



**Ontario Professional Planners Institute  
Submission to the Ministry of Public Infrastructure Renewal  
Comments on Discussion Paper:  
*Places to Grow – Better Choices. Brighter Future*  
September 24, 2004**

### **Introduction**

The Ontario Professional Planners Institute (OPPI) is pleased to provide the Ministry of Public Infrastructure Renewal with comments on the discussion paper: *Places to Grow – Better Choices. Brighter Future*. OPPI has a longstanding interest in growth management issues and we would like to thank the Ministry for the opportunity to comment on this document.

As the recognized voice of the Province of Ontario's planning profession, OPPI represents over 2,600 practicing planners and 400 student members. The Institute is a key stakeholder on planning and related issues. Our members work for government, private industry, agencies and academic institutions and are committed to improving the quality of Ontario's environments and communities. We provide leadership and vision on issues related to planning, development and other important socio-economic issues.

### **OPPI's Position on Growth Management**

OPPI supports policies that promote growth management in the Greater Golden Horseshoe. We believe that an effective growth plan for the area must be broadly encompassing, clearly articulated, and based upon sound objectives and policies. Further, the plan must be based upon the same principles as good planning - the orderly development of socially, economically and environmentally sustainable communities and the efficient and effective use of public investments.

OPPI supports growth management initiatives that achieve the following objectives:

- Establishing meaningful settlement area boundaries and implementing effective regional growth management.
- Promoting cities as the engines of the economy — ensuring downtown cores, mainstreets, towns and cities are healthy and liveable.

- Protecting prime agricultural lands, rural landscapes and natural resources.
- Linking new transportation, water and sewer infrastructure to sound and sustainable growth management plans.
- Strategically investing in and efficiently operating a full range of transportation modes.
- Implementing incentive-based systems and performance measures that consider and reflect social, economic and environmental priorities.
- Ensuring that existing and new communities are healthy places to live and have high standards of air and water quality.
- Investing in the physical infrastructure of existing communities through infill, reuse and intensification of well-serviced centres and corridors.
- Building healthy communities that respond to the social and cultural needs of existing and new residents.
- Making certain that every community, new or old, has a distinctive sense of place, character and vibrancy that attracts people and investment
- Ensuring that existing and new communities support the broad mixture and range of land uses, development densities and housing options that make communities liveable and meet economic and social needs.
- Protecting, acquiring and restoring open spaces and natural systems that define, characterize and support communities and regions.
- Ensuring fairness, openness, efficiency and certainty in the development process.
- Fostering cooperation and partnerships among governments, agencies, citizens and entrepreneurs in investing in and building communities.
- Promoting education and advocacy regarding the objectives, principles and implementation of growth management.

## ***Exploring Growth Management Roles in Ontario: Learning from “Who Does What Elsewhere”***

In September 2001, OPPI released a policy paper: *Exploring Growth Management Roles in Ontario: Learning from “Who Does What Elsewhere”*. (Copy attached) Through this paper OPPI recommended the following actions for federal, provincial and municipal consideration:

***Recommendation 1:*** *A multi-layered and coordinated growth management strategy for Ontario should be prepared. This strategy should include five key components: a clear mandate and commensurate commitments; clear definition of roles and means of collaboration between key stakeholders; innovation in policy frameworks supported by financial commitments; better tools; and promotion of education and awareness.*

***Recommendation 2:*** *Growth management roles of all levels of government and key stakeholders should be clearly defined and coordinated. The recommended model of growth management involves the federal government as broad policy setter and funding provider, the provincial government – the identified growth management champion – as policy leader, facilitator and principal funding provider, regional-scale governments as coordinators and conduits of funding and local municipalities as implementers. Innovative public-private partnerships should be sought to meet the medium- to long-term infrastructure and land conservation requirements for growth management.*

***Recommendation 3:*** *Seek innovation in growth management policy and legislation regarding approaches to short- and long-term planning, mechanisms and structures that address the scope of urban economies, means of accommodating long-term growth projections, financial mechanisms related to development and coordinated allocation of resources. Innovations should be applied in a coordinated and comprehensive manner in all areas affecting community growth management efforts, including transportation, energy, environment and finance.*

***Recommendation 4:*** *A powerful and effective set of tools should be compiled that complement the growth management strategy and policy framework. These tools could include innovative approaches such as urban growth boundaries based on carrying capacities, targeted funding and financial incentives.*

***Recommendation 5:*** *An education and advocacy program should be established focused on enhancing awareness of the principles and value of growth management and the components of an Ontario growth management strategy. This awareness-building effort should be coordinated among all levels and government and key stakeholders to make the best use of resources and to ensure information is available to the general public, the*

political, investment and development communities and professionals involved with growth management issues.

These recommendations remain valid and directly applicable to the growth management issues in the Greater Golden Horseshoe. It is key that these five recommendations, particularly Recommendation #4, are applied to the growth plan.

