

Clause 8 in Report No. 13 of Committee of the Whole was adopted, without amendment, by the Council of The Regional Municipality of York at its meeting held on September 24, 2015.

8 Report of the Regional Planning Commissioners, Regional Public Works Commissioners and Regional Single-Tier Treasurers on the Provincial Growth Plan Review

Committee of the Whole recommends adoption of the following recommendations contained in the report dated August 14, 2015 from the Commissioner of Corporate Services and Chief Planner:

1. Recommendations

It is recommended that:

- 1. Council endorse the recommendations as documented in the executive summary for the report entitled "Implementing the Growth Plan: Seeking Provincial and Municipal Alignment to Support a Prosperous Ontario" (Attachment 1) as developed by RPCO, RPWCO and ORSTT.
- 2. The Regional Clerk forward this report and attachments to the Ministry of Municipal Affairs and Housing and the local municipalities.

2. Purpose

The purpose of this report is to seek Council endorsement of the recommendations contained in the executive summary of the report "Implementing the Growth Plan: Seeking Provincial and Municipal Alignment to Support a Prosperous Ontario" (Attachment 1). That report identifies key challenges and opportunities for the Province of Ontario and municipalities in the Greater Golden Horseshoe (GGH) to implement the Growth Plan in a way that creates complete communities, is financially sustainable, uses infrastructure efficiently, and supports economic prosperity across the GGH.

3. Background

The restructuring of the southern Ontario economy has resulted in challenges in realizing the objectives of the Growth Plan

June 2016 will be the tenth anniversary of the Growth Plan. The past decade saw a global and economic transformation. Since 2008, the recession and its aftermath accelerated an economic transformation that was already underway in southern Ontario. The economy has transitioned from goods to services production with a significant loss of manufacturing jobs and the rise of more knowledge and creative forms of economic activity across many sectors such as financial services, information technology, business services, and health and education.

These changes have impacted a number of municipalities and their ability to achieve Growth Plan population and employment targets and their ability to finance growth in a sustainable manner has also been affected. Implementation of the Growth Plan is a critical public policy tool in supporting greater prosperity and quality of life. Since 2006, York Region and other municipalities throughout the GGH have worked to implement the Growth Plan. Metrolinx was created to drive investment in public transit and substantial investment in public transit has occurred. A number of municipalities including York Region have developed their own intra-regional rapid transit systems.

Public transit investment has become a foundational element of supporting a variety of "shifts" throughout the GGH, including higher density development, more compact new communities, developing complete communities and a greater focus on design excellence. However, there have also been challenges, and in some cases, impediments in realizing the objectives of the Growth Plan.

The Regional Planning Commissioners, Regional Public Works Commissioners and the Ontario Regional and Single Tier Treasurers came together to provide input to the Province on Growth Plan implementation

In support of the Province's provincial review of the Growth Plan, the Regional Planning Commissioners of Ontario (RPCO), the Regional Public Works Commissioners of Ontario (RPWCO) and the Ontario Regional and Single Tier Treasurers (ORSTT) came together to provide input on the challenges and opportunities of implementing the Growth Plan from the perspective of the three disciplines of planning, public works and finance. The comprehensive report that was completed brings forward a number of recommendations in relation to financing growth, implementing efficient infrastructure and planning for

employment. The executive summary of this joint initiative is appended as Attachment 1.

RPCO is a group of senior planning officials from upper-and single-tier municipal governments across Ontario. They meet on a regular basis to discuss planning issues of mutual interest, and advocate positions on behalf of the member municipalities to provincial and federal governments.

The members of RPWCO plan, design, build, operate and maintain the Public infrastructure (Transportation, Water, Wastewater, Solid Waste, Park and Public Buildings) that serve the vast majority of citizens and visitors to the Province of Ontario. RPWCO's Strategy Committee and three Sub-Committees identify priority issues, develop common positions and communicate these to key decision makers. RPWCO also works to enhance awareness of infrastructure and service delivery issues to key decision makers.

ORSTT includes representation from upper-and single-tier municipal governments and meets regularly to discuss financial issues of mutual interest, identify issues and develop common positions to senior levels of government.

