Town of Whitby
Staff Report

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Report Title: Bill 108, More Homes, More Choice Act, 2019

Report to: Council

Date of meeting: May 27, 2019

Report Number: CAO 19-19

Department(s) Responsible:

Office of the Chief Administrative Officer

Submitted by:
Matt Gaskell, Chief Administrative Officer

Acknowledged by M. Gaskell, Chief Administrative Officer

For additional information, contact:

Warren Mar, Commissioner of Legal and By-law Services, x4342

Chris Harris, Town Clerk, x4302

1. Recommendation:

1. That regarding Bill 108, the Council of The Corporation of the Town of Whitby respectfully requests that the Province:

    a. extend the June 1, 2019 deadline for comments on Bill 108 in order to provide additional time for municipalities to better understand and comment on the proposed legislation;

    b. consult with municipalities and related associations for a reasonable period to make informed decisions prior to releasing any draft regulations;

    c. enshrine revenue neutrality in the proposed legislation in order to protect taxpayers in growing municipalities;

    d. consider the expansion of library reference material resulting from growth remaining an eligible service;

    e. target any financial incentives to rental and affordable housing only;

f. limit the freezing of development rates triggered by any action to a maximum of two years;

g. consider any calculation of rates under a new regime to be based on a connection with the costs of providing the service;

h. permit any outstanding development charge payable including interest as a result of instalments to be registered against the land to which it applies; and,

i. provide for existing Development Charge By-laws to remain in effect until expiry or development of the new Community Benefit Charge rate.

2. That the Clerk be directed to send a copy of this resolution and Report CAO 19-19 to the Premier, Minister of Municipal Affairs and Housing, Minister of Finance, Minister of the Environment, Conservation and Parks, Lorne Coe M.P.P., AMO, and Durham Area Municipalities.

2. Highlights:

- Bill 108, More Homes, More Choice Act, 2019 proposes to amend 13 pieces of provincial legislation, with the stated goal being to address the shortage of affordable housing in Ontario by finding faster ways to get a mix of housing types built.
- Staff are concerned that the wide scope of changes being proposed to these statutes will not accomplish the stated goal of the Province. Instead, the likely outcomes will be: increased property taxes to make-up for the possible shortfall in revenue through the new community benefit charge; little to no change in housing prices, where construction labour, land acquisition/servicing costs, and market forces are the major influencers on housing costs; the inability for municipalities to review planning applications properly and in accordance with municipally-adopted official plans; a return to the lengthy and inefficient planning appeals process; and the potential for less protection of heritage properties and species at risk.
- There are still unquantifiable unknowns at this time, since the Province has not yet released draft regulations that need to accompany the legislative changes. Municipalities should be further consulted on these regulations, and be given time to respond to the fiscal challenges that will lie ahead.

3. Background:

Bill 108, More Homes, More Choice Act, 2019 passed first reading on May 2, 2019 and is currently in second reading debate. The Bill proposes to amend 13 pieces of provincial legislation which are listed below:

- the Cannabis Control Act, 2017;
- the Conservation Authorities Act;

- the Development Charges Act, 1997;
- the Education Act;
- the Endangered Species Act, 2007;
- the Environmental Assessment Act;
- the Environmental Protection Act;
- the Local Planning Appeal Tribunal Act, 2017;
- the Occupational Health and Safety Act;
- the Ontario Heritage Act;
- the Planning Act; and,
- the Workplace Safety and Insurance Act, 1997.

Upon review of Bill 108, it has been determined that amendments to 8 of the pieces of provincial legislation would impact municipalities. An overview of the proposed changes to each of these 8 pieces of legislation, along with a commentary about how the changes would affect the Town is provided in this sectionand section 4 of this report. A copy of the Bill can be viewed here.

Conservation Authorities Act (Schedule 2 of Bill 108)

Schedule 2 of the Bill introduces a new concept of Conservation Authority core services. Core services include programs and services related to natural hazard risks, land management and conservation of lands owned or controlled by the authority, source water protection under the Clean Water Act, 2006, and other Conservation Authority responsibilities under legislation as prescribed in regulations. Expectations for these core services will be set out in regulations.

The draft amendments would also require Conservation Authorities to enter into agreements with municipalities on service delivery to avoid duplication, especially in relation to planning and development matters.

This schedule also includes governance and oversight provisions such as board member training and Minister oversight for Conservation Authorities.

Development Charges Act, 1997 (Schedule 3 of Bill 108)

The Housing Supply Action Plan introduces changes that would alter Development Charges (DCs). Highlights of the changes include:

- The separation of DCs and a new Community Benefits Charge (CBC) to pay for some municipal services. Greater clarity as to the municipal services to be paid for by the CBC are not specified.

- The 10% statutory deduction on waste diversion services will be removed. Municipalities may now charge the full capital costs of waste diversion services when calculating development charges (not including landfill sites, landfill services, or incineration). For Whitby this results in a potential $113,000 increase in DC recovery over the term of the 2017 DC By-law.

- Proposed changes also affect rules on when development charges are payable if the development is rental housing, institutional, commercial,

industrial, or non-profit housing. In these cases, development charge payments to the municipality would now be made as six annual installments commencing upon occupancy. Municipal governments may charge interest from the time of building permit issuance and the interest rate would be determined by regulation. Front-funding payment agreements reached prior to the changes to the DC Act coming into force will be preserved.

- Second dwelling units in new residential buildings and structures ancillary to all dwellings would be exempt from development charges.

- Public library material (for reference or circulation), which is currently an eligible service in the DC Act would become an ineligible service.

Endangered Species Act, 2007 (Schedule 5 of Bill 108)

The suite of changes contained in this schedule is intended to streamline development while protecting endangered species.

The proposed changes would require that species at risk be considered in the broader geographic context (both inside and outside Ontario) when determining species' status. The role of the Committee on the Status of Species at Risk in Ontario (COSSARO) would remain the same. However, to increase predictability, their reports would now be due each year in January. Bill 108 also enables the phasing in of protection implementation and gives the Minister discretion to consider social and economic factors when determining a response to species at risk.

A key change is that the Minister would be able to enter into "landscape agreements". A landscape agreement authorizes activities that would otherwise be prohibited with respect to one or more listed species. Agreements would include requirements to execute specified beneficial actions that would assist in the protection or recovery of species.

