



February 1, 2010

Hon. Brad Duguid  
Minister  
Ministry of Energy and Infrastructure  
Hearst Block  
4th Flr, 900 Bay St  
Toronto ON M7A 2E1

Hon. Michael Gravelle  
Minister  
Ministry of Northern Development, Mines and Forestry  
Whitney Block  
5th Flr Rm 5630  
99 Wellesley St W  
Toronto ON M7A1W3

**Re: Proposed Growth Plan for Northern Ontario, October 2009**  
**EBR Registry Number: 010-8128**

Dear Ministers:

On behalf of the Ontario Professional Planners Institute (OPPI), we would like to thank the Ministry of Energy and Infrastructure and the Ministry of Northern Development, Mines and Forestry for the opportunity to review the draft Proposed Growth Plan for Northern Ontario.

OPPI is the recognized voice of the Province's planning profession. Our more than 3,000 members work in government, private practice, universities, and non-profit agencies in the field of urban and rural development, urban design, environmental planning, transportation, health and social services, heritage conservation, housing and economic development.

OPPI is committed to creating and fostering healthy communities in Ontario. Launched in 2006, our "Healthy Communities, Sustainable Communities" initiative continues to emphasize the importance of urban design, active transportation and green infrastructure, links between public health and land use planning, and strategies for collaborating on tangible actions for healthier communities. Planners have a pivotal role to play in bringing together multiple partners and disciplines and in engaging their communities about the necessary changes. OPPI members are committed to creating and fostering healthy communities throughout Ontario and will play a key role in the implementation of many of the action items identified by the Northern Growth Plan.

OPPI commented on the "Towards a Growth Plan for Northern Ontario: A Discussion Paper" by letter dated September 23, 2008 (Available online at: <http://www.ontarioplanners.on.ca/pdf/Growth%20Plan%20for%20the%20North%20September%202008.pdf>) and met with Ministry staff to discuss our comments. We are pleased that a number of the comments we made on the Discussion Paper have been addressed including the promotion of environmental stewardship, addressing the quality of place, emphasis on First Nations and a discussion of the Provincial Policy Statement (PPS). Our comments on the Proposed Growth Plan follow. We hope that there will be future opportunities to provide additional comment related specifically to the details of implementation.

The Proposed Growth Plan is intended to co-ordinate the activities of many participants throughout the North. Its vision, organization and implementation rely on the activities of Provincial ministries, municipal governments, the private sector, institutions, First Nations and their Treaty organizations, and the public.

Although the document is a "Growth Plan," the six guiding principles do not make any reference to growing the population, economy or assessment base in northern Ontario. The Plan should clearly state that the Province of Ontario is committed to stabilizing these items and identify the role that northern Ontario will play as part of the solution to managing growth in Ontario and reducing the growth pressures in southern Ontario.

The plan purpose addresses five themes set out in the Introduction, under "Purpose of the Plan". These themes include:

- Building Towards a New Economy
- Investing in People and Progress
- Forging a New Relationship with Aboriginal Peoples
- Connecting and Strengthening Northern Communities
- Promoting Environmental Stewardship

The Plan outlines numerous action items. We recommend that the Plan include tables that summarize the various actions proposed within the context of the overall themes. The identification of priorities, who is responsible for individual actions, the time framework in which the action will be undertaken, and performance standards need to be integral parts of the Plan.

The Plan's weakness is the absence of a detailed implementation strategy. The consultation process to this point has been inclusive and it is our hope that the Province will continue its consultations with stakeholders as it develops a strategy for implementing the numerous action items identified. As a profession, we believe that we will have a key role to play in implementing many of the Plan's initiatives and would welcome the opportunity to be involved in additional consultations.

We appreciate where multiple responsibilities exist in this challenging fiscal environment, events may not occur as planned and ongoing adjustments will be required. It should be recognized that the Plan may require periodic updates to address these adjustments.

We believe this arrangement will provide the participants greater certainty as to their responsibilities and future actions and enable them to organize their organizational activities with plan implementation.

Our specific comments address each of the five building blocks addressed by the Plan.

### **Building Towards a New Economy**

Northern Ontario's industrial sector is diverse, yet mainly mining and forestry are emphasized in the Plan. While these sectors are important, there should also be references to advanced manufacturing, steel, emerging technologies and the infrastructure requirements to support these industries.

With respect to **mining**, the "Plan of Action" sets out general tasks to be undertaken to address innovation and emerging research in this sector. The Mining Act amendments address community plans in the Far North planning area. Additional discussion is needed on how the development and approval of community plans under the Far North legislation is to be coordinated with Mining Act approvals. Funding to implement community planning in remote communities will also be needed.