The three organizations have been reporting to the Regional and Single-Tier Chief Administrative Officers of Ontario, who share the view that this review is important work for all. A number of other municipalities that participated in the study are also reporting to their respective Committees and Councils on the study's findings and recommendations. The provincial government assisted by funding a part of this work through the Ontario Growth Plan Implementation Fund.

In May 2015, Regional Council submitted a number of comments and recommendations to the Province on the Coordinated review of the Growth Plan, Greenbelt Plan, Oak Ridges Moraine Plan and Niagara Escarpment Plan

Regional staff brought forward a staff report (Report No.1 of the Commissioner of Corporate Services and Chief Planner, dated May 21, 2015) at a special meeting of Council on May 28, 2015 seeking endorsement for a number of recommendations as the Region's formal response to the Coordinated review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan (ORMCP) and Niagara Escarpment Plan (Environmental Bill of Rights (EBR) No. 012-3256).

Council endorsed the recommendations, as amended, and that report and attachments have been forwarded to the Minster of Municipal Affairs and Housing as input to the 2015 Coordinated Review.

The recommendations and findings from this joint RPCO, RPWCO and ORSTT study complement the recommendations Regional Council has already submitted to the Province in providing further guidance on issues related to growth management and community building in the GGH.

4. Analysis and Options

The study analysis draws on experience of eight of the largest municipalities in the Growth Plan area

RPCO, RPWCO and ORSTT agreed to focus on issues and recommendations to help the Province better align Growth Plan policy with actual implementation by municipalities. All of the Greater Toronto and Hamilton Area municipalities (Durham, Halton, Hamilton, Peel, Toronto and York) are included in the analysis, as are the Regions of Niagara and Waterloo.

The report analysis and recommendations are organized into five sections:

- 1. The policy and economic context within which the Growth Plan is being implemented on the ground
- 2. Conforming with Growth Plan projections and targets
- 3. Financing growth
- 4. Encouraging efficient planning and deployment of growth-related infrastructure
- 5. Protecting employment lands

Federal, Provincial and municipal infrastructure investments are misaligned

The change to the southern Ontario economy has resulted in economic uncertainty that is impacting the ability of municipalities to meet Growth Plan population and employment forecasts and targets (i.e. intensification, greenfield density and urban growth centre targets) and to finance growth in a sustainable manner. The report states that "This economic uncertainty reinforces the need for a co-ordinated federal-provincial and municipal economic strategy for the region, coupled with a commitment to strategic infrastructure investments...."

In particular, there is a misalignment in the timing and quantum of both federal and provincial investments with municipal growth related planning and infrastructure implementation. The Growth Plan requires municipalities to

undertake detailed planning with a longer time horizon (i.e. to 2041) than provincial infrastructure plans or plans managed by Metrolinx. At the federal level, the lack of a federal transit investment strategy puts municipalities at great risk and financial exposure when introducing or expanding transit. The announcement in the 2015 Federal Budget of a permanent transit fund (at a relatively low investment level) is a step in the right direction, but more investment is required.

There is some concern with the Growth Plan's forecasts

The GGH is forecast to be home to 13.5 million people and 6.3 million jobs by 2041. The pattern of development to accommodate this growth is heavily influenced by the Growth Plan's targets for intensification and Greenfield density that are intended to encourage more compact, intensified and mixed use development.

There is concern that the Growth Plan's jobs and employment projections and targets are too high or anticipate growth too soon in most areas of the GGH, outside of the City of Toronto. In addition, the provincial Ministry of Finance published its own updated population forecasts in 2014, which are considerably lower than the anticipated growth outlined in the Growth Plan. A comparison of forecasts in population for various municipalities is appended as Attachment 2 to this report.

The longer term forecasts may prove to be fairly accurate, but short term fluctuations in growth can contribute to a misalignment in the location and timing of population and job growth that can create an imbalance in municipal financing, and result in a risk of overbuilding or underbuilding of critical, cost-effective, growth related infrastructure. The report calls for greater flexibility meeting projections and Growth Plan targets that could save municipalities upwards to hundreds of millions of dollars.