Bill 108 also establishes a Species at Risk Conservation Fund and an agency to manage and administer the Fund. The purpose of the Fund is to provide funding for activities that are reasonably likely to protect or recover species at risk. Where municipal work or development damages habitat, a charge in lieu of meeting certain imposed conditions would be possible with a permit. The municipality or developer would still have to minimize impacts and seek alternatives.

Environmental Assessment Act (Schedule 6 of Bill 108)

The Province is proposing to increase exemptions for Pre-Approved projects within the municipal class Environmental Assessment, such as localized operational improvements, streetscaping, sidewalks, and re-designation of existing travel lanes to street parking and/or cycling lanes. As well, exemptions from the Act are also proposed for various provincial initiatives related to transit, transportation, mines, parks and real estate. The Bill also provides a new process for governing amendments to approved class environmental assessments and to

specify when the Minister can issue orders to comply and the conditions that can be included in those orders.

Local Planning Appeal Tribunal Act, 2017 (Schedule 9 of Bill 108)

The Local Planning Appeal Tribunal (LPAT) remains but will no longer evaluate appeals based solely on compliance with official plans and consistency with provincial plans and policy. Instead, it will return to a "best planning outcome" approach, by also allowing appeals that only list land use planning reasons for the appeal. This means a return to "de novo" hearings (hearings that potentially provide less consideration of decisions made by Council). This means that final planning decisions would be taken out of the hands of Council. Historically, the use of a de novo approach to appeals has led to lengthy hearings.

The Bill proposes limits to third party appeals of subdivisions and promotes increased mediation to resolve appeals. There would also be new limits on the extent of testimony. As well, the Province has committed to hiring additional staff to help deal with the existing LPAT case backlog that arose from the transition from the Ontario Municipal Board. Lastly, there may be a requirement introduced for mandatory Alternative Dispute Resolution.

Occupational Health and Safety Act (Schedule 10 of Bill 108)

Currently, the Occupational Health and Safety Act includes provisions respecting the certification of joint health and safety committee members. Various amendments are proposed regarding the Chief Prevention Officer's power to, among other things, revoke or amend a certification or amend the requirements for obtaining a certification.

Ontario Heritage Act (Schedule 11 of Bill 108)

The Bill proposes changes that would improve heritage register maintenance and transparency. The amendments would require Council to notify property owners if their properties are not formally designated but have been included on the Town's heritage register due to cultural heritage value or interest.

The proposed legislation includes new timelines for a number of notices and decisions that are currently open-ended as well as changes to the appeal process from the Conservation Review Board to the Local Planning Appeal Tribunal. The amendments also provide additional clarity to the meaning of "alteration" and "demolition" and the reference to "prescribed principals" throughout.

Planning Act (Schedule 12 of Bill 108)

Bill 108 touches on numerous land use planning policies.

The Bill would allow the creation of second units in ancillary buildings. It also reduces timelines for making decisions and proposes to shelter plans of subdivision from third party appeals.

The schedule further proposes to change the conditions under which municipalities can establish inclusionary zoning by-laws and policies to facilitate affordable housing development. Inclusionary zoning would be limited to areas

around protected major transit stations or areas with a development permit system in place. The Bill would also allow the Minister of Municipal Affairs and Housing to exercise authority to order an area to be subject to inclusionary zoning. These proposed changes would continue to allow municipalities the ability to enact inclusionary zoning but would restrict the application of this affordable housing tool.

Another change is that either a municipality or the Minister can initiate the use of a Community Planning Permit System (CPPS) in areas strategic for housing growth.

The proposed legislation also introduces a new Community Benefits Charge (CBC) to address the costs of providing services to new residents as a result of growth. This is a change to Section 37 of the Planning Act allowing a municipality, through a by-law defining an area, to impose community benefits charges against land to pay for the capital costs of facilities, services and matters required because of development or redevelopment in the area. Notably, costs of growth eligible for development charges are excluded from the new Community Benefits Charge.

The CBC by-law would be based on a strategy produced by the municipality which identifies the costs of growth not covered by development charges. As well, the Ministry of Municipal Affairs and Housing will be preparing a list of eligible items for the charge, methodology for calculating the charge and any caps they may deem necessary.

It should be noted that the Community Benefits Charge would be held in a special account and these funds must be spent in keeping with the Act and regulations. Specifically, each year a municipality would have to spend or allocate at least 60 percent of the money that is in the special account at the beginning of the year. Certain lands (e.g., hospitals) would be exempted from the new Community Benefits Charge. These exemptions will be listed in a future regulation.

4. Discussion:

A review of the potential impacts of Bill 108 is provided below.

Conservation Authorities Act (Schedule 2 of Bill 108)

Provincial funding under the Hazard Program is proposed to be reduced by 50% in 2019. This represents a reduction of $3.7 million from the annual $7.4 million allocation across Ontario. The funding is used for floodplain mapping, monitoring, forecasting flooding, regulating development activities in floodplains and protecting and restoring natural cover to reduce flooding impacts.

Funding impacts will take effect in 2019. The Region of Durham has indicated that their staff are working with the five Conservation Authorities within Durham Region to discuss impacts.

Development Charges Act, 1997 (Schedule 3 of Bill 108)

A number of municipalities have been collaborating with each other, the Municipal Finance Officers' Association of Ontario, and the Association of Municipalities of Ontario to understand the financial impacts on municipalities.

Although much of the financial impact on municipalities will not be known until the regulations have been passed, the proposed changes resulting from Bill 108 appear to have significant financial impacts on municipalities and future debt levels by shifting costs from developers to the taxpayer.

This additional impact on existing taxpayers, as well as new taxpayers, would drive increases in taxes or reduce the ability for municipalities to continue to fund community infrastructure such as parks, community/indoor recreation centres, libraries and parking facilities; secure parkland in new and intensified areas, and may impact the ability for municipalities to provide some of the critical hard (roads related) services required for development to occur.

The actions identified in Bill 108 are often inconsistent with the desired outcomes communicated by the Province. The Bill is inconsistent with the principle that growth pays for growth along with informed long term financial planning, and will have unintended consequences on both municipalities, as well as development.

A study by the Altus Group in 2018 indicated that the cost of development charges represented between 4% and 10% of the total cost of an average household. The Province's focus through Bill 108 is on community infrastructure development charges that currently experience a 10% statutory deduction under the DC Act and parkland dedication fees included in the Planning Act, which represents about half of total development charges. Despite the fact that prices are driven by market forces beyond the control of municipalities, it would be difficult to envision how the average house becomes more affordable as a result of a real price reduction of 2% to 5%. This also assumes that such savings will be passed on to the purchaser, which is not required in the legislative changes.

