



Ontario
Home Builders'
Association

Discussion Paper

on

Places to Grow

Better Choices. Brighter Future

A Growth Plan

for the Greater Golden Horseshoe

by

Ontario **Home Builders' Association**

September 24, 2004



Ontario
Home Builders'
Association

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September 24, 2004

Growth Plan for the Greater Golden Horseshoe
Ministry of Public Infrastructure Renewal
Smart Growth Secretariat
777 Bay Street, 16th Floor
Toronto, Ontario, M5G 2E5

Re: Places to Grow: Better Choices. Brighter Future

Dear Minister

Thank you for the opportunity to present our views on *Places to Grow: Better Choices. Brighter Future* – a discussion paper on the province's plan for growth and economic expansion in the Greater Golden Horseshoe. OHBA supports in principle the direction of the Province's strategy. There is no doubt that a region wide plan is needed to manage growth to ensure that all Ontarians can expect a high quality of life, a healthy environment and a prosperous economy.

The primary issue that the government needs to address is housing affordability. Reductions in the supply of land through fixed urban boundaries and any further increases in levies, fees and development charges will impact the cost of housing for consumers.

We are also concerned that although the plans for targeted infrastructure and intensification are well warranted, please keep in that mind that unforeseen consequences could have detrimental effects on the local communities. The plan needs to have flexibility to adapt to an ever-changing marketplace. It was only five years ago that there was an acute shortage of rental accommodation throughout the province, yet today the vacancy rates are at 30 year highs.

Currently, in addition to this discussion paper, *Places to Grow*, there are several initiatives by the government, that are in the consultation phase – initiatives such as the Greenbelt Task Force, and Planning Reform in Ontario consisting of three consultation discussion papers on Planning Act Reform and Implementation Tools, Provincial Policy Statement: Draft Policies, and OMB Reform in Ontario.



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We wish to emphasize that the recommendations and policies of all these initiatives should be co-ordinated such that all the various ministries are involved in the final decisions and the land-use initiatives and policies arising from them are interwoven to create a comprehensive and definitive strategy for the province to address the anticipated growth over the next 30 years.

We are pleased to provide you with our comments and we would be pleased to meet with you to discuss the discussion paper in detail. Thank you for the opportunity to present our views. We look forward to hearing your decision in this matter.

Yours sincerely,

Peter Saturno
President
Ontario Home Builders' Association



Ontario
Home Builders'
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About OHBA

The Ontario Home Builders' Association was formed in 1962 with 10 locals to give residential builders a voice in the provincial government, facilitate changes in the industry, and provide links among home-building businesses, suppliers and services.

Now, it is comprised of an Executive Committee, Board of Directors, and nine different standing committees. OHBA consists of 3,600 member companies organized into 30 local associations across the province. Member companies include builders, developers, trades, suppliers and service professionals who employ over 250,000 persons in the private sector. OHBA represents the majority of the builders and developers in Ontario and we are the voice of the residential construction industry in Ontario.

Our members live, work and play in the municipalities that make up their community, and therefore, our comments should be taken in balance with the fact that we not only do business in the cities, towns and villages in Ontario, we also live and raise our families there.



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Executive Summary

The Ontario Government's goal is to provide long term benefits to Ontarians – new economic growth, more liveable communities, enhanced transportation choices, clean and safe water and improvements to the environment. Ontario also has to plan for the 4 million new residents who will reside in Ontario over the next 30 years.

This OHBA paper is in response to the Government's request for comments on their Discussion Paper on a Growth Management Strategy for the Greater Golden Horseshoe.

