



**Ontario Professional Planners Institute
Submission to the
Ministry of Public Infrastructure Renewal
Comments on *Places to Grow*
Draft Growth Plan for the Greater Golden Horseshoe
April 18, 2005**

Introduction

The Ontario Professional Planners Institute (OPPI) is pleased to provide the Ministry of Public Infrastructure Renewal with comments on the Draft Growth Plan for the Greater Golden Horseshoe. OPPI has a longstanding interest in growth management issues and we would like to thank the Ministry for the opportunity to comment on the draft Plan.

OPPI supports, in principle, strong policies and mechanisms to implement a meaningful strategy for growth management and protection of the Greenbelt Area. We commend the Province for the substantial amount of work undertaken in these policy areas within an extremely ambitious timeframe. Given the tremendous growth challenges facing, in particular in the Greater Golden Horseshoe, the reinsertion of the Province's lead in planning to manage growth is welcomed.

While we have some specific concerns, we strongly support your Government's bold leadership in growth management planning. We urge the Government to show equally bold leadership in meeting the fiscal challenges of infrastructure planning, development, and operation. The Growth Plan will only succeed, and its vision for the Greater Golden Horseshoe will only be realized, if backed by very ambitious funding commitments.

We have structured our submission to identify 4 areas of concern and, in addition, we have included detailed commentary on specific policies in an attached appendix.

Introduction of Sub-Area Growth Strategies

The Draft Growth Plan introduces a new policy layer with the creation of five Sub-Area Growth Strategies. We support this direction as it recognizes that the Greater Golden Horseshoe area is a large and diverse territory where a one-size-fits-all policy approach would not be desirable for growth management. We are concerned, however, that Sub-Area Growth Strategies introduce another new layer of planning policy (in addition to local Official Plans, Regional Official Plans, Greater Golden Horseshoe Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan, Regional Market Areas, Watershed Plans, Source Water Protection Plans, and the Provincial Policy Statements). This has two key implications: additional resources and time required for the preparation of an additional set of policies; and secondly, the interpretation and understanding of this new policy layer.

In addition, we are concerned that the Draft Growth Plan defers many critical policy directions to Sub-Area Growth Strategies that could be addressed at the Greater Golden Horseshoe Growth Plan level. In particular, we propose that identification of built up areas, intensification corridors, affordable housing targets, and waste diversion targets should be addressed in the Greater Golden Horseshoe Growth Plan. Where appropriate these targets could be refined in the Sub-Area Growth Strategy.

OPPI recommends:

1. The Province should prepare Sub-Area Growth Strategies so as to maintain momentum and establish certainty in policy direction in a timely manner, in full cooperation with the relevant ministries, by no later than June 2006.
2. The Province should amend the Draft Growth Plan to include policies that: identify intensification areas, intensification corridors and built boundaries; and address affordable housing targets and waste diversion targets.

Intensification Strategies

The Draft Growth Plan proposes significant innovation in policies directed at encouraging intensification. OPPI supports policy innovation in this regard. In particular, we note the 40% intensification target and density targets of 200 people and jobs/ha in intensification areas and 40-50 people and jobs/ha in designated growth areas.

A better understanding of the basis and application of these targets is important. Some questions that come to mind include: on what basis were these targets established, how are they to be measured and what are the geographic territories to which they are to be applied? If the policies and their application are not clearly understood, the policy will not be effective and may create a greater impediment to intensification.

In addition, as noted in the Technical Paper – *Application of Land Use Intensification Target for the Greater Golden Horseshoe*, the policies and targets alone will not be enough to implement growth management. Complementary regulatory mechanisms and financial incentives are essential to the success of these plans and need to be matched with policy ambitions. It is our understanding that, amendments to existing legislation and a new implementation toolkit are being prepared to address this issue. We welcome the introduction of these supporting tools and would be pleased to comment on these initiatives at the appropriate time.

Finally, one of the greatest challenges at the local municipal level to achieve intensification policies in urban areas is objections from surrounding communities to proposals for increased density along corridors. The Draft Growth Plan identifies the need to protect heritage, stable neighbourhoods and environmental features in planning for intensification, however, the policies do not provide any direction to address the, at times, inherent conflict between this and intensification objectives. The addition of policy direction to address this conflict would be helpful.

