To: Chair and Members 
Economic Development and Planning Committee 
Outstanding Business List and Issue: Correspondence from Ministry of Municipal Affairs and Housing (June 20, 2008) – Employment Land Budget

From: Tim McCabe 
General Manager 
Planning and Economic 
Development Department 

Telephone: 905-546-4339 
Facsimile: 905 546-4364 
E-mail: Tim.McCabe@hamilton.ca

Date: November 5, 2008

Re: Correspondence from Ministry of Municipal Affairs and Housing (June 20, 2008) – Employment Land Budget (PED08066(b))

Council Direction:

City Council, at its meeting of June 25, 2008, requested staff to report back with an Information Report to the Economic Development and Planning Committee on staff’s position regarding matters raised in the above-noted correspondence, attached as Appendix “A” to this Report.

Information:

The purpose of this Information Report is to identify the different positions and assumptions used for the employment land budget between the City and Provincial staff.

1.0 Background

On June 20, 2008, staff received comments from the Ministry of Municipal Affairs and Housing (MAH) staff outlining their concerns regarding the assumptions used by the City to calculate future employment lands needs.

Given there was inadequate time for the staff and Committee to explore these concerns, staff was requested to prepare an Information Report explaining the differences between the Province’s preferred assumptions and the ones used by City staff to calculate the amount of employment land required by 2031.

Since June 23, 2008, staff has met with Provincial staff on three occasions, provided them with the information on the Airport lands as requested, requested additional information via e-mail in September 2008. To date there has been no change in
Provincial staff’s position. Further, City staff have requested Provincial staff to outline the technical basis for their assumptions and to specifically reference which Provincial policy legislation or regulation the City conflicts with. Staff have invited staff from the Province to the November 27, 2008 Economic Development and Planning Committee Meeting.

It is important to note that other GTA municipalities continue to have similar concerns to those raised in the Hamilton context. The Regional Planning Commissioners of Ontario have sent a letter (attached as Appendix “B” to this Report) to the Province outlining major concerns with the land budget methodologies used by MAH staff.

2.0 Purpose of a Land Budget

The purpose of a land budget is to project the amount of employment and residential land a municipality requires to meet the growth targets for a specific time frame (the City uses 2031). An integral part of GRIDS was the development of both employment and residential land budgets for the entire city. In terms of the employment component, in early 2008, the City updated this information based on the most recent data available (year end 2007).

In the most simplistic terms, the land need is demand minus the land supply. A number of factors are attributed to demand including the growth targets, density, “net” vs “gross’ land calculations. The supply is the amount of land that is vacant or has the strong potential for redevelopment (i.e. existing residential uses).

3.0 Provincial Methodology for Calculating a Land Budget

In 1995, the Province produced the Projection Methodology Guideline: A Guide to Projecting Population, Housing Need, Employment and Related Land Requirements. The excerpt below illustrates how the municipalities are to use this guide:

“The methods presented here are meant as “best practices”. They incorporate analytical principles, data definitions and data sources that will be readily understood by provincial ministries and other approval authorities. However, they are not the only way to project growth and are not mandatory. Municipalities may develop alternative approaches, but where they do so, they should be prepared to document how and why the alternative approach departs from the approach recommended in this guideline.”


In addition, to the above noted document, the Province also included components of the land budget definitions within the Places to Grow Growth Plan. More specifically, they apply the 50 persons and jobs per hectare (pjh) density to all Greenfield lands excluding natural heritage features.
With respect to the assumptions used in Hamilton’s land budget, staff and Council endorse Hemson’s methodology.

4.0 Comments Received from the Province

The Table below is a summary of the differences. Following the table is staff’s explanation of the differing assumptions.

