

Factors Contributing to the Lengthy Time from Designation of Greenfield Lands to Building Housing: Two Halton Region Case Studies



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*The opinions expressed in this research report are those of the authors only and do not represent the opinions and views of either CUR or Toronto Metropolitan University.

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Executive Summary

Many homebuyers in the Greater Toronto and Hamilton Area (GTHA) habitually prefer ground-related housing, particularly single-detached houses. As a result, municipalities plan for ground-related housing on undeveloped lands (greenfields) adjacent to their built-up areas. Unfortunately, it is common to take ten years or more for new housing development to start once greenfield lands are designated for residential use. This protracted planning process delays bringing serviced sites to the marketplace, leading to a lack of supply and higher prices for ground-related housing.¹

This paper explores the factors contributing to the lengthy process of bringing designated greenfield land to the housing development stage. It provides the results of in-depth analyses of the various steps and timelines in the planning process for two case studies in Halton Region: North Oakville in the Town of Oakville and the Boyne Survey in the Town of Milton. Halton Region is interesting since it has a sizable inventory of designated greenfield land. Still, its share of housing starts in the Greater Toronto Area (GTA) is lower than in the early 2000s.

Key Findings

- **The time to prepare designated lands for housing production is indeed lengthy**

The case studies confirm the lengthy timelines for transforming greenfield lands

¹ BILD (2022). 'Municipal Benchmarking Study, Greater Toronto Area.' Altus Group. [Online] Available: <https://www.bildgta.ca/wp-content/uploads/2022/09/Municipal-Benchmarking-Study-2022.pdf>. This report looks at several areas, including municipal approval processes, timelines for approvals, and government charges, that have direct links to issues related to housing supply and/or housing affordability. These include the costs of developing new housing, as well as the factors that impact the timeliness in which developers and landowners can bring new housing supply onto the market. It concluded that the lengthy and worsening approval timelines and escalating municipal costs increase the price floor that units need to be sold at to be feasible. The result is fewer units get built.

for residential development: 12 years for North Oakville (from 1999 to 2011) and 18 years for the Boyne Survey (1999 to 2017).

- **Each primary phase of the planning process contributed to the lengthy approval process**

In North Oakville, the timelines following the designation of these lands as greenfields in Halton Region's Official Plan were as follows:

- Approval of the land designation in the Oakville Official Plan **3 years**
- Ontario Municipal Board (OMB) decision on landowners' appeal regarding Secondary Plan delays **4 years**
- Approval of North Oakville East Secondary Plan **2 years**
- First new housing starts **3 years**

For the Boyne Survey lands, this process was more complex. The timelines following the designation of these lands as greenfields lands in Halton Region's Official Plan were as follows:

- Milton Council adoption of Boyne Survey Secondary Plan **11 years**
- Halton Region adoption of Milton Secondary Plan **3 years**
- Ontario Municipal Board (OMB) approves Secondary Plan **2 years**
- Milton Council approves Tertiary Plan modifications **2 years**

In fairness, the Boyne Survey lands were intended to be the final phase to bring in three sizeable greenfield land areas designated for residential development in Halton Region's Official Plan, which was part of Milton's planned growth till 2011.

Conclusions

Timelines of 12 and 18 years for transforming designated greenfield lands to approved sites with trunk services cause housing shortages in the GTHA, a critical issue for a region seeing dynamic growth. Our research supports criticism of the current provincial planning system that substantial changes are required to shorten the planning approval process for all applications, whether for greenfields or the redevelopment of existing urban areas.²

Additionally, data for certain parts of the process which contribute to the extended timelines are not readily available, such as the timelines for the application process for draft approval and for registration as well as servicing constraints. However, the Province is moving to address these delays through the *More Homes for Everyone Act* (Bill 109) and *More Homes Faster Act* (Bill 23).

Other findings include the following:

- The inadequate supply of short-term land, results from arduous, lengthy, and uncertain municipal approval regimes; and
- The process of appeals to the Ontario Land Tribunal (previously the Ontario Municipal Board), a common occurrence under the current planning system, is a significant determinant in the time necessary to bring designated lands to market.

Recommendations

We recommend that municipalities target timelines of five years after the designation of greenfield lands in their Official Plans until the lands become part of the short-term land supply as defined in the *Provincial Policy Statement*. Secondly, we recommend an emphasis on a better collection of timeline data on each phase of the land use planning process.

