Ontario Professional Planners Institute

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HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

May 20, 2015

Draft Minimum Distance Separation Formulae
Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West, 3rd Floor
Guelph, ON   N1G 4Y2

Re: Draft Minimum Distance Separation (MDS) Formulae

Dear Sir or Madam,

On behalf of the Ontario Professional Planners Institute (OPPI), please find below comments on the Draft Minimum Distance Separation Formulae. We appreciate this opportunity to provide 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" (RPP).

What parts of the Guidelines are helpful?

The MDS document is generally well written and provides some examples that aid in the understanding of the principles included in the document; however, the inclusion of some illustrations would be helpful to specifically show a circumstance that the text is contemplating.

How could the document be improved?

General Comments:
The language used throughout the document should be reviewed to ensure it is consistent with the terminology used in the relevant PPS policies (i.e. 1.1.3.8(d), 1.1.5.9, 2.3.3.3, and 2.3.6.1(b)) and is conveying the required level of policy compliance (e.g. 'shall' versus 'should'). In some areas, slightly different language or terminology is used in the document, which could cause confusion.

Many of the 43 Guidelines in the MDS Formulae appear to be more "requirements" than "guidelines". The document could distinguish between guidelines that are requirements, and guidelines that are simply for guidance. In addition, some of the guidelines appear to take precedence over others. If this is the intent, the document should specifically state which guidelines are paramount.

The MDS document should avoid providing direction to municipalities on what Planning Act approvals they should require for a particular proposal regarding possible changes to the calculated MDS separation (e.g. minor variance, zoning by-law amendment). Municipalities are in the best position to determine what planning applications and review processes are most appropriate.

Parts of the MDS document are to be incorporated into local land use planning documents, including the Blank Calculation Forms and the Factor Tales. It is suggested that the document be amended to clarify that this is recommended and not required. Municipalities may choose to specifically reference the MDS Formulae, as amended by the Province from time to time, and provide a link to the website containing the MDS Formulae, rather than including the majority of the MDS document, so that Planning documents do not have to be amended each time the Province amends the MDS document.

Are there any other comments about the draft Guidelines in general?

OPPI members are providing individual responses to OMAFRA directly regarding a number of technical issues with some of the Guidelines. Therefore, this submission does not provide specific responses to the individual Guidelines in the MDS Formulae.

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

Sincerely,

Loretta Ryan, MCIP, RPP, CAE
Director, Public Affairs
Ontario Professional Planners Institute