

July 24, 2020

Ontario Growth Secretariat
Municipal Affairs and Housing
777 Bay Street
23rd floor, Suite 2304
Toronto, ON M7A 2J3, Canada

Re: Proposal Number: 20-MMAH006/ 2.ERO 019-1679: Proposed Land Needs Assessment Methodology for A Place to Growth: Growth Plan for the Greater Golden Horseshoe.

Via e-mail: growthplanning@ontario.ca

Dear Ontario Growth Secretariat

I am writing to you regarding the proposed *Land Needs Assessment Methodology for A Place to Growth: Growth Plan for the Greater Golden Horseshoe*. The assessment provides the basis for the population and employment growth forecasts with which municipalities would be required to conform under the proposed revisions to the growth plan.

I was involved in the development of the original Places to Grow Legislation and Plan, including serving on the Ministerial Advisory Committee on Implementation of Places to Grow Plan (Greater Golden Horseshoe Growth Plan), with the then Ontario Ministry of Public Infrastructure Renewal. An extensive discussion of the 2005/06 revisions to the province's planning policies, including the introduction of the GGH Growth and Greenbelt Plans, and revisions to the Provincial Policy Statement (PPS) is provided in my book *Blue-Green Province: The Environment and the Political Economy of Ontario*.¹

The *Land Needs Assessment* occupies a central role in the overall revisions to the GGH Growth Plan being proposed by the province. Municipalities would be required to use a selected growth outlook from the Land Needs Assessment as the updated forecasts, or use higher forecasts as determined through the municipal comprehensive review, in revising their Official Plans and other planning documents to conform with the revised Growth Plan, by July 2022. Among other things the planning framework under the plan would be extended to 2051.

My comments are focussed on the overall approach to long-term planning embodied in the *Land Needs Assessment* and proposed amendments to the growth plan. I note that other expert commentators have observed that previous Growth Plan forecasts have over-forecast future population growth

¹ Vancouver, UBC Press, 2012. See also Winfield, M., "Environmental Policy: Greening the Province from the Dynasty to Wynne" in J.Malloy and C.Collier eds., *Government and Politics of Ontario 6th Ed.* (Toronto: University of Toronto Press, 2016).



in many parts of the region, leading to risks of the over-designation of land for urban residential uses, at the expense of agricultural lands and important natural heritage, ecological and hydrologic features and functions.² I also note that the Neptis Foundation, in its 2017 update on land supply in the GGH concluded that the “total unbuilt supply of land to accommodate housing and employment to 2031 and beyond now stands at 126,600 hectares,”³ a substantial expansion from the Foundation’s earlier assessments.

Land Needs Assessment and approaches to planning

The land needs assessment prepared for the ministry provides an interesting exploration of potential scenarios for the future of the region. However, as recent events and experience have demonstrated, the challenges associated with attempting to make projections related to economic activity and population dynamics over the kinds of timescales which the needs assessment attempts to cover are virtually insurmountable.

As the province’s Commission on the Reform of Ontario’s Public Services noted in 2012:

“There is a cone of uncertainty that broadens the further out into the future we look. There will always be errors, and the further out those forecasts and projections look, the larger the errors will be.”⁴

In that context, the projections presented in the *Land Needs Assessment* can only represent one of a range of potential future scenarios for the region. As such, municipalities cannot reasonably be required to adhere rigidly to the projections contained in the assessment, as the proposed revisions to the plan would have them do.

A much more flexible and adaptive approach to long-term planning is required. Such an approach needs to recognize and respond to the levels of uncertainty inherent in the timescales over which the needs assessment and revised plan propose to operate. These kinds of limitations to conventional planning models and the need for more resilient approaches are increasingly recognized among scholars and practitioners engaged in a wide range of long-term planning activities.⁵

² K.Eby, *Population Forecasting in the GGH: A Comparison of the Growth Plan Population Forecasts and the Ministry of Finance Population Projections* March 2020.

³ Neptis Foundation, *An update on total land supply: Even more land available for homes and jobs in the Greater Golden Horseshoe* (Toronto: Neptis Foundation, March 2017). <https://www.neptis.org/publications/update-total-land-supply-even-more-land-available-homes-and-jobs-greater-golden>.

⁴ Pg.90.

⁵ See, for example, Kato, Sadahisa and Ahern, Jack (2008) "Learning by doing':adaptive planning as a strategy to address uncertainty in planning", *Journal of Environmental Planning and Management*, 51:4, 543 — 559 https://scholarworks.umass.edu/cgi/viewcontent.cgi?article=1000&context=larp_grad_research. See also R.B. Gibson, ed., *Sustainability Assessment: Applications*, (London: Earthscan, 2016)

Experience within the province and elsewhere have highlighted the difficulties and risks associated with planning over multidecade timeframes. Projections over such timeframes will almost inevitably be subject to external, uncontrollable and unanticipated biophysical, technological, social economic and political events, which may alter fundamental assumptions upon which projections have been built. The current COVID-19 pandemic provides a prominent example of such an event. It is highly unlikely that it will be the only such event over the three decades covered by the *Land Needs Assessment*.

Modelling methodologies have no real means of anticipating these types of exogenous events. They may be able to consider specified types of disruptions to specific variables, but tend to operate on the basis of relatively linear projections of past behaviours, particularly over longer timeframes, with a relatively limited range of potential deviations. The *Land Needs Assessment* very much falls into this category of projection, largely relying on simple linear progressions of existing trends, particularly beyond the middle part of the current decade (i.e. 2024/25). Even then the assessment makes some surprising and unexplained assumptions, including a dramatic increase in domestic fertility rates between 2031 and 2046 (pg.12).