The length of time it has taken municipalities to bring their official plans into conformity with the Growth Plan and the lack of a common land budget methodology remain concerns

Every one of the eight municipalities surveyed for the study had their official plan amendments appealed to the Ontario Municipal Board (OMB). Five of them continue to work through their appeals, five years after the 2009 adoption date. York Region had 90% of its official plan approved by the OMB in 2014, and is still trying to resolve its appeal of Chapter 6 pertaining to agriculture and rural policies.

The lack of a uniform method for land budgeting has been a key item under appeal amongst municipalities. A uniform methodology from the Province for

determining land budgets would avoid OMB appeals and costly delays in approval.

There is insufficient development charge revenue to pay for growth

The report also concludes that "growth is not paying for growth, leaving the remainder to be paid for by property tax and user rate payers." Development charge revenues are inadequate and the inherent risk in paying in advance for large scale capital infrastructure projects and the lag time in payback for these investments are contributing to a financial burden for many municipalities throughout the GGH. Transit systems to support intensification growth are proving to be the greatest financial burden for municipalities and difficult to finance under current *Development Charges Act* limitations. A number of municipalities have responded to this situation through debt financing, the deferral of capital projects and front-ending agreements. Specific recommendations target changes that are required through amendments to the *Development Charges Act*.

Amendments to the *Planning Act* proposed through Bill 73 go some way to bringing the quantum and timing of growth revenues in line with growth costs. However, commitments from the federal and provincial governments for transit funding and other strategic investments are also needed.

Better integration of land use and infrastructure decisions are needed

The joint report indicates that land use planning and infrastructure decisions need to be better integrated. This includes more efficient Environmental Assessment and *Planning Act* processes and approvals, as well as reforms to the OMB. OMB decisions often go against municipal approved Official Plans and contribute to additional infrastructure costs.

Some municipalities, including York Region, undertake a sophisticated analysis to determine how to deploy infrastructure more efficiently to reduce costs, minimize risks and promote growth in specific locations. For example, as part of the current Municipal Comprehensive Review (MCR) work being undertaken at York Region, land use planning is being co-ordinated with financial planning and the updates to the infrastructure master plans for water and wastewater and transportation.

Stronger provincial support for employment lands protection is required

Municipalities are under pressure to convert employment lands to other uses. Current provincial policy does not provide enough support at OMB hearings, especially for strategic employment lands that are essential to move people and goods along 400 series highways. Employment lands are broadly defined in provincial documents from power centres which provide significant part time employment to uses that provide more full time employment benefits in value added businesses in manufacturing and technology and other sectors. A strengthened policy framework and a more refined definition of employment lands are required.

Fifteen recommendations have been made to the Province to address Growth Plan implementation issues and challenges

In order to address the challenges and opportunities highlighted above in this report, RPCO, RPWCO and ORSTT agreed upon a number of recommendations that have been forwarded to the Province. These recommendations are included in Attachment 1. The following recommendations are of particular importance to York Region and would result in a more successful implementation of the Growth Plan:

- A long term Provincial Infrastructure Plan that conforms to the Growth Plan
- A long term commitment by the Federal Government for transit funding
- Greater flexibility in applying growth forecasts
- A uniform framework or methodology for land budget work
- Further limits to appeals of official plans and amendments that implement the Growth Plan
- Ontario Municipal Board reform
- Amendments to the *Development Charges Act* to ensure growth pays for growth and to expand the entitlement for municipal collection for transit infrastructure
- The introduction of reasonable fixed timelines for provincial decision points in the Environmental Assessment process
- Further strengthening municipal abilities to designate and protect strategic employment lands

- A more refined definition of employment lands, particularly strategic employment lands
- Training and implementation guidance by the Province for all who use and apply the Growth Plan

Link to key Council-approved plans

The recommendations from the study are applicable to the goals, objectives and policies areas of York Region Official Plan-2010 and relate to the eight goal areas of Vision 2051. A more successful implementation of the Growth Plan's policy framework will facilitate the achievement of the indicators of success in the 2015 to 2019 Strategic Plan.

5. Financial Implications

The costs, including funds and in-kind contributions, were provided by RPCO, RPWCO and ORSTT and the Provincial Government through the Ontario Growth Plan Implementation Fund.

