



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

Proposed Performance Indicators for the
Growth Plan for the Greater Golden Horseshoe, 2006
EBR Registry Number: 012-1213

April 30, 2014

Ms. Michelle Noble
Director
Ministry of Infrastructure
Ontario Growth Secretariat
777 Bay Street, Suite 425
Toronto, ON
M5G 2E5

Dear Ms. Noble:

On behalf of the Ontario Professional Planners Institute (OPPI), please find below comments and responses to the questions regarding the proposed performance indicators for the Growth Plan for the Greater Golden Horseshoe, 2006. We appreciate this opportunity to provide our input.

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").

Our submission is divided into two sections. This first part offers our high-level comments on the report and the second section provides detailed responses to the specific questions posed in your Consultation Guideline.

General Comments

OPPI supports the Growth Plan and we believe there is a need for transparent monitoring and benchmarking. It is within this spirit of support that we offer the following general comments and suggestions for improvement:

1. The indicators list appears to focus more heavily on Section 2 of the Growth Plan (Where and How to Grow) and covers some of the transportation

aspects of Section 3 (Infrastructure to Support Growth). However, in general, the indicators list does not appear to provide any opportunity to understand how well other aspects of the Plan are being achieved. Key gaps include indicators for monitoring the polices of:

- Section 3: Infrastructure to Support Growth (such as water and wastewater systems and goods movement)
- Section 4: Protecting What is Valuable (natural areas, prime agricultural areas, etc.)
- Section 5: Implementation (policy implementation, see item 2 below)

2. The Indicators list has all quantitative indicators, relying on a range of data sources and geo-spatial calculations, which have some limitations (as noted in the Technical Report). It might be helpful to include some policy-related indicators that demonstrate how municipalities are implementing the Growth Plan through proactive policy, such as:

- Number of municipalities (single, upper and lower) with approved official plans and zoning by-laws which conform to the Growth Plan and have been:
 - Adopted by Council
 - Approved by the approval authority
 - Appealed to the OMB
- Urban Growth Centre with approved secondary plans for UGC
- Major Transit Station areas with approved secondary plans for Major Transit Station Areas
- Length of kilometres of new/proposed higher order transit systems with:
 - Environmental approvals (EA approval)
 - Approved funding
 - Under construction(kilometres and type)

The introduction of a set of policy indicators would provide a useful lens for understanding why change is or is not occurring.

3. Our understanding is that one of the key drivers behind the Growth Plan, and planning in general, is to promote economic development and competitiveness. Recognizing that the Greater Golden Horseshoe (GGH) is an integral part of Ontario's economy and, more broadly, the Canadian and global economy, we suggest that the indicators list also include some general, GGH-wide economic performance indicators, such as Gross Domestic Product (GDP), per capita GDP, business investment (machinery and equipment), unemployment rates, etc. This type of data is tracked by Statistics Canada and we presume that special tabulations could be generated. The dataset would complement the "Plan and manage growth to support a strong and competitive economy" theme and would help to provide

an overall benchmark for understanding how well the GGH is performing (see item 4 below for additional details).

4. The list of indicators focuses on various aspects of how change is occurring within the Greater Golden Horseshoe. We believe it might be helpful to provide some benchmarking statistics which show how change is occurring relative to other major Canadian and North American cities.
5. One of the guiding principles of the Growth Plan is to “provide for different approaches to managing growth that recognize the diversity of communities in the *GGH*”. It would be beneficial to include an indicator which demonstrates how well this principle has been implemented – for example how the Growth Plan has been implemented in cities, towns, village, rural areas and First Nations communities.