In general, OHBA supports the principle behind the strategies described in the discussion paper subject to the comments provided in this paper. We recommend that:

- The province offer a **balanced** vision for growth that weighs both economic and environmental needs and choice in housing;
- The province recognize that shelter is a necessity of life and provision of this necessity is as important as providing food (agriculture) and water;
- The definition of *Intensification* be revised so as to clarify that it can also be a tool used in new greenfield development;
- Reasonable goals be set for intensification and redevelopment - goals based on what individual municipalities can expect to achieve as a result of their own growth forecasts;
- All levels of government assist in formulating a financial plan, including providing financial guarantees, to make Brownfield Redevelopment increasingly viable;
- Planning tools be formulated to deal with minimum distance separation issues between incompatible land uses for Brownfield Redevelopment;
- Any review of the *Development Charges Act* be limited to reducing the amount of Development Charges payable by the new home purchaser;
- Any review of the *Development Charges Act* to provide incentives for redevelopment should not be at the expense of increased Development Charges for other residential projects;

- A "housing allowance" be provided for those in critical need of shelter;
- The *Development Charges Act* not allow mandatory exemptions to any level of government for the provision of affordable and/or social housing;
- Etobicoke City Centre be included in the list of Priority Urban Centres;
- The decision to designate Pearson International Airport and the John C. Munro International Airport as economic anchors be supported;
- The province align provincial investment decisions with the priorities of the growth plan;
- The environmental assessment process for critical infrastructure and transit projects be streamlined;
- The commitment to compact form and intensification not be exclusive of other forms of development;
- The condition of allowing an urban boundary expansion of a municipality only if a minimum 40% of the projected growth has been planned to be achieved through intensification be reviewed with the definition of *intensification*;
- The province work within existing legislation in determining the fairness of the distribution of the costs of development;
- The province expeditiously complete the Environmental Assessment process for the planning and construction of the Mid-Peninsula Transportation Corridor;
- The province consult with business to form partnerships and invest in the economic development of the region;
- The province implement its strategies for Integrated Regional Transportation Network and Sustainable Water and Wastewater Services;
- The province prioritize its investment in infrastructure funding primarily for "hard" services; and
- The province pass the legislation required to create the Ontario Strategic Infrastructure Financing Authority (OSIFA) to provide efficient and affordable financing for public infrastructure projects;

Finally, we recommend that, in addition to the strategies discussed in this paper, the recommendations of all current initiatives such as the Greenbelt Task Force, and Planning Reform in Ontario consisting of three consultation discussion papers on Planning Act Reform and Implementation Tools, Provincial Policy Statement: Draft Policies, and OMB Reform in Ontario, be co-ordinated such that all the various ministries are involved in the final decisions and the land-use initiatives and policies arising from them are interwoven to create a comprehensive and definitive strategy for the province to address the anticipated growth over the next 30 years.

We feel that the environmental, social and economic goals of Ontario should be a balance and in order to create and maintain that balance, the economic future of Ontario plays a very significant role. Without investments in job creation and employment opportunities, Ontarians will see a decline in their quality of life.

We are committed in our resolve to ensure that Ontario communities prosper and grow and are prepared to work with competing factions within the stakeholders to arrive at a workable solution that will enhance the quality of life for all Ontarians.



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OHBA Discussion Paper

on

Places to Grow

Better Choices. Brighter Future

1. About this Paper

On June 12, 2004, the Government of Ontario released a Discussion Paper on the province's plan for growth and economic expansion in the Greater Golden Horseshoe, from Peterborough to Barrie to Kitchener-Waterloo to Niagara Falls. The discussion paper is entitled *Places to Grow: Better Choices. Brighter Future*.

The Ontario Government's goal is to provide a comprehensive framework for managing economic and population growth in Ontario that promotes vibrant communities, a strong economy and enhanced environmental sustainability. Ontario also has to plan for the 4 million new residents who will reside in Ontario over the next 30 years.

This report represents a synthesis of the ideas gleaned from our membership and other sources of information. While there is an extensive debate in literature and discussion groups about smart growth development, much of it is more descriptive than analytical. The issue of why intensification and redevelopment is not more readily accepted by the population at large, and the barriers, obstacles and challenges confronting intensification/redevelopment projects, has not been examined in detail. There is even less information available about the best ways to overcome these challenges.

