



June 8, 2010

John Taylor, Sr. Planner
Ministry of Municipal Affairs and Housing,
Local Government and Planning Policy Division,
Provincial Planning Policy Branch
777 Bay Street, Floor 14
Toronto, Ontario M5G 2E5

**Re: EBR Registry Number: 010-9407
Greenbelt Plan Draft Performance Monitoring Framework Discussion Paper**

Dear Mr. Taylor,

On behalf of the Ontario Professional Planners Institute (OPPI), we would like to thank the Ministry of Municipal Affairs and Housing for the opportunity to respond to the Greenbelt Plan Draft Performance Monitoring Framework Discussion Paper.

OPPI is the recognized voice of the Province's planning profession. Our more than 3,000 members work in government, private practice, universities, and non-profit agencies in the field of urban and rural development, urban design, environmental planning, transportation, health and social services, heritage conservation, housing and economic development.

OPPI is committed to creating and fostering healthy communities in Ontario. Launched in 2006, our "Healthy Communities, Sustainable Communities" initiative continues to emphasize the importance of urban design, active transportation and green infrastructure, links between public health and land use planning and strategies for collaborating on tangible actions for healthy communities.

Planners play a pivotal role in bringing together multiple partners and disciplines and in engaging their communities about the necessary changes. OPPI members are committed to creating and fostering healthy communities throughout Ontario and monitoring will be an important tool in achieving this goal.

Here is our response organized as answers to the questions raised in the Discussion Paper.

Question #1: Section 1.0 describes the limitations of the Greenbelt Plan and its ability to regulate pressures that contribute to matters such as urban sprawl, the fragmentation of agricultural land, and negative impacts in ecological features. As such, it is important to recognize the limitations of the Greenbelt plan when developing a performance monitoring framework. Do you agree with this approach?

Answer: We observe that the Niagara Escarpment Plan was prepared in the 70s and approved after hearings in June 1985 many years before the Oak Ridges Moraine Conservation and Greenbelt Plans were drafted and approved. Natural heritage system policies in the form of designations and policy applied to these plans are quite different making comparison potentially difficult. The planning area environments (i.e., Niagara Escarpment and Oak Ridges Moraine) are also quite different with each of the Plans having quite different construction intended to address their respective landscapes.

The Niagara Escarpment Plan