Growth Does Not Pay for Growth

In Whitby, a study by Hemson indicated that tax rates would need to increase by 1.5% each and every year over the next ten years to pay for the tax based cost of growth after considering revenues from new development.

Much of the proposed legislation introduces limits on the ability for municipalities to collect for the cost of development currently collected through parkland in lieu dedications and development charges related to community infrastructure.

Currently, the cost of development is shared by developers and taxpayers. Any reductions in the ability to collect development charges by shifting savings to the development process directly impacts existing taxpayers, either by shifting more pressure on taxes, or reducing the existing and future services that can be addressed within the funding available.

Although supply and demand does contribute to the price of a house, data from the City of Toronto questions if supply of ready to develop housing lands is the real issue to be addressed when considering affordable housing and rental

accommodation. Incentives specifically targeted to affordable or rental housing may be more effective to achieve the desired results and have less impact on municipal taxpayers.

Ontario municipalities currently are among the lowest funded in terms of provincial support, and as such, property taxes are the main source of revenue available to municipalities. Municipalities are challenged to keep taxes to a manageable level due to inflationary costs, construction costs, and the ability to maintain existing assets, as well as plan for a sustainable future.

Below, please find highlights related to the proposed changes to the Development Charges Act contained in Bill 108.

1) Development Charges will no Longer Contribute to Community Infrastructure

Development charges would no longer support community infrastructure identified in Whitby's ten year capital program, including parks and recreation, library, general government, parking infrastructure and non-administration operational facilities (i.e. non-admin portion of Town Hall and IT) for the Town.

Issues:

- In 2019, Whitby significantly reduced the ten year growth related capital program in order to mitigate the exisiting legislative tax impacts. After the review, the 10 year capital program includes a growth related capital program for community infrastructure of $164 million, either in process or planned over the 10 year timeframe with an additional $35 million identified in year 11. Major projects include Whitby Town Hall ($50 million), the Whitby North Sports Complex ($29 miilion), parks and trails ($34 million), technology infrastructure ($21 million), and a downtown Whitby parking structure ($10 million);

- The above program is financed through a combination of development charges, parkland cash in lieu contributions, debt, and tax based funding.

- Any change resulting from Bill 108 that does not allow a revenue neutral option to collect development related costs would put further growth related costs onto existing taxpayers as well a new taxpayers.

2) Narrowing of Development Charge Eligible Services

The new regulations are expected to prescribe eligible expenses for the remaining eligible services in the DC Act.

Issues:

- There is a concern the hard (roads and related) services would be prescribed/narrowed under regulation, further reducing the growth revenues available for municipalities and infrastructure needs.

3) Timing of Development Charge Payments

Development charges in Whitby are currently due at the issuance of a building permit.

Bill 108 proposes that the timing of development charge payments related to rental housing, non-profit housing development, institutional development, industrial development, and commercial development would include six equal annual installments; with the first payment due at building permit occupancy, and the remaining installments due at each of the following five anniversaries. Interest at a prescribed rate would be allowed on amounts owing after the first payment. Any unpaid amounts after five years would be eligible to be added to the property account as taxes:

Issues:

- The focus on rental and non-profit housing is consistent with the Province's stated objectives;

- Deferring payment for commercial and industrial developments is not consistent with the Province's stated objectives and would allow developers to benefit at the expense of taxpayers since Bill 108 would require municipalities to finance the obligations of developers over five years;

- This delay in payment creates a significant gap between construction of infrastructure and collection of development charges which would require municipalities to finance the costs through increased debt or deferred spending on infrastructure needed for development to occur; and,

- If a property is sold after development is complete, but within the five year timeframe, the new property owner is technically responsible for any outstanding development charges still owing.

4) Timing of Development Charge Rate Determination

Under the current DC Act, DC rates are determined at the time of payment (building permit stage).

Under Bill 108, DC rates are to be determined based on the rate in effect at the day an application for approval of the development in a site plan control area under Section 41 of the Planning Act was made, or the day an application for amendment to a by-law passed under Section 34 was made, or the day the development charge would be payable under Section 26.1 of the DC Act. This will result in the rate being set earlier in the development process.

Issues:

- This adds certainty to developers in terms of what is owing;

- It adds uncertainty and risk to municipalities due to the disconnection between the determination of costs and the actual costs incurred when the

infrastructure is constructed. All budgets and development charges are based on estimates that get updated based on better information the closer it is to construction of the infrastructure; and,

- Municipalities are experiencing significant price fluctuations on capital projects affected by inflation, tariffs, and the economic environment. The greater time between setting a rate and actual construction increases the uncertainty of the costs and the risk to the capital program. This is expected to increase the costs to taxpayers and increase debt requirements.

5) Library Collection/Materials Expansion

The expansion of library collections is specifically excluded in Bill 108 and as a result would fall to the tax base. Currently under the DC Act, this is an eligible service.

Issues:

- The current 2019 ten year capital growth program includes $1.75 million for expansion of the library collection due to Whitby's growing community; and,

- The ability to provide additional library material to keep pace with the demand from growth would fall directly on the tax base or reduce the ability of the library collection to keep pace with the growing community.

6) Waste Diversion

Under the current DC Act, growth related projects pertaining to waste diversion are an eligible service with a 10% statutory deduction. Under Bill 108, the 10% would be removed resulting in a $113,000 increase in DC recovery over the term of the 2017 DC By-Law.

7) Second Dwelling Units

Under the current DC Act second dwelling units in existing houses are already exempt from development charges.

Under Bill 108, second dwelling units in newly constructed houses and additional dwelling units ancillary to dwellings will also be exempt from development charges. This would permit accessory apartments (basement apartments and ancillary buildings) to be constructed in new houses without incurring development charges.

Issues:

- This is expected to reduce development charge collections.

8) Existing Front Funding Agreements

Existing front funding agreements would remain in effect. The ability to keep the existing West Whitby Front Funding agreement is positive.

9) Existing Revenue Opportunities under the Planning Act

Bill 108 eliminates parkland contributions under Section 42 (parkland) and Section 51 (plans of subdivision), as well as Section 37 density/height bonus provisions and rolls them into a new capped Community Benefit Charge along with community infrastructure (parks, recreation, parking, libraries etc.) previously included under the Development Charges Act.

