

November 30, 2001

Hon. Chris Hodgson
Minister
Ministry of Municipal Affairs & Housing
17th Floor, 777 Bay Street
Toronto, ON M5G 2E5

Smart Growth Management Councils

Dear Minister:

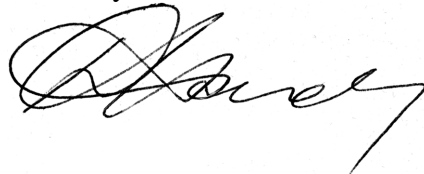
On behalf of the Ontario Professional Planners Institute (OPPI), I would like to thank you for the opportunity to provide comments regarding Smart Growth Management Councils. In this regard, please find attached our submission.

In summary, OPPI endorses the objectives as reflected in the mandate for Smart Growth Management Councils but has serious reservations about the proposals for boundaries and composition of these Councils. We question whether separate Councils, distinct from existing regional or municipal authorities, are required or whether an alternate mechanism(s) for coordinated planning should be, perhaps, explored.

The members of our Institute have invaluable insight and experience to lend to this important initiative and we urge the Province to call upon our expertise directly or through the Smart Growth Secretariat. Established in 1986, OPPI is the recognized voice of the Province's planning profession and provides vision and leadership on key planning issues. The Institute's 2,400 practicing planners are employed by government, private industry, agencies, and academic institutions. Members have skills and knowledge in a wide variety of fields including urban and rural community development, urban design, environment, transportation, health and social services, housing, and economic development.

I would be pleased to discuss our submission with you. Please feel free to contact me at 416-944-8444 or contact Loretta Ryan, Manager, Policy and Communications, OPPI at 416-483-1873, ex. 26.

Sincerely,

A handwritten signature in black ink, appearing to read 'D Hardy', written over a light grey circular stamp.

David Hardy, MCIP, RPP
Director, Policy Development
Ontario Professional Planners Institute

Copy:

Michael Fenn, Deputy Minister, Ministry of Municipal Affairs and Housing
Brad Graham, Smart Growth Secretariat, Ministry of Municipal Affairs and Housing

Dennis Jacobs, MCIP, RPP, President, OPPI

Loretta Ryan, MCIP, RPP, Manager, Policy and Communications, OPPI



Response to Request for Input on Smart Growth Management Councils

**by the Ontario Professional Planners Institute
submitted November 30, 2001**

Overview

Established in 1986, the Ontario Professional Planners Institute (OPPI) is the recognized voice of the Province's planning profession and provides vision and leadership on key planning issues. The Institute's 2,400 practicing planners are employed by government, private industry, agencies, and academic institutions. Members have skills and knowledge in a wide variety of fields including urban and rural community development, urban design, environment, transportation, health and social services, housing, and economic development. The members of our Institute have invaluable insight and experience to lend to Smart Growth initiatives and we urge the Province to call upon our expertise directly or through the Smart Growth Secretariat.

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The Smart Growth Strategy

OPPI has a strong interest in Smart Growth and growth management. We recently issued a position paper on the subject entitled *Exploring Growth Management Roles in Ontario: Learning from "Who does What Elsewhere"**. This research, released in October of this year, built upon our earlier position statement on effective Smart Growth and growth management, released in June 2001.**

The objectives and principles of the Smart Growth strategy, as set out in the Ministry's consultation paper, generally reflect those set out in our position paper and position statement. Similarly, we endorse the integrated approach to managing growth, with concurrent emphasis on economic, social and environmental issues. It is clear that Smart Growth provides an important opportunity to integrate diverse issues and initiatives. To be truly effective, however, a Smart Growth strategy must focus increasingly on implementation and coordination of ongoing initiatives at the local level.

