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Ontario Standing Committee  
on Social Policy

Bill 73, Smart Growth for Our  
Communities Act, 2015.

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November 9, 2015

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**SP** | Sustainable  
Prosperity

**SUBMISSION**

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November 9, 2015

Standing Committee on Social Policy  
C/o Valerie Quioc Lim, Clerk  
Room 1405, Whitney Block  
Queen's Park,  
Toronto, ON  
M7A 1A2

Sent by Email to: [vquioc@ola.org](mailto:vquioc@ola.org)

**Re: Bill 73, Smart Growth for Our Communities Act, 2015 - An Act to amend the  
Development Charges Act, 1997 and the Planning Act**

Dear Chair and Members of the Standing Committee,

Sustainable Prosperity (SP) thanks the Government of Ontario and the Standing Committee on Social Policy (the Committee) for the opportunity to comment on Bill 73, *Smart Growth for Our Communities Act, 2015 - An Act to amend the Development Charges Act, 1997 and the Planning Act*. The discussion below is in relation to the proposed amendments to the *Development Charges Act, 1997*.

**About Sustainable Prosperity**

Sustainable Prosperity (SP) is a national research and policy network based at the University of Ottawa. SP focuses on market-based approaches to build a stronger, greener economy in Canada. SP brings together business, policy and academic leaders to developing innovative ideas and inform policy development.

Our Sustainable Communities program focuses on analyzing and developing a broad array of market-based instruments to help municipalities address environmental concerns while boosting their economies and improving their fiscal capacity.

Because prices are a strong influence on decisions, in order to achieve their policy goals governments will need to work to align prices with those goals. Where prices are pulling in the direction of policy goals, it will be much easier to achieve those goals. Governments in

Canada - and in all developed countries - already employ pricing policy to help achieve their policy goals, e.g. to promote retirement savings (RRSP tax deductions), reduce youth tobacco consumption (tobacco taxes) or reduce waste and pollution (fee for plastics bags at grocery stores, tipping fees at municipal landfill, or carbon taxes).

For further discussion of the issues outlined in this submission, please refer to Sustainable Prosperity's, "Government of Ontario Development Charges System Review – Submission,"<sup>1</sup> "Suburban Sprawl: Exposing Hidden Costs, Identifying Innovations,"<sup>2</sup> and "Managing Urban Sprawl: Reconsidering Development Cost Charges in Canada."<sup>3</sup>

### **The benefits of allowing municipalities to recover the full costs of development using development charges**

There are several benefits that can be obtained by allowing municipalities to use development charges to recover the full costs that development imposes upon them.

- Fiscal health and sustainability.** Municipalities bear many costs related to new developments. These costs are significant, and are imposed at several stages: prior to and during the construction of new developments (capital costs of infrastructure construction); during the lifespan of that infrastructure (maintenance and repair costs); when the infrastructure first needs to be rehabilitated a few decades after construction (capital costs of rehabilitation); and permanently into the future (indefinite cycle of operational costs and capital costs of periodic rehabilitation). Development charges are an essential mechanism for recovering these costs. If the charges are inadequate to compensate for those current and future costs, new developments can erode municipalities' financial positions, resulting in cuts to programs (including social programs), tax increases or public debt.

"OPPI strongly support measures that would allow municipalities to recover the full cost of municipal infrastructure investment."  
- Ontario Professional Planners Institute<sup>4</sup>

<sup>1</sup> M. Wilson and D. Thompson, "Government of Ontario Development Charges System Review - Submission" (January 10, 2014)

[www.sustainableprosperity.ca/sites/default/files/publications/files/Government%20of%20Ontario%20Development%20Charges%20System%20Review.pdf](http://www.sustainableprosperity.ca/sites/default/files/publications/files/Government%20of%20Ontario%20Development%20Charges%20System%20Review.pdf).