Issues:

- Existing in kind contributions after receiving land in the Town was in the range of $400,000 per year and was expected to grow as development increases;

- Intensification allows for additional revenues not connected to a flat price and was expected to help supplement the cost of parks and park related infrastructure in the future; and,

- Section 37 provisions were an option that would have been investigated as the municipality matures and density/height increases to provide additional funding opportunities.

10) Community Benefit Charge

The proposed legislation allows municipalities to pass by-laws to impose community benefit charges for “community infrastructure”. This charge would be based on a maximum value equal to a prescribed percentage of the value of land based on the day before a building permit is issued.

Bill 108 allows municipalities to receive in kind contributions (facilities etc. required by development), or land from a developer. The value of these contributions is required to be subtracted from the Community Benefit Charge revenues in place for the development. Each year the municipality must spend or allocate 60% of the collections it receives.

Issues:

- The combination of a municipality’s inability to collect development charges for all infrastructure and cash in lieu for parkland, in addition to capping the rate(s), is expected to significantly add to the share of growth related costs paid by existing taxpayers. This will affect a municipality’s ability to fund growth related capital for community infrastructure (parks, recreation, parking, libraries etc.), while also impacting the ability to fund needed hard (roads and related) infrastructure required for development to occur;

- Land values are not a good proxy for need. The existing development charge regime allows a connection between cost of infrastructure and the rate to be charged. The new Community Benefit Charge is capped based on the value of land and does not recognize a link between costs and development charge rates;

- The current revenues from cash in lieu (collected and used as prescribed under the Planning Act) help offset the tax impact for eligible projects;

- Opportunities to address future intensification costs for parks and recreation services through the Planning Act are reduced; and,

- The required annual allocation of 60% of all fees collected impacts a municipality's ability to plan and fund for larger projects.

11) Increased Red Tape and Administrative Burden

One of the desired outcomes of Bill 108 by the Province was to reduce red tape; however, upon review it is believed that the proposed changes will increase the administrative burden for municipalities.

General Financial Concerns Related to Bill 108:

There is a lot of uncertainty in terms of what the details are related to the legislation since these would be included in regulations to be passed after legislation is approved.

This includes:

- What are the transition provisions under the Act?

- Will the Town's existing DC By-law remain in effect until it matures in 2022?

- Will the regulations prescribe eligible expenses for the remaining DC eligible services?

- What happens to existing reserve fund balances both for the affected development charge services and for cash in lieu?

- How is existing debt related to the library affected (currently funded by development charges and a tax based reserve fund)?

- Is there an ability to secure for the six annual payments of development charges?
- How will the cap on the Community Benefit Charge be determined?
- What type of additional study will be required to enact Community Benefit Charges?
- Can the Community Benefit Charge funding be used to pay for existing infrastructure currently funded under the affected development charges?
- Will the prescribed rate for land be updated on a regular basis?
- Will municipalities be able to update the Community Benefit Charge on a regular basis?
- Will the Community Benefit Charge assign charges to specific services or broader services?
- How do the changes encourage residential development to remain classified as affordable rental housing? How will the program be enforced and for what length of time?

Debt Capacity Impacts

The existing capital program forecasts to utilize debt to help fund projects. The ability to address the projected annual debt repayment related to hard (roads and related) services alone would require the full development charges collected from the first 332 homes each year for 20 years based on today's borrowing and DC rates. It is expected that debt levels would increase to address the impacts of Bill 108 and would further impact the ability to pay for infrastructure. Given the cyclical nature of the housing market when there is an economic downturn (similar to 2008-2013) and a slowdown in new development occurs, any shortfall in the DC portion of the fixed debt payments would need to be paid by the tax base.

Endangered Species Act, 2007 (Schedule 5 of Bill 108)

Major Changes

A. Current: In the event that a Species at Risk (SAR), are present or could be impacted as a result of a development, the current legislation requires the developer to be responsible for overseeing the implementation of a mandated Recovery Strategy.

Bill 108: Proposes the creation of a "pay in lieu" program and remove the requirement for the developer to oversee the recovery strategy.

Implications: This could reduce the incentive to avoid or minimize disruption to an area where SAR could be present. It removes the likelihood of the funds

being applied towards recovery efforts of the species, or even slowing down the process. This would also eliminate the requirements for the recovery efforts to take place within the area in which the impacts have been posed.

Coupled with the Province's ability for the delay in automatic protections by up to three years, as proposed, there is concern that this allows the developer to influence the decisions made on the details of a recovery strategy. (This refers to the change noted in C. below).

B. Current: Species currently identified as "At Risk" must be listed within 3 months of the Committee on the Status of Species at Risk in Ontario (COSSARO) submission report to the Minister of Natural Resources and Forestry.

Bill 108: Proposes the expanding of listing the report to 12 months.

Implications: This could result in the report which highlights the status of the species deemed "At Risk" being outdated and slow down the protection process for that species.

C. Current: Species at risk are protected immediately after the COSSARO report is submitted, even if the scientific evidence suggests the classification is wrong; provision also exists for the ability to revoke at a later date.

Bill 108: Proposes that the Minister be given authority to delay automatic protections for up to 3 years at their discretion.

Implications: A number of species have seen significant decline in periods of less than three years; examples include the Brown Bat, Monarch Butterfly and Honey Bee. By delaying the automatic protection, the impacts on a specific species could result in dealing with an elevated threat level of that SAR for which a more intensive recovery strategy may be required, which could result in a recovery strategy not being effective.

D. Current: The current SAR legislation provides framework to evaluate the level of threat a species may have based on their status in Ontario.

Bill 108: Includes the addition of polices to determine whether a species is at risk through evaluating of its "biologically relevant geographical range".

Implications: This would allow species to potentially be de-listed if populations of a particular species are present in another area, including outside of Ontario.

This could pose a significant threat to Ontario's biodiversity; the loss of one species in a specific area can have ecological impacts on a number of species. This policy does not factor risks that could be presented as a result of pests and disease or climate change.

E. Current: COSSORO is currently comprised of scientific and aboriginal experts.

Bill 108: Includes a provision that would allow non-scientific experts to join the committee.

Implications: Although details surrounding the membership have not been clearly defined, by expanding the membership to non-experts could result in a reduction in the scientific rigor in which decisions are currently made.

F. Current: Within the current SAR there is a requirement for Government Response Statements to be provided within 9 months of the publication of a recovery strategy.

Bill 108: proposes to remove the requirement for Government Response Statements.