2. Our Vision

OHBA has a vision for a clean, green Ontario with a robust and healthy economy that consists of:

- strong and prosperous communities with a high quality of life;
- acceptance by all members of the communities to work together towards having strong economic growth;
- acceptance of regional and local identities within a larger social and economic community;
- an efficient, streamlined government with cost-effective delivery of services, using a rational and consistent set of policies for planning; and
- a level playing field with clearly defined rules allowing the private sector to provide safe, affordable, healthy and quality housing.

OHBA stresses that the builders and developers who make up its membership, must be part of the solution to achieve these significant goals and is committed to working together with the Government to ensure that the end results meet the objectives of OHBA and the Ministry so as to benefit the citizens of Ontario.

The new housing industry plays a significant role in the economics of Ontario. Housing starts in Ontario reached 85,180 in 2003 (of which 50,208 were in the GTA). Our members contribute approximately 3.3 direct and indirect person-years of employment per housing start and in 2003, the new housing industry provided employment for approximately 268,000 persons. The total economic activity generated by the new housing industry in Ontario was approximately \$19 billion in 2003.

The government has recognized that the home-building industry is an important part of the economic engine that makes Ontario a desirable place to live. It is important because it contributes to a prosperous economy, creates jobs and makes the dream of home ownership a reality for Ontarians.

When our members build a house, they help to build the foundations of their communities. They create jobs in the building trades, suppliers, professionals and other spin-off industries. People need to furnish their new homes, they redecorate, and they buy appliances. This helps the communities around the province to prosper.

3. Vision for Growth Management

The Ontario government has forecast that the population of Ontario will increase by approximately 4 million persons within the next 30 years. The new residents have to be housed and provided with job opportunities, education and recreation facilities.

It is also expected that the economy will grow by approximately 2 million jobs. This growth will help Ontario to continue to prosper by generating up to 67% of Ontario's GDP and nearly 33% of Canada's output.

Ontario needs to implement a strategic vision to ensure that new growth is healthy growth and contributes to the prosperity and sustainability of its communities by maximizing the benefits of growth and minimizing costs.

A vision for the Greater Golden Horseshoe has been put forth in the Government Discussion paper as adapted from the Central Ontario Smart Growth Panel submission.

It describes communities based on the pillars of a strong economy, clean and healthy environment and social equity, providing a wide variety of choices for living with modern well-maintained infrastructure and easy access to shelter, food, education, health-care, arts and recreation and information technology.

Further, an integrated transportation network plays an important role in the lives of Ontarians by allowing them choices for easy travel using public transport, roads, walking and cycling.

Urban centres would develop based on compact development patterns and the natural environment and agricultural lands would be protected. The economy of the Greater Golden Horseshoe would mature into an economic powerhouse of global significance so as to function as Canada's principal international gateway.

Ontarians would enjoy a high standard of living and an exceptional quality of life.

4. General

Historical trends suggest that growth in the Greater Golden Horseshoe has been at the rate of 120,000 persons per year for the past 20 years with the Greater Toronto Area and Hamilton accounting for almost 80% of that growth or 96,000 persons per year.

This trend is expected to continue. Almost 4 million new people are expected to call the Greater Golden Horseshoe as home in the next 25 years and almost 75% of these people will reside in the GTA and Hamilton.

There is still land within the existing urban boundaries of many municipalities that provides capacity to accommodate the projected growth. However, not all of the land within the urban boundaries is available for development. There may be socio-economic and geographic reasons why residential development cannot readily occur on all the urban land designated within a municipality's urban boundary.

Provision of suitable housing is a key factor in attracting new businesses to locate within the Greater Golden Horseshoe. Skilled workers in new industries will demand housing that meets their needs and wants and if the choice of housing is restricted, the potential of attracting new businesses will be limited. Generally, building upon the business and investment attractiveness of existing communities will require more than depending on the principle of being more efficient in the development pattern within existing urban areas.