<table>
<thead>
<tr>
<th>Assumptions</th>
<th>City Staff position</th>
<th>Province</th>
<th>Other GTA municipalities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Employment Growth target Increase (2031)</td>
<td>59,000 jobs (10,000 additional jobs)</td>
<td>49,000 jobs</td>
<td>Recognizes there are regional differences</td>
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<td></td>
<td></td>
<td></td>
<td>Local Hamilton matter</td>
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<tr>
<td>2. Long term vacancy on employment lands</td>
<td>10%</td>
<td>0%</td>
<td>10%</td>
</tr>
<tr>
<td>3. Population related employment uses on employment lands</td>
<td>10%</td>
<td>0%</td>
<td>Not addressed</td>
</tr>
<tr>
<td>4. Density calculation for non developable lands</td>
<td>Density should not apply to all non developable lands – utility corridors, major roads, cemeteries and natural heritage features</td>
<td>Density should not apply to natural heritage features only Wants to see employment intensification</td>
<td>Same as City staff</td>
</tr>
<tr>
<td>5. Using the net to gross factor of 20%</td>
<td>This comment relates to Point 4 above</td>
<td>Use of a net to gross factor may impact on growth targets</td>
<td>Addressed through item 4 above</td>
</tr>
<tr>
<td>6. Land budget assumes most growth in Greenfield areas.</td>
<td>As part of the land budget and Municipal Comprehensive Review for employment lands, the City has provided the province with a detailed inventory of remaining vacant lands in our existing employment areas.</td>
<td>See column 2</td>
<td>n/a</td>
</tr>
</tbody>
</table>
4.1 2031 Employment Growth targets – 49,000 vs. 59,000 jobs

City’s explanation: Hamilton is expected to accommodate 149,000 jobs on employment lands (does not include major office or population related) which represents an increase of 49,000 jobs between 2001 and 2031. This growth target assumes the number of jobs is always increasing and it does not consider any losses. Hemson Consulting added an additional 10,000 jobs (10% of the 2001 Employment Land employment) to the employment growth. These additional jobs are added:

- to recognize that as employment areas mature and productivity gains are made, especially in manufacturing, a decrease in the number of jobs occurs, and an increase in the number of purpose-built buildings that are not as well suited to adaptive reuse; and,
- to compensate for the job losses in the City.

Province’s Explanation: The Province does not accept the additional 10,000 jobs because the growth target for employment is 49,000.

4.2 10% long term vacancy factor of Greenfield Land Supply.

City’s Explanation: This factor recognizes that as the Industrial Business Parks develop there will be remnant parcels that are leftover due to ownerships, existing non-employment land uses that do not relocate or cease.

Province’s Explanation: MAH’s Projection Methodology Guideline does not support the use of vacancy factors when dealing with long-term planning horizons.

4.3 10% factor for population related employment uses within employment areas.

City’s Explanation: All the uses within employment areas are not considered Industrial. Several uses exist that are considered as supportive uses to employees in Industrial areas (i.e. restaurants, hotels, some retail uses). The jobs in these areas would be considered as “population related” employment and, therefore, the land base used for these uses does not contribute to the Employment Land employment job targets required by the Province.

Province’s Explanation: The Province believes that lands used for accessory or supportive commercial uses that serve the employment areas should be accommodated as part of the employment lands.

4.4 “Net” lands only excludes provincially significant Natural Heritage features and 20% Net to gross factor.

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2 Same study as above pgs. 19-21
City Explanation: As noted above, the Growth Plan requires that jobs/person densities be attributed to all lands except natural heritage features. For example, if there are 100 hectares of non developable lands (i.e. major roads, utility corridors, buffers from natural heritage features), 5,000 (50 pjh x 100 ha) people and jobs would be attributed to these areas. In reality, these 5000 jobs/persons would have to be transferred to the developable Greenfield lands. Therefore the density of the developable lands has increased substantially over the 50 pjh. The more land a municipality has that is not developable, the higher the density is on the remaining developable lands.

The City’s definition of net, along with what other GTA municipalities intend on using, only includes those lands which could accommodate employment uses. Therefore it excludes roads, storm water management ponds and other non developable features.

This issue is a major one for all the other GTAH municipalities.

Province’s Explanation: Places to Grow Growth Plan defines the term “density target” as measuring the number of employees that could be accommodated on all greenfield land except natural heritage features. Their definition of net includes all lands except natural heritage features.

4.5 Intensification on existing employment lands

City's Explanation: The City, as part of the land budget and the Municipal Comprehensive Review background work, undertook a rigorous evaluation of the vacant employment lands within the existing business parks. Further, the City, through various brownfield programs, is recognized as a leader in the field of Brownfield remediation. Given our recent work, staff have asked for clarification numerous times from the Province for the meaning of “employment intensification”.