Implications: This would remove the mandate for the public posting of recovery strategies which could result in reducing or removing opportunities for public consultation.

G. Current: In order to determine if a development could jeopardize the survival or recovery of a SAR in Ontario, the Minister is required to gain cabinet approval and consult with an independent expert.

Bill 108: Includes the proposal to remove the requirement for this minister to gain cabinet approval and consult with an independent expert to determine the level of threat that a SAR is exposed to.

Implications: The proposed change provides the provincial government with more authority to override scientific experts in order to allow activities to take place.

H. Current: The Endangered Species Act comes into effect each time a specific listed species could be impacted in the location in which the activity is taking place.

Bill 108: Includes parameters to provide a “Landscape Agreement” which provides approval for all activities within a location even if multiple projects are taking place in one area.

Implications: This would reduce the time for developers to gain approval for activities to take place. However, it would not address site specific issues and result in not identifying the impacts for all the species at risk that are present on the site on which the activity is occurring.

Currently there are 243 species listed under the Endangered Species Act most of which are listed as a result of declining population caused by climate change, habitat loss, disease, invasive species and pollution.

Although many of the proposed changes speed up the process for the developers, it also eliminates much of the ability to apply scientific rigor to the decision making process to ensure that SAR’s are provided the best opportunity of recovery.

Environmental Assessment Act (Schedule 6 of Bill 108)

The proposed changes associated with the environmental assessment process are not anticipated to negatively impact to the Town.

Occupational Health and Safety Act (Schedule 10 of Bill 108)

The powers of the Chief Prevention Officer (CPO) will be expanded primarily in the area of training and recertification training. Currently, Joint Health and Safety Committee (JHSC) member certification and refresher training schedules can only be amended if a change is made to the Act. Bill 108 will give the CPO the ability to make these changes in response to workplace issues, workplace safety trends, etc.

In addition, the clause does not limit these powers to JHSC training. As a result, impacts to municipal obligations and/or budget may come with little warning.

Ontario Heritage Act (Schedule 11 of Bill 108)

Staff have reviewed the proposed changes to the Ontario Heritage Act through Bill 108. The proposed changes to the Ontario Heritage Act would significantly alter the way the Town implements heritage conservation.

General Comments:

Use of the word "Prescribed": Bill 108 uses the word "prescribed" frequently throughout the proposed modifications of the Ontario Heritage Act. Without having regulations to review along with the modified Ontario Heritage Act, it is difficult to understand the potential implications Bill 108 may have on various heritage processes and resources in the municipality.

Some examples referencing the term "prescribed" includes:

Section 26.0.1 - **Principles:** A council of a municipality shall consider the prescribed principles, if any, when the council exercises a decision making authority under a prescribed provision of this Act.

Comment: No further reference to "prescribed principles" provided therefore unable to comment on how this proposed modification would impact the municipality. This comment also applies to Section 39.1.2.

Section 29(1.2) – **Limitation:** If a prescribed event has occurred in respect of a property in a municipality, the council of the municipality may not give a notice of intention to designate the property under subsection (1) after 90 days have elapsed from the event, subject to such exceptions as may be prescribed.

Comment: What does a "prescribed event" mean? The wording of this clause is unclear and the terms of a process are unclear. Does this mean that if a property is being reviewed for a Planning Act application and at that time, it is not brought forward for designation, that it can no longer be considered for designation in the future?

Section 32(18) – **Reapplication**: If a prescribed circumstance applies, the owner of the property may not reapply to have the by-law or part thereof designating the property repealed within the time period determined in accordance with the regulations, except with the consent of the council.

Comment: It is very difficult to understand what this clause speaks to or its impacts without having knowledge of what a “prescribed circumstance” or within a time period that has not yet been determined.

Section 33(2) – **Application for Alteration of property and Demolition or removal:** An application under subsection (1) shall be accompanied by the prescribed information and material.

Comment: Cannot determine how this would impact heritage permit applications. The existing application process and requirements are straightforward for property owners. These potential additional requirements should not be prohibitive and discouraging which would hinder potential future designations. Is this prescribed information and material at the discretion of the Province or the municipality? Clarity is required. This comment also applies to section 34(2).

Section 34.3(1) – **Council consents to application under s. 34 – required steps or actions:** The council of a municipality shall take such steps or actions as may be prescribed if the owner of a property designated under section 29 has applied in writing to the council for consent to a demolition or removal referred to in paragraph 1 or 2 of subsection 34(1) in respect to the property,

Section 34.3(2) – **Same (Demolition or removal):** a regulation made for the purposes of subsection (1) may prescribe different steps or actions that must be taken by a council in different circumstances or that no steps or actions need to be taken by a council in certain circumstances.

Comment: Sections 34.3(1) and (2) are too vague. Determining how this would impact the process is not possible based on the wording of these sections without further information on the term “prescribed”.

Changes to Appeal Process: The appeal process has been modified to replace the current appeal process to the Conservation Review Board (CRB) – an adjudicative tribunal that, through the mandate provided by the Ontario Heritage Act, considers a number of matters related to heritage properties - with the LPAT. There are concerns surrounding this including:

- the lack of heritage professional expertise within members of the LPAT, whereas members of the CRB were specifically heritage professionals with a thorough understanding and working knowledge of heritage matters; and,

- the removal of the ability for the council of a municipality to make the final decision. Heritage is a matter that is unique in each municipality, and the

decision has implications that impact the municipality. Allowing a Tribunal member who is not versed in local heritage matters to make the final decision can have longstanding impacts on the municipality's heritage resources.

New Complete Application and Timeframe Requirement: The proposed modifications include new requirements for a municipality to complete a notice of complete application for alterations and demolition applications within a specific timeframe, failing this there will be deemed consent. Staff are supportive of this approach to be consistent with Planning Act applications.

Notification in Local Newspaper: The reference to Notice Publication in a local newspaper is still identified throughout the modifications and no new options for circulation or notification have been identified. The costs associated with publishing notices within newspapers are upwards of $1,000 and may be required at various points throughout a process identified within this Act. These costs are extremely onerous to municipalities. Additionally, many communities are losing newspapers as a source of information due to changing times. Other options for circulation of these notices should be reviewed.

Section 27: Heritage Register

Section 27(5) – **Notice to property owner:** If a property that has not been designated under this part has been included in the register under subsection (3), the council of the municipality shall, within 30 days after including the property in the register, provide the owner of the property with notice that the property has been included in the register.