<sup>2</sup> Thompson, D. "Suburban Sprawl: Exposing hidden costs, identifying innovations" (Oct 2013), Sustainable Prosperity [www.sustainableprosperity.ca/dl1045](http://www.sustainableprosperity.ca/dl1045)

<sup>3</sup> Sustainable Prosperity "Managing Urban Sprawl: Reconsidering Development Cost Charges in Canada" (Jan 2012), [www.sustainableprosperity.ca/article2364](http://www.sustainableprosperity.ca/article2364)

<sup>4</sup> Ontario Professional Planners Institute, Letter to John Ballantine dated Jan 10, 2014 Re: Development Charges Act, 1997 Consultation EBR Registry #012-0281

- **Fairness to taxpayers.** Fairness requires that existing property tax payers should not be required to subsidize the costs of new developments. If development charges cover the full costs that development imposes on municipalities, costs will not be shifted onto property tax payers.
- **Public policy goals related to urban form.** The Government of Ontario has adopted a clear policy direction relating to urban form: to reduce suburban sprawl;<sup>5</sup> direct growth to built-up areas;<sup>6</sup> use land efficiently;<sup>7</sup> to minimize negative impacts to air quality and climate change;<sup>8</sup> and promote energy efficiency.<sup>9</sup> Municipalities across Ontario have adopted similar goals (see Appendix A – Examples of Municipal Policy Goals Relating to Urban Form). By enabling municipalities to set development charges that reflect the full costs imposed by new developments, provincial legislation can help municipalities to send the market the right prices signals to reduce sprawl, and direct growth to established areas, thereby reducing automobile dependency and emissions and other costs.<sup>10</sup>

*“Ontario’s long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support strong, liveable and healthy communities, protect the environment and public health and safety, and facilitate economic growth.”*

- Ontario Ministry of Municipal Affairs and Housing

<http://ontarioplanners.ca/getattachment/a73739a1-17e7-4ab7-b335-8dbfcb512c06/Submission-on-Development-Charges-Act-1997-Consult.aspx>.

<sup>5</sup> Ontario Ministry of Infrastructure “Growth plan for the greater golden horseshoe, 2006” (Jun 2013) P.7, <https://www.placestogrow.ca/content/ggh/2013-06-10-Growth-Plan-for-the-GGH-EN.pdf>

<sup>6</sup> Ontario Ministry of Infrastructure “Growth plan for the greater golden horseshoe, 2006” (Jun 2013) P.14, <https://www.placestogrow.ca/content/ggh/2013-06-10-Growth-Plan-for-the-GGH-EN.pdf>; The Places to Grow Act, SO 2005, c 13, s 6, [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_05p13\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05p13_e.htm)

<sup>7</sup> Ontario Ministry of Infrastructure “Growth plan for the greater golden horseshoe, 2006” (Jun 2013) P.10, <https://www.placestogrow.ca/content/ggh/2013-06-10-Growth-Plan-for-the-GGH-EN.pdf>; Ontario Ministry of Municipal Affairs and Housing “Provincial Policy Statement, 2005” (2005) P.5, <http://www.mah.gov.on.ca/Asset1421.aspx>.

<sup>8</sup> Ontario Ministry of Municipal Affairs and Housing “Provincial Policy Statement, 2005” (2005) P.14, <http://www.mah.gov.on.ca/Asset1421.aspx>

<sup>9</sup> Ontario Ministry of Infrastructure “Growth plan for the greater golden horseshoe, 2006” (Jun 2013) P.32, <https://www.placestogrow.ca/content/ggh/2013-06-10-Growth-Plan-for-the-GGH-EN.pdf>

<sup>10</sup> Thompson, D. “Suburban Sprawl: Exposing hidden costs, identifying innovations” (Oct 2013), Sustainable Prosperity [www.sustainableprosperity.ca/dl1045](http://www.sustainableprosperity.ca/dl1045)

- **Growth paying for growth.** The principle that growth should pay for growth is supported by allowing the recovery of full costs. Development charges, if structured properly, can help to ensure that those who benefit from new development also bear its costs.

