



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

May 28, 2015

The Honourable Ted McMeekin
Land Use Planning Review
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay St., Suite 425 (4th floor)
Toronto ON M5G 2E5

Dear Minister McMeekin,

On behalf of the Ontario Professional Planners Institute (OPPI), I am submitting the Institute's response with regards to the coordinated Provincial Plan Review – EBR Registry Number 12-3256.

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

In preparing our response we have considered the questions put forward in the Province's "Our Region, Our Community, Our Home" discussion paper we have widely consulted our membership. We would also take this opportunity to highlight several recent submissions that OPPI has provided, which reinforce a number of the comments within this submission, including:

- Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (EBR #011-1528)
- Amendment 2 to the Growth Plan for the Greater Golden Horseshoe (EBR #011-7468)
- Land Use Planning and Appeal System Consultation (EBR #012-0241)
- Proposed Performance Indicators for the Growth Plan for the Greater Golden Horseshoe (EBR #012-1213)
- Climate Change Discussion Paper (EBR#0123452)

We offer the following key comments:

OPPI Strongly Supports the Role of Provincial Planning

The planning policy landscape in Ontario has continued to evolve over the last decade and a half. OPPI strongly supports the leadership role that the Province has taken on a number of critical economic, social and environmental issues.

It is our understanding that the tools put in place, dating back to the Oak Ridges Moraine Plan (2002), Greenbelt Plan (2005) and Growth Plan for the Greater Golden Horseshoe (2006), as well as the Provincial Policy Statement (2005, 2014) and changes to the Planning Act, are intended to:

- Ensure Ontario's economy is competitive and innovative;
- Protect and enhance important natural features and functions;
- Enable cities, towns and villages to grow and prosper;
- Improve the way people and goods move;
- Promote complete communities;
- Ensure agricultural and rural areas are protected and also have the ability to grow and prosper; and,
- Ensure infrastructure is in place to accommodate all of the above noted objectives.

We support the goals and objectives of the Greenbelt Plan, Places to Grow, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. The Province should maintain the integrity of these plans and must strive to improve and update existing tools, and where required, deliver new tools that support the above-noted objectives.

1. There is an opportunity to harmonize, simplify and improve the plans

There is an opportunity to harmonize, simplify and consolidate the various Provincial Plans. The Province should explore opportunities to consolidate and harmonize the following plans into one or two consolidated plan(s):

- Growth Plan for the Greater Golden Horseshoe;
- Greenbelt Plan;
- Oak Ridges Moraine Conservation Plan; and,
- Parkway Belt West Plan (if this plan is to be reviewed).

While each plan was originally drafted with a unique purpose in mind, we support a multi-disciplinary and integrated approach to long range planning. There are opportunities to consolidate the above-noted plans into one larger plan or at a minimum, consolidate the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Parkway Belt West Plan into one plan (and the Growth Plan as a separate plan).

The consolidation of the Provincial Plans would ensure a consistent and repeatable time-frame for updating Official Plans (and avoid "perpetual" review cycles). The consolidation and harmonization must allow municipalities to more easily implement Provincial policy, reducing potential for conflict between various plans. Finally, a consolidated plan(s) would make Provincial land use planning more accessible to the public and other agencies.

The Niagara Escarpment should be acknowledged in a consolidated Plan, however, due to the permitting process and separate institutional nature of the Niagara Escarpment Commission, we suggest the policies of the Niagara Escarpment Plan remain separate and distinct. Key items which should be addressed in the Plan consolidation should include the use of graphics (diagrams, imagery, etc.), improvement of mapping, harmonization of key terms/definitions and, where possible, the use of plain language to ensure that the Plan can be easily understood by a broad audience.

2. There is an opportunity to articulate a new long term economic vision for Ontario

As a collection, the above-noted plans articulate a land use and environmental vision for managing change. Within the Greater Golden Horseshoe, Metrolinx's Big Move provides a transportation vision that is intended to help align land use and transportation planning objectives. Notably absent from the Provincial planning framework, however, is a broader economic vision. Most land use plans are developed with a clear set of economic and market objectives. The Growth Plan for the Greater Golden Horseshoe, however, is not based on a clear economic vision (apart from a series of population and employment projections). There is an opportunity, through this review, for the Province to take a step back and look at Ontario's position in the global economic landscape, assess the issues and opportunities and articulate a new long term economic vision. An analysis of this sort may lead to alternative approaches to, for example, employment lands planning, green energy siting, goods movement, and/or providing greater emphasis on planning for the creative economy.

The updated Provincial Plans need to formally articulate Ontario's future economic vision for the lands within the Plan areas (or more broadly at a Provincial scale). The vision should tie together the range of initiatives and programs, including but not limited to, strategies for growing Ontario's:

- Manufacturing sector (including both traditional and advanced manufacturing)
- Agricultural sector and the rural economy
- Construction sector
- Food and food processing sector
- Health care and health related industries
- Education (with an emphasis on the role of post-secondary education)
- Business services
- Technology
- Creative economy, the arts and tourism
- Innovation across all sectors

3. Continue to integrate long range transit infrastructure planning with land use planning

Moving people and goods in an efficient way is one of the most important challenges facing the Province. OPPI supports the continued integration of long range transportation and land use planning. Metrolinx's Big Move provides a strategy where major transit investments will occur. The Growth Plan identifies Urban Growth Centres (a number of which are also mobility hubs in the Big Move), along with a policy framework for major transit station areas and, at the regional and local level, a number of municipalities are planning rapid transit networks. Most municipal official plans have recently been updated to include transit-supportive development policies, and a number

of plans also include well-defined long range urban structure plans, showing major nodes, intensification corridors and mixed use zones.