6. Local Municipal Impact

This report will be distributed to the local municipalities for information. The recommendations contained within the study are relevant to all nine local municipalities through their Growth Plan conformity work and official plan update and implementation work.

7. Conclusion

Municipalities within the GGH have had close to a decade of experience in the implementation of the Growth Plan. All municipalities are on a learning curve in planning and providing the necessary infrastructure and services for more complete communities and for more intensified and compact growth.

In support of the Province's provincial review of the Growth Plan, RPCO, RPWCO and ORSTT came together to provide input on the challenges and opportunities in implementing the Growth Plan from the perspective of the three disciplines of planning, public works and finance.

A series of recommendations have been sent to the Province and if agreed upon, will further advance the implementation of the Growth Plan in a way that is financially sustainable, uses infrastructure efficiently, creates liveable communities and supports economic prosperity across the Region.

For more information on this report, please contact Paul Bottomley, Manager of Policy, Research and Forecasting at ext. 71530.

The Senior Management Group has reviewed this report.

August 14, 2015

Attachments (2)

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Accessible formats or communication supports are available upon request



EXECUTIVE SUMMARY

Implementing the Growth Plan: Seeking Provincial and Municipal Alignment to Support a Prosperous Ontario

Prepared for the RPWCO, RPCO, and ORSTT By Nicola Crawhall and Associates

MAY 2015





REGIONAL PUBLIC WORKS COMMISSIONERS OF ONTARIO



Ontario Regional and Single Tier Treasurers

EXECUTIVE SUMMARY

This report identifies key challenges and opportunities for the Province of Ontario and the municipalities in the Greater Golden Horseshoe to implement the Greater Golden Horseshoe Growth Plan (Growth Plan) in a way that is financially sustainable, uses infrastructure efficiently, creates livable communities and supports economic prosperity across the region. Findings reflect consensus positions developed amongst the Regional Planning Commissioners of Ontario, the Regional Public Works Commissioners of Ontario, and the Ontario Regional and Single Tier Treasurers. The analysis in the report draws upon the experience of eight of the largest municipalities included in the Growth Plan, the six inner ring regional and single tier municipalities (York Region, Durham Region, City of Toronto, Peel Region, Halton Region, and the City of Hamilton) and two outer ring municipalities, the Regions of Waterloo and Niagara.

While this report is focused on the experience of municipalities in implementing the Growth Plan in the Greater Golden Horseshoe (GGH), a number of the issues identified and recommendations in relation to financing growth, implementing efficient infrastructure and planning for employment are equally relevant to municipalities outside of the GGH.

Looking at challenges and opportunities in implementing the Growth Plan from the perspective of three disciplinesplanning, public works and finance, allowed Commissioners to identify issues and their interlinkages. This provides a more complete picture of the landscape that municipalities are navigating as they manage growth in the Greater Golden Horseshoe.

Analysis and conclusions are presented in five sections: i) the policy and economic context within which the Growth Plan is being implemented on the ground; ii) conforming with Growth Plan projections and targets; iii) financing growth; iv) encouraging the efficient planning and deployment of growth-related infrastructure; and v) protecting employment lands.

The Policy and Economic Context

Misalignment of federal, provincial and municipal infrastructure investments

The 2008 recession and its aftermath accelerated an economic transformation that was already underway in Southern Ontario, resulting in a dramatic loss of manufacturing jobs and their replacement with jobs in the services sector, health and education institutions and logistics firms. These changes have had a significant impact on meeting Growth Plan projections and targets and financing growth, due to changes in employment, spatial demands for employment, and a decline in revenues from non-residential development charges (DCs) and property assessment in some areas of the GGH. While dips in business cycles are to be expected, the concern is that this structural change to the southern Ontario economy will not result in a cyclical rebounding of the manufacturing sector, despite a drop in oil prices and a decline in the value of Canadian currency.

This economic uncertainty reinforces the need for a coordinated federal- provincial and municipal economic strategy for the region, coupled with a commitment to strategic infrastructure investments to support this shared economic vision.