The restrictions on full cost recovery imposed by the *Act* have resulted in major losses to municipalities. Approximately 25% of growth-related costs are shifted onto taxpayers. For example, Mississauga's losses amounted to over \$20 million in a ten-year period.<sup>11</sup> Halton Region's losses amounted to \$148 million over a 15-year period.<sup>12</sup>

### **Bill 73 – steps in the right direction**

Bill 73 takes major steps in the direction of allowing municipalities to recover the full costs of development using development charges. The Bill does this both by (i) creating new authorities in the Act itself and (ii) enabling new authorities that would be detailed, later, in regulations. This is an important distinction — what is created by the Act versus what is enabled in regulations. Sustainable Prosperity's submission will examine where the treatment of specific development charges issues could be made more specific in the legislation, thus giving greater predictability to both developers and municipalities and ensuring municipalities attain the level of authority they require to move toward full cost recovery.

As a final prelude to our specific proposals, an important point of caveat — Sustainable Prosperity's submission will be suggesting areas where municipalities can be given greater authority and discretion to recover the full costs of development through development charges. However, municipal councils will decide, in their particular circumstances, the degree to which the development charges authorities granted to them through Bill 73 would be used. They will be accountable to their voters on whether they have hit the right balance between cost recovery and other political issues.

Below we briefly discuss three areas that Bill 73 would change – ineligible services, the mandatory 10% reduction, and the 10-year average service cap – and ways in which to strengthen the Bill. Ontario has the opportunity to be in a leadership position in enabling

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<sup>11</sup> Municipal Finance Officers' Association of Ontario, "Frozen in time: Development charges legislation underfunding infrastructure 16 years and counting" (Aug 23, 2013) <https://www.amo.on.ca/AMO-PDFs/Reports/2013/2013-Frozen-in-Time-Development-Charges-Reform-MFO.aspx>.

<sup>12</sup> M. Hennessey, "Halton Hills mayor wants growth to pay for itself: Halton Region backs Mayor Bonnette's motion" (theifp.ca July 20, 2015) [www.theifp.ca/news-story/5739551-halton-hills-mayor-wants-growth-to-pay-for-itself/](http://www.theifp.ca/news-story/5739551-halton-hills-mayor-wants-growth-to-pay-for-itself/)

municipalities to implement full cost recovery and send the right pricing signals to the market to help steer growth toward established areas.

### ***Ineligible Services***

*"As a principle, municipalities object to having legitimate municipal services deemed ineligible, either by regulation or legislation."*

- Association of Municipalities of Ontario<sup>13</sup>

The *Development Charges Act, 1997* s.2(4) prevents municipalities from collecting development charges for specific services, such as hospitals, waste management services, and tourism facilities. Bill 73 s.2(2) would revoke that subsection of the *Act*, which is a good first step toward full cost recovery. However, it would still allow for regulation to prescribe ineligible services.

The only way to give municipalities the option to recover the full costs of development, instead of partial costs, is to fully eliminate the ineligibility list. If the Government wishes to allow full municipal cost recovery, then the Bill should be amended to remove the provision allowing for the government to pass regulations that render certain costs ineligible.

*"Three revisions to the Development Charges Act, 1997 are recommended to eliminate barriers to cost recovery: 1. Eliminate Section 2(4), "Ineligible services," so that all services are eligible for development charges..."*

- Municipal Finance Officers' Association of Ontario<sup>14</sup>

Removing the regulatory authority would mean that future governments would need to pass legislation in order to render municipal costs ineligible for recovery, thus requiring greater deliberation and transparency for municipalities and voters.

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<sup>13</sup> Association of Municipalities of Ontario, "Development Charges and Planning Reform" [www.amo.on.ca/Advocacy.aspx](http://www.amo.on.ca/Advocacy.aspx) (accessed Nov 1, 2015).

<sup>14</sup> Municipal Finance Officers' Association of Ontario, "Frozen in time: Development charges legislation underfunding infrastructure 16 years and counting" (Aug 23, 2013) <https://www.amo.on.ca/AMO-PDFs/Reports/2013/2013-Frozen-in-Time-Development-Charges-Reform-MFO.aspx>.

### **10% Reduction**

*"In the interests of promoting the financial sustainability of Ontario's municipalities, no services within the Act should be subject to a discount."*

- Ontario Professional Planners Institute<sup>15</sup>

The *Development Charges Act, 1997* ss.5(1)8 requires municipalities to reduce by 10% the capital costs that it can collect. Bill 73 s.3 would add transit services to a list of services excluded from the 10% reduction requirement. This is a step toward full cost recovery and will assist in development of transit. However, it still leaves in place a 10% loss for municipalities in respect of other services. The only way to grant authority to municipalities to recover the full costs of those services is to repeal ss.5(1)8 of the *Act*.