Collectively, the work being done by various Provincial ministries and agencies, as well as regional and local governments, is generally positive. From a planning perspective, there is much to be proud of and much has been accomplished. Notwithstanding this, there continues to be significant obstacles for delivering an integrated, efficient transportation network. There are a number of opportunities to improve the current framework, including:

- Ensure there is a dedicated, long term provincial funding source for major transit investments (LRTs, Subways, BRTs, rural transit, etc.) – funding program should be tied to broader economic strategy referenced in item 3;
- Provide more creative financial tools to local and regional municipalities for transit funding;
- Examine relief opportunities for small businesses who are negatively impacted during the construction phase of major transit projects;
- Ensure that major provincial facilities that serve the public, such as hospitals, court houses, post-secondary institutions and police stations, are being located within major transit areas (recently, this has not always been the case);
- Integrate and harmonize the language and policy directions from the Growth Plan with the Big Move (e.g. ensure boundaries of the plans are the same, use common language and terms, etc.); and,
- Consider a program to support rural transit delivery.

4. Greater flexibility on implementation is required to address unique circumstances in rural areas

The four Provincial Plans cover diverse geographies and there is a need to recognize some of the differences and fine tune the policies accordingly. The majority of policies within the Growth Plan are intended to deal with a perceived common set of issues related to rapid population and employment growth, however, a number of municipalities actually face the opposite problem in that these are small, rural, slow growing or even declining places.

The policies related to compact built form, high density, and transit supportive development do not resonate in most small towns and villages (particularly those in the outer ring), many of which are shrinking. Municipalities with declining populations face challenges that impact delivery of municipal services, making it difficult to upgrade infrastructure and plan for the future. Planning for transit in this context is also unique. The impacts of aging populations in rural Ontario is also a major concern, as demographic shifts make it difficult to foresee shrinking places as being “resilient”. Finally, rural economies are dependent upon more than just a healthy mix of traditional employment lands, rather these also depend upon a diverse mix of activities, including farming, tourism and recreation, small businesses, aggregates and energy. In reviewing and updating the Provincial Plans, there is a need to apply a rural lens that recognizes some of the unique challenges and opportunities facing communities across rural Ontario (including those within the plan areas). The updated policy framework should take a closer look at the situation of rural areas and implement a program that responds to some of the above-noted challenges.

5. Incorporate direction for planning for climate change

As expressed in our recent EBR response to the Ministry of the Environment and Climate Change's Climate Change Discussion Paper, OPPI is supportive of the province's recent and ongoing initiatives relating to the need to integrate climate change mitigation and adaptation into the development and infrastructure planning process. This is an emerging field with a broad range of potential professional and institutional players and a need for collaborative problem-solving. Planners are aware that they have a significant role to play, and the Provincial Plan review provides an opportunity to articulate and provide guidance on the forms this may take. As a further expression and elaboration of the new climate change-related policies in the 2014 PPS, we are hoping that policies in the new Provincial plan(s) as well as provincial commitments and supplementary guidance will be developed to address such matters as:

- Protection, restoration, improvement and expansion of natural heritage systems to maintain and enhance carbon sequestration and stormwater storage, infiltration and drainage;
- Identifying and developing policies for areas with climate-related vulnerabilities;
- Promoting and supporting low impact development and green infrastructure;
- Reinforcing existing infrastructure where required;
- Providing requirements for climate change adaptation plans, including community energy plans;
- Expanding the knowledge and data base to clarify the implications of the changes taking place at regional and local levels, and;
- Developing standards and guidance that recognize the dynamics and implications of evolving information and knowledge (e.g. new flood plain mapping and the development capacity, property value, insurance etc. issues that go with this).

6. Expand and improve the range of tools for municipalities to plan for growth

There are also a number of opportunities to expand the tools available to municipalities to assist with the implementation of provincial policy, including:

- Updating guidelines for preparing municipal land budgets;
- Conditional zoning and form-based codes;
- Dedicated transit funding program (noted above in item 4);
- Initiate a process to examine opportunities for using a net environmental gain policy tools/framework (where certainty in net gains can be achieved);
- Mitigation and adaptation tools/programs that identify vulnerable areas, and promote restoration, rehabilitation and overall improvement/expansion of the natural systems, as well as low impact development/green infrastructure; and,
- Refinement to the Development Charges Act that allows municipalities to more sustainably fund infrastructure investments (see our upcoming submission on Bill 73).

Where new tools are introduced, we also suggest that the Province provide several pilot projects and/or municipal grant programs to demonstrate how to best implement new tools.

Conclusion

We welcome the opportunity to meet with you and your staff to further discuss our submission. To schedule a meeting or for further information, please contact me at 416-668-8469 or by email at l.ryan@ontarioplanners.ca

Sincerely,

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

Loretta Ryan, MCIP, RPP, CAE
Director, Public Affairs