OHBA feels that a balance is required between new greenfield development and development within the existing urban areas to provide affordable, attractive and healthy housing choices.

In general, OHBA supports the principle behind *Places to Grow: Better Choices. Brighter Future* and the five Growth Plan Objectives listed, subject to our comments in this paper.

5. Intensification and Compact Urban Form

OHBA believes that there should be a choice in housing.

Our members are supportive of intensification and redevelopment policies but believe that these policies should not be exclusive of other forms of development. We believe that opportunities should be provided for the sector of the public that want (or need) housing in the core of a community in the form of intensified medium to high density housing. Some of our members specialize in this form of housing development.

However, there is a large proportion of the population in Ontario that desires a single family dwelling, people who need space for their children to grow and to play in less intense neighbourhoods. To deny that opportunity for a family to live in a new single family dwelling is denying those persons the freedom of choice as to where they can live and raise their children.

The principle of *Intensification and Compact Urban Form* is often considered in conjunction with "Redevelopment and Intensification" within existing communities and neighbourhoods. The definition of Intensification implies "redevelopment within an existing urbanized area..". OHBA believes that this principle should not be restricted to redevelopment sites within an existing built-up area. Intensification and the Compact Urban form can also be a tool used in new greenfield development in order to achieve efficient use of land.

Any intensification or redevelopment project, small or large, is subject to opposition from neighbours because of the NIMBY (Not In My Back Yard) syndrome – that is human nature. How much this impacts on the decisions of the local municipal council depends on various factors such as the scale of the development, experience of council on understanding NIMBYism and how outspoken the objectors are.

We wish to stress that what Ontario's communities **need** is **not** necessarily the **same** as what the residents of the communities **want**.

The difficulty faced by OHBA members is that intensification projects are not easily accepted by existing residents of the community, especially in municipalities which have predominantly developed with low density housing form in the past. It will be difficult to break the existing trend of growth to achieve the growth management plan that is efficient and desirable.

We need a reasonable definition of intensification and redevelopment, a definition that sets reasonable goals as to what a municipality can expect to achieve of its own growth forecast through intensification and redevelopment.

What might work in one city may not necessarily work in another town and could be a disaster in a smaller rural community.

The Greater Golden Horseshoe area has many examples of intensification within existing urban envelopes. The communities of Toronto, York, East York and Hamilton demonstrate that they have developed at a relatively high density within their boundaries and all of the former municipalities within the amalgamated City of Toronto developed using the compact urban form.

For instance, North York has developed with an average density of 18.6 units per hectare with only 41% of the dwelling units being developed as low density housing.

This has been illustrated by Malone Given Parsons Ltd. in their paper *Analysis of Land Supply in the GTA-Hamilton Area*, July 2004. for UDI/Ontario. Appendix A from their report is reproduced below as Table 1.

Brownfield redevelopment will require special tools in the form of financial aid to allow developers to build on former industrial sites that may be contaminated. The main problem is the cost of remediation and lack of financing. All levels of government will need to formulate a financial plan to make Brownfield Redevelopment increasingly viable. Financial guarantees from the Provincial and Federal Government would be necessary to provide front end financing from institutional and private sources. Since most brownfield sites are located within existing industrial areas, planning tools will also be required to deal with minimum distance separation issues between incompatible land uses.

Table 1

Existing Density for Selected Municipalities in GTA-Hamilton Area

	Population ^[1]	Number of Dwellings ^[1]	Area (Hectares) ^[2]	Density (uph)	Occupied Dwelling Units ^[3,4]		
					High	Medium	Low
Aurora	40,167	13,412	1,853	7.2	4%	19%	77%
Brampton	325,428	98,753	12,650	7.8	16%	17%	67%
Burlington	150,836	59,020	5,733	10.3	16%	23%	60%
Hamilton	490,268	194,154	8,143	23.8	18%	20%	62%
Markham	208,615	61,618	6,250	9.9	9%	13%	78%
Mississauga	612,925	198,235	15,540	12.8	25%	18%	57%
Newmarket	65,788	21,589	2,607	8.3	6%	21%	72%
Oakville	144,738	50,000	7,526	6.6	13%	17%	70%
Pickering	87,139	27,188	2,679	10.1	7%	13%	80%
Richmond Hill	132,030	41,966	4,374	9.6	13%	17%	70%
Vaughan	182,022	54,359	6,141	8.9	7%	10%	83%