Province’s Explanation: No additional information or response from Provincial staff on this issue has been received as of the date of this Report.

5.0 Additional Issue

An issue that has not been resolved by the Province to date is the need to protect employment lands past the 20 year time frame. This issue has been raised with the Province through the Staff Report (PED08156) - Planning for Employment in the Greater Golden Horseshoe (Provincial Background Paper), as well as the letter from the Regional Planning Commissioners of Ontario (RPCO), attached as Appendix “B”.
Conclusion:

Staff from Hamilton and other municipalities are continuing to press the Province to develop a land budget methodology which has a standard set of assumptions but allows municipalities to have some flexibility to recognize regional market differences.

Staff will also be an active participant in any negotiations that continue to be spearheaded through RPCO.

Tim McCabe  
General Manager  
Planning and Economic Development Department

JHE/GP:dkm  
Attachs. (2)
FACSIMILE TRANSMITTAL SHEET

TO: _____ Guy Paparella and Joanne Hickey-Evans

DATE __20__/06__/2008_

TEL.# ___________________ FAX #: __1-905-643-7250__

PAGES __6__ including this cover page

SUBJECT: ___AEGD and Official Plan/Comprehensive Review________

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FROM:  MSO – CENTRAL OFFICE:

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<th>Alejandro Gonzalez</th>
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<td>Bruce Singbush</td>
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<td>Darryl Lyons</td>
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<td>David Sit</td>
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<td>Diane Plass</td>
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<td>Andrea Ubeyskera</td>
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<td>Frank Kenyeres</td>
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<td>Ian Russell</td>
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<td>Jeremy Fredrickson</td>
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<td>Karren Wallace</td>
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<td>Marc Megierowicz</td>
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<td>Michelle Moretti</td>
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<td>Pearl Rosen</td>
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<td>Richard Belfilze</td>
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<td>Tom Guthfreund</td>
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<td>X Victor Doyle</td>
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<td>Yvonne Hurst</td>
<td>585 - 6379</td>
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NOTES/COMMENTS:

Please call 416-585-6226 if you experience any difficulties with this transmission.
June 20, 2008

Mr. Guy Paparella, MCIP, RPP  
Director  
Industrial Parks and Airport Development Division  
&  
Ms. Joanne Hickey-Evans, MCIP, RPP  
Manager, Policy Planning  
Strategic Services/Special Projects Division  
Planning and Economic Development Department  
City of Hamilton  
77 James Street North, Suite 400  
Hamilton ON  L8R 2K3

Dear Mr Paparella and Ms. Hickey-Evans:

Subject: Comprehensive Employment Study and draft Updated Employment Land Supply Budget for the new Official Plan and the Airport Employment Growth District

The Ministries of Municipal Affairs and Housing (MAH) and Public Infrastructure Renewal (PIR) are very supportive of the City’s efforts to date in working toward the implementation of the Growth Plan for the Greater Golden Horseshoe, and continue to support the planning for an Airport Employment Growth District.

This correspondence pertains to the City of Hamilton’s Report, ‘Focusing Efforts on Employment Lands’ (PED08066) dated February 27, 2008, and particularly the Comprehensive Employment Study Report (Hemson 2006) and the draft Employment Land Budget Update Report (March 5, 2008).

The employment forecast contained in Schedule 3 of the Growth Plan allocates an additional 90,000 new jobs to the City of Hamilton to the year 2031. The Ministries support the recommendations arising from this work whereby employment would be allocated as follows - Major Office: 11,000 jobs; Population Related: 31,000 jobs; Employment Land: 49,000 jobs.

It is our understanding that the City is currently undertaking the second stage of its new Official Plan to develop policies and mapping for the Urban Area. In parallel, it is
also undertaking an official plan amendment to expand the urban boundary as well as a secondary plan study, among other related study components, to provide for an Airport Employment Growth District (“AEGD”) adjacent to the John C. Munro International Airport – an initiative the ministries continue to support. The aforementioned studies provide key information which will inform both the new Official Plan and the AEGD while also addressing commitments made during the settlement of the OMB appeal related to the AEGD.

