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HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

October 31, 2016

Ms. Cindy Tan, Manager
Ministry of Municipal Affairs
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street, Suite 425 (4th floor)
Toronto, ON M5G 2E5

Ms. Kim Peters
Strategic Advisor
Ministry of Natural Resources and Forestry
Niagara Escarpment Commission - Georgetown Office
232 Guelph Street
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L7G 4B1

**Re: Land Use Planning Review:
Proposed Growth Plan for the Greater Golden Horseshoe, 2016 - Notice #012-7194
Proposed Greenbelt Plan (2016) - Notice #012-7195
Proposed Oak Ridges Moraine Conservation Plan (2016) - Notice #012-7197
Proposed Niagara Escarpment Plan (2016) - Notice #012-7228**

Dear Ms. Tan & Ms. Peters,

On behalf of the Ontario Professional Planners Institute (OPPI), I am submitting the Institute's response with regard to the coordinated land use planning review. Our submission is intended to provide guidance on areas where we believe there are opportunities to improve the proposed plans.

OPPI is the recognized voice of the Province's planning profession. Our almost 4,500 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").

OPPI strongly supports the policy-led provincial planning system and the goals and objectives of the Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. The Province should maintain the integrity of these plans and must

continuously strive to improve and enhance existing tools and, where required, develop and deliver new tools to support the objectives and implementation of these plans.

Our submission is organized into four main sections:

- Proposed Growth Plan for the Greater Golden Horseshoe;
- Proposed Greenbelt Plan;
- Proposed Oak Ridges Moraine Conservation Plan; and,
- Proposed Niagara Escarpment Plan.

Proposed Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Golden Horseshoe (Growth Plan) provides a sustainable land use planning framework for one of North America's largest urban agglomerations. The Growth Plan is a significant tool intended to enhance the global competitiveness of the region and improve the quality of life for people living and working in the Greater Golden Horseshoe, as well as for those future generations who will call this area their home. OPPI supports, and is encouraged by, a number of the proposed policy changes to the Growth Plan, including:

- Stronger policies that are intended to improve the planning and design for complete communities.
- The introduction of a broad policy framework that directs municipalities to proactively plan for climate change through a combination of measures.
- The introduction of policies that support the planning and development of "complete streets."
- The strengthening of the housing policy framework that acknowledges the need for a more robust and comprehensive approach to planning for affordable housing.
- The acknowledgment of the need for a standard methodology for land needs assessment; and,
- The inclusion of policies for engaging the public, First Nations and Metis communities in efforts to implement the policies of the Growth Plan.

There are also a number of proposed policies that merit further refinement. We offer the following observations for your consideration:

- *Strategic Growth Areas and Nodes/Corridors*: The proposed plan introduces a new term – "strategic growth areas." It is our understanding that the term "strategic growth areas" is used to describe important locations for intensification – such as nodes, corridors, brownfields, greyfields, etc. From an urban structure perspective, it is important to note that nodes and corridors can and should also be planned for designated greenfield areas. The Province should provide policy direction to ensure connections are planned for existing nodes and corridors in built-up areas and future nodes and corridors in greenfield areas.
- *Greenfield Density and Intensification Targets*: The proposed Growth Plan includes new density targets for greenfield areas (80 people and jobs per hectare) and increased

intensification targets (60% across the built-up area). These two proposed changes appear to be significant and will have a range of impacts on the long range planning of towns, cities and regions within the Greater Golden Horseshoe. It's unclear at this time what the effect of these two major policy changes will be, although some have posited that there might be impacts on housing affordability and land availability. While the proposed Plan does provide some flexibility for municipalities in the outer ring, the expectation is that the pace of future urban boundary expansions within the inner ring will slow.

Density should not, however, be pursued at all costs and we believe the complete communities concept should be the overarching principle of the Growth Plan. The Province should consider flexibility that prioritizes the planning of complete communities of quality over the achievement of the planned density and intensification targets. There must also be flexibility to ensure the local context of municipalities can be accommodated. It is also important to consider how municipalities at different stages of urban development and growth will or can address greenfield and intensification requirements.