City of Toronto by communities (former municipalities)

	Population ^[5]	Number of Dwellings ^[3]	Area (Hectares) ^[2]	Density (uph)	Occupied Dwelling Units ^[3,4]		
					High	Medium	Low
East York	115,185	47,114	1,377	34.2	42%	14%	44%
Etobicoke	338,117	125,541	7,033	17.8	34%	17%	49%
North York	608,288	223,889	12,053	18.6	42%	17%	41%
Scarborough	593,297	195,968	10,933	17.9	35%	15%	50%
Toronto	676,352	313,208	7,945	39.4	38%	28%	34%
York	150,255	59,834	1,826	32.8	33%	22%	45%
Total	2,481,494	965,554	41,168	23.5	38%	20%	42%

Source:

^[1] GeoSuite 2001 Census (Catalogue No. 92F0085XCB)

^[2] The density used in this analysis is a gross number and contains land uses not generally included in Official Plan definitions. These uses include regional road rights-of-way; highways, valleylands/open space, mixed use commercial, retail and office lands along with the typically included uses of all residential areas, schools and parks. The only areas excluded from the measured urban areas would be: major open space corridors, major institutional uses such as airports, train yards and the employment/industrial lands.

^[3] PCensus 2001 data

^[4] Occupied dwelling units from 2001 census: High - Apartment 5 or more storeys; Medium - Row House, Apartment (detached duplex), and, Apartment less than 5 storeys; and, Low - Single-detached house; Semi-detached house; and, Other single-attached house

^[5] Statistics Canada 2001 Community Profile

Reprinted from: ***Analysis of Land Supply in the GTA-Hamilton Area***, July 2004, UDI/Ontario, Malone Given Parsons Ltd.

The suggested "review of the *Development Charges Act* to ensure that new development pays its fair share of the costs of growth..." is not supported by OHBA. The new housing industry is the most regulated and taxed industry in Ontario, after alcohol and tobacco. Comments such as those implied in the discussion paper that new development does not pay its fair share can be attributed to exemptions given by municipalities to *non-residential* Development Charges in order to attract business to the community. If a municipality favours the creation of employment lands within its boundaries, then the municipality as a whole should bear the cost of that development.

The possible use of mandatory exemptions in Development Charges By-Laws to provide incentives for redevelopment of existing areas should not be at the expense of increased development charges for other residential projects. If redevelopment of existing areas is considered for the social good of the community, then the community at large should contribute towards this goal. The new home purchaser should not bear the cost of redevelopment incentives.

OHBA acknowledges the principle that there is an obligation on the part of all citizens of Ontario (and Canada) to provide housing for the less fortunate members of our society. We believe in our social safety nets – that is the very fabric of our society that makes Canada the best place to live in the world.