2 BILD (2022). 'Municipal Benchmarking Study, Greater Toronto Area.' Altus Group. [Online] Available: <https://www.bildgta.ca/wp-content/uploads/2022/09/Municipal-Benchmarking-Study-2022.pdf>.

Background

An ample supply of sites in both built-up and greenfield areas that have received land use planning approvals and are serviced (short-term land sites) is essential to the sustained production of a range of new housing. Unfortunately, the Greater Toronto and Hamilton Area (GTHA) has lacked an ample supply of short-term land sites for a range of housing for at least 15 years and this has had consequences for affordability. This situation arises from an arduous and lengthy municipal approval process and a lack of urgency by municipal politicians and their staff advisors. This is illustrated by the Region's failure to monitor its short-term land supply by unit type as required by Policy 1.4.1 of the *Provincial Policy Statement*.

The planning system is failing to respond urgently to the Province's household growth forecasts by type of housing unit occupied. In addition, it generally does not provide for the additional units needed to create a balanced market vacancy rate and the need to replace existing units lost from the existing housing stock (e.g. demolitions and fires).³ As a result, past shortfalls have accumulated and must be replenished if affordability is to be enhanced significantly. The shortfall in the production of ground-related housing (single- and semi-detached houses and townhouses) in the Greater Toronto Area (GTA) is significant.⁴

3 Accommodating household growth is the largest component of housing need. Other components include sufficient vacancies to create balanced market conditions and the replacement of net units lost through demolition, fire and conversion of housing units to non-residential uses. Since the early 1990s most of these long-term household forecasts have been prepared by Hemson Consulting Limited. Units are also needed to counter the underproduction of housing for the next decade if affordability is to be removed.

4 In a recent Will Dunning report, it was estimated that Toronto and Oshawa had a shortfall of approximately 140,000 units of ground-related housing between 2006 to 2019. Dunning, Will (2022). 'Housing Production in Canada Has Fallen Far Short

The land needs assessment methodology released by the Province in 2020 mentions that household forecasts may be adjusted for various reasons, allowing for vacancies and the net replacement of units lost from the existing housing stock.⁵ However, as discussed in a previous CUR report, municipalities are not bound by these recommendations and are not required to boost starts to account for past underproduction.⁶

This paper analyses timelines for greenfield lands transitioning through the planning process from when these lands are designated for residential use to when new housing is started. It uses two community areas in the Halton Region as case studies – Oakville and Milton. Previous research by CUR documented that Halton Region that while has a sizable inventory of designated greenfield land, its share of housing starts in the GTA is lower than in the early 2000s.⁷ The two case studies are sizable designated greenfield land areas in Halton Region.

of the Needs of Our Growing Population.' [Online] Available: https://www.wdunning.com/files/ugd/ddda71_58e2ddb75914a1188a6377e71c696c1.pdf

5 Ministry of Municipal Affairs and Housing (2021). 'Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020).' [Online] Available: <https://files.ontario.ca/mmah-land-needs-assessment-methodology-en-2020-08-27.pdf>

6 Amborski, David and Frank Clayton (2021). 'The Holy Grail: Accelerating Housing Supply and Affordability by Improving the Land-use Planning System.' Centre for Urban Research and Land Development. [Online] Available: https://www.torontomu.ca/content/dam/centre-urban-research-land-development/CUR_Accelerating_Housing_Supply_and_Affordability_by_Improving_the_Land-use_Planning_System_Nov_2021.pdf

7 Clayton, Frank (2022). 'No to Urban Boundary Expansion: Halton Region Is Not Hamilton, but Still Challenges Provincial Directives for 30-Year Land Supply.' Centre for Urban Research and Land Development. [Online]. Available: https://www.torontomu.ca/content/dam/centre-urban-research-land-development/CUR_Halton_Land_Use_July_2022.pdf

York Region reveals a lengthy approval process to ready designated greenfield lands for housing – 11+ years

York Region designated three new community (greenfield) areas in its 2011 Official Plan – Markham, Vaughan and East Gwillimbury.⁸ At the beginning of 2022, only the community area in Markham had subdivision plans registered – 12 years after the lands were first designated. The Region did not disaggregate its planning processes to explain the contribution of the various planning phases to the lengthy timeline.⁹