* A downloadable copy of the report is available at: www.ontarioplanners.on.ca

** Also available at: www.ontarioplanners.on.ca

The Province's Role

OPPI concurs that the province should be taking a strong role in implementing Smart Growth principles across its jurisdiction. There are three major areas for Provincial leadership:

- Coordination and integration -- creating a strategic framework:
 - Establishment of a Secretariat reporting to an inter-ministerial committee provides an effective mechanism to coordinate provincial initiatives and foster partnerships amongst municipalities, the private sector and the non-government sector.
 - Creation of a strategic planning framework at the Provincial level can set the stage for inter-municipal strategies at lower tier levels.
- Creating the right tools for Smart Growth through innovative legislative and financial mechanisms to facilitate effective growth management and economic development.
- Providing the legislative framework at the Provincial level, through appropriate changes to the Municipal Act, the Planning Act and the Provincial Policy Statement. The current review of the PPS provides an ideal opportunity to enshrine the principles of Smart Growth.

OPPI believes the Province can perform a pivotal role in securing funding, in creating innovative new tools and in broadly coordinating the growth management efforts of its constituent municipalities.

Smart Growth Management Councils

The Province is proposing to establish Smart Growth Management Councils to further the implementation of its objectives. OPPI agrees that effective mechanisms must be developed to address inter-regional growth issues and to facilitate the integration and co-ordination of municipal Official Plans and cross-boundary municipal infrastructure. The mandate and activities set out in the consultation paper would achieve these objectives and the creation of strategic inter-municipal plans could sit within the broader-scaled Provincial framework and, as such, are generally supported. This raises the critical issue, however, as to how this might best be achieved.

OPPI has extremely strong reservations regarding the creation of Smart Growth Management Councils comprised of appointed officials for the following reasons:

- If granted decision-making authority, the Smart Growth Management Councils would create an additional level of planning.
- If not granted decision-making authority, the Councils would be helpful, at best, and ineffective and time-consuming, at worst.
- There would be no accountability or administrative/reporting relationships to existing municipalities and no ability to coordinate concurrent initiatives at the local level. Further, we note that there is no discussion in the paper on methods of public consultation in the decision-making process.

We believe that Smart Growth initiatives must be implemented within existing planning and political structures and result in a process that is streamlined rather than further complicated. This was one of the fundamental conclusions of OPPI's Growth Management paper. This does not, however, mean that new vehicles to ensure coordination and integration are not valid. There are models for achieving this without "reinventing the wheel". In many instances in Ontario, regional government provides the overall coordination and broad direction to its constituent municipalities. This same principle has been applied on an inter-regional or inter-municipal basis. The Greater Vancouver Regional District, for example, draws from elected officials to address inter-municipal issues in a partnership of twenty-one municipalities and one electoral district. It is a wholesale utility and transportation service provider to the municipalities and monitors progress on the "Liveable Region Strategic Plan" which was adopted by consensus of the municipalities.

The Greater Toronto Services Board was a similar partnership but suffered from lack of funding and authority over key elements of interregional structure. Our Institute is on record as supporting the creation of the GTSB *provided it was given the authority to prepare regional plans under very specific conditions*. Had this authority been granted, the GTSB experience might have been more productive.

An approach of "partnership of municipalities" (which could be termed Smart Growth Councils) would provide an effective basis to build readily on existing initiatives, resources and political structures to direct growth in a strategic manner throughout the province.

The issue of boundaries for these partnerships or Councils is one, which has not been adequately addressed in the Ministry's Consultation Paper. Notwithstanding the list of criteria, the rationale for creating five large Smart Growth Management zones is not readily apparent from the consultation paper. It is, therefore, difficult for OPPI to comment other than to observe that the proposed zones are extremely large and may be difficult to address strategically. In Northern Ontario, for example, the size of the proposed areas, their sparse populations, and the lack of municipal structure may make it difficult to find a "community of interest" upon which to formulate an interregional strategic plan.

We understand that you are seeking additional input through the consultation process on the delineation of boundaries, and look forward to further information in this regard.

Conclusion

In conclusion, OPPI is supportive of the Province's Smart Growth initiative and suggested principles. The notion of interregional coordination is critical and to that end the establishment of partnerships or Councils is vital. These should, however, be based on existing planning and political structures, so as to enhance the focus on implementation.

We thank you for the opportunity of commenting, and look forward to further information as it becomes available.