An update on the total land supply: Even more land available for homes and jobs in the Greater Golden Horseshoe

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This is the third in a series of Briefs on the land supply for future urban development designated by municipalities across the Greater Golden Horseshoe to accommodate growth to 2031. This Brief sums up the supply of land in (a) the Designated Greenfield Area (DGA), (b) unbuilt areas within Undelineated Built-up Areas (UBUAs), (c) land added through boundary changes to Barrie and Brantford and (d) Amendment 1 to the Growth Plan. Altogether, the supply of unbuilt land for housing and employment planned until 2031 and beyond is 125,600 hectares.

How much land is available for development in the Greater Golden Horseshoe?

Determining how much land has been set aside to accommodate future housing and employment across the Greater Golden Horseshoe is a fluid process, because land supply data are not fixed once and for all. Ontario Municipal Board decisions, amendments to local official plans, and boundary adjustments constantly alter the numbers.

In the first phase of analysis in 2013, Neptis researchers focused on estimating the extent of the “Designated Greenfield Area” (DGA).¹ This was land set aside by municipalities in land budgeting exercises to accommodate the population and employment targets allocated by the Province for the period 2006–2031 in the Growth Plan for the Greater Golden Horseshoe. The purpose of this research was to determine how much new DGA was being added to the land that had already been set aside in municipal plans before the establishment of the Growth Plan.²

Since 2013, some lands have been reclassified, several official plans have been amended, and certain municipal boundaries have been redrawn. Neptis has therefore updated the analysis to arrive at a current estimate of the total land supply to 2031 and beyond.

Updated mapping that delineates the built-up area as of 2016 extends the analysis to include all “settlement areas” in the GGH and allowed Neptis researchers to calculate how much of the total land supply remains unbuilt. This analysis is part of the continuing work of the Neptis Foundation to understand and visualize how the region will grow in the decades to come.

² The study found that 88,000 hectares had been designated before 2006, and a further 19,100 hectares between 2006 and 2013. Allen and Campsie, Implementing the Growth Plan, Table 3.9. http://www.neptis.org/publications/how-will-growth-be-accommodated/chapters/land-supply-question
Figure 1: Components of the land supply in the GGH to 2031 and beyond

Our estimate of the *unbuilt* supply of land to accommodate housing and employment to 2031 and beyond now stands at **125,560** hectares.

The breakdown of the total land supply is as follows:

- **Designated Greenfield Area (DGA):** this land totals almost 103,200 hectares, fairly evenly split between the Inner Ring (Greater Toronto Hamilton Area) and the Outer Ring; about 87,440 hectares remains unbuilt.

- **Undelineated built-up area:** 31,250 hectares of unbuilt land remain in within the settlement boundaries of small towns, villages, and hamlets across the region, which altogether total 50,240 hectares.

- **Municipal Boundary Adjustments:** More than 5,000 hectares have been added to the Cities of Barrie and Brantford as the result of boundary adjustments and annexation.
Amendment 1 and the Simcoe Sub-Area exception: more than 1,800 hectares have been added in Simcoe County through Amendment 1 to the Growth Plan.

<table>
<thead>
<tr>
<th>Components of land supply</th>
<th>Unbuilt as of 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Designated Greenfield Area (DGA)</td>
<td>87,440</td>
</tr>
<tr>
<td>Undelineated Built-up Area (UBUA)</td>
<td>31,250</td>
</tr>
<tr>
<td>Municipal Boundary Adjustments</td>
<td>5,010</td>
</tr>
<tr>
<td>Amendment 1, Simcoe County</td>
<td>1,860</td>
</tr>
<tr>
<td><strong>Total remaining unbuilt</strong></td>
<td><strong>125,560</strong></td>
</tr>
</tbody>
</table>

The new total incorporates recent analysis by Neptis,\(^3\) which shows that a significant amount of unbuilt land remains inside the settlement areas of hundreds of rural towns, villages, and hamlets across the region. The Growth Plan explicitly states that these small settlements are not meant to accommodate much growth because most do not have full municipal water and wastewater systems.\(^4\) Nonetheless, these settlements face increasing development pressure.

**Components of the land supply in the GGH**

![Figure 2: Unbuilt land supply in the Inner (GTHA) and Outer Rings of the GGH as of 2016](image)

**Designated Greenfield Area**

The Growth Plan defines the Designated Greenfield Area (DGA) as “the area within a settlement area that is not built-up area.”\(^5\) The DGA can accommodate up to 60 percent of residential development as well as employment and other uses. The remaining 40 percent of residential development is directed to existing built-up areas in the form of intensification.

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\(^4\) Ministry of Public Infrastructure Renewal, *Growth Plan for the Greater Golden Horseshoe*, 2006, section 2.2.2j.
The DGA includes lands that were approved for development before the Growth Plan was established in 2006, as well as new land added since then. The amount of land for development is calculated through a land budgeting exercise whereby municipalities (1) convert population allocations to housing units and the land needed for those units, and (2) allocate employment forecasts to the land needed for different types of employment.