*"...2. Remove Section 5(1), paragraph 8, the step in "Determination of development charges" that requires municipalities to reduce their capital costs by 10%...."*

- Municipal Finance Officers' Association of Ontario<sup>16</sup>

### **10-year Average Service Level Cap**

*"[E]liminating the mandatory ten year historic service standard to the remaining eligible costs would be an important forward looking step. Planning services looking back does not work for the future."*

- Association of Municipalities of Ontario<sup>17</sup>

The *Development Charges Act, 1997* ss.5(1)4 limits municipalities to calculating a development charge based on historic levels of service (average of the ten preceding years). Bill 73 s.3 would relax that requirement for services prescribed by regulation, requiring that the 10-year period be the following 10 years, rather than the preceding 10 years.

This could be a move toward full cost recovery. However, that will depend entirely on the regulations passed. Also, Bill 73 leaves it open to future governments to decide – without

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<sup>15</sup> Ontario Professional Planners Institute, Letter to John Ballantine dated Jan 10, 2014 Re: Development Charges Act, 1997 Consultation EBR Registry #012-0281 [ontarioplanners.ca/getattachment/a73739a1-17e7-4ab7-b335-8dbfcb512c06/Submission-on-Development-Charges-Act-1997-Consult.aspx](http://ontarioplanners.ca/getattachment/a73739a1-17e7-4ab7-b335-8dbfcb512c06/Submission-on-Development-Charges-Act-1997-Consult.aspx).

<sup>16</sup> Municipal Finance Officers' Association of Ontario, "Frozen in time: Development charges legislation underfunding infrastructure 16 years and counting" (Aug 23, 2013) <https://www.amo.on.ca/AMO-PDFs/Reports/2013/2013-Frozen-in-Time-Development-Charges-Reform-MFO.aspx>.

<sup>17</sup> Association of Municipalities of Ontario, "Development Charges and Planning Reform" [www.amo.on.ca/Advocacy.aspx](http://www.amo.on.ca/Advocacy.aspx) (accessed Nov 1, 2015).



legislative oversight – that calculations for all services will be subjected to the historic service levels.

A more reliable step toward full cost recovery and the provision of adequate services would be to allow municipalities to determine needed services levels, taking into consideration historic and anticipated future levels.

*"...3. Update Section 5(1), paragraph 4, which entails that the service levels development charges are based on is an average service level for the previous ten years, with a more flexible understanding of service levels. Municipalities should be able to adopt forward looking service levels, define the basis for service levels and broad service categories."*

- Municipal Finance Officers' Association of Ontario<sup>18</sup>

### **Toronto**

*"City Council request the Province of Ontario to amend the Development Charges Act to:*

- a) remove or amend the historical service level restrictions on development charge rate calculations;*
- b) eliminate the statutory 10 percent reduction to eligible costs; and*
- c) eliminate exclusions of ineligible municipal services."*

- Toronto City Council<sup>19</sup>

### **Halton**

*"Halton Regional Council strongly urges the Province to amend the Development Charges Act, 1997 (DCA, 1997) to be consistent with the principle that "growth pays for growth", including the following:*

- Include all growth-related services funded by a municipality*
- Remove the 10% discount for all services*
- Replace the 10 year average historic service level limits with a service level that is forward looking*
- Remove mandatory exemptions*
- Continue to provide maximum flexibility to use alternate funding tools to finance significant growth related infrastructure to meet the Provincial Growth Plan"*

- Halton Regional Council<sup>20</sup>

<sup>18</sup> Municipal Finance Officers' Association of Ontario, "Frozen in time: Development charges legislation underfunding infrastructure 16 years and counting" (Aug 23, 2013) <https://www.amo.on.ca/AMO-PDFs/Reports/2013/2013-Frozen-in-Time-Development-Charges-Reform-MFO.aspx>.