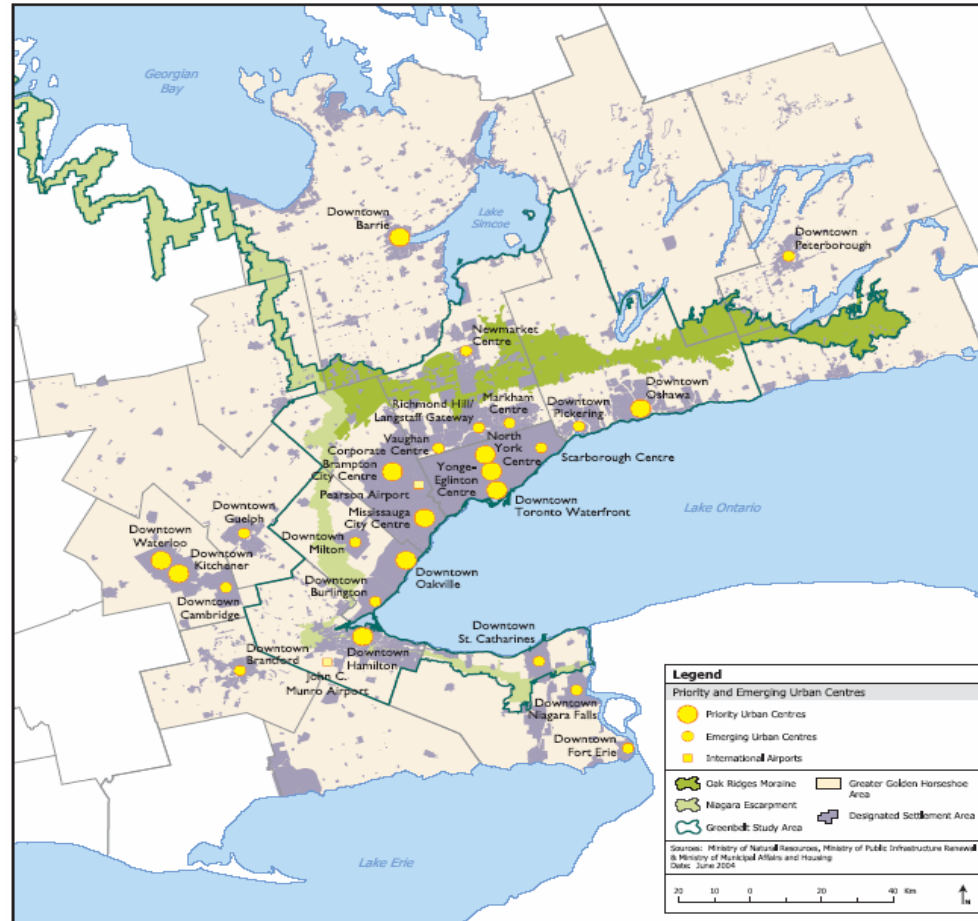
Therefore, we welcome the suggested action by the province to encourage the construction of more affordable and appropriate housing through capital funding under the federal-provincial Affordable Housing Program. We also suggest that a "housing allowance" be provided for those in critical need of shelter. Housing allowances take immediate advantage of existing vacant units rather than costly capital expenditures.

However, we are opposed to exemptions under the *Development Charges Act* that allow mandatory exemptions to all levels of government for the provision of affordable and/or social housing.

6. Priority Urban Centres and Emerging Urban Centres

OHBA supports the designation of Priority Urban Centres and Emerging Urban Centres. A copy of the Map 3 showing Priority and Emerging Urban Centres is reproduced below from the province's discussion paper *Places to Grow: Better Choices. Brighter Future*

Map 3: Priority and Emerging Urban Centres



Reproduced from *Places to Grow: Better Choices. Brighter Future*. A Growth Plan for the Greater Golden Horseshoe, Discussion paper, Summer 2004

We do have some comments on the choice of some of the centres. For instance, we question why Downtown Oshawa has been selected as a Priority Urban Centre. We feel that there may be other centres where it may be more prudent to invest in (such as Etobicoke City Centre) rather than Downtown Oshawa.

The designation of Pearson International Airport in Mississauga and the John C. Munro International Airport in Hamilton as economic anchors is supported by OHBA.

We also are in support of the strategies outlined by the province to encourage growth and prosperity in priority urban centres and emerging urban centres in the greater Golden Horseshoe. Specifically, we support the strategy to align provincial investment decisions with the priorities of the growth plan by locating provincial institutions and other facilities within urban centres.