We understand that at its March 26, 2008 meeting, Council resolved that staff consult the public, the Province and various stakeholders on the draft Land Supply/Budget and report back in June 2008 on the outcome of the public input. The final results are then to form the basis for the new Official Plan and the AEGD. It is our understanding that staff will report back at the City’s June 23, 2008 Economic Development and Planning Committee.

MAH/PIR also note that the gross additional land need estimate is included in the City’s recently released AEGD Secondary Plan Phase 1 - Land Use, Draft Report (May 2008) and that the net developable land area of the AEGD is estimated at 1,218 hectares (Tables 7.6a and 7.7). The net developable land area estimate is based on ‘netting out’ certain existing uses (e.g. arterial commercial, institutional and residential), existing infrastructure, existing major utility corridors/facilities, future infrastructure and floodplains, all of which could have an impact on the City achieving the density targets established by the Growth Plan for the Greater Golden Horseshoe.

A meeting was held on April 16, 2008 between City staff/consultants and representatives from MAH. MAH/PIR previously met with City staff/consultants on November 14, 2007 to discuss provincial comments regarding the assumptions used in the Comprehensive Employment Study and the MKI Peer Review of the study.

MAH/PIR acknowledge the significant work the City has undertaken with respect to its new Official Plan program, particularly the level of detailed background studies to inform the Urban Plan and AEGD as part of what the City terms as a ‘municipal comprehensive review/conversion analysis’ for employment lands. More specifically, the City’s residential intensification study; staff’s analysis of existing employment areas, including potential conversions, impacts of hydro corridors, floodplains and other non-developable land on the land supply; and, the recent assessment of brownfield opportunities all have assisted in further informing these exercises.

**Land Budget**

While generally supportive of the overall methodology and level of analysis, including the recommendations of City staff to retain the 11,000 Major Office jobs forecast in accordance with the Growth Plan ‘Compact Scenario’; previously identified concerns remain with certain assumptions used to determine the draft employment land supply budget. The assumptions have the potential to result in an overestimation of the land needed for future employment growth. These matters are outlined in Attachment 1 to this letter. The continued use of these assumptions increases the
estimate of additional land needed to accommodate the AEGD.

The ministries are generally supportive of planning for overall employment densities based on a density of 37 employees per net hectare. However, the ‘netting out’ for gross and net land areas as defined in the studies and discussed in more detail in Attachment 1, has implications for achieving the minimum density target in the Growth Plan which is for a minimum of 50 residents and jobs combined per gross hectare in designated greenfield areas.

**Employment Land Needs**

Policy 2.2.6.5.e of the Growth Plan states that a municipality may permit conversion of lands within employment areas, to non-employment uses, only through a municipal comprehensive review where it has been demonstrated that the lands are not required over the long term for the employment purposes for which they are designated.

The City’s land budgeting work identifies a need for additional employment lands similar to those analyzed for conversion, hence demonstrating that existing employment lands are required over the long term. A conversion of the existing employment lands should therefore not be contemplated at this juncture of the City’s growth planning process.

**Municipal Comprehensive Review**

The work undertaken by the City to date has not fulfilled the requirement of a municipal comprehensive review as defined in the Growth Plan. The Growth Plan defines a municipal comprehensive review as an official plan review, or an official plan amendment, initiated by a municipality that comprehensively applies the policies and schedules of the Plan.

In fulfilling the requirements of a municipal comprehensive review, in addition to policy 2.2.6.5 and policy 2.2.8.2 of the Growth Plan, it must also comprehensively apply the policies and schedules of the Growth Plan, and at a minimum, such a review would include:

- Use of the population and employment forecasts in Schedule 3 of the Growth Plan and allocation of population and employment;
- Completion of an intensification strategy in accordance with policy 2.2.3.6 of the Growth Plan that at a minimum:
  - quantifies and accommodates a significant portion of both future employment and residential development through intensification throughout the built-up area in accordance with the policies in 2.2.3 of the Growth Plan;
  - identifies a minimum intensification target for residential development that maximizes and ensures implementation of the intensification strategy;
  - identifies the appropriate type and scale of development and sets targets for employment and residential growth in intensification areas,
urban growth centres, major transit station areas and intensification corridors;
  o demonstrates how the proposed expansion or conversion will allow the City to meet the minimum designated greenfield area density target and objectives for population and employment in accordance with Section 2.2.7 of the Growth Plan;
  o demonstrates how the proposed expansion or conversion will allow the City to meet the minimum intensification target for residential development and related objectives in accordance with Section 2.2.3 of the Growth Plan; and
  o implements the results of the municipal comprehensive review through the Official Plan program.