Scope and structure of the paper

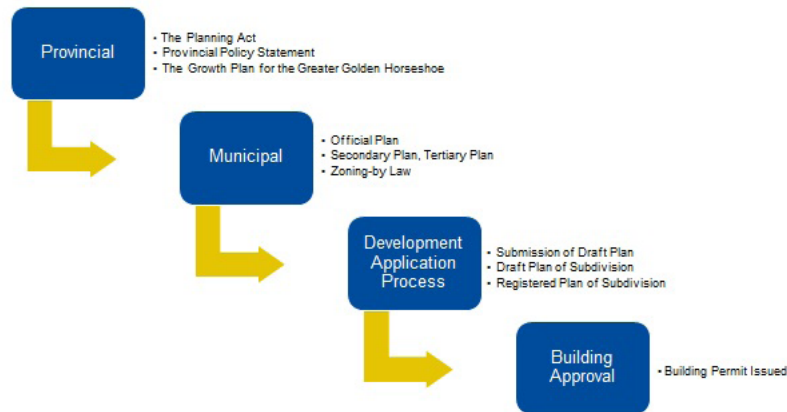
The paper begins with a simplified overview of the land use planning process for greenfields in the Greater Golden Horseshoe (GGH). Then two case studies are studied - in Oakville (North Oakville) and Milton (Boyne Survey).¹⁰ A detailed overview of the chronology for each case study is included in separate documents: Appendix A (North Oakville) and Appendix B (Boyne Survey) which will be published separately on CUR's website in the future.

8 York Region (2021). 'Proposed 2051 Forecast and Land Needs Assessment.' [Online] Available: <https://pub-vaughan.escrimemeetings.com/filestream.ashx?DocumentId=68877>

9 Email from York Region, Planning Staff, to Graeme Paton. September 14, 2022.

10 Information on the timelines of planning approvals is based on municipal reports, land needs assessments, official plans, Ontario Land Tribunal appeal decisions, media articles and correspondences with municipal staff and private sector planners.

Figure 1: Simplified Overview of Greenfield Land Planning Process, Greater Golden Horseshoe



Source: CUR, based on Appendix

Understanding the land planning system in Ontario

The planning system in Ontario is determined by the Province, which sets planning policies while municipalities are responsible for applying them. Figure 1 provides a simplified visual overview of how the planning process unfolds in the GGH.

Ontario - Provincial-wide planning directives¹¹

- *The Planning Act* – establishes the policies and ground rules for land use planning in Ontario.
- *The Provincial Policy Statement (PPS)* – provides more specific directives to municipalities to apply under the auspices of the *Planning Act*. There are policies that

¹¹ Our look into the planning directives is defined by the Provincial Government’s ‘Citizen Guide to Land Use Planning’. Ministry of Municipal Affairs and Housing (2019). ‘Citizen’s Guide to Land Use Planning.’ [Online] Available: <https://www.ontario.ca/document/citizens-guide-land-use-planning>

municipalities must maintain sufficient supplies of short- and medium-term land to accommodate an appropriate range and mix of housing options and densities to meet projected market-based demand under section 1.4.1b of the PPS.¹²

Ontario - Greater Golden Horseshoe (GGH)

- *The Growth Plan for the Greater Golden Horseshoe* – the long-term plan for this vast region centered on the city of Toronto. First introduced in 2006, it is designed to promote economic growth, create complete communities, protect the environment, encourage transit, and provide a range of housing to meet housing needs and promote affordability. Municipalities in the GGH must follow these policies and provincial-

¹² Section 1.4.1b states that municipalities must “maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.” Ministry of Municipal Affairs and Housing (2020). ‘Provincial Policy Statement.’ [Online] Available: <https://files.ontario.ca/mmah-provincial-policy-statement-2020-accessible-final-en-2020-02-14.pdf>

wide directives. Most GGH municipalities must plan for a minimum of 50% of new housing units being built in their delineated built-up area and a minimum density of 50 persons and local jobs combined per net hectare on greenfield lands.

Municipal planning documents and policies

- *Official Plan* – establishes broad planning objectives for upper-tier, single-tier, and lower-tier municipalities, which must conform to the provincial policies and interests.
- *Secondary Plan* – provides a more detailed scope in a defined area within the municipality and acts as an additional layer for land use planning under the Official Plan.
- *Zoning by-laws* – implement the Official Plan and Secondary Plans by providing more detailed land use regulations, designating dwelling types, density, setback, etc.
- *Site Plan control* – applied to individual sites in a municipality to ensure the developments follow site plan applications – it is an optional planning tool in the *Planning Act*.

