



Comments from the Ontario Professional Planners Institute on Places to Grow Act, 2005

**Standing Committee on General Government
April 20, 2005**

Good Afternoon. My name is Gregory Daly. I am the Chair of Policy Development at the Ontario Professional Planners Institute. With me today is Melanie Hare who is a member of our Policy Development Committee and Loretta Ryan who is our staff Manager of Policy and Communications.

I would like to thank the Committee for the opportunity to speak. My remarks today are based on recommendations contained in our letter to the Minister, dated December 17, 2004 and our submission dated April 18, 2005. Copies of these and are other submissions related to planning reform are posted on the OPPI website at: www.ontarioplanners.on.ca

We will be offering comments today on both the Places to Grow Act and the Draft Growth Plan for the Greater Golden Horseshoe.

The Ontario Professional Planners Institute, also known as OPPI, is the recognized voice of the province's planning profession. OPPI provides leadership and vision on policy matters related to planning, development, and other important socio-economic and environmental issues.

As the Ontario affiliate of Canadian Institute of Planners, OPPI brings together the 2,600 practicing professional planners from across the province. In addition, we have about 400 student members.

The breadth of our members' knowledge and the diversity of their experience provides OPPI with a unique perspective from which to contribute to planning reform.

OPPI members work for municipalities and other governments, as consultants and in private industry, and for a wide variety of agencies, not-for-profits, and academic institutions. Our members practice in many fields including urban and rural community planning and design, and environmental assessment.

OPPI is a professional association funded entirely by membership fees and program and activity revenue. Through our public policy program we conduct research on planning issues and general quality of life issues. We distribute this information to our members, government, the public and the media. Our purpose is to provide objective and balanced submissions based on the collective experience and wisdom of our members.

Comments on the Act

While we have some specific concerns, we strongly support your Government's bold leadership in growth management planning.

We urge the Government to show equally bold leadership in meeting the fiscal challenges of infrastructure planning, development, and operation. The Places to Grow Act and in particular, the Growth Plan, will only succeed if backed by very ambitious funding commitments.

Bill 136 proposes to place approval authority for Growth Plans at the cabinet level. This results in the introduction of new policy layers with the creation of Growth Plans and specifically, in the case of the Greater Golden Horseshoe's Draft Growth Plan, five Sub-Area Growth Strategies which would be amendments to the Growth Plan.

While we support this direction, we are concerned, that these Sub-Area Strategies introduce another new layer of planning policy in the Golden Horseshoe. This new layer would be in addition to the Growth Plan itself, the Provincial Policy Statement, local and regional Official Plans, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan, the Niagara Escarpment Plan, Watershed Plans, and Source Water Protection Plans.

This has two key implications: additional resources and time required for the preparation of an additional set of policies; and secondly, the interpretation and understanding of this new policy layer. There is a point

beyond which a planning system can become so complex, no matter how laudable its aims, that it no longer functions efficiently and effectively, and loses its credibility with decision-makers and the public.

Municipalities will have to be full players at the table along with the Province in developing workable Sub-Area Strategies. Municipalities will have to develop and implement the official plan and zoning bylaw amendments necessary to conform with the Sub-Area Strategies and other new planning directions. They will have to interpret and apply these policies in their review of planning applications. Each Golden Horseshoe municipality will have to dedicate significant additional staff and resources to properly accomplish these tasks.

OPPI recommends:

- That resources be made available, perhaps on a matching grant basis, to support the local governments in their implementation of Bill 136.

OPPI supports the establishment of Growth Management Advisory Councils. We request greater detail on their role, constitution, and participants. We recommend that the Councils should include members of the planning profession. As the voice of Ontario's planning profession we look forward to being involved.

OPPI recommends:

- That a citizen based model be considered for the Advisory Council. This Council should include at least one member of the planning profession.

Comments on the Growth Plan

I would now like to turn our comments to the Draft Growth Plan for the Greater Golden Horseshoe. Many of our comments about this Plan are closely related to our comments on Bill 136 itself.