OPPI recommends:

3. The Province should offer more detailed elaboration and interpretation regarding the application of intensification targets.
4. The Province should issue a draft implementation toolkit in support of intensification ambitions.
5. The Province should refine draft policy to address the issue of intensification in the context of stable residential neighbourhoods.

Natural System Policies

In Section 4.2, the Draft Growth Plan addresses and recognizes the value of a systems approach for the protection of the natural environment. This appears, however, to reflect traditional approaches to the natural environment and does not reflect contemporary strategies and innovations currently being employed in practice. OPPI encourages the Province to support and encourage innovative approaches to natural system protection. In particular, we are concerned that the natural system protection policies are based on approaches to greenfield developments and do not reflect the

range of urban conditions within the Greater Golden Horseshoe. More specifically, it is essential to ensure that the natural resource objectives do not conflict with intensification objectives or water source protection targets. For example, with regard to water source protection, it may be necessary to consider watershed-wide targets that allow for transfer of water source targets and performance standards from urban areas to other parts of the watershed.

OPPI recommends:

6. The Province should review the draft Growth Plan policy in light of current natural system preservation practices.
7. The Province should refine the natural system policies as they apply specifically to intensification areas, existing built up areas and designated urban areas.
8. The Province introduces, where possible and appropriate, policies in support of high performance environmental technologies and innovations (green site and building specifications, green infrastructure, etc.).

Implementation is Key

The Draft Growth Plan is an excellent foundation of policy direction in support of growth management. To be effective, this policy framework must be supported by a range of implementation and monitoring tools and the necessary financial and institutional resources. Adequate Provincial funding is key to the implementation of these plans. In addition to institutional support from the provincial level, there is a need for resources and training at the municipal level.

OPPI recognizes and fully supports the Ministry of Public Infrastructure Renewal's proposal for a 10-year infrastructure strategy. The correlation between the Draft Growth Plan Strategy and Infrastructure strategy is important. OPPI encourages the Province to consider targeted funding strategies in support of intensification and urban redevelopment and the utilization of public investment as a means to ensure compliance with the Growth Plan policies.

OPPI recommends:

9. The Province should release the proposals for implementation mechanism, financial incentives and resources at the earliest possible date.
10. The Province should consider targeted funding strategies in support of intensification and urban redevelopment and the utilization of public investment as a means to ensure compliance with the Growth Plan policies.

In conclusion, OPPI commends the Province for the overall effort related to growth management initiatives. This is a key policy direction for our Province and in particular for the Greater Golden Horseshoe. We appreciate the opportunity to comment on the Draft Growth Plan and remain willing to discuss or expand on any of the items raised in this submission.

Appendix

In addition to the above overriding comments, we offer the following specific comments for consideration.

Section Specific comments

Section 2 – Where and How to Grow

2.2.2.3

OPPI supports the forecast review every five years. There does not appear to be a provision in the legislation for the five year review. In addition, there doesn't appear to be a mechanism for the extension of the plan past the initial thirty year horizon to 2031. Presumably, the plan and forecasts should be extendible on a rolling basis with each five year review.

2.3.2.6/2.6.2.1

OPPI supports the mix of jobs and residents as part of intensification targets. It is unclear, however, how this will be measured (at what scale, net or gross density) or how residents per hectare densities translate into dwellings per hectare given the changes over time in residents per dwelling. Use of precedents to illustrate this level of mixed use density might be helpful.

2.3.1

Intensification Policies need to address the implications for recreational and seasonal development. In four of the Sub-Areas we have areas of recreational development. There is no recognition how seasonal or recreational development should be taken into account. At the individual municipal level this is very important. It is unclear what will happen to lower-tier municipalities that have seasonal development and can't meet intensification targets. Would this skew, for example, the requirements for areas in Peterborough County?

2.3.2.12

OPPI fully supports this policy direction.

2.3.2.14

OPPI fully supports the reintroduction of policy in support of secondary suites.