Municipal development approvals process

- *Submission of Draft Plan* – the submission for approval of a developer's required documents to support applications for subdivision plans, most commonly on greenfield lands designated for urban development. A draft plan documents the new municipal infrastructure needed for the lands under consideration, the division of land parcels, and land uses for separate parcels.¹³

- *Draft Plan approval* – draft plan approval occurs when a municipality has comfort with the plan in principle. Typically, several conditions are attached to the support in principle, which an applicant must satisfy before the plan is registered.
- *Registered Plan of Subdivision* – a legal document issued by the municipality that approves specific terms, including but not limited to surveyed boundaries and dimensions of lots, sites for community infrastructure, and access points. Once a plan is registered, subject to available servicing, the land is now buildable for new development.

Even though the PPS requires municipalities to maintain an inventory of shovel-ready residential sites, there continues to be a shortage of serviced land in the GGH. This often leads to delays in bringing housing to market on greenfield lands. For example, in Milton, the development of its greenfield lands stalled until the early 2000s because of the lack of regional sewer and water capacity.¹⁴ In York Region, the development of greenfield lands in East Gwillimbury, Newmarket and Aurora is constrained by delays in constructing the Upper York Servicing Solution, which was initially estimated for completion in 2016 and is now delayed to 2026 at the earliest.¹⁵

13 Toronto (2022). 'Draft Plan of Subdivision.' [Online] Available: <https://www.toronto.ca/city-government/planning-development/application-forms-fees/building-toronto-together-a-development-guide/draft-plan-of-subdivision/>

14 The Canadian Business Journal (2021). 'Town of Milton: Canada's Fastest Growing Municipality.' [Online] Available: <https://www.cbj.ca/town-of-milton/>

15 Email from York Region, Planning Staff, to Graeme Paton. September 14, 2022.

Case Study: North Oakville

Background

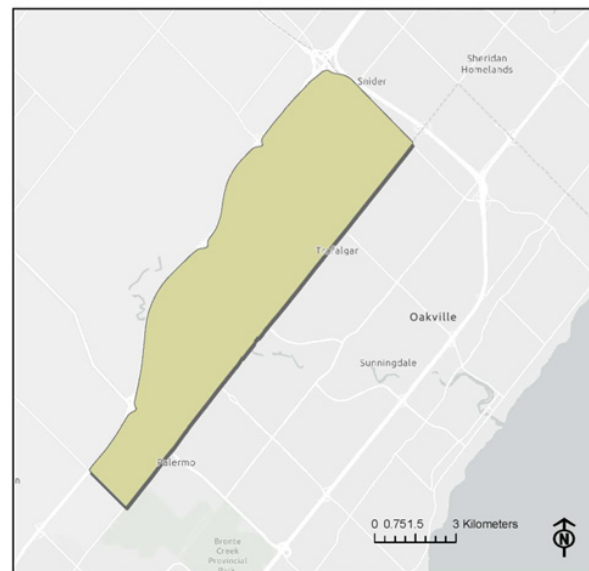
The Town of Oakville has a finite supply of greenfield lands, approximately 4,000 acres (1,620 hectares).¹⁶ Most of this land is located in the North Oakville East Secondary Plan area of North Oakville. These lands lie north of Dundas Street and south of Highway 407, between Ninth Line and Tremaine Road. The North Oakville lands are divided into two secondary plan areas: North Oakville East and North Oakville West.

The case study investigates the planning and timelines of the greenfield lands in the North Oakville East Secondary Plan since these lands are primarily residential. As we noted, transforming greenfield lands into residential development in North Oakville took 12 years.