Instead, there is concern over what is seen as a misalignment in the timing and quantum of provincial and federal investments with municipal growth-related planning and infrastructure implementation. For example, at the provincial level, the Growth Plan requires that municipalities make detailed plans using a longer time horizon than provincial infrastructure plans or plans managed by Metrolinx.

At the federal level, Canadian cities are at a disadvantage compared to their OECD competitors, because Canada remains one of the only OECD countries without a longterm, predictable federal transit-investment strategy. This lack of a federal transit investment strategy puts municipalities at great risk and financial exposure when introducing or expanding transit. The announcement in the 2015 Federal Budget of a permanent transit fund beginning in 2017, albeit at a relatively low investment level, is a step in the right direction.

Growth Plan Projections and Targets

Lack of Confidence in Growth Plan projections

By 2041, it is projected that the Greater Golden Horseshoe (GGH) area in Ontario will be home to 13.5 million people and 6.3 million jobs. The pattern of development to accommodate this growth is being influenced by provincial policy contained in the Greater Golden Horseshoe Growth Plan, 2006, that encourages intensified, mixed use development.

The achievement of the Growth Plan is heavily dependent on the ability of municipalities to realize provincially assigned population forecasts and intensification and density targets. However, there is great concern that the Growth Plan jobs and employment projections and targets are too high or anticipate growth too soon in most areas of the GGH, outside of the City of Toronto. This is not to suggest that any one set of projections would be perfectly accurate. Economic conditions that shape growth temporally and spatially are inherently uncertain over a 30-year period. However, as municipalities are mandated to integrate Growth Plan projections and targets into their Official Plans (O.P.s), misalignment in the location and timing of population and jobs projections risks creating a systemic imbalance in municipal balance sheets, creating a risk of overbuilding or underbuilding critical, cost-effective, growth-related infrastructure. Greater flexibility in meeting projections and targets could save municipalities tens, even hundreds of millions of dollars.

There is slow progress in attracting jobs to greenfield development, particularly at higher densities. While there is value in a combined density target, a change in the way employment is defined under the target may be a more practical method of encouraging employment density in greenfield development.

Some progress is being made in inner ring and select outer ring municipalities to meet the Growth Plan's 40% residential intensification target. While this is good news, once achieved, the target still permits 60% greenfield development to continue. As municipalities in the inner ring with more mature economic activity reach the intensification target, there should be consideration of a review to raise the target, in consultation with the municipality. Bringing O.P.s into conformity with the Growth Plan has proven to be a difficult and drawn out process. Every one of the eight municipalities surveyed for this study had their O.P. amendments appealed. Five of them continue to work through their appeals, five years after the 2009 adoption date.

Likewise, differences in the assumptions used by municipalities to determine their land budgets has made it difficult to defend the municipal comprehensive review at the Ontario Municipal Board, with appellants challenging the methodology for determining them. A uniform methodology, from the Province, for determining land budgets would help defend municipal land budgets at the time of municipal comprehensive reviews and avoid costly delays.

Financing Growth

Insufficient development charge revenue to pay for growth

Ultimately the successful implementation of the Growth Plan must be supported by a sustainable financial model whereby growth pays for growth. The inadequacy of development charge revenues, the risk inherent in paying in advance for large scale infrastructure, and the lag in payback for these major investments, are all contributing to the financial burden that municipalities are bearing in paying for growth. Simply put, growth is not paying for growth, leaving the remainder to be paid for by property tax and user rate payers.

As development charges are proving to be insufficient to pay for growth in intensified urban developments, many municipalities are using an increasing share of their debt capacity to finance growth-related infrastructure. Some municipalities are deferring growth related capital projects, and some are turning to front-ending agreements to reduce the risk associated with carrying considerable debt to fill the gap.

New transit systems to support intensification are proving to be the greatest financial burden and the most difficult to finance under the current *Development Charges Act* limitations. Bringing the quantum and timing of growth revenues in line with growth costs through amendments to the *Development Charges* Act is essential to support the implementation of the Growth Plan, and to meet growth demands more generally. Proposed amendments to the *Development Charges Act* under Bill 73 go some way in addressing these concerns. Timely commitments from the federal and provincial governments with respect to transit funding and other strategic investments are also needed.

