSA where a planning study has recently been completed or is nearing completion will be considered for designation as a PMTSA.

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- Phase 3 (approximately 50 MTSA) – require local area studies to demonstrate how the minimum density targets will be planned for.
- Additional MTSA (approximately 25) – do not yet have approved Environmental Assessments, but work is underway.

The following plan from the Staff Report denotes the proposed MTSA prioritization:



Inclusionary Zoning

This affordable housing tool is being prioritized for incorporation into each MTSA that is located in a strong or moderate market, as classified by the City. Strong market areas are “more easily able to absorb the impact of inclusionary zoning requirements, with only marginal impacts on land value.” Moderate market areas are those that do not meet the test for a strong market, but are still areas where significant new

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development is being supported.

Urban Growth Centres

Toronto's five Urban Growth Centres (UGC) each must be planned to achieve a minimum of 400 residents and jobs per hectare by 2031. All five UGCs already have secondary plans in place, two of which (Downtown and Yonge-Eglinton) were recently updated. Planning for focused reviews of the other three (North York Centre, Scarborough Centre, and Etobicoke Centre) are under way, and these will inform the delineation and density calculations for the related MTSAs.

Other Strategic Growth Areas

Strategic Growth Areas (SGA) can take many forms, including UGCs, MTSAs, and City Avenues. The Growth Plan allows municipalities to optionally delineate SGAs and assign densities to them as part of the MCR. While the City has not yet identified SGAs requiring delineation, it will monitor the need through the MCR process.

Land Needs Assessment

Staff are proposing to perform a Land Needs Assessment to determine the quantity of land required to accommodate forecasted growth through 2041. Through this, Staff will project population and employment forecasts across the City.

Conversion Requests

Staff have proposed an MCR commencement date of August 4, 2020, allowing Staff to start receiving formal requests this summer to convert lands designated *Core Employment Areas* or *General Employment Areas* to non-employment uses. During the previous MCR (resulting in Official Plan Amendment 231, still under appeal at the Local Planning Appeal Tribunal), the City received over 140 requests for conversion. Staff have recommended a set of standard policies for conversion and removal (see Attachment 3 to the Staff Report), and have recommended that the Chief Planner review options on introducing a fee associated with reviewing conversion requests.

Environmental Policies

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Another of the thematic categories of Growth Plan requirements is updating environmental policies. Staff are proposing to develop Official Plan policies based on conservation objectives related to water, energy, air quality improvement, integrated waste management, and stormwater master plans, but the Staff Report contains little detail around the proposed revisions or review process.

Engagement Strategy

While the details of the proposed engagement strategy remain hazy, Staff are developing an engagement strategy that is intended to explain the process, approach and outcomes; major areas of work; and associated timing. Its stated intention is to engage all Torontonians, businesses, and other stakeholders, including First Nations and Métis communities.

Why You Need to Get Ready Now

Conformity exercises and MCRs approved by the Minister are not subject to appeal. As a result, consultation with the City as it performs this work will be critical for those interested in redeveloping land.

Those with land within a potential MTSA should review Attachment 2 to the Staff Report to determine individual MTSA study status and prioritization, consult with the City about intentions for their site(s), and actively engage in the MCR consultation process due to the potential for a PMTSA to include unappealable property-specific constraints on development potential. Unappealable inclusionary zoning policies are also anticipated to be implemented on a wide-spread basis.

Other Municipalities

A number of other upper and single tier municipalities in the Greater Golden Horseshoe are at various stages of their own MCR's and have had to turn their minds to Growth Plan conformity. Municipalities that had already embarked on their MCR process prior to 2019 have adjusted their work programs and policy directions to align with the new Growth Plan, and may need to do so again. Examples of MCRs already underway are Halton Region, York Region, City of Barrie, Niagara Region, City of Brantford, Region of Durham, Region of Peel and County of Simcoe. Numerous lower tier municipalities have also embarked on official plan reviews to conform to their respective upper-tier official plans and the Growth Plan.