Halton Region and Town of Oakville planning processes

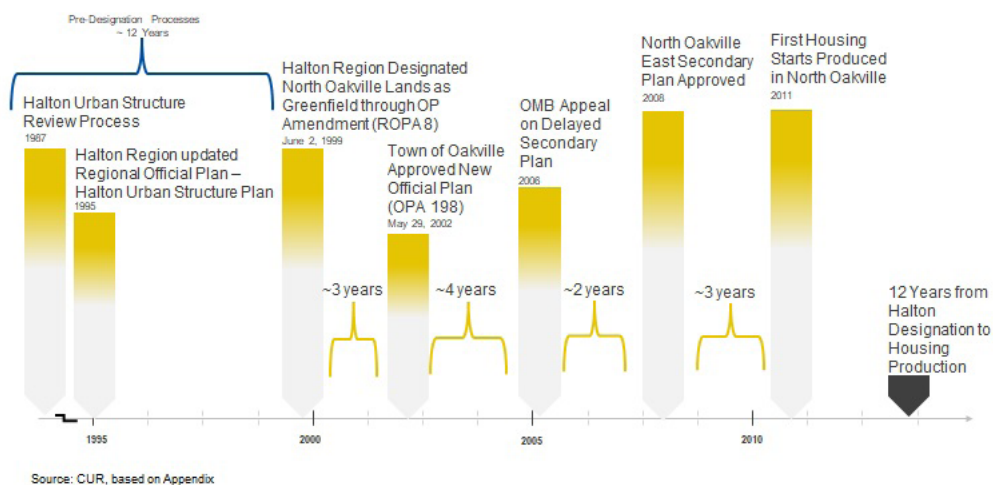
Figure 3 documents the steps and timing required to transform approved land into built housing in the North Oakville East Secondary Plan area.

Figure 2: North Oakville Greenfield Lands



Map Source: City of Burlington, Province of Ontario, Town of Oakville, Esri Canada, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, NRCAN, Parks Canada

Figure 3: North Oakville East Secondary Plan, Timeframe for Greenfield Land to Come to Market, 1999-2011



Source: CUR, based on Appendix

16 Hemson Consulting (2022). ‘Modified Preferred Growth Concept Land Needs Assessment for the Region of Halton.’ [Online] Available: <https://www.halton.ca/getmedia/8b2841f9-11ed-44b8-9a02-3c64ddb08ed/LPS-Draft-Modified-Lands-Needs-Assessment-Report.aspx>

While the attention here is on documenting the timelines from when Halton Region designated greenfield land for development in its Official Plan, it is important to note that the designation date was preceded by 12 years of research and review, including the assessment of future residential land needs.¹⁷

Key dates in the approval process:

- Halton Region Official Plan update 1995*

Halton Region updated their Official Plan under Halton Urban Structure Review (HUSR) and Halton Urban Structure Plan to expand urban boundaries to accommodate growth to 2011.¹⁸
- Halton Region designates North Oakville lands through ROPA 8 June 2, 1999*

The Region designated the North Oakville lands as greenfield in June 1999 by implementing the Halton Urban Structure Plan to allow for the expansion of urban areas within the Halton Region by re-designating the subject lands as ‘Urban Area’.
- Town of Oakville Official Plan Amendment 2002*

After Halton's designation in June 1999, the Town of Oakville updated its Official Plan to conform with Halton Regional Official Plan, designating the lands as urban through Official Plan Amendment 198.
- Town of Oakville North Oakville Secondary Plan appeal January 2006*

After filing an appeal to the Ontario Municipal Board, developers agreed to contribute particular properties to the Town's Natural Heritage System.¹⁹

17 For this paper, CUR analyzes the North Oakville Secondary East Plan since the majority of housing is being allocated for this area.

18 Email Correspondence between Hemson Consulting LTD. and Frank Clayton, July 18th, 2022

19 Ontario Land Tribunal (2006). ‘Case Number #0324.’ [Online] Available: https://www.omb.gov.on.ca/e-decisions/PL041188_%230324.pdf

- Developers also filed an appeal arguing that the Town of Oakville took too long to complete the North Oakville Secondary Plan.²⁰
- Oakville approves North Oakville East Secondary Plan February 2008*

The Town split North Oakville East Secondary Plan and the North Oakville West Secondary Plan, known collectively as the North Oakville Secondary Plan.

Oakville’s Council then approved the North Oakville East Secondary Plan through Official Plan Amendment 272.
- Construction begins on North Oakville East Secondary Plan lands April 2011*

According to CMHC, housing starts began in April 2011, producing nearly 500 units in the first year.