Infrastructure Efficiency

Better Integration of Land use and Infrastructure decisions

Infrastructure is the primary driver of growth costs. If it is deployed efficiently and appropriately, it can not only save municipalities money, it can be a public revenue generator by driving growth and other forms of value to the community. If it is deployed inefficiently, it can add to costs and become a drag on both growth and public revenues.

Building in an assessment of costs, benefits, and risk exposure to infrastructure planning and decision making can make the difference between the former vs the latter outcome.

Some municipalities and other public agencies are undertaking more sophisticated analysis to determine how to deploy infrastructure more efficiently to reduce costs, minimize risk and promote value, in balance with other operational, environmental and societal objectives. Better integration of land use and infrastructure decisions can also support planning for infrastructure efficiency.

External influences, like lengthy and complex provincial approvals and OMB decisions that go against Official Plans also contribute to infrastructure costs.

Employment Lands Protection

Stronger Provincial support for employment lands protection

Some GGH municipalities are under intense pressure to convert employment lands, leaving some areas with insufficient employment lands for the next twenty year period, particularly larger parcels of land.

Notwithstanding a strengthened provincial policy framework for protecting employment lands, municipalities have found that support for this strengthened provincial policy does not always extend across some provincial ministries and agencies, in the implementation of provincial plans, and in OMB hearings.

Greater support is needed from the Province to support the protection of employment lands, especially strategic employment lands that are essential to move people and goods, along 400 series highways, at border crossings, and around active ports and harbours.

In this shifting employment landscape, some developers are challenging municipal assumptions on which their employment land DC calculations are based, calling into question whether the currently accepted methodology to calculate employment DCs needs to be reconsidered.

Conclusions and Recommendations

Municipalities are still on a learning curve in planning for and servicing more intensified and dense growth in the GGH. They are adapting and improving their strategies along the way. This study explores the added challenges and opportunities posed by federal and provincial governments in supporting growth in the GGH. The compounding effect of the issues raised in this study stands in the way of the successful implementation of the Growth Plan, and is contributing to the strain of financing this growth.

To address these issues, the following recommendations were agreed to by the RPWCO, RPCO, and ORSTT Commissioners at a March 2 workshop. As noted above, while this report and its findings are focused on the Greater Golden Horseshoe and the Growth Plan, much of the analysis and many of the conclusions are relevant to municipalities outside of the GGH. In order to highlight these, recommendations with broader geographic relevance have been identified with an asterisk (*).

Policy and Economic Context

Recommendation #1

The Province's long term infrastructure plan should be required to conform with the Growth Plan over a planning horizon that is compatible with municipal planning horizons, that is, 15 + years, through an amendment to the proposed *Infrastructure for Jobs and Prosperity Act* (Bill 6) currently before the Legislature. The Infrastructure Plan should provide enough detail in terms of timing and specific projects so as to enable coordination with complementary municipal infrastructure investments.

*Recommendation #2

The Federal Government should make a long term commitment (15 + years) to stable funding for transit, amounting to a minimum of 30% of capital costs.

Conforming with Growth Projections and Targets

Recommendation #3

In light of Ministry of Finance projections, Growth Plan population and employment projections should be reviewed and revised. Consideration should be given to building flexibility into the projections, providing a numeric and timing range within which the projected growth is expected to occur.

Recommendation #4

The Province should continue to prescribe the 40% minimum intensification target for inner ring municipalities but, once the target is achieved, based on the progress towards intensification in more 'mature' regions and cities over time, the Province should, in consultation with municipalities, raise the intensification target.

Recommendation #5

The Province should amend the combined employment and residential density target for greenfield development to distinguish among the types of employment that are included so that industrial and knowledge-based jobs would be excluded and only population-related jobs would be combined with the residential target.

*Recommendation #6

The Provincial Government should provide a uniform methodology for determining land budgets, developed in consultation with municipalities.

Paying for growth

*Recommendation #7

To ensure that growth pays for growth, the Province should amend the *Development Charges Act* (DCA) as follows:

- removal of the 10% discount (Sec. 5.(1) 8.)
- removal of service level cap based on 10 –year historical average (Sec. 5.(1) 4.)
- removal of all other service exemptions such as waste facilities, parks.
- removal of 50% industrial expansion exemption (4. (2)
- removal of clause in the DCA that prohibits municipalities from gaining, or developers from losing financially as a result of an OMB appeal. (16. (4))
- Metrolinx should not be given authority to charge DCs for growth related infrastructure and should no longer be permitted to invoice municipalities for costs associated with Metrolinx assets.