The scale of the uncertainties embedded in the proposed Land Needs Assessment can be conceptualized by projecting backwards over the kind of 30-year timeframe over which the *Land Needs Assessment* is to operate. An Ontario in 1990, for example, was a province which the world wide web/internet and cell phones barely existed, manufacturing still dominated much of the economy, and the scientific consensus around the mechanisms and impacts of climate change was only just being formalized. Looking forward, the impacts of pandemics like COVID-19, or changes in the biophysical environment, like climate change, on international travel and movement may affect future immigration and migration patterns for the province in ways that may be significant, but are unknown at this point.

As a result, plans flowing from the kind of rigid, linear approach embedded in the *Land Needs Assessment*, and the proposed revisions to the Growth Plan, have consistently failed to respond to changing circumstances and new societal needs. In fact, in many cases they have led to the massive overbuilding of infrastructure which was found to be no longer needed by the time it was completed. The province's own experience with long-term planning in the electricity sector highlights this point.

Both Ontario Hydro, and its successor for planning purposes, the Ontario Power Authority (OPA/now the Independent Electricity System Operator (IESO)), relied on linear, long-term forward projections of electricity needs, only to see their resulting plans overtaken by changing economic circumstances, specifically major declines in anticipated electricity needs due to structural economic change away from energy intensive

manufacturing and resource extraction and processing activities. The result, in Ontario Hydro's case, was a massive over-construction of electricity generating capacity at a cost that effectively bankrupted the utility. In the case of the OPA/IESO over-construction and technological inflexibility has been a significant factor in the dramatic increases in Ontarians' electricity bills over the past decade.⁶

In effect, the proposed *Land Needs Assessment* would act as the foundation for a similar rigid, inflexible and linear approach to municipal and provincial land-use and infrastructure planning, implemented through the revised growth plan. The likely effect, in the GGH is, among other things, the over-designation of land for urbanization. Within the region those lands are typically subject to existing high-value uses, including agriculture, and can represent natural heritage and hydrological systems and features providing important ecological services to the region's population.⁷

The scale of the environmental, economic, social, political and technological uncertainties over the proposed thirty year life of the needs assessment mean that it cannot act as the sole basis for planning to which GGH municipalities must rigidly adhere, as proposed in the revised growth plan. To do so would almost certainly result in decisions that do not align with the actual needs of GGH residents decades from now. At best the proposed *Land Needs Assessment* should represent maximum levels of growth which municipalities are not permitted to plan to exceed, rather than a minimum around which they must plan.

More contemporary approaches to long-term planning have emphasized the importance of recognizing the scale and significance of the uncertainties over multi-decade timeframes. More flexible, resilient, responsive and adaptive approaches to planning have been adopted as a result. In the case of the GGH, this would require granting much greater flexibility to municipalities in assessing future land needs, and for those needs to be re-assessed and revised over much shorter timeframes. A more incremental and iterative process is required to ensure the alignment of planning decisions with changing environmental, economic and social conditions. A simple linear planning model, like that proposed through the *Land Needs Assessment* and revised Growth plan, is unlikely to bring positive results in an increasingly non-linear world.

⁶ See generally MacWhirter, R., and M. Winfield, "The Search for Sustainability in Ontario Electricity Policy." in G. Albo and R. MacDermid eds., *Divided Province: Ontario Politics in the Age of Neoliberalism* (Kingston/Montreal: Queens-McGill University Press 2019).

⁷ See Sara J. Wilson, *Nature on the Edge: Natural Capital and Ontario's Growing Golden Horseshoe* (Vancouver; David Suzuki Foundation, 2013). <https://davidsuzuki.org/wp-content/uploads/2018/02/nature-edge-natural-capital-ontario-golden-horseshoe.pdf>. See also M. Anielski, *Investing in the Future: The Economic Case for Natural Infrastructure in Ontario* (Toronto: Greenbelt Foundatio 2019), [https://d3n8a8pro7vhmx.cloudfront.net/greenbelt/pages/12305/attachments/original/1591017841/GB EconomicCase_REPORT_e-ver.pdf?1591017841](https://d3n8a8pro7vhmx.cloudfront.net/greenbelt/pages/12305/attachments/original/1591017841/GB_EconomicCase_REPORT_e-ver.pdf?1591017841).

Moreover, the projections contained in the *Land Needs Assessment* are completely disconnected from any consideration of the biophysical realities and limitations (e.g. groundwater supplies) within the region. There is no consideration, for example, of the impacts of the levels of urbanization that could be required by the assessment on natural heritage features, prime agricultural lands, or hydrological systems and features.

The Ministry of Environment, Conservation and Parks' Water Quantity Working Group, for example, has recently concluded that the combined impacts of population growth and climate change will lead to unsustainable rates of surface water use in some areas of the GGH.⁸ Individual municipalities must have the flexibility to take these kinds of constraints into account in their planning activities.

The province has offered no discussion of the overall quality of life and livability of a region like that envisioned through the *Land Needs Assessment* and revised Growth Plan. The situation invites questions around whether the future projected by the assessment is environmentally or economically sustainable, or if it is even desirable from the viewpoint of the region's residents.

I would be pleased to discuss my comments on this matter with ministry and Ontario Growth Secretariat staff.

Yours sincerely,



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Cc: The Hon. Steve Clark, Minister of Municipal Affairs and Housing
Jeff Burch, MPP, NDP Municipal Affairs Critic
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Mike Schreiner, MPP, Green Party Leader
Jerry DeMarco, Environmental Commissioner of Ontario

⁸ Ontario Ministry of Environment, Conservation and Parks, *Assessment of Water Resources to Support a Review of Ontario's Water Quantity Management* presentation to Water Quantity Protection External Working Group, July 10, 2020.