In light of the foregoing, MAH and PIR request further discussions with City staff and its consultants regarding the assumptions identified in this letter prior to the City finalizing its employment land needs work and conversion criteria for the new Official Plan and the AEGD.

If you have any questions, or wish to contact me, my direct phone number is (416) 585-6109.

Sincerely,

Victor Doyle, M.C.I.P., R.P.P.
Manager
Community Planning and Development
Municipal Services Office – Central

c. Ron Glenn, Director (A), Growth Policy, Planning and Analysis, PIR
The following are MAH/PIR’s detailed comments on assumptions used by the City to determine employment land needs:

<table>
<thead>
<tr>
<th>Assumption</th>
<th>Provincial Comments</th>
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<tbody>
<tr>
<td>1) Planning to accommodate an additional 10,000 projected employment land</td>
<td>This approach is not supported. The City of Hamilton is to plan to accommodate the net</td>
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<td>jobs by 2031 to compensate for future declines in existing employment</td>
<td>new jobs and the requirements for new lands associated with the 49,000 new employment</td>
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<td>land base (59,000 employment land jobs where Growth Plan ‘Compact Scenario’</td>
<td>land job forecast.</td>
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<td>forecasts 49,000 employment land jobs).</td>
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<td>2) The land budget accommodates additional employment growth primarily in</td>
<td>The Growth Plan requires municipalities to prepare intensification strategies and plan</td>
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<td>greenfield areas.</td>
<td>to accommodate significant amounts of both future residential and employment growth in</td>
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<td>existing built up areas. To date, MAH/PIR have not seen any intensification analysis</td>
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<td>related to employment lands.</td>
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<td>3) Use of a factor of 10% of total greenfield supply to account for long-</td>
<td>The Provincial Projection Methodology Guideline does not support the use of vacancy</td>
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<td>term vacancy.</td>
<td>factors when dealing with long-term planning horizons.</td>
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<td>4) Use of a factor of 10% of future employment land growth to estimate</td>
<td>Use of this factor is not supported and these uses should be considered as integral to</td>
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<td>amount of employment land that will be used for population-related</td>
<td>the assumed employment land density of 37 employees per net hectare</td>
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<td>employment uses.</td>
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<td>5) ‘Netting out’ existing uses (e.g. arterial commercial, institutional,</td>
<td>Policy 2.2.8.2 c) of the Growth Plan requires that the timing of the expansion and the</td>
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<td>residential), existing infrastructure, utility corridors/facilities,</td>
<td>phasing of development within the designated greenfield areas will not adversely affect</td>
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<td>future infrastructure and floodplains to achieve the net developable land</td>
<td>the achievement of the intensification target and density target, and the other policies</td>
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<td>area for the AEGD.</td>
<td>of the plan. The netting out of lands that would not be netted out for the purpose of</td>
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<td>achieving the greenfield density target, has the potential to impact the City being</td>
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<td>able to achieve the Growth Plan targets. It is also not clear how this approach fits</td>
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<td>with Section 2.2.7 of the Growth Plan.</td>
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<td>6) Using a net-to-gross factor of 20%. Definition of ‘net’ used in the</td>
<td>As in 5 above, the use of this ‘net-to-gross’ approach may have a potential impact on</td>
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<td>Comprehensive Employment Study</td>
<td>the City being able to achieve the Growth Plan density targets. It is also not clear</td>
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<td>how this approach fits with Section 2.2.7 of the Growth Plan.</td>
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October 16, 2008

Mr. Brad Graham, Assistant Deputy Minister
Assistant Deputy Minister’s Office
Ontario Growth Secretariat
4th Floor, Suite 425
777 Bay Street
Toronto ON M5G 2E5

Dear Mr. Graham:

Re: Greater Toronto and Hamilton Area (GTAH) Land Budget Methodology

A GTAH working group was established under the direction of the Regional Planning Commissioners of Ontario (RPCO) to find a consistent methodology to measure GTAH land needs.