We also support the strategy to streamline the environmental assessment process for critical infrastructure and transit projects. Most of the municipalities have been struggling with the burden of environmental assessments and Class EAs for the past few years and have found the process to be costly and burdensome as well as being subject to frivolous objections.

7. Future Growth Areas

We wish to emphasize that not all municipalities within the Greater Golden Horseshoe have sufficient land to accommodate the anticipated growth. The rate of growth in all areas is not the same and some municipalities are facing ever-increasing pressures to provide land to satisfy the need of housing.

Whereas, OHBA supports the principle of "*a greater commitment to compact form and intensification*," we also believe that there should be a choice in housing. We do not believe that intensification policies should be exclusive of other forms of development.

Therefore, the condition that adjustments to urban boundary expansions over the next five years only be considered in the five areas identified in the plan may essentially put the rest of the Greater Golden Horseshoe area on hold, waiting for the analysis for the next five years.

Also, one of the conditions of urban boundary expansion that "*the municipality has planned to accommodate a minimum of 40% of the projected growth through intensification*" may not be realistically achievable. We suggest that this condition be reviewed with the definition of intensification.

As mentioned before, one of the problems faced by our members on intensification projects is that they are not easily accepted by existing residents of the community, especially in municipalities which have predominantly developed with low density housing form in the past. It will be difficult to break the existing trend of growth to achieve the growth management objective that is efficient and desirable. To penalize the housing industry because of NIMBY attitudes of existing residents is unfair and impractical.

Also, as discussed previously, the definition of *Intensification* should not be limited to existing urban areas. There is a significant difference between land being "available" for redevelopment, land that is "designated" and land that is "marketable". There may be several instances of residential intensification and redevelopment cases where lands suitably designated are not necessarily available for development or redevelopment. Vacant land may be brownfield sites but circumstances and the level of contamination might prevent redevelopment opportunities for housing.

A municipality may elect to designate its entire community core for medium to high density redevelopment and that may satisfy the 10 year supply of designated and available land but all of the community core is not "available" for redevelopment because there are no owners that are prepared to tear down existing buildings and reconstruct on the same site (redevelop).

There may be socio-economic and geographic issues why residential development cannot readily occur on brownfield sites within a municipality. A majority of brownfield sites are located within existing industrial areas, thereby creating a conflict because of the incompatibility between industrial and residential uses. These brownfield sites would not be "*marketable*" for housing and therefore by designating them for intensification/residential use does not make them "available" for housing. The suggested strategy of 40% of new growth through infill and intensification could be interpreted by a potential new home purchaser to imply that

not only can I not buy a single family dwelling and therefore have to move into a high rise (or townhouse), but now I must move into a high rise in an undesirable area of the city.

OHBA believes that it is important to maintain a balance between the goals for intensification / redevelopment and greenfield development.

We would like to comment on the province's role to "*....ensure the costs of development are borne fairly by beneficiaries.*" We recommend that the province work within existing legislation in determining the fairness of the distribution of the costs of development. As discussed before, fairness should require that costs for the social (or other) good of the entire community are not transferred as a burden to the new home purchaser.

8. Economic Strength

We are supportive of the province's objective that the growth plan for the entire Greater Golden Horseshoe region shall "*focus on making it a more attractive place for businesses and workers to invest their skills and capital.*"

One of the strategies involves "*improving transportation efficiency for workers and goods both within the region and across its border to the United States.*" In this regard, it is critical that the planning and construction of the Mid-Peninsula Transportation Corridor be completed as soon as possible.

OHBA supports the expeditious completion of the Environmental Assessment and construction of the Mid-Peninsula Corridor, not only to ease congestion on the QEW and border crossings, but to also relieve development pressure on tender fruit lands adjacent the QEW corridor.

We welcome the government's economic development strategy of "*partnering with business and economic development organizations.*." so as to make the Greater Golden Horseshoe an economic powerhouse.

9. Small Town and Rural Communities

Our rural communities, though distinctive from the large urban centres, face the same growth pressures as increasing number of urban residents choose to move to the countryside. We endorse the province's strategies for our rural municipalities that will help to preserve their unique characteristics.