There is a minimum density requirement of 50 people and jobs per hectare for development in Designated Greenfield Areas (certain Outer Ring municipalities are allowed to use lower density targets).6 This requirement is calculated across the entire DGA of an upper-tier municipality, such as York Region. This means that lower density in one part, such as the Town of Whitchurch-Stouffville, could be compensated for by higher density in the neighbouring City of Markham, which are both part of York Region.

In 2013, the Neptis estimate of the total DGA across the Greater Golden Horseshoe was about 107,100 hectares. Since then, we have revised our estimate following Ontario Municipal Board decisions and amendments to local official plans, to arrive at our new estimate of about 103,200 hectares in total.

For example:
- In Pentanguishene and Midland, land previously identified as DGA has been reclassified as “land not for urban uses.”
- In Peel Region, new settlement areas have been added in the Town of Caledon.
- In Waterloo Region, a 2015 Ontario Municipal Board decision reduced the amount of DGA, reversing an earlier OMB decision that had established a larger DGA but had been opposed by the Region.7

Note that the DGA estimate is a gross number, and includes areas that may not be developable, such as wetlands, woodlands, and other “take-outs.” However, for the DGA municipalities account for these take-outs as part of the land budgeting process that ultimately determines the DGA boundary.

Undelineated Built-Up Areas (Rural Towns, Villages, and Hamlets)

The Growth Plan makes a clear distinction between, on the one hand, urban settlements with full municipal water and wastewater systems and, on the other, rural settlements (small towns, villages, and hamlets) that depend on private or communal wells as a source of water and on septic tanks for wastewater disposal.

The distinction underpins a key goal of the Growth Plan: that of “directing major growth to settlement areas that offer municipal water and wastewater systems and limiting growth in settlement areas that are serviced by other forms of water and wastewater services.”8

Early on during the implementation of the Growth Plan, the Province decided that these rural settlement areas would not be a focus for growth. As a result, the Province never delineated a boundary between the built-up and unbuilt areas as it had done for more urbanized areas. The Province called areas with limited or no municipal servicing undelineated built-up areas (UBUAs), although these settlements are delineated in municipal official plans. This decision meant that the Province did not know just how much unbuilt land lay within these rural settlement areas.

6 In the 2016 draft of the amended Growth Plan, this target has been increased to 80 people plus jobs per hectare.
8 Ministry of Public Infrastructure Renewal, Growth Plan for the Greater Golden Horseshoe, 2006, section 2.2.2j.
Neptis has included unbuilt land within the undelineated built-up area as part of the total supply for the following reasons:

1. New Neptis analysis shows that 31,250 hectares of the 50,240 hectares that lie within the rural settlement boundaries shown on municipal official plans (about 62 percent), is unbuilt. This is a significant supply of potentially developable land.

2. Contradictions between the Growth Plan and other Provincial documents have blurred the distinction between these settlements and urban settlements such that some municipalities are counting development in UBUAs as “intensification.”

3. In Simcoe County, which has planned for almost 40 percent of its growth to be in the form of intensification, about 65 percent of the units that have been approved as intensification are being directed to UBUAs; 83 percent of these units are in the form of single detached housing units.

4. Proposed amendments to the Growth Plan could entrench the approach taken by Simcoe County and would allow other municipalities to count growth in UBUAs, even in the form of housing units on previously undeveloped land, as “intensification.”

5. Finally, infrastructure planning is already taking place in municipalities such as Simcoe County to extend urban services to rural settlement areas (thereby allowing leapfrog growth instead of the contiguous outward growth of urban areas), even though the Growth Plan explicitly directs major growth to settlement areas that already offer municipal water and wastewater systems and limits growth in settlement areas that are serviced by other forms of water and wastewater systems.

Barrie Annexation and Brant County–Brantford Boundary Adjustment Lands

Municipal law in Ontario allows for the restructuring of municipal boundaries through annexations and amalgamations.

Since the Growth Plan came into existence, two significant boundary adjustments in the GGH have been allowed by the Minister of Municipal Affairs, resulting in more than 5,000 hectares of rural land being added to the land supply.

In the Barrie–Innisfil Boundary Adjustment, an almost built-out Barrie was allowed to annex almost 2,300 hectares from neighbouring Innisfil in 2009. This annexation was followed in 2016 by the Municipal Boundary Agreement between rural Brant County and the City of Brantford, which resulted in 2,720 hectares of mostly prime agricultural land being brought into the urban envelope.

Neptis did not initially include the Barrie annexation lands as part of the DGA supply because it was unclear whether these lands would form part of the 2031 supply. Secondary plans for a significant portion of these lands

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10 These percentages are derived from Neptis’s analysis of the land budget for the County of Simcoe (the land budget was retrieved from http://www.simcoe.ca/dpt/pln/growth).