Specific Responses to Consultation Guideline

1- PROPOSED PERFORMANCE INDICATORS

- **Are the proposed indicators the right ones? Why or why not?**
 - In general the proposed indicators cover a number of important metrics which will help to track the implementation of the Growth Plan.
 - As noted above, we believe there is room for additional metrics which track policy implementation, the protection of resources, infrastructure provision and diversity.
- **Which of the proposed indicators do you think will be most effective to evaluate the Growth Plan’s implementation? Why?**
 - The metrics which closely align with the prescribed targets found in the Growth Plan are the most useful in the short term, as they provide a direct link between specific policy and the result. Accordingly, indicators such as the Urban Growth Centre Density, Intensification and Major Transit Area Density appear to have the greatest potential. Over the longer term, other metrics will be equally useful once we have established historical results for comparison (e.g. commute time, mode split, etc).
 - For methodological reasons, the Greenfield Area Density (in its current format) appears to have less potential.
- **Are there any proposed indicators which do not meet the Ministry’s intent? Which indicators and why?**
 - One of the intents of the Growth Plan was to make more efficient use of land and reduce the rate of urban expansion. Indicator 12 does not provide an adequate assessment of this aspect of the Growth Plan. A more appropriate metric would compare historical expansions rates to current rates. Accordingly, the designation of new urban land and consumption of land would be more appropriate (with some benchmarking against historical figures).
 - The Location of Major Office Space meets the general intent of the Growth Plan to direct Major Office uses to Urban Growth Centres, however we note that the metric does not align with the Growth Plan’s definition of Major

Office space. Also, this metric might be more helpful if it included a finer grain breakdown of where major office developments are occurring (greenfields vs. built up area).

- **Are there any other performance indicators the Ministry should consider?**
 - For a commute time indicator, it might also be useful to provide a second indicator which shows the mode split by travel time intervals (i.e. the invert of the current indicator)
 - Consider including a robust set of environmental metrics, such as ecological footprint, greenhouse gas emissions, etc. Refer to Canadian Environmental Sustainability Indicators, which provides some useful examples.
 - For additional suggestions, please refer to our general comments noted on pages 1 and 2.

2- METHODOLOGY AND DATA SOURCES

- **Do you have any feedback on the data sources used to develop the proposed performance indicators?**
 - We understand that there is no perfect data source and appreciate the efforts made to use a variety of different data sets.
- **Do you know of any other available data sources which could inform the work on performance indicators? Are these sources available across the region?**
 - The Transportation Tomorrow Survey provides some interesting data on mode split, commuting time and origin/destination data.
 - Local municipalities collect a wide variety of statistics on planning approvals, employment lands, etc.
 - We are also aware of a range of alternative methodologies for calculating a number of the metrics. We would be happy to meet with your team to discuss alternative approaches/methodologies to calculating some of the more cumbersome metrics. The calculation for Indicator 8 (Connections), for example, could also include transit and walking connections and not simply look at "intersections", since the Growth Plan promotes multi-modal connections. For this particular metric, we are also aware of some alternative methodologies (such as the number of road, transit, cycling and walking connections per ha) and would be willing to discuss this item further with your technical team.
 - We note that some indicators use different metrics for walking distances (500 metres and 800 metres). We also note that a number of planning documents have historically used 400 metres to simulate walking distance. Some efforts to harmonize these metrics should be made (or provide a rationale for the different approaches).
- **Is it appropriate for municipalities to share data to measure implementation of the Growth Plan? Why or why not?**
 - Yes, it is entirely appropriate for municipalities to share data to ensure alignment, consistency and transparency.

REPORTING ON THE PERFORMANCE INDICATORS

● How often should the Ministry report on the Growth Plan's performance?

- The Ministry might consider providing a short yearly report based on annually available datasets, as well as a more thorough 5-year report which takes into account Statistics Canada datasets.
- Given the reliance on other agencies for statistics, the Ministry might also consider collecting and developing its own data sources and sets.

● Should reporting be aligned with the mandated reviews of the Plan?

- Where possible, the reporting should be aligned with the Province's review cycle.
- Although we note that there are a number of different Provincial documents operating on different review time frames (Provincial Policy Statement, Growth Plan, Greenbelt, etc.) some effort should be made to review all plans in a "comprehensive" fashion, at the same time.

● What is the best way to report on the performance indicators?

- Reporting should include a summary report; a detailed technical report; and raw datasets which are made available to the public for use and incorporation into local planning initiatives.

OTHER COMMENTS

- We appreciate the effort taken to deliver two levels of reporting (one which is visually attractive, easy to understand and in summary format) and a second document which provides a more detailed description of methodology.
- Throughout the Technical Report and the Discussion paper, there is reference made to "hectares". For clarity purposes, it would be helpful to identify whether the calculation is a "net" area or a "gross" area. In most cases, we understand the calculation to be a gross area, but this should be clarified, particularly where non-developable environmental features have (or haven't) been included.

Thank you again for the opportunity to provide comments. To discuss further, please contact me at (416)668-8469 or by email at policy@ontarioplanners.ca

Sincerely,



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