10. Infrastructure to Support Growth

Infrastructure funding is critical to achieving the strategies of implementing an Integrated Regional Transportation network and Sustainable Water and Wastewater services.

The Infrastructure of our cities and urban areas is badly in need of repair and expansions. Much of the infrastructure is outdated and is deteriorating due to age and lack of maintenance. Lifestyles have changed over the years and today's society uses more energy and consumer goods thereby putting an increased strain on our resources and services.

It is imperative that the planning of these infrastructure projects commence immediately. Upgrades to municipal sewer, water and road infrastructure put a large strain on municipal budgets and in most cases cannot be recovered through Development Charges because they relate to existing infrastructure.

Investment in strategic infrastructure is paramount in order that the quality of life of the people in the Greater Golden Horseshoe is maintained and enhanced. This investment should be prioritized such that infrastructure funding is primarily for "hard" services which have been neglected for a long time.

OHBA suggests that the source of infrastructure financing of major works such as transit, highways, water purification plants, wastewater treatment plants, should be from sources other than Development Charges. The affordability of new homes is at a threshold now because of fees, levies, taxes and charges for improved services required by municipalities. On an average this accounts for between \$20,000.00 and \$40,000.00 of the cost of a new dwelling depending on the municipality, which is a significant amount.

We recommend that the province make it a priority to pass the legislation required to create the Ontario Strategic Infrastructure Financing Authority (OSIFA) to provide efficient and affordable financing for public infrastructure projects. OSIFA would be funded by the sale of Infrastructure Renewal Bonds, a new financial instrument, which would be offered to institutional and individual investors.

We would caution the province in accepting the statement that *a more compact and efficient development pattern could save over 20% in infrastructure costs over the next 25 years in the GTA compared to current development patterns* at face value. There are several assumptions that need to be made in the design of infrastructure, especially infrastructure based on a watershed basis, which would counter-act the advantages of the compact urban form.

11. Protecting What is Valuable

We are appreciative of our precious natural water resources and we are supportive of strategies that would promote integrated and co-ordinated approaches to growth, source water protection and infrastructure planning within watersheds.

The creation of the Golden Horseshoe Greenbelt has been proposed by the province as a means of creating a permanent greenbelt around our most urbanized areas, thereby limiting any further development in that area. We suggest that whatever form the ultimate greenbelt takes, it should not preclude infrastructure links between the lands on either side of the greenbelt.

If infrastructure is prohibited from traversing the greenbelt, the effect would be to isolate the lands bounded by the greenbelt and Lake Ontario from the lands on the other side of the greenbelt for essential services such as water and wastewater systems, as well as transportation corridors.

12. Conclusions

The Greater Golden Horseshoe area is poised for an economic resurgence. The region has the potential to accommodate the province's growth over the next 30 years. We are in agreement with the objective of harnessing the strengths of the region so as to re-establish itself as an economic engine of the province and country.

Currently, in addition to this discussion paper, *Places to Grow*, there are several initiatives by the government, that are in the consultation phase – initiatives such as the Greenbelt Task Force, and Planning Reform in Ontario consisting of three consultation discussion papers on Planning Act Reform and Implementation Tools, Provincial Policy Statement: Draft Policies, and OMB Reform in Ontario.

We wish to emphasize that the recommendations of all these initiatives should be co-ordinated such that all the various ministries are involved in the final decisions and the land-use initiatives and policies arising from them are interwoven to create a comprehensive and definitive strategy for the province to address the anticipated growth over the next 30 years.

We feel that the environmental, social and economic goals of Ontario should be a balance and in order to create and maintain that balance, the economic future of Ontario plays a very significant role. Without investments in job creation and employment opportunities, Ontarians will see a decline in their quality of life.

OHBA is committed to working with the Province in creating the right balance and to ensure that Ontario is prosperous and healthy.