Infrastructure in the form of roads, hydro-electricity and transmission system development are important considerations when mining interests develop business plans upon which to base decisions to proceed through the various Mining Act approvals. Growth Plan infrastructure improvements should be coordinated in such a way as to facilitate development, where possible and where First Nations are in agreement. Furthermore, the Province should also allocate resources to address First Nation concerns where infrastructure crosses traditional lands and waters.

Where new mines have been developed in the last 20 years, many have been remote. Can municipal governments plan their infrastructure and services to better support and service these remote locations? The plan should discuss what these infrastructure and services might be.

The existing **forest** tenure and pricing system predates the Crown Forest Sustainability Act. It would be useful to summarize across the active forest management units what the current state of the forests is in order to establish regional benchmarks on which a new tenure and pricing systems can be evaluated. The existing forest management system involved field and plant operations in selected communities across the north. Many of these communities have come to rely on these operations for their economic livelihood and have planned and developed their municipal infrastructure and land uses in support of these activities.

The alternative new tenure and pricing regimes will impact those communities, depending upon where the operations are planned. Provision should be made to assess the economic impact these changes will have and provide for municipal governments to make adjustments, where required, in order to balance out the public costs and benefits that may accrue as the industry is reorganized.

A fuller discussion of the value added products and new markets will provide a better vision of what possibilities exist. This could be accomplished by more detailed discussion of success stories by region across the planning area.

Bill 191 addresses the Far North. In part it is premised upon maintenance of the northern Boreal Forest for carbon purposes. We understand studies have been undertaken of active forest management units. Could this research be summarized and discussed in terms of potential future management opportunities and constraints?

Some form of forest management certification appears to be needed to better position Ontario's forest products for world markets. Could the various alternatives be summarized and discussed?

With respect to **Green Energy**, several transmission and feed-in tariff pricing systems have been announced through programs implementing the Green Energy legislation. In the Far North, basic transmission and road infrastructure may be needed in addition to these programs in order to enable projects to be developed. Distances are too great and potential generating sources won't generate sufficient power to cover the transmission installation and operating costs easily. Furthermore, demand in remote communities is insufficient to address these development costs in many instances. What measures will be considered to address these matters should these circumstances arise?

With respect to **agriculture and aquaculture**, priority should be given to protecting farms and higher quality agricultural soils close to the main urban centres.

On the subject of **tourism and cultural industries**, we agree that the White Feather Forest Plan is an excellent model for sustainability. We also understand the plan provides for a protected area designation which the community wishes to develop as a special park. But because the Ministry of Natural Resources parks and conservation reserves policies are standardized across the Province, these have to be amended to enable the community plan to be implemented. Where possible, regulatory and administrative procedures under other legislation such as the Public Lands Act should be amended to help community driven efforts like this to be implemented.

Furthermore, the White Feather Forest Plan was prepared in part to enable forest operations north of the active forest management units. But the necessary licensing and management approvals under the Crown Forest Sustainability Act follow the preparation and approval of the White Feather Plan, largely as a separate planning effort. To the extent possible, future community plans should also encompass as many of the requirements for related approvals where infrastructure and Public Lands Act approvals.

In recent years, tourism operations both small remote independent operators and larger attractions located in urban centres, have suffered from the overall downturn in the economy. Funding the development, expansion and upgrading of tourism facilities and infrastructure will be required for this sector to remain viable in northern Ontario. There is also a need to realize a coordinated branding and marketing campaign for tourism and other sectors to ensure an accurate image of northern Ontario's strengths and competitive advantages.

### **Investing in People and Progress**

Northern Ontario has an older workforce than the provincial average and very little in-migration which will further compound the existing shortage of professionals and skilled trades in the region. This problem is expected to become a critical deterrent to economic development within the next few years. The Growth Plan should include a reference and methodology to develop appropriate programs and incentives to encourage workers to locate in northern Ontario.

Further, the Plan should include a reference to the importance on expanding northern universities and colleges both as an economic development initiative and as a means of developing an educated workforce which is more likely to remain in northern Ontario.

### **Forging a New Relationship with Aboriginal Peoples**

OPPI supports the measures provided for in the Plan. In the Far North, remote Aboriginal communities are the only settlements. Community plans for these communities may include infrastructure needed to address social, cultural, economic and environmental concerns.

Infrastructure such as all weather roads, transmission facilities and the development of hydro-electrical facilities to take communities off diesel generators may not be financially feasible, even with the special programs offered in the implementation of the Green Energy Act. Flexibility and additional financial assistance may be required in order to implement these programs, especially where these projects overlap with proposals addressed in the infrastructure section.