Comment: Staff recommend that the notice be provided 30 days in advance of a statutory public meeting, similar to section 41.1(6)(b) for Heritage Conservation Districts. This would allow municipalities to inform and educate a property owner about the process and rationale for listing their property and is consistent with current legislation already found within the Ontario Heritage Act. This may reduce the number of potential objections to council which would save resources on the part of the municipality and the property owner.

Section 27(7) – **Objection:** The owner of a property who objects to a property being included in the register under subsection (3) shall serve on the clerk of the municipality a notice of objection setting out the reasons for the objection and all relevant facts.

Comments: There are a number of comments that stem from this clause:

- The list of properties being added to the register will have already been brought forward to Council, this clause would then require it to be brought back to Council should an owner object. The time and resources spent on

this could be extremely significant for municipalities who are undergoing a review of the entirety of the register.

- This section, as written, does not provide a time limit for objection by an owner and is not consistent with other objectionable matters. It is recommended that an objection period of 30 days from the date of notice be added as this is consistent with other timeframes for objection.

- What would the municipal requirements be in response to an owner's objection? This process to list a property is now similar to a designation in order to support adding the property to the register. Depending on the municipal requirements, there are potential significant resources and cost implications with this.

Section 27(8) – **Decision of Council:** If a notice of objection has been served under subsection (7), the council of the municipality shall,

a) Consider the notice and make a decision as to whether the property should continue to be included in the register or whether it should be removed; and,

b) Provide notice of the council's decision to the owner of the property, in such form as the council considers proper, within 90 days after the decision.

Comment: How could Council and/or the Heritage Committee's summer recess impact this timeframe? Could the municipality have delegated authority for a matter such as this?

Section 30: Amending of Designating By-law

Section 30(8) – **Notice of withdrawal**: If the council of the municipality decides to withdraw the notice of the proposed amendment, either on its own initiative at any time or after considering an objection under subsection (7), the council shall withdraw the notice by causing a notice of withdrawal;

b) to be published in a newspaper having general circulation in the municipality.

Comment: Section 30(6) states that the owner may file an objection within 30 days of receiving notice of an amendment, as such, under this section, why would the notice be required to be published in the newspaper if the owner is the only body that can appeal the proposed amendment? This is onerous and costly to a municipality. This comment is also valid for Section 30(9)2.

Section 32: Repeal of Designating By-law, Owner's Initiative

Section 32(2) – **Notice required:** Upon receiving an application under subsection (1), the council of the municipality shall cause notice of the application to be given by the clerk of the municipality in accordance with subsection (3).

Section 32(3) – **Notice of Application:** Notice of an application shall be published in a newspaper having general circulation in the municipality and shall contain,

a) An adequate description of the property so that it may be readily ascertained;

b) A statement explaining the cultural heritage value or interest of the property and a description of the heritage attributes of the property, as set out in the by-law that is the subject of the application;

c) A statement that further information respecting the application is available from the municipality; and,

d) A statement that notice of objection to the application may be served on the clerk within 30 days after the date of publication of the notice of the application under this subsection.

Comment: This is a new notice requirement for a municipality that would require a notice of application to be published in a newspaper if property owner applies to repeal a designating by-law. This is costly and onerous for a municipality.

Section 32(13) – **Dismissal without hearing of appeal** – Despite the Statutory Powers Procedure Act and subsections (10) and (12) of this section, the Tribunal may, on its own motion or on the motion of any party, dismiss all of part of the appeal without holding a hearing on the appeal if,

a) The Tribunal is of the opinion that,

   i. The reasons set out in the notice of appeal do not disclose any apparent ground upon which the Tribunal could allow all or part of the appeal, or

   ii. The appeal is not made in good faith, is frivolous or vexatious, or is made only for the purpose of delay;

b) The appellant has not provided written reasons in support of the objection referred to in subsection (7) or (8), as the case may be;

c) The appellant has not paid the fee charged under the Local Planning Appeal Tribunal Act, 2017; or,

d) The appellant has not responded to a request by the Tribunal for further information within the time specified by the Tribunal.

Section 32(14) – **Representations**: Before dismissing all or part of an appeal on any of the grounds mentioned in subsection (13), the Tribunal shall,

a) Notify the appellant of the proposed dismissal; and,

b) Give the appellant an opportunity to make representations with respect to the proposed dismissal.

Comment: These sections state that the Tribunal can dismiss all or a part of the appeal without holding a hearing for a number of reasons identified above, however Section 32(14)(b) states that they shall give the appellant an opportunity to make representation with respect to the proposed dismissal. What type of format would this representation be in? Would this provide the Tribunal an option to reverse the dismissal? This could be costly to a municipality if outside legal counsel is required. The option for a appellant to make representations on a potential dismissal is identified through all new modifications that now allow appeal to the Tribunal, including Section 29(17)(b), 33(13)(b), 34(7)(b).

Section 33: Alteration of Property:

Section 33(7)(2) – **Same:** For the purposes of subsection (6), the time period is determined as follows: If a notice under subsection (4) or (5) is not served on the applicant within 60 days after the day the application commenced, as determined in accordance with the regulations, the period is 90 days after the end of that 60-day period or such longer period after the end of the 60-day period as agreed upon by the owner and the council.

Comment: This timeframe identified in this section requires clarity. This comment also applies to Section 34(4.3)(2).

Section 41: Designation of heritage conservation district:

Section 41(4) – **Appeal to Tribunal**: any person who objects to the by-law may appeal to the Tribunal by giving the Tribunal and the clerk of the municipality, within 30 days after the date of publication under clause (3)(b), a notice of appeal setting out the objection to the by-law and the reasons in support of the objection, accompanied by the fee charged under the Local Planning Appeal Tribunal Act, 2017.

Comment: Is it proposed that the responsibility to notify and send the appeal directly to the Tribunal shift to the objector? This is not consistent with other sections of this Act that state it is the responsibility of the clerk of the municipality to send the appeal.

Section 41(6) – **If no notice of appeal:** If a notice of appeal is given within the time period specified in subsection (4), the Tribunal shall hold a hearing ~~open to~~

~~the public~~ and, before holding the hearing, shall give notice of the hearing to such persons or bodies and in such a manner as the Tribunal may determine.

Comment: The wording stating that hearings are open for the public has been removed. Does this mean that Tribunal meetings not open to the public for matters that fall under this section?

