



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

February 7, 2013

Ms. Hannah Evans
Director
Ministry of Infrastructure
Ontario Growth Secretariat
777 Bay Street, Suite 425
Toronto, ON M5G 2E5

EBR Registry Number: 011-7468

**Proposed Amendment 2 (2012) to the Growth Plan for
the Greater Golden Horseshoe, 2006**

Dear Ms. Evans:

The Ontario Professional Planners Institute (OPPI) appreciates the opportunity to comment on the Proposed Amendment 2 (2012) to the Growth Plan for the Greater Golden Horseshoe, 2006.

OPPI is the recognized voice of the Province's planning profession. Our almost 4,000 members work in government, private practice, universities, and not-for-profit agencies in the fields of urban and rural development, urban design, environmental planning, transportation, health, social services, heritage conservation, housing, and economic development. Our Members meet strict practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (or "RPP").

www.ontarioplanners.ca

We welcome an opportunity to meet with you and your staff to further discuss our submission or answer any questions that you may have about it. To schedule a meeting or for further information, please contact me at (416) 668-8469 or by email at policy@ontarioplanners.ca

Sincerely,

A handwritten signature in black ink, appearing to be 'L.R.' followed by a horizontal line.

Loretta Ryan, MCIP, RPP
Director
Public Affairs
Ontario Professional Planners Institute

Ontario Professional Planners Institute's Comments on the Proposed Amendment 2 (2012) to the Growth Plan for the Greater Golden Horseshoe, 2006

The Ontario Professional Planning Institute (OPPI) supports the Province's efforts to manage growth. Through previous submissions on the Growth Plan, OPPI has continuously given strong support for a comprehensive and policy-led approach to managing growth and development in the Greater Golden Horseshoe. It is within the spirit of this support that we provide the following submission. Our comments, observations and recommendations are organized into two main sections. The first section provides general comments and the second section includes some technical comments and questions related to the Amendment.

GENERAL COMMENTS & RECOMMENDATIONS

The release of long range forecasts in advance of the comprehensive review of the Growth Plan's policies is premature. We understand there is a need to update forecasts to take into account new Census data from 2006 and 2011 (although the 2011 dataset is only partially complete). We also understand that at present, the existing Schedule 3 forecast covers a period of approximately 19 years. We are also aware, however, that the majority of municipalities have only recently completed their comprehensive review exercises and are currently working on implementation items. Lastly, the new forecast does not include data which will be made available through the National Household Survey that will be released later on this year. The National Household Survey is a rich collection of data on a wide range of topics which should be considered when preparing long-range forecasts.

With the above in mind, there does not appear to be a compelling case to update the forecasts at this time. Notwithstanding the lack of an apparent urgent need to update the forecast, we are of the opinion that the forecast review should be undertaken at the same time as the Growth Plan's comprehensive review (which is only 2-3 years away). This will allow the forecasts to better take into account infrastructure, environmental, agricultural, health and economic considerations.

We suggest that the Province places on hold the draft Amendment until it has completed its comprehensive review to properly assess and validate a number of the basic assumptions which underpin the forecasts, namely

infrastructure capacities, land availability, transportation improvements and environmental constraints. The outcomes of a thorough assessment of these considerations could result in modifications to the forecast. The allocation of growth in advance of any of the above-noted technical analysis has the potential to prejudice future decisions related to urban expansions and infrastructure investments.

There is an opportunity to test alternative growth scenarios. Most of the single, upper and lower-tier municipal conformity exercises examined different growth scenarios. Given the range of uncertainty in projecting population and employment growth almost 30 years out into the future, there is a reasonable expectation that there would be an assessment of alternative growth scenarios at the Greater Golden Horseshoe level. The analysis of economic, social and demographic trends presented in Hemson's Technical Report is based on a continuation of historic trends (albeit with some modifications). While the report is comprehensive in its coverage of demographic trends, it is expected that the technical report prepared would have examined and tested the implications of different trends and policies over this time period. How will the "Big Move", for example, impact the long range growth prospects of the Greater Golden Horseshoe? Alternatively, how would declining investments in transit and transportation infrastructure affect the long-range growth prospects?

ADDITIONAL TECHNICAL COMMENTS & QUESTIONS

The following is a list of questions and comments of a technical nature.

1. Do all comprehensive reviews need to cover a timeline which corresponds to the Schedule 3 forecast time horizons? If your next municipal comprehensive review is in 2018, for example, can your horizon be 2038 rather than 2036 or 2041 as set out in the Growth Plan?
2. Will the Province be reviewing the Schedule 3 forecasts again when it undertakes its review of the Growth Plan policies in 2016?
3. There are two key trends which could benefit from some additional commentary:
 - What is the impact of a combination of declining mortality rates and increasing fertility rates, which increase our population growth rates, but does not result in the expected demand for new housing?
 - Why is the rate of employment growth falling behind the rate of population growth?

4. What is the basis for individual municipal allocations? Some of the projections diverge from past trends and it would be helpful if Hemson could provide a short brief on the growth drivers for each of the upper-tier and single-tier municipalities.
5. When will the Province be launching its review of the Growth Plan and what sort of technical analysis can we expect?
6. The release of the revised forecasts has the potential to undermine the integrity of the existing forecasts and invites challenges (both from municipalities conducting conformity exercises and at hearings at the Ontario Municipal Board). What is the Province's Plan to address these potential risks?