Staff from the upper tier municipalities of Durham, Halton, Hamilton, Peel and York held four separate technical meetings from January to July of 2008 to review the land needs methodology. The Province, with representation from MMAH and PIR, was also invited and attended these sessions.

All municipalities are advanced in their own individual work. There are some differences in approaches, but there is agreement to revise differences, where possible, to conform to the general methodology. At the same time, market conditions do vary across the GTAH and RPCO believes the Province should allow for some flexibility in the determination of land requirements that reflect more localized economic and market conditions across the region. RPCO feels that a common, workable methodology and assumptions is in our common
interest, will simplify implementation and limit challenges. After carefully examining the land budget methodology, RPCO has the following refinements for the Province to consider. These recommendations represent a natural evolution in the implementation of the Growth Plan as well as provide opportunities for the advancement of the provincial economy.

**Environmental extractions and other public uses (e.g. highways, hydro corridors) extractions**

*Places to Grow* lists environmental features that are to be excluded in measuring the density target of 50 people/jobs per hectare. There are additional environmental features that are undevelopable as well as a number of large scale infrastructure systems and facilities that should be considered for exclusion. Some municipalities may have a larger share of features on non-developable lands that will result in inconsistencies in the **real density target** between municipalities.

1. **The Province should re-examine the list of items for environmental extraction in measuring the density target of 50 people/jobs per ha in Policy 2.2.7(3) of the Growth Plan. Other features that should be considered for exclusion include linked natural heritage systems as identified through supporting studies from Official Plan work, regionally and locally significant woodlands as identified through scientific studies, local wetlands, ESA’s, surface water tributaries and buffers thereto, floodplain/regulated lands and life science ANSI’s.**

2. **Similarly, the Province should consider revising the wording of policy 2.2.7 (3) to indicate “This density target will be measured over the entire designated Greenfield area for each upper or single tier municipality, excluding the following features where the features are both identified in any applicable official plan or provincial plan, or where the applicable provincial plan or policy statement prohibits development in the features…”**

3. **The Province should exclude other non-developable lands such as 400 series highways and related freeway links, utility corridors, major power generation facilities, rail corridors, airport lands, Parkway Belt lands, cemeteries, and other major non-developable features (existing and future) that are identified by municipalities.**

**P2G Density target of 50 people/jobs per hectare**

RPCO is fully supportive of the provincial density target of 50 people/jobs per hectare. However, there are some inequitable technical variations amongst municipalities (i.e. due to types of industries present in employment lands and lower-than-P2G-target-densities in approved plans) making it difficult to achieve the target.

Employment land densities across the GTAH are generally lower than 50 jobs per hectare and vary considerably between municipalities. Not achieving the 50 jobs per hectare target on employment lands means that **higher residential densities, which may vary significantly amongst municipalities**, will be required to achieve the overall 50 people/jobs per hectare target.

4. **The Province should recognize densities in approved plans while targeting 50 people/jobs outside of approved plans.**
Employment lands

5. The Province should apply a 10% vacancy factor to all vacant lots within employment lands that do not develop over the long-term, or they should consider going to 2036 for employment land designation on the condition that these lands are carefully phased and cannot be converted to residential uses.

6. The Province should consider treating major retail uses separately from traditional employment uses for land budget purposes and should specifically exclude major retail uses from the “Employment Area” definition.

7. Strategically located employment lands located in proximity to 400-series highways are in limited supply and should be identified and protected for. The Province should allow for the identification of these regionally significant employment lands on a map appended to an R.O.P. with accompanying policies ensuring their protection for long-term employment uses beyond 2031.

RPCO thanks the Province for their input and participation in the GTA working group sessions. More technical detail explaining the justification for the recommendations will be provided under separate cover.

Sincerely,

A. L. Georgieff, M.C.I.P., R.P.P.
Chair
Regional Planning Commissioners of Ontario

ALG:sv

c. Regional Planning Commissioners of Ontario (RPCO)