Planning Act (Schedule 12 of Bill 108) and Local Planning Appeal Tribunal Act, 2017 (Schedule 9 of Bill 108)

Second Units

Currently, the Planning Act permits second units (i.e. accessory apartments) in single detached, semi-detached or rowhouse dwellings, and in an accessory building, if there is only one unit in the main (single detached, semi-detached or rowhouse) dwelling – i.e. total of two (2) units on one lot. It appears that Bill 108 would permit second units in a detached, semi-detached or rowhouse, as well as an additional unit in an accessory building – i.e. total of three (3) units on one lot. A proposed regulation that would provide the necessary details for implementation was not included with the release of Bill 108.

This change may not impact newer subdivisions/neighbourhoods, where single, semi, and townhouse lot sizes may not be able to accommodate all required zoning provisions (e.g. minimum required parking; minimum lot frontages; minimum landscaped open space; etc.) for a total of three dwelling units on one lot. However, the proposed change may impact older neighbourhoods with larger lot sizes, where required zoning provisions could be met for additional units.

Accessory apartments represent approximately two percent (2%) of Whitby's existing housing stock. Over the last ten years, the Town has averaged approximately 28 new accessory apartments annually. Between 2016 and 2018, there was a total of 144 new accessory apartments registered (approximately 10% of new housing stock).

The more significant impact is related to the potential foregone development charge revenue under the proposed changes to the Development Charges Act which would exempt all second units (as discussed in more detail earlier in this report).

Inclusionary Zoning

Currently, municipalities would be able to determine where Inclusionary Zoning (for affordable housing purposes) could be applied, subject to undertaking an assessment report regarding housing need and demand and financial implications. Bill 108 would limit the application of Inclusionary Zoning to: protected Major Transit Station Areas (MTSAs); areas subject to Community Planning Permit System (CPPSs); or, areas as ordered by the Minister.

Whitby has not yet undertaken the necessary steps to implement an Inclusionary Zoning By-law. Whitby has also not developed a CPPS (i.e. development permit system). Protected MTSAs may be identified through the Region's Envision

Durham Municipal Comprehensive Review (MCR). Should a municipality want to use Inclusionary Zoning for affordable housing, then it should be empowered to determine the area(s) to which it could be applied, and should not be restricted to applying only to MTSAs, CPPSs, or Minister-ordered areas.

Reduced Timelines

Amendments to the Planning Act brought about by Bill 139, the Building Better Communities and Conserving Watersheds Act, 2017 have been largely repealed. The proposed changes will have an impact on both the timing and approach taken by a municipality to evaluate development applications and by the LPAT to adjudicate an appealed application

Bill 108 proposes to significantly reduce the timelines for decisions regarding Official Plan Amendments, Zoning Amendments and Draft Plans of Subdivision, as outlined below:

Application Type	**Pre-Bill 139**	**Bill 139**	**Bill 108**
Official Plan Amendment	180 days	210 days	120 days
Zoning By-law Amendment	120 days	150 days	90 days
Draft Plan of Subdivision	180 days	180 days	120 days

Bill 108 would also eliminate the ability to extend the approval timeframe for OPAs by an additional 90 days, with mutual agreement of the municipality and approval authority (e.g. Town of Whitby and Region of Durham for non-exempt OPAs, Secondary Plans).

Reduced timelines are impractical and limit the ability of staff to adequately circulate, review, assess, and make recommendations regarding applications. Shorter timelines would also limit staff's ability to conduct effective public consultation and work collaboratively with applicants for the best planning outcomes for the community.

The intent of Bill 108 is to reduce processing timelines to bring new dwelling units to market quicker. However, the unintended consequence is that shorter timelines could lead to more appeals for non-decisions, protracted timeframes awaiting LPAT hearings and decisions, and adding to the existing backlog of LPAT cases as a result of the transition from OMB to LPAT.

The Province should maintain the timelines established by Bill 139 which were based on extensive consultation with stakeholders.

Consistency/Conformity Test and LPAT Changes

Appellants are no longer required to “explain how” the matter being appealed is inconsistent with, or not in conformity with, Provincial and Regional planning policies. Although Bill 108 still maintains the ability to appeal based on the consistency/conformity test, it would no longer limit appeals to just that test. Rather, an appellant could also appeal provided they include land use planning reasons for an appeal (i.e. old OMB hearing “de novo” approach). If an appellant were to appeal on the basis of inconsistency/non-conformity, they must expand on the consistency/conformity matter in their appeal.

Bill 139 established a higher standard for consideration of appeals – the consistency/conformity test. This approach provided greater weight to local decision-making that was consistent with, and in conformity with Provincial land use planning policy directions. A shift to the pre-LPAT, former OMB approach regarding appeals that are not just consistency/conformity appeals, provides an additional opportunity to be heard at the LPAT, which could potentially lead to an increased number of appeals. As noted above, this further adding to the LPAT backlog would be contrary to the intent of Bill 108 to get housing to market sooner.

Instead of requiring the streamlining of hearings as implemented in Bill 139, the LPAT will now have the discretionary authority to limit any direct examination or cross-examination of a witness if the LPAT is satisfied that all matters relevant to the issues in the proceeding have been fully or fairly disclosed, or where the LPAT considers appropriate. Given the LPAT’s current practice of not limiting examinations or questions, the likely outcome of this discretion will be a return to lengthy hearings.

While the regulations are not yet available, Bill 108 proposes to provide for mandatory mediation or other dispute resolution processes if prescribed, in specified circumstances. It also repeals provisions relating to the LPAT’s ability to seek direction or refer matters of law to the Divisional Court.

Implications to Municipalities Regarding the LPAT Changes

Bill 108 will likely result in an increased number of appeals for non-decision by Council, because of the time-limited municipal opportunity for a full review of the planning application. The proposed dispute resolution processes will likely be geared more towards expediting approvals of development applications, instead of incorporating projects into a comprehensive planning process undertaken and properly researched by municipalities.

The return to de novo hearings based on wider grounds for appeal, and the reinstatement of the power of the LPAT to be a substitute decision maker for Council, will have the effect of reducing regard for Council’s decision-making authority with regard to planning matters.

It is recommended that the Province retain and strengthen the Bill 139 Planning Act grounds for appeals of zoning by-laws and official plan amendments to only issues of consistency with provincial policy statements, conformity with provincial plans, and (for zoning by-laws) conformity with the Official Plan. Deference to the

Town's Official Plan and Secondary Plan's should be enshrined in the legislation, which will require developers to adhere to those planning policies. This would have the effect of limiting the ability of appeals to the LPAT, and speed up planning approvals through the municipal process, which is more consultative and comprehensive than the LPAT process.