<sup>19</sup> City of Toronto, City Council Decision, October 8, 2013, Item EX 34.1 "Development Charges By-law Review" <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.EX34.1#>.



## **Limits on municipalities**

Prescriptive legislative and regulatory controls over municipal development cost recovery are not necessary. There are existing and powerful limits on what municipalities can do. First, market discipline will restrain municipalities from applying excessive development charges, and can ensure developers receive adequate and competitive returns on their investments, including the development charges that they pay. If developers felt the charges were too high, they could take their developments to other municipalities.

Second, if voters feel the municipal government is setting development charge rates too high, with negative consequences for municipal development or finances, then the voters can remove and replace the Mayor and Council.

Between market discipline and democratic governance, there are strong mechanisms in place to ensure that development charges are not excessive.

## **Important additional issues**

There are two additional points worth addressing, as they are often raised in discussions of development charges – housing affordability, and jobs and economic growth.

### ***Housing affordability***

It is often asserted or implied that keeping development charges low to the point of precluding full municipal cost recovery will somehow make housing more affordable. This argument ignores important costs. Housing affordability is actually comprised of several elements:

1. the up-front “sticker” price paid by the buyer of a house
2. subsequent additional costs paid by the buyer
3. public costs:
  - a. financial costs paid by governments and passed on to taxpayers
  - b. non-financial costs absorbed by individuals and businesses.

The sticker price omits additional costs faced by the homeowner, the largest of which is transportation. If a house is located in a far flung or low density area that requires the

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<sup>20</sup> Minutes of Halton Regional Council Meeting No. 09-15, Wednesday, July 15, 2015  
<http://sirepub.halton.ca/cache/2/zebsi4m54daaziboandj251j/18763111022015023957893.PDF>.

household to own even just one more automobile than it would otherwise need (due to poor walkability or transit service, distance from amenities and services, etc.) then costs go up dramatically. The cost of owning just one car averages approximately \$10,000 per year, and so the effective cost of that home over the typical period of a mortgage (20-30 years) will be increased by hundreds of thousands of dollars - thus greatly reducing affordability.

Preventing municipalities from recovering the full costs that new developments impose on them does not eliminate those costs; it merely shifts them onto others. The gap is made up primarily by property taxes paid by others, making housing elsewhere in the municipality less affordable. Given that many lower income people rely on re-sale or rental housing, instead of new housing, the portion of the market most critically in need of affordability actually becomes less affordable due to failure to recover the costs of new developments.

Housing locations and housing types that require additional automobile transportation impose additional costs of smog, collisions, climate change emissions, policing, emergency response and other costs. Such public costs raise the total costs borne by real individuals, businesses and communities.<sup>21</sup>

### ***Economic growth and job creation***

Enabling full cost recovery for new housing developments can help rein in sprawl and increase density in established areas - generating economies of agglomeration that boost economic growth:

- Higher urban density results in spreading the fixed costs of infrastructure over more businesses and households, reducing costs on a per-unit basis.
- Density also improves the access of firms to workers and vice versa. Firms have more potential workers to choose from, resulting in better employment fit and higher labour productivity.
- Job seekers have more employers to choose from, reducing unemployment.
- Greater density of firms and employees results in productivity-enhancing knowledge spillovers, both within sectors and between sectors.
- Urban density improves the access of firms to suppliers and markets.
- Proximity of firms in related or complementary industries allows for productivity gains through specialization and outsourcing.

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<sup>21</sup> For a more in depth analysis of how housing affordability is linked to sprawl, see D. Thompson, "Suburban Sprawl: exposing hidden costs, identifying innovations." (2013). Sustainable Prosperity. [http://www.thecostofsprawl.com/report/SP\\_SuburbanSprawl\\_Oct2013\\_opt.pdf](http://www.thecostofsprawl.com/report/SP_SuburbanSprawl_Oct2013_opt.pdf)

## Conclusion

To sum up, there are several benefits to allowing municipalities to achieve full cost recovery through development charges:

- Improved municipal ability to achieve their goals and provincial goals regarding efficiency of land use
- Improved municipal financial sustainability, and ability to cover the costs of programs, including social programs
- Greater fairness for municipal tax payers
- Support of the principle that growth pays for growth
- The boosts to economic growth from economies of agglomeration.