Many OPPI members are involved in consultation efforts on behalf of municipalities and the private sector. Difficult and weighty issues are being addressed on their own. A clear articulation of what consultation means and under what circumstances is critical to moving forward with economic development that has positive results for First Nations and other peoples. We encourage patience and sensitivity as these matters are resolved.

### **Connecting and Strengthening Northern Communities**

Northern Ontario is a large geographic area with widely varied environmental, social, cultural and economic circumstances. The allocation of scarce resources among declining, stable and growing municipalities will be challenging. In the Far North, we observe the remote Aboriginal communities are the only settlements with the exception of Moosonee.

The recommendation to develop and implement a comprehensive transportation plan with identified priorities and intergovernmental funding is strongly supported. However, it is anticipated that the critical issues relating to short line railways, the lack of deepwater port facilities and the continued improvements to major highways will be addressed in advance of completing the comprehensive plan.

The Growth Plan proposes to establish regional economic zones within a year. Given that this will significantly affect the economic future of northern municipalities, aboriginal communities and unincorporated areas, this proposed action should not come into effect without consultation and agreement among the various parties.

The Growth Plan also makes reference to regional service delivery. A similar consultative process should be followed.

### **Promoting Environmental Stewardship**

OPPI supports the use of traditional ecological knowledge in conjunction with science to manage northern Ontario's varied and important environmental features and landscapes.

We are very pleased to see the Plan recognize that there are distinct circumstances affecting northern and rural communities that should be acknowledged in the Provincial Policy Statement (PPS). Northern Ontario Planners have long been advocating the need for policy change and are eager to work towards a policy framework that recognizes the unique circumstances of the north, and provides the necessary flexibility to promote economically and environmentally sustainable development in the north.

In addition to a review of the PPS, it is recommended that the entire policy framework that applies to natural heritage be reviewed. There are currently policies applied under the PPS when Planning Act decisions are made; and policies applied by MNR when Public Lands Act decisions are made. This is further complicated when resource decision making occurs, such as the approval of forest management plans under the CFSA or Green Energy proposals where decisions affecting natural heritage policy occur.

It is also important to note that we are moving into a period where climate change impact mitigation and adaptation, together with the application of the Endangered Species Act and the Federal Species at Risk Act will result in significant changes in the application of natural heritage policies in organized municipalities and on Crown and private lands. How these various frameworks could be coordinated so the effect is to secure the natural heritage system and to provide for sustainable development on all lands should be contemplated.

With respect to **climate change** we understand that the Ministry of Natural Resources has undertaken significant research on climate change mitigation within active forest management units. We also understand that the Far North Science Advisory Panel established by the Premier to assess the planning area is about to release their report. These are important initiatives and we recommend that their results be used in this section's recommendations.

Mitigation and adaptation strategies are required to address climate change, especially in the Far North where infrastructure is limited and heavy reliance is placed on winter roads and diesel electrical generators. The Expert Panel on Climate Change Adaptation released its report last December. We recommend that a process be set out whereby recommendations in that report are considered and where possible addressed in the implementation of the Growth Plan.

As a professional body, OPPI knows that the role of planners is vital in helping Ontario, Canada and the world meet the challenges of climate change. We see the planning profession playing a key role in helping communities adapting to climate change.

OPPI supports the Far North Act and the leadership role provided by that legislation for First Nations in planning.

We are pleased that the Plan recognizes the importance of incorporating **quality of place** principles in local planning. OPPI's collaborative effort with the Ministry of Municipal Affairs and Housing to develop "Planning by Design: A Healthy Communities Handbook" is an example of where the planning profession is already taking a lead role in this regard. Planners will continue to be at the forefront of promoting quality of place principles and look forward to working toward the development of strategies to incorporate these principles as contemplated by the Growth Plan.

**Conclusion:**

OPPI members working throughout the north in municipalities, Conservation Authorities, the consulting community and elsewhere in the private sector, will be closely involved in the implementation of an approved Northern Growth Plan and have a strong resource of expertise to address its implementation.

I would be pleased to discuss our comments further with you. Please feel free to have your staff contact Loretta Ryan, MCIP, RPP, Manager, Policy & Communications at (416) 483-1873 x 226 or by e-mail at [policy@ontarioplanners.on.ca](mailto:policy@ontarioplanners.on.ca) for follow up or to schedule a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Sue Cumming". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Sue Cumming, MCIP, RPP  
President  
Ontario Professional Planners Institute



Copy:

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