

April 16, 2025

Jasmine Gujral
Director, Local Government Policy Branch
Ministry of Municipal Affairs & Housing
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Re: Feedback on Proposed Amendments to O. Reg. 530/22 to Expand Strong Mayor Powers and Duties to Additional Municipalities

Dear Ms. Gujral,

On behalf of the Ontario Professional Planners Institute (OPPI), we are writing to provide our feedback on proposed amendments to O.Reg. 530/22 that seek to expand 'strong mayor' powers to 169 additional municipalities in the Province of Ontario.

About OPPI

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPPs) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions. Our members work across a geographically diverse cross-section of Ontario – from small townships to towns to big cities, from northern Ontario to the Greater Toronto Area.

OPPI Position on 'Strong Mayors'

The *Strong Mayors, Building Homes Act, 2022* originally created the concept of 'strong mayors' in the Province of Ontario by conferring additional authorities to Heads of Council for specified municipalities. OPPI participated in committee hearings to express support for the desired outcome of unlocking more homes, transit and infrastructure. OPPI did not oppose the broader concept of additional authority for some Heads of Council, but we expressed significant concern with the provision that would allow for the direct hiring or firing of the head of a planning department or Chief Planner.

Like engineers, RPPs are regulated professionals with training, expertise, and a strict Code of Conduct that requires them to act in the public interest and this sentiment informs their advice to Council. Councils retain full authority to make decisions, but the planner's advice is independent and governed by professional requirements regulated by OPPI.



OPPI recommends that the Ministry remove the Head of Council's ability to directly hire or fire the head of a planning department.

Retaining this authority for the existing list of municipalities and further extending it to additional municipalities presents significant risks, including:

- 1. Reducing Housing Approvals:** Planners recommend approval of projects based on the merit of the application, not local politics. The independence of their professional advice can be a shield for Councils to approve projects that may be unpopular with neighbourhood groups. This can create the permission structure for the remainder of Council to approve a project that a councillor opposes due to local politics. The independence of planners allows more projects to proceed; undermining it may risk the province's objective to build more homes, transit and infrastructure.
- 2. Risking Professional Misconduct:** Permitting a Head of Council to fire a Chief Planner would not only weaken the independence of professional advice to Council, but it would also create a risk for the professional to be compliant with OPPI's Code of Conduct and regulatory authority under the *Ontario Professional Planners Institute Act, 1994*. Planners may be forced to make difficult decisions between being offside with the Head of Council and risking their employment or being offside with their professional regulator's Code of Conduct.

Further, the *Planning Act* permits planning staff to provide expert advice as part of the Ontario Land Tribunal (OLT) appeals process. If a planner gives expert testimony at an OLT hearing that is contrary to the Head of Council's perspective, it may jeopardize their employment. This would risk existing checks and balances and destabilize the integrity of Ontario's planning system.

- 3. Increasing Cost to Taxpayers:** The precarious nature of a senior planner's employment, especially during a time when there is a shortage of planners, would negatively impact recruitment and retention of senior planners in the municipal sector, especially in smaller municipalities. This would not only slow down approvals, but municipalities may have to incorporate "golden parachutes" in employment contracts to attract new planners, adding more cost to local taxpayers.

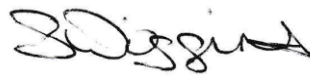
Thank you for the opportunity to provide feedback as the Ministry of Municipal Affairs and Housing considers proposed amendments to O. Reg. 530/22.

If you have any questions or would like to setup a meeting to further discuss our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Claire Basinski, MCIP, RPP, CP3
Chair



Susan Wiggins, CAE, Hon IDC
Executive Director

CC: Caspar Hall, Assistant Deputy Minister, Ministry of Municipal Affairs & Housing