Introduction of Sub-Area Growth Strategies

We are concerned that the Draft Growth Plan defers many critical policy directions to the Sub-Area Strategies that could be addressed at the Growth Plan level. In particular, we propose that identification of built up areas, intensification corridors, affordable housing targets, and waste diversion targets should be addressed in the Growth Plan now. Where appropriate these targets could be refined in the Sub-Area Strategies. Time is of the essence, and deferring these decisions risks their not being made soon enough.

OPPI recommends:

- The Province should prepare the Sub-Area Growth Strategies, in full cooperation with the relevant municipalities, by no later than June 2006. This will maintain momentum and quickly establish certainty on key policies.
- The Province should amend the Draft Growth Plan to include policies that: identify intensification areas, intensification corridors and built boundaries; and address affordable housing targets and waste diversion targets.

Intensification Strategies

The Growth Plan's intensification policies and targets alone will not be enough to implement growth management. Complementary regulatory mechanisms and financial incentives are essential to the success of these plans and need to be matched with the Government's policy ambitions. It is our understanding that, amendments to existing legislation and a new implementation toolkit are being prepared to address these challenges. We welcome the introduction of these supporting tools and will be pleased to comment on them.

One of the greatest challenges to achieving intensification within already built-up areas are objections from existing adjacent neighbourhoods to proposals for increased density along corridors. The Draft Growth Plan identifies the need to protect heritage, stable neighbourhoods and environmental features in planning for intensification. However, the policies do not provide any direction to address the, at times, inherent conflict between intensification objectives and other needs. It would be helpful to add policy direction to address this conflict.

OPPI recommends:

- The Province should offer more detailed elaboration and interpretation regarding the application of intensification targets.
- The Province should issue a draft implementation toolkit to help municipalities implement intensification policies.

- The Province should refine the Growth Plan to address the issue of intensification in the context of stable residential neighbourhoods.

Natural System Policies

The Draft Growth Plan recognizes the value of a systems approach for protecting the natural environment. This appears, however, to reflect traditional approaches to the natural environment and does not reflect the most up-to-date planning strategies and innovations. OPPI encourages the Province to support and encourage innovative approaches to natural system protection.

In particular, we are concerned that the natural system protection policies are based on approaches to traditional greenfield developments. They do not reflect the range of urban conditions within the Greater Golden Horseshoe and especially the intensified development that the Draft Growth Plan advocates. It is essential to ensure that the natural resource objectives do not conflict with intensification objectives or source water protection targets. For example, with regard to source water protection, it may be necessary to consider watershed-wide targets that allow for transfer of performance standards from urban areas to other parts of the watershed.

OPPI recommends:

- The Province should review the draft Growth Plan policy in light of current natural system preservation practices.

- The Province should refine the natural system policies as they apply specifically to intensification areas, existing built up areas and designated urban areas.
- Wherever appropriate, the Province should introduce policies in support of high performance environmental technologies and innovations (green site and building specifications, green infrastructure, etc.).

Implementation is Key

OPPI recognizes and fully supports the Ministry of Public Infrastructure Renewal's proposal for a 10-year infrastructure strategy. The infrastructure strategy will be absolutely essential to successful implementation of the Growth Plan.—

OPPI recommends:

- The Province should release its proposals for implementation mechanisms and financial incentives and resources as soon as possible.
- The Province should target its funding strategies to support intensification and urban redevelopment, and to use public investment to ensure compliance with the Growth Plan policies.

Conclusion

In conclusion, OPPI commends the Province for its ambitious initiatives to better manage growth. This is a very important new policy direction for our Province and in particular for the Greater Golden Horseshoe. We urge the Government to take the complementary steps I have described, to ensure that Bill 136 and the Growth Plan will indeed guide us towards a healthy and prosperous future.

Like the Government, OPPI is dedicated to better, stronger, and clearer community planning. Our members have a unique role to play in delivering on these ambitions. We urge the Province to draw upon OPPI as a professional resource on matters relating to planning in Ontario. We welcome the opportunity to meet with representatives from MPIR or from any of the three parties to discuss our submission.

Thank you and we would be pleased to answer any questions.

Check against delivery.