Bill 73 takes a major step in this direction, and with a few small changes it could enable full cost recovery for municipalities, putting Ontario in a leadership position.

Again we thank the Committee for the opportunity to comment, and for its consideration of these comments.

Yours truly,

*"Original signed"*

Mike Wilson  
Executive Director  
Sustainable Prosperity

*"Original signed"*

David Thompson  
Policy Director  
Sustainable Communities Program

## Appendix A – Examples of Municipal Policy Goals Relating to Urban Form

**North Bay** - North Bay's Official Plan addresses "concentrating urban built form... infilling, intensification, and reclamation of brownfields," stating that development charges are to be used to ensure that "new development pays for itself and that additional capital costs do not fall on existing residents in the form of higher property taxation and user fees."<sup>22</sup>

**Toronto** - Toronto's Official Plan directs that "the majority of the new growth will take place in the areas of the City where intensification is appropriate – in the Downtown, the Centres, and along the Avenues," and speaks to "reducing loss of foodlands to urban sprawl."<sup>23</sup>

**Windsor** - Windsor's Brownfield Redevelopment Strategy and Community Improvement Plan includes "[promoting] Smart Growth, including the reduction of urban sprawl and its related costs."<sup>24</sup>

**Ottawa** - Ottawa's Official Plan "promotes an efficient land-use pattern within the urban area through intensification of locations that are strategically aligned with the transportation network, particularly the rapid transit network, and [aims] to achieve higher density development in greenfield locations."<sup>25</sup>

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<sup>22</sup> City of North Bay "Official Plan" (Jan 2012) P.5

<http://www.cityofnorthbay.ca/common/pdf/CityofNorthBayOfficialPlan-2013.pdf>

<sup>23</sup> City of Toronto "Toronto Official Plan" (Dec 2010) Toronto City Planning. p. 1-5

[http://www1.toronto.ca/staticfiles/city\\_of\\_toronto/city\\_plannippng/developing\\_toronto/files/pdf/chapters1\\_5\\_dec2010.pdf](http://www1.toronto.ca/staticfiles/city_of_toronto/city_plannippng/developing_toronto/files/pdf/chapters1_5_dec2010.pdf)

<sup>24</sup> City of Windsor "Windsor Brownfield Redevelopment Strategy and Community Improvement Plan" RCI Consulting (2010), P.6 <http://www.citywindsor.ca/residents/planning/Land-Development/Planning-Policy/Documents/Brownfield%20Redevelopment%20Strategy.pdf>

<sup>25</sup> City of Ottawa "City of Ottawa Official Plan, 2003" (2003) City of Ottawa By-Law No. 2003-203, <http://ottawa.ca/en/official-plan-0/volume-1-official-plan>

**Hamilton** - Hamilton's Official Plan endorses the concept of residential intensification, setting targets for development and population density in established and downtown areas.<sup>26</sup>

**Thunder Bay** - Thunder Bay's Official Plan encourages "efficient residential land use within the City by facilitating the creation of new residential accommodations within existing buildings or on previously developed and serviced land." Thunder Bay "recognizes that compact urban form results in efficient transit systems and shall support the intensification of the City's existing and developing urban areas."<sup>27</sup>

**Niagara Falls** - Niagara Falls' Community Improvement Plan aims to "[limit] sprawl in the City and promote infill and downtown redevelopment."<sup>28</sup> Its Brownfields Community Improvement Plan states that it will use "brownfield development to reduce the amount of greenfield land being consumed... thereby reducing urban sprawl and its associated negative environmental impacts, including air and water pollution and the loss of prime agricultural land."<sup>29</sup>

**Guelph** - Guelph's Urban Design Action Plan states that "by 2015 at least 40% of residential growth must be occurring within the city's built boundary, through redevelopment and intensification. A significant portion of this growth will occur in the downtown... The growth that occurs on greenfield sites outside the built boundary must be denser and have a broader mix of uses than typical post-war suburban development..."<sup>30</sup>