Summary

In North Oakville, following the designation of these lands as greenfields, it took 12 years before housing starts commenced. Significant dates are as follows:

- Approval of the land designation in the Oakville Official Plan 3 years
- OMB decision on landowners' appeal regarding secondary plan delay 4 years
- Approval of North Oakville East Secondary Plan 2 years
- First new housing starts 3 years

20 Blackburn, Angela (2006). ‘Town lands major deal in North Oakville.’ Inside Halton. [Online] Available: <https://www.insidehalton.com/news-story/2911358-town-lands-major-deal-in-north-oakville/>

Case Study: Boyne Survey Secondary Plan

Background

Our second case study is the Boyne Survey area of Milton. As shown in Figure 4, these lands consist of approximately 2,300 acres.²¹ It was the third wave of urban expansion, following the Bristol and Sherwood surveys.²²

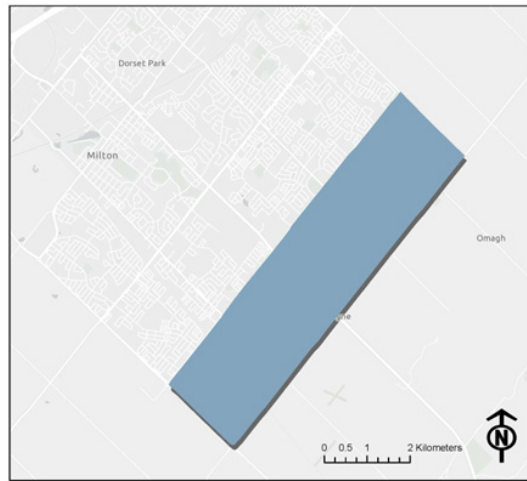
The Boyne Survey is part of a much larger designation of greenfield lands, composed of three phased land areas: Bristol (Phase One), Sherwood (Phase Two), and Boyne Surveys (Phase Three).

Boyne Survey was designated as Phase Three due to servicing allotments and its distance from the existing urban area.

Halton Region and Town of Milton planning processes

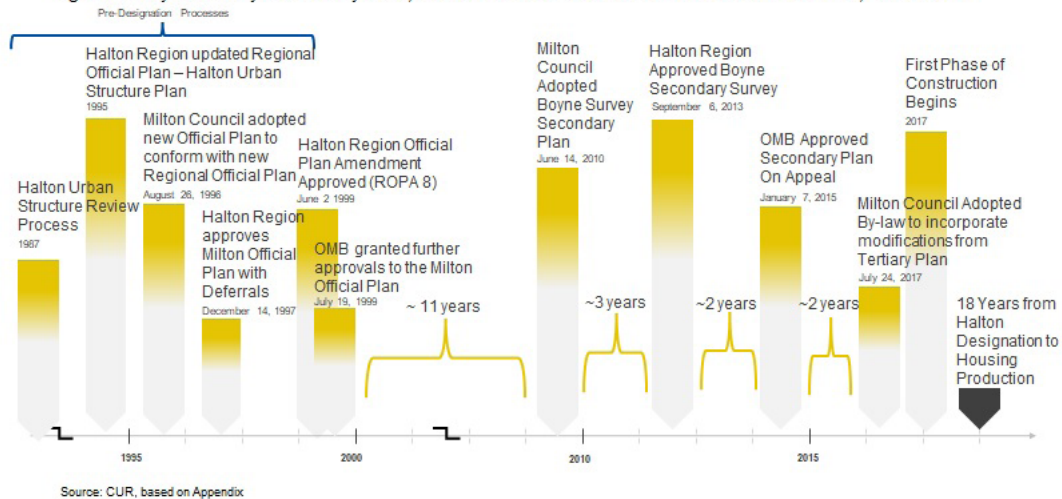
Figure 5 summarizes the planning timeframe for Boyne Survey (Boyne Survey Secondary Plan) to transition land from greenfield designation to housing being built.

Figure 4: Boyne Survey Greenfield Lands



Map Source: Province of Ontario, Esri Canada, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, NRCan, Parks Canada

Figure 5: Boyne Survey Secondary Plan, Timeframe for Greenfield Land to Come to Market, 1999-2017



21 Milton. 'Boyne Survey Secondary Plan.' [Online]

Available: <https://www.milton.ca/en/business-and-development/boyne-survey-secondary-plan.aspx>

22 Town of Milton. Phasing: Urban Expansion Area Map. [Online] Available: <https://schoolplanning.hcdsb.org/wp-content/uploads/sites/9/2018/03/Town-of-Milton-Phasing.pdf>

Key dates in the approval process:²³

- *Halton Region Official Plan update* 1995

Halton Region updated their Official Plan under Halton Urban Structure Review (HUSR) and Halton Urban Structure Plan to expand urban boundaries to accommodate growth to 2011.²⁴

- *The Town of Milton Council adopts Official Plan* August 26, 1996

The Town of Milton adopted the new Official Plan, approved by the Region of Halton on December 14, 1997, with deferrals. It replaced the 1984 Town Official Plan and conformed to the 1995 Regional Official Plan.