- *Transit Corridors and Transit Stations:* Policy 2.2.4.5 states that Major Transit Station areas will be planned to achieve minimum density targets (200 people and jobs per hectare for subways; 160 people and jobs per hectare for light rail; and, 150 people and jobs per hectare for express rail service on the GO transit network) by 2041. Policy 2.2.4.6 states that the targets do not apply to land designated as prime employment areas. It is important to note that there may be other mitigating factors that should be considered when planning the lands around station areas. Other factors could influence the ability to meet the proposed density targets, including the need to protect/conservate cultural heritage resources, managing land use compatibility impacts associated with rail infrastructure (such as a layover facility), impacts on stable residential neighbourhoods and the need for appropriate transitions in building height, scale and density. The policies should acknowledge local context and that in some circumstances an alternative target may be required depending on the context of the lands around the station.
- It is also worth noting that Metrolinx's current Mobility Hub Guidelines document, which we understand is being updated at this time, includes density targets for different forms of transit. *Table ii.3 Suggested Land Use Densities by Transit Technology and Transit Mode Share* for Mobility Hubs provides densities for subways (250 p/j per hectare or higher), express rail (150-300 p/j per hectare), light rail (200-400 p/j per hectare), bus rapid transit (100-250 p/j per hectare), regional rail (50-200 p/j per hectare) and bus/streetcar (50-150 p/j per hectare). The Province could consider providing a range of densities to reflect the range of possible conditions in and around different types of Major Transit Station areas. Alternatively, the Province might also consider harmonizing Policy 2.2.4.5 with Table ii.3 from the Big Move.
- The Province should consider reconciling the different distances for Major Transit Station areas and Mobility Hubs. Major Transit Station areas, which includes heavy and light rail, are defined as an area within 500 metre radius of the station, whereas Metrolinx's

Mobility Hub Guidelines distinguish between three different zones (primary zone of 250 metres; secondary zone of 500 metres; and a tertiary zone, which is beyond 500 metres, usually up to 800 metres). While it is understood that not all Major Transit Stations are Mobility Hubs, there is an opportunity to harmonize the two approaches.

- *Employment Land Framework:* The proposed Growth Plan includes a new policy framework for employment lands, introducing a two-tiered approach for employment lands in upper and single tier municipalities. The approach distinguishes between Prime Employment Areas and Employment Areas. OPPI is generally supportive of this policy framework, although we do foresee a number of challenges to implementing the policies. Employment land within the current planning framework is regulated to protect employment lands and limit conversion considerations through the municipal comprehensive review process. Further regulation and limitations to local municipalities (by only allowing consideration by upper tier municipal comprehensive reviews) could inhibit the ability to invest and attract development, respond to local market conditions, create jobs and in particular, redevelop brownfields. The proposed policies should be carefully considered to ensure municipalities can plan appropriately based on local objectives and context.
- *Regeneration Areas:* It is important to note that the proposed Growth Plan no longer includes references to “regeneration areas,” as it is our understanding that the use of this term was not well understood. Several municipalities, however, have incorporated policies and designated areas in official plans as “regeneration areas.” The regeneration area policy framework should be reviewed and a modified version included in the proposed Growth Plan as it is a useful tool for municipalities looking to promote brownfield redevelopment in strategic locations.
- *Implementation Tools:* It remains unclear as to when the Province will complete a number of the implementation tools referenced in Policy 5.2.2. Some of the proposed tools are a greater priority than others. Most municipal official plans, for example, include policies and schedules identifying natural heritage and agricultural systems (in reference to policy 5.2.2.2 b and c). The Province also maintains a number of guidelines for identifying the significance of natural features and refining the natural heritage system mapping. Accordingly, the need for the preparation of more detailed mapping at this stage appears to be less critical compared to other tools, such as the proposed land needs methodology (in reference to policy 5.2.2.1.c). It is crucial that a standard land needs methodology is released in a timely manner to ensure that municipalities and stakeholders have the opportunity to comment on a draft version prior to the release of the document. Growth Plan conformity work cannot commence until the Province completes the land needs methodology, hence the importance of accelerating this exercise.
- It is also recommended that the Province consider an aggregate resources study for the Greater Golden Horseshoe as part of its implementation program (Policy 5.2.2).
- Finally, clear transition policies must be articulated.

Proposed Greenbelt Plan & Oak Ridges Moraine Conservation Plan

We support and are encouraged by the following additions and modifications:

- The efforts to harmonize policies and defined terms across the four plans are a welcome change. There are, however, several opportunities for further improvements that are noted below.
- The inclusion of 21 major urban river valleys and seven associated coastal wetlands to what is protected by the Greenbelt.
- The addition of four parcels of land identified by the City of Hamilton and the Region of Niagara as Protected Countryside to what is protected by the Greenbelt.

We offer the following suggestions for consideration:

- The Province should consider harmonizing the definitions of natural heritage system in the Greenbelt Plan with the natural heritage system defined in the Growth Plan. Other terms that should be harmonized include: hydrologic features, key hydrologic features, natural heritage features and areas.
- The Province should consider defining the term “impervious areas” as it relates to Policy 3.2.2.e.
- Further harmonization is suggested to ensure alignment between Policy 1.4.3.2 of the proposed Greenbelt Plan and Policy 2.2.9 of the proposed Growth Plan. These policies apply to rural areas in the proposed Growth Plan and Towns/Villages and Hamlets in the Greenbelt Plan.
- The proposed Greenbelt Plan includes the direction that settlement areas are to be planned as “net zero communities” over the long term. The term net-zero is defined as *“communities that meet their energy demand through low-carbon or carbon-free forms of energy and off-set, preferably locally, any releases of greenhouse gas emissions that cannot be eliminated. Net-zero communities include a higher density built form, and denser and mixed-use development patterns that ensure energy efficiency, reduced distances travelled, and improved integration with transit, energy, water and waste systems.”* The goal of planning for net-zero communities is an excellent goal, however, the proposed Greenbelt (and Growth Plan) do not include sufficient detail on how communities are to achieve this goal. For this goal to be acted upon it will require more detailed policy guidance, as well as a more thorough understanding on how the Province will contribute to this effort (financially and otherwise).
- Policy 5.3 states that the Province will work with municipalities to prepare consistent mapping of the agricultural system across the Greater Golden Horseshoe. The proposed Growth Plan for the Greater Golden Horseshoe includes a similar policy direction. We note that a number of municipalities have already incorporated and designated lands for

agricultural uses within official plans. We are pleased to note the Province's intention to collaborate with municipalities, as understanding the methodology, expectations and intended outcomes of this exercise will be a primary concern for both municipalities. The Province should also consider an appropriate mechanism for engaging landowners in this exercise.

Proposed Niagara Escarpment Plan

We offer the following suggestions for consideration:

- OPPI supports the inclusion of policies for engaging the public, First Nations and Metis communities in efforts to implement the policies of the Niagara Escarpment Plan.
- We understand that the Niagara Escarpment Plan is an older Plan and is administered separately from the Greenbelt, Oak Ridges Moraine and Growth Plan. While the Plans are administered separately we believe there remains an opportunity for further refinement and harmonization. A number of key terms used in the three other Plans are different than those used in the Niagara Escarpment Plan, such as a number of the water resource and natural heritage terms, as well as how urban uses are defined and addressed. Other terms are used in the Niagara Escarpment Plan, but are not defined (net-zero community). We suggest that the Province take a closer look at the key terms and definitions used in the Niagara Escarpment Plan and attempt to further harmonize them with the other three major Provincial Plans and remove conflicts.
- The inclusion of cemeteries in the definition of institutional uses is a positive first step in reconciling some of the challenges for planning for cemeteries (although cemeteries are usually considered as a form of private open space). The Province should consider allowing cemeteries in certain designations (Part 1) and provide specific development criteria (Part 2).
- We understand that the Province is in the process of evaluating a number of mapping and boundary changes as part of the Plan review. We understand that the Province has made efforts to engage the public and landowners in the process through public open house events and online engagement through the NEC's website. It is unclear whether or not the Province has notified individual property owners regarding prospective changes, however, given the distinct nature of the NEP we suggest and encourage the Province to make best efforts to inform and engage affected property owners in the process.

Additional Items for Consideration

Overall, OPPI is generally supportive of the Province's efforts to refine and harmonize the four Provincial Plans. In addition to the items presented above, we would like to offer the following comments:

- The proposed changes to the four major Provincial Plans are substantial. The expectation is that it will take municipalities several years to implement. To ensure a

smooth transition the Province should deliver a robust and comprehensive training program for planners – including planners in the public, private and not-for-profit sectors.

- There is a need to articulate a long-term economic vision for Ontario, and more specifically for the Greater Golden Horseshoe. As a collection, the above-noted Plans provide a land use and environmental vision for managing change. These documents, combined with Metrolinx's Big Move, provide a transportation vision that is intended to help align land use and transportation planning objectives. The economic foundation of the Greater Golden Horseshoe continues to evolve and we believe this important piece is missing from the Provincial planning framework. Efforts should be taken to comprehensively study various aspects of the Greater Golden Horseshoe economy and identify any policy modifications based on the results. Areas of interest could include the role of advanced manufacturing, opportunities to growth knowledge-based industries, the importance of the agricultural sector and the rural economy, health care and health-related industries and other areas of interest as required.

With this in mind, the Province should also consider a comprehensive study of the Greater Golden Horseshoe's housing market to ensure that the appropriate and affordable range of housing choice is available in the market.

- There is a considerable reliance on development charges and assessment growth as the main vehicles for planning and building complete communities. There is a need to expand and improve the range of tools for municipalities to plan for and implement the Growth Plan and other Provincial Plans. Municipalities need access to a wider range of municipal finance tools and/or dedicated funding, particularly as new challenges begin to emerge.
- We encourage the Province to provide leadership on the monitoring and implementation of the objectives of the four Plans. Further details on the timing and mechanisms for monitoring should be provided for all four Plans.

OPPI supports the Province's efforts to improve Ontario's land use planning system. We would welcome the opportunity to meet with you and your staff to discuss our submission and answer any questions you may have. To further discuss our submission or to schedule a meeting, please have your staff contact me at (416) 668-8469 or by email at policy@ontarioplanners.ca

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ryan', followed by a horizontal line.

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