The Province should also be requested to properly staff the LPAT with sufficient numbers of planners, caseworkers, and hearing members in order to clear the current backlog. Nothing in Bill 108 addresses this operational concern or provides clear timelines for holding hearings or issuing decisions.

Third Party Appeals

Bill 108 would further limit who can appeal approval or conditions of Draft Plans of Subdivision/Condominium to only the applicant, municipality, Minister, public body, or prescribed list of persons. This change would align with the current process for Site Plan approvals and Removal of Holding Zoning Amendments. The intent appears to be further streamlining and expediting final approval timelines, thereby reducing costs associated with bringing housing to the market quicker.

Appeals by members of the public are more often associated with the Official Plan/Zoning land use planning instruments, than with the implementation mechanism of a Draft Plan of Subdivision. Although restricting third party appeals could expedite the approval process (in a limited number of circumstances), the low frequency of third parties appeals has generally not been a hindrance to the approval of subdivisions. There may be circumstances where a third party appeal of a condition of draft approval has merit, to address a material land use planning matter (e.g., noise mitigation, flood hazard), that may not be part of the OP or Zoning process. Because of the limited number/nature of circumstances where a Draft Plan condition is appealed by third party, there appears to be no demonstrated need to change the Planning Act to restrict third party appeals. However, the restriction of third party appeals for non-decision of privately initiated OPA, Zoning and Subdivision applications is supported.

Community Benefit Charge

The proposed changes to the Planning Act would replace existing Section 37 regarding 'Bonusing' with a new 'Community Benefit Charge'. Although the Whitby Official Plan contains policies regarding bonusing, the Town has not passed a by-law to implement existing Section 37 provisions. Without a proposed regulation, it is unclear what the administrative impacts would be if CBC's are included in the final version of Bill 108.

Parkland Dedication

Bill 108 has major impacts and changes in the way parkland is secured and developed. Within the current regulations of Section 42 of the Planning Act, the Town can require developers to provided parkland or a cash value equivalent through development applications/agreements. Bill 108 would replace parkland

dedication with a provision called a Community Benefit Charge. This charge would remove the Town's ability to require developers to provide parkland through development approvals/agreements. The alternative rate for parkland using a density-based parkland calculation (1 hectare/312 units) is also removed. Bill 108 now limits parkland to the value of the land at 2% for commercial/industrial and 5% for residential. This would have a major impact on the Town's ability of secure an adequate amount of parkland and the means of consolidating funds to purchase parkland.

Bill 108 would also remove the ability of the Town to utilize Development Charges to collect money to pay for park projects. All of the Town's new parks and growth projects including future parks in West Whitby and Brooklin Secondary Plan areas are funded up to approximately 90% by Development Charges. Major growth projects including those within the Waterfront Master Plan and Waterfront Trail are largely funded by Development Charges.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)

On May 2, 2019, the Province also released "A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)". The new Growth Plan would come into effect on May 16, 2019.

Website: www.placestogrow.ca

A Place to Grow: A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019): https://files.ontario.ca/mmah-greater-golden-horseshoe-place-to-grow-english-15may2019.pdf).

Planning and Development staff's comments regarding the January 2019, proposed Amendment to the Growth Plan, are outlined in Report PL 28-19: https://whitby.civicweb.net/FileStorage/97FDE12B289548A0BF96E030C4211879-PL%2028-19%20Staff%20Report.pdf

One of staff's previous comments included requesting revisions to the proposed Provincially Significant Employment Zones (PSEZs). There were no changes to Whitby's PSEZs, between the January 2019 proposed Amendment and the May 2019 Place to Grow versions. However, on May 16, 2019, the Province indicated that previous municipal requests for PSEZ changes are currently being reviewed and that municipalities can make further requests for revisions. Such requests could include realigning boundaries to existing zones, adding or removing parts of land to or from a zone (e.g., correcting boundaries based on existing land use designations), and creating new zones (e.g., along Highways 407 and 412). The Province has indicated that requests will be evaluated based on the consensus reached between upper-tier and lower-tier municipalities, and that Council endorsement will be required. Planning and Development staff will work with Regional (and Provincial) staff regarding appropriate revisions, as previously requested by the Town.

Growth Plan Transitional Regulation

Section 14.13.7 of the Durham Regional Official Plan (ROP) was included in the ROP as part of a settlement of ROPA 128 appeals. Section 14.13.7 identifies that certain lands (e.g., deferred lands) in north Whitby remain subject to appeal of ROPA 128, but can be brought back to LPAT for consideration for inclusion within the urban boundary. The proposed revisions to the transition regulation 311/06 do not identify the ROPA 128 deferred lands. Any LPAT decision regarding the deferred lands should continue to be considered under the 2006 Growth Plan, not the 2019 Growth Plan.

5. Financial Considerations:

Any financial impacts arising from Bill 108 are difficult to determine until the regulations are in place.

It is anticipated that the consolidation of community infrastructure development charges and the Planning Act cash in lieu provisions to the new Community Benefit Charge provisions where the rates are fixed, would impact the ability to fund the Town's existing 10 year capital program for community infrastructure of $164 million and negatively affect debt levels.

Once the full impacts are known, the proposed capital program may require further scope changes or deferrals to community infrastructure capital projects in order to minimize the impacts on existing taxpayers.

6. Communication and Public Engagement:

The proposed changes to the Ontario Heritage Act were presented to the Heritage Whitby Advisory Committee at their regular meeting on May 14, 2019. No comments on the proposed changes have been received from the Committee.

7. Input from Departments/Sources:

Office of the Chief Administrative Officer Report CAO 19-19 has been circulated across the Corporation and input has been provided by relevant departments.

8. Strategic Priorities:

a. Council Goals

The information contained in this report is consistent with the following Council Goals:

- To continue the Whitby tradition of responsible financial management and respect for taxpayers; and to understand the importance of affordability and sustainability to a healthy, balanced community.

b. Corporate Strategic Plan and Strategic Priorities

The information contained in this report is consistent with the following elements of the Corporate Strategic Plan and Strategic Priorities:

We will be a high performing, innovative, effective and efficient organization.

- Continually improve how we do things by fostering innovation and focusing on making our processes better.

9. Attachments:

Not applicable.