Subsequent to the release of this paper, OPPI has maintained a close watch on these issues and has commented on a number of key planning reform initiatives, many of which are directly or indirectly connected to growth management. Copies of OPPI's submissions are available on our website at: [www.ontarioplanners.on.ca](http://www.ontarioplanners.on.ca). In particular, we would like to highlight our August 30, 2004 submission to the Ministry of Municipal Affairs and Housing regarding the recently circulated planning reform discussion papers. Our comments on these discussion papers also apply to the efforts underway at the Ministry of Public Infrastructure Renewal. (Copy attached)

OPPI would now like to provide additional comments as they pertain to the discussion paper:

### **Objectives: Where and How to Grow, Infrastructure that Supports Growth and Protecting What is Valuable**

Much of what is outlined in these three sections of the discussion paper supports good planning principles and is in keeping with good growth management objectives. We applaud the Ministry's efforts to highlight these issues and would like to offer the following comments:

- OPPI supports the principle of intensification and compact development. We agree that there are many key redevelopment and intensification opportunities and we support initiatives that will help to use land more efficiently, effectively and in a more environmentally responsible manner. Much of the government's focus on intensification remains, however, on residential uses. Greater consideration needs to be given to intensifying industrial and commercial uses as these often comprise significant portions of a municipality. Densities of employment areas have not been increasing over time. If we are to achieve meaningful intensification that supports public transit, then we need to have densities for residential, employment and commercial uses that contribute to a compact urban form.
- For redevelopment, intensification and infill objectives to be fulfilled, there must be reforms that address the current economic and regulatory disincentives to urban development opportunities. For example, amendments to the development charges system and building code provisions should be considered in order to support intensification and

redevelopment activities. In addition, an examination of the environmental review process and liabilities related to brownfield redevelopment could address constraints to reuse of underutilized urban land. Finally, financial incentives by way of such tools as tax credits, tax relief or tax increment financing could help to balance the current financial disincentives for infill and brownfield sites.

- Innovative planning and design can be key to supporting intensification and compact development. OPPI urges the government to explore means of encouraging infill and other types of intensification. The Development Permit System holds promise in this area. OPPI supports this concept but it currently remains a limited pilot project with little evidence of success. OPPI supports a review of the approach to the Development Permit System and the need for refinements to the current regulations that will encourage and facilitate its use.
- The approach to urban growth boundaries introduces a more rigorous policy framework with regard to expansion but is limited to strengthening the current policy structure which on its own has a history of being ineffective. Effective growth boundary policies must be supported by policies and incentives which respect land use provisions on both sides of the boundary. In addition, the Province may wish to consider using the pilot project approach utilized for the Development Permit System to explore alternative means for defining boundaries. For example, boundaries could be defined by environmental science and carrying capacities.
- Brownfields in urban areas offer enormous potential for intensification and infill. The remediation and redevelopment of these sites are key urban renewal pieces and can support compact urban form objectives. While the discussion paper does address brownfields, given its importance and the complexities of redeveloping these sites, the growth plan for the Greater Golden Horseshoe will need to go much further beyond that which is outlined in the discussion paper.
- The discussion paper promises 10-year plans related to infrastructure and regional transportation networks. There is little detail provided as to how this will be accomplished in terms of funding and deadlines for completion. There is also insufficient detail as to how these efforts will dovetail with local plans.
- We are concerned with the potential interpretations and possible errors in mapping, particularly Map #4. There is, for example, a very large area in Niagara-Fort Erie designated as a future growth area. This does not appear to be in keeping with the government's intention of encouraging compact urban form. Although the mapping for future growth areas is intended to be conceptual, it needs to support growth management objectives rather than

appearing to work against these plans. In addition, major elements of this map are missing, such as, agricultural uses beyond those indicated as being grape lands or part of the Holland Marsh. It is imperative that accurate mapping is included in the growth plan for the Greater Golden Horseshoe.

As noted earlier, we agree with the planning objectives outlined in the discussion paper as they are based upon the sound planning principles that are basic to all good planning documents. We are concerned, however, that the linkage between these planning principles and their implementation is not readily apparent in this discussion paper.

### **Implementation: Moving Forward**

OPPI is concerned about the lack of detail in this discussion paper regarding implementation. There is simply too little information supplied as to the next steps. There are many good ideas but not much about how these will happen. For example, we are concerned about the impact that additional monitoring and review requirements will have on municipalities. We are also concerned that there will be adequate resources and effective tools to implement policy initiatives. The discussion paper does not provide enough detail as to how municipalities will meet these goals from either a training, staffing or financial perspective.

We are especially concerned that there does not appear to be any intent from the Ministry to circulate a draft plan. It is our understanding that the Ministry is going to release a final plan and then draft legislation for consultation. Given the importance of this document to the Greater Golden Horseshoe and the above noted lack of detail about implementation, we believe that it is imperative that prior to the release of draft legislation, stakeholders are given an opportunity to comment on a draft plan. Without the opportunity to review a draft plan, it is difficult to provide meaningful comments on implementation matters. There is still considerable work that needs to be done regarding how the implementation will unfold and it is essential that this is thought through and thoroughly vetted prior to the drafting of legislation.

### **Appendix – Glossary of Terms**

The recent round of planning-related consultations highlights the need for consistent definitions. The definitions listed in the *Places to Grow* discussion paper should be the same as those in the Provincial Policy Statement. For example, there are currently different definitions for brownfields and intensification in the draft PPS and this consultation paper. These documents require editing for consistency, elimination of repetition, and greater clarity. To clarify intent, the Province should ensure that identical definitions are included in the planning reform initiatives. The lack of clear and defined terms could have far reaching implications making interpretation difficult and the reading of sections unclear and problematic.

## **Conclusion**

OPPI is dedicated in its support of good community planning in this Province. Our members are committed to improving the quality of Ontario environments and communities. Planners can contribute substantially to the formulation of a growth management strategy for the Greater Golden Horseshoe. We urge the Ministry to draw upon OPPI as a professional resource on matters relating to planning in Ontario and we would welcome the opportunity to provide representatives to work with Ministry staff on this review and other planning related initiatives.