2.4

This section references “transit supportive densities”. The definition of the term describes the mixture of housing in support of transit use. While it is difficult to be prescriptive about transit supportive density, Ministry of Transportation’s Transit Supportive Land Use Planning Guidelines - 1992, holds relevance today and perhaps should be reissued as direction regarding these policies.

2.5.3 Employment Areas

Introduction of comprehensive review is a good step towards the effective preservation of employment land. Policy providing direction with changing nature of employment uses, and encouraging sustainable practices should be considered.

This section needs better definitions: regional market areas and transit supportive density are examples of terms that require further explanation.

2.7

Terms, such as, ‘development cycle’ need to be defined.

2.8.2

We commend the statement that small cities and towns will not be permitted to become the next wave of sprawl and OPPI supports this policy.

Section 3 - Infrastructure to Support Growth

It is important that infrastructure investment supports existing and planned intensification areas as a priority for deferred maintenance and repair of infrastructure. This is critical to ensuring that the existing and planned concentrations of jobs and residences are properly served by attractive alternatives to driving. These core services are necessary prerequisites for any cost-effective and effective expansion of the transportation network.

We are concerned about the number of growth centres and the allocation of resources to such a large and investment-needy network of infrastructure. More specifically, Schedule 5 identifies two higher order transit lines that terminate in the middle of the Greenbelt, rather than at an urban centre. The rationale for this decision is unclear. If a GO Transit line is put in, there will be pressure for the area to grow, which is contrary to the Greenbelt Plan. If these pressures can be resisted, the potential demand for the line will be limited, thereby putting the cost-effectiveness of the service into question.

Accordingly, OPPI believes that a more considered, market-based analysis of how an integrated multi-modal transportation system could serve the Plan must be prepared: In particular, to help identify which investments should be put in place at what time in order to guide – that is, precede – development, so as to ensure that the alternatives to driving are in place before people and workers move in.

Section 4 - Protecting What is Valuable

We commend the province for providing a much stronger policy framework in support of natural system preservation. We note improvement from the Discussion Paper regarding integration of policy elements. While this provides the policy framework it is essential to ensure all related initiatives are integrated in the future e.g. source water protection.

4.3

We commend the set of policies now being contemplated for healthy rural areas located between the built up area and the Greenbelt Plan. There needs to be a sustainable agricultural policy that moves beyond land use planning. In areas where agriculture needs to diversify beyond traditional livestock and cropping systems (in order to more fully take advantage of near urban markets) governments can assist in this transition through appropriate incentives, education and extension. Unless agriculture can adapt to higher value and more profitable production there is a risk that the land base will become more valuable for other non-agricultural purposes.

4.5

We acknowledge and support the comprehensive approach that has been taken.

4.6.2

We acknowledge and support the provincial document focus on these issues. We suggest that another section be added on how land use/urban form can contribute to public health. Municipalities should be encouraged to improve travel options including walking and cycling and integrate recreation and open space areas within employment, commercial and residential environments so as to increase opportunities for greater physical activity and personal and social well being.

5.2.3, 5.2.5, 5.2.6 and 5.2.7

These should be dealt with in the Draft Growth Plan not Sub-Area Growth Strategies. These could, however, be refined by Sub-Area Growth Strategies.

Section 6 Implementation

This is critical. We encourage a commitment to resources and timelines as soon as possible. A stronger understanding of how to operationalize policies is key. Setting up a good data evaluation, response and feedback is critical.

6.2

An elaboration on the role and structure of Advisory Committee is needed. We strongly recommend that a Registered Professional Planner sits on the Committee

6.7

We support the Province developing guidelines.

6.8

We support the introduction of monitoring systems. In addition to a sprawl index, we suggest that there also be an intensity index, measuring success of actually getting a more compact and liveable urban form as a result of these policies. Making clear and meaningful information on plan performance widely available (e.g. online) in a timely fashion is critical for the plan's success.

Section 7 – Ten-Year Infrastructure Plan

OPPI strongly encourages the tabling of draft Infrastructure Strategy and other implementation tools for public comment as soon as possible.