<sup>26</sup> Hamilton "Urban Hamilton Official Plan" (30 Oct 2013) <http://www.hamilton.ca/NR/rdonlyres/0A939735-8827-4D79-8C54-B01970515106/0/UHOPVol1PoliciesrevOct2013.pdf>

<sup>27</sup> City of Thunder Bay "Official Plan" (Oct 2000) By-law 189-2000. P6.6, [http://www.thunderbay.ca/Assets/\\_thunderbayassets/docs/planning/1721.pdf](http://www.thunderbay.ca/Assets/_thunderbayassets/docs/planning/1721.pdf)

<sup>28</sup> The City of Niagara Falls Canada "Downtown Niagara Falls Community Improvement Plan" (Nov 2004). RCI Consulting and GSP Group, Inc. P.34, <http://www.niagarafalls.ca/pdf/business/cip/downtown/downtown-niagara-falls-CIP-november-2004.pdf>

<sup>29</sup> The City of Niagara Falls "Brownfields Community Improvement Plan" (Feb 2006). RCI Consulting and GSP Group, Inc, and Acres International. P.2, <http://www.niagarafalls.ca/pdf/business/cip/brownfield/brownfield-community-improvement-plan.pdf>

<sup>30</sup> City of Guelph "Urban Design Action Plan" (4 May 2009) Urban Strategies Inc. P.4 <http://guelph.ca/wp-content/uploads/UrbanDesignActionPlan.pdf>

**London** - London's Community Improvement Plan for Brownfield Incentives focuses on redevelopment that will provide a public benefit by "reducing urban sprawl and taking advantage of the City's existing servicing infrastructure."<sup>31</sup>

**Barrie** - Barrie's Official Plan identifies the need "to provide residential densities which are higher, more cost effective, energy efficient, and more environmentally sustainable than previous development in the City." Housing intensification will "minimize the infrastructure requirements of new development and... utilize existing services including transit, schools, and open space."<sup>32</sup>

**Brampton** - Brampton's Official Plan states: "to ensure that Brampton will grow in a sustainable manner, the City is committed to plan for compact and transit supportive communities that use resources efficiently and are sensitive to the natural environment."<sup>33</sup>

**Greater Sudbury** - Greater Sudbury's Official Plan recognizes the need for "increased residential intensification, the need to provide municipal services in an efficient and responsible manner, and the necessity of promoting sound environmental planning policies consistent with provincial directives."<sup>34</sup>

**Mississauga** - Mississauga's Official Plan states that "projected growth will be directed to appropriate locations to ensure that resources and assets are managed in a sustainable manner to:

- a. protect ecological functions, public health and safety;
- b. utilize existing and proposed services and infrastructure such as transit and community infrastructure;
- c. minimize environmental and social impacts."<sup>35</sup>

<sup>31</sup> City of London "Community Improvement Plan for Brownfield Incentives" By-law C.P.-1451-70, P.14 <http://www.london.ca/business/Planning-Development/fees-incentives/Documents/Brownfield-CIP.pdf>

<sup>32</sup> City of Barrie "City of Barrie Official Plan" (March 2011) City of Barrie Planning Services Department. P.2-7 <http://www.barrie.ca/Doing%20Business/PlanningandDevelopment/Documents/Official%20Plan%20-%20Office%20Consolidation%20March%202011.pdf>

<sup>33</sup> City of Brampton "Official Plan" (Oct 2008) p.3-1 <http://www.brampton.ca/EN/Business/planning-development/Documents/PLD/officialplan358-2006.pdf>

<sup>34</sup> City of Greater Sudbury "Official Plan" (14 June 2006) City of Greater Sudbury Planning Services Division P.18 <http://www.greatersudbury.ca/?LinkServID=75012515-928F-6F71-E9FF1FF1CEE6E6AB>

<sup>35</sup> City of Mississauga "Mississauga Official Plan" (Sept 2011) p.5-2 [http://www6.mississauga.ca/onlinemaps/planbldg/OfficialDocs/MOP\\_5.pdf](http://www6.mississauga.ca/onlinemaps/planbldg/OfficialDocs/MOP_5.pdf)