11 The 2016 draft of the amended Growth Plan states that “The built boundary consists of delineated and undelineated built-up areas.” Since all development within the built boundary is considered intensification, development in UBUAs would be treated as intensification. Proposed Growth Plan for the Greater Golden Horseshoe, 2016, section 7. Retrieved from https://placetogrow.ca/index.php?option=com_content&task=view&id=420&Itemid=101


now show that development is being planned under the current Growth Plan DGA requirements of 50 people and jobs per hectare and within the 2031 planning horizon.

The planning horizon of the Brant County–Brantford boundary adjustment lands is not yet clear, as Provincial approval took effect in January 2017.14

Amendment 1 Lands (Simcoe County and the Cities of Barrie and Orillia)

The Province introduced Amendment 1 to the Growth Plan in October 2010. The Amendment specifically focused on Simcoe County and the cities of Barrie and Orillia, creating special policies in the Growth Plan not available to other municipalities in the Greater Golden Horseshoe.

The policies involved two key changes:

(1) The creation of two strategic settlement employment areas along Highway 400, one in Bradford West Gwillimbury and the other in Innisfil just south of Barrie, as well as the creation of two other employment districts northeast of Barrie.15

(2) The creation of seven primary settlement areas when previously there was only one growth node in the area, the City of Barrie. The six other primary settlement areas are Alcona, Alliston, Bradford, Collingwood, Orillia, and Penetanguishene/Midland.16

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14 For the full text of the agreement, see http://www.brantford.ca/Projects%20Initiatives%20CityCounty%20Boundary%20Adjustm/Brantford-BrantSignedOrder.pdf

15 See Ministry of Infrastructure, Growth Plan for the Greater Golden Horseshoe, Office Consolidation 2013, section 6.4.1.

16 See Ministry of Infrastructure, Growth Plan for the Greater Golden Horseshoe, Office Consolidation 2013, Schedule 8.
The Province’s rationale for the Simcoe exceptions was that the sub-area was “facing intense growth and development pressures” while containing “important environmental assets for the Greater Golden Horseshoe.”

The creation of the primary settlement areas did not add any new land to the urban envelope, but the creation of the strategic settlement employment areas along Highway 400 and the other two employment nodes did add 1,861 hectares that were previously not eligible for development under Growth Plan rules.

Strategic settlement employment areas are defined in the Growth Plan as being “planned and protected for employment uses that require large lots of land and depend upon efficient movement of goods and access to Highway 400. These are not settlement areas. Major retail and residential uses are not permitted.”

Neptis has included these lands in its total land supply estimates because these areas are part of the urban envelope. Municipal water and wastewater infrastructure plans link them to other settlement areas. Although

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19 See Ministry of Infrastructure, Growth Plan for the Greater Golden Horseshoe, Office Consolidation 2013, section 7, p. 55.
these lands were intended for employment uses only, pressure is building in Bradford West Gwillimbury, which has a strategic settlement employment area on Highway 400, to convert employment lands to residential uses, based on the argument that there is an oversupply of employment lands in the municipality.\footnote{See, for example, letter from Keith McKinnon, KLM Planning Partners, to Ryan Windle, Office of Community Planning, Bradford West Gwillimbury, October 4, 2016, retrieved from http://www.townofbwg.com/Shared%20Documents/Planning/OPReview_Comments/2016-10-04_Lormel_Developments.pdf}

**Conclusion**

The total unbuilt supply of land to accommodate housing and employment to 2031 and beyond now stands at almost 125,600 hectares.

Most of that land is in the Designated Greenfield Area contiguous to existing built-up urban areas, where full municipal water and wastewater servicing is available or planned.

However, the second largest amount of land is in Undelineated Built-up Areas, areas that were never meant to be a focus of growth. Proposed changes to the Growth Plan would, however, allow municipalities to direct growth to these areas and count that growth as part of municipal intensification. Such a change would encourage leapfrog development and undermine the goals of the Growth Plan.

The third largest amount has been added to the total by way of urban boundary expansions near Barrie and Brantford.

The fourth and final amount is in the form of employment areas added to the County of Simcoe through Amendment 1 to the Growth Plan. Although at present residential growth is not permitted on these lands, there may be pressure to convert them to residential settlements, which would also undermine the goals of the Growth Plan.

The total inventory of land is sizable, and any future proposals for boundary expansions should take into account the amount of land already available for development.

Understanding the total amount of land available for development outside the built-up areas in the region is the question Neptis set out to answer in this Brief. But understanding the *location* of that land is equally important. Not all the land is equally appropriate as the focus of growth in the Greater Golden Horseshoe.

It is equally important to understand and calculate the supply of land available for intensification in the built-up urban areas of the region. This is an essential element of the land supply that needs to be monitored in order to deliver on the intensification-first principle of the 2016 Growth Plan.