- *Halton Region approves Milton Official Plan with deferrals* December 14, 1997

Milton's Official Plan was updated to adopt an urban structure to manage growth through 2021 with the Boyne Secondary Plan Area as Phase 3 of the Plan.

- *Halton Region brings lands into the urban boundary through ROPA 8* June 2, 1999

The Region designated the Milton lands as greenfield in June 1999 through ROPA 8. This amendment would allow for the expansion of urban areas within Halton Region by re-designating the subject lands as Urban Area.

- *Ontario Municipal Board grants further approvals* July 19, 1999

The Ontario Municipal Board granted additional approvals on July 19, 1999. The 1995 Regional Official Plan (HUSP) brought in Phases 1 to 3 urban expansion areas – Boyne Survey being Phase 3.²⁵

Town of Milton approves Boyne Survey Secondary Plan June 2010

Council adopted the Boyne Survey Secondary Plan and sent the Plan to Halton Region for approval.

As per the Regional Official Plan, Bristol and Sherwood Survey were brought in initially through Phases 1 and 2, resulting in a delay for the Boyne Survey Secondary Plan to come into effect.

- *Halton approves the Boyne Survey Secondary Plan* September 2013

Halton Region approved the Secondary Plan, though landowners later appealed it to the Ontario Municipal Board, leading to further delays.

- *OMB approves the Boyne Survey Secondary Plan after appeal* January 7, 2015

After Halton Region's approval, the Secondary Plan was appealed to the OMB, and later approved on January 7, 2015, except for materials relating to policies and mapping that stayed under appeal on a site-specific basis.²⁶

- *Milton Council adopts By-Law from Tertiary Plan* July 2017

Halton Region approves a revised and consolidated Boyne Survey Secondary Plan.

Milton Council passed a by-law to adopt Official Plan Amendment No. 40.

First phase of construction begins 2017

Residential construction starts began in 2017.²⁷

²³ During the course of the research, contradicting information was received in determining these series of events. The chronologies are our best estimate of the series of events which transitioned the land through the various planning stages.

²⁴ Email correspondence between Hemson Consulting LTD. and Frank Clayton, July 18th, 2022

²⁵ Email from Town of Milton, Planning Staff, to Graeme Paton. September 12, 2022

²⁶ Town of Milton. Boyne Survey Secondary Plan. [Online] Available: <https://www.milton.ca/en/business-and-development/boyne-survey-secondary-plan.aspx#January-7-2015>

²⁷ Halton District School Board (n.a). [Online] Available: <https://www.hdsb.ca/schools/School%20Boundary%20Reviews/2017%20Milton%20SW%2010%20PS/BoyneDevelopmentsAndPhase3.pdf>

Conclusions

Timelines of 12 and 18 years for transforming designated greenfield lands to approved sites with trunk services cause housing shortages in the GTHA, a critical issue for a region seeing dynamic growth. Our research supports criticism of the current provincial planning system that substantial changes are required to shorten the planning approval process for all applications, whether for greenfields or the redevelopment of existing urban areas.²⁸

Additionally, data for certain parts of the process which contribute to the extended timelines are not readily available, such as the timelines for the application process for draft approval and for registration as well as servicing constraints. However, the Province is moving to address these delays through the *More Homes for Everyone Act* (Bill 109) and *More Homes Faster Act* (Bill 23).

Other findings include the following:

- The inadequate supply of short-term land, results from arduous, lengthy, and uncertain municipal approval regimes; and
- The process of appeals to the Ontario Land Tribunal (previously the Ontario Municipal Board), a common occurrence under the current planning system, is a significant determinant in the time necessary to bring designated lands to market.

Recommendations

We recommend that municipalities target timelines of five years after the designation of greenfield lands in their Official Plans until the lands become part of the short-term land supply as defined in the *Provincial Policy Statement*. Secondly, we recommend an emphasis on a better collection of timeline data on each phase of the land use planning process.

28 BILD (2022). 'Municipal Benchmarking Study, Greater Toronto Area.' Altus Group. [Online] Available: <https://www.bildgta.ca/wp-content/uploads/2022/09/Municipal-Benchmarking-Study-2022.pdf>.

Appendices

Two appendices containing the chronologies of the two case studies documenting the process of bringing greenfield lands to market will be available separately on CUR's website in the future.

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