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HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

February 28th, 2018

Aidan Grove-White
Manager, Ministry of Municipal Affairs
Ontario Growth Secretariat
Partnerships and Consultation Branch
777 Bay Street Floor
c/o Business Management Division, 17th floor
Toronto ON M5G 1Z3

**Re: Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe
EBR Registry Number: 013-2016**

Dear Aidan,

The Ontario Professional Planners Institute (OPPI) is the recognized voice of the Province's planning profession. Our more than 4,000 members work in government, private practice, community agencies, academic institutions and not-for-profit agencies in a variety of specialties across Ontario. Our members must meet strict practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (or "RPP").

On behalf of the Ontario Professional Planners Institute (OPPI), I am submitting our response with regard to the Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe. Our submission is intended to provide guidance on areas where we believe there are opportunities to improve the Methodology. OPPI supports the Province's efforts to deliver a standard land needs methodology. Since the introduction of the Growth Plan, there have been a variety of different methodologies utilized by municipalities and planning consultants across the Greater Golden Horseshoe in an effort to determine the long-term land need implications associated with the Schedule 3 forecasts.

During the last round of municipal comprehensive reviews, there were a number of complex and lengthy OMB hearings focused on the different land needs methodologies, technical assumptions and outcomes. Through past submissions, OPPI has encouraged the Province to provide additional guidance on land needs methodology, and we understand that a commitment was made to establish a standard approach through the recent changes to the Growth Plan (Policy 5.2.2c). It is our expectation that the introduction of a standard land needs methodology will provide greater clarity on the land needs forecasting process.

While OPPI is supportive of the need for additional Provincial guidance on land needs forecasting, we also suggest the Provincial government allow for flexibility to address unforeseen nuances which may emerge through the MCR process. It remains entirely possible that some exercises may produce undesirable outcomes which are only partially consistent with the Growth Plan objectives.

For example, as the proposed Methodology doesn't acknowledge housing unit mixes, it is possible some municipalities will experience shortages in low and medium density housing forms and produce a surplus of higher density housing. Maintaining a healthy and robust supply of housing for all unit types is an important aspect of planning for complete communities which should not be ignored.

Accordingly, it is critical that the Methodology recognize the importance of meeting all of the objectives of the Growth Plan (and not just the various targets and/or policies) to ensure the focus remains on finding positive planning solutions (as opposed to a strict adherence to process). We suggest the Methodology Document include formal acknowledgement that the overall intent of the Methodology is to provide a process which implements all of the Growth Plan objectives, and that the Province remains open to exploring solutions where the methodological conclusions appear to have undesirable impacts.

We are encouraged to see the Methodology Discussion Paper recognizes the need for dialogue and check-in with the Province as the Municipal Comprehensive Review (MCR) progresses. Because this methodology applies to the 21 upper- and single-tier municipalities across the Greater Golden Horseshoe, we recommend the Ministry of Municipal Affairs make the Land Needs Assessments available on its website as the methodology evolves. This will provide an opportunity for collaboration among municipalities and may also inform any modifications to the methodologies moving forward. It is our desire to see this increased dialog allowing upper- and single-tier municipalities to resolve area specific issues and concerns. The Province should consider how lower-tier municipalities will be engaged in discussions regarding land needs (for example, implementing local urban structure plans could present challenges in the two-tiered system). To that end, it is important that all municipalities have the opportunity to be involved.

In addition to the above, we offer the following additional suggestions:

- Disputes/issues should be addressed in a timely manner. The Province should consider how it will resource issues/concerns and plan to have a process in place to resolve issues arising during the MCR process (resulting from the outcomes of the land needs work)
- The Methodology should include a definitions or glossary section
- Providing standardized electronic forms in excel or similar format
- Providing an online resource to supplement the Methodology document with access to additional resources:
 - A pre-recorded video explaining how the methodology works, showing examples
 - Contact information for Provincial representatives responsible for administering the Methodology, so that planners can pose technical questions or gain access to a technical support resource
- Providing a summary document intended for members of the public and municipal officials covering the importance of land needs planning and generally explaining how the methodology works. As municipalities move through the MCR process it will be helpful to have access to supporting tools which promote education and awareness

Should you have any questions regarding our submission, please feel free to contact me at 416-483-1873 or by email at executivedirector@ontarioplanners.ca.

Sincerely,

A handwritten signature in black ink that reads "Mary Ann Rangan". The signature is written in a cursive, flowing style.

Mary Ann Rangan
Executive Director
Ontario Professional Planners Institute