Infrastructure efficiency

Recommendation #8

The Province should limit appeals of Growth Plan-related OPs with significant infrastructure cost implications through amendments to the *Planning Act* and/or the *Places to Grow Act*.

*Recommendation #9

The Province should introduce reasonable fixed timeframes for provincial decision points in the environmental assessment process, including Part II bump-up requests.

Recommendation #10

Relevant provincial legislation (*Places to Grow Act, Planning Act,* proposed *Infrastructure for Jobs and Prosperity Act* (Bill 6) and policies (Provincial Policy Statement) should be amended to facilitate and encourage municipalities to:

a) further integrate land use planning, infrastructure and financing considerations at the beginning of the land use planning process;

 b) standardize the practice of making all lifecycle costs (ongoing operations and maintenance, replacement costs) transparent when considering costs of new growth related infrastructure;

c) undertake comprehensive business case assessments of major infrastructure works like transit, large water and wastewater treatment facility expansions, that includes consideration of costs, benefits and return on investment.

Employment lands

Recommendation #11a

The province should articulate criteria in the Growth Plan for identifying strategic employment lands, including but not limited to land adjacent to 400 series highways corridors, airport lands, border crossing areas, active ports and harbours, and strategic transit corridors, and allow for 'generational' protection of these lands, either with no time horizon, or a minimum 30 year horizon.

Recommendation #11b

The Province should limit appeals related to strategic employment lands through amendments to the *Places to Grow Act* and/or the *Planning Act*.

*Recommendation #12

The Ministry of Municipal Affairs should launch Growth Plan training and specific implementation guidance for provincial ministries, boards and agencies whose policies may infringe or conflict with a municipality's efforts to protect employment lands.

Recommendation #13

The Growth Plan should establish a process to negotiate 'land swaps' between municipalities and the Province to allow for the protection of consolidated employment lands where provincial policy, e.g. provincially significant wetlands, has the effect of severing employment lands; where this involves the Greenbelt or Oak Ridges Moraine plans, the swap of equivalent land parcels to protect employment lands should result in 'no net loss' to the territory delineated in these Provincial plans.

Recommendation #14

Where designated employment lands are consistent with the Growth Plan, the Province should make these non-appealable to the OMB through amendments to the *Planning Act* or *Places to Grow Act*. When a municipality has planned for various categories of employment lands in a conformity exercise, appeals should be prohibited OR the scope of the appeal should be limited to population-based employment only.

*Recommendation #15

The Province should support other measures of determining employment land DCs used in other jurisdictions that better reflect actual servicing costs, such as lot size, trip generation (people and distribution).

Table 1: MOF population projections compared to GP projections expressed as difference in % growth from 2011 historical population

('000)	Historical	GP	MoF	% difference in growth from 2011	GP	MoF	% difference in growth from 2011	GP	MoF	% difference in growth from 2011
	2011	2021	2021		2031	2031		2041	2041	
Toronto	2704.6	2,975	3,030.90	2%	3,193	3,354.40	6%	3,400	3,639.30	9%
Durham	626.8	770	716.8	-8%	970	830.8	-22%	1,190	956.3	-37%
Halton	517.2	645	634.3	-2%	816	775.7	-8%	1000	931.5	-13%
Peel	1340.5	1,559	1,586.10	2%	1,766	1,855.60	7%	1,970	2,112.10	11%
York	1065.5	1,330	1,285.40	-4%	1,585	1,529.30	-5%	1,790	1,763.90	-2%
Hamilton	535.6	601	581.6	-4%	683	631.5	-10%	780	677.6	-19%
Niagara	442.8	483	457.9	-6%	544	478.2	-15%	610	495.2	-26%
Waterloo	523.8	624	584.7	-8%	742	650.9	-17%	835	712.7	-23%

(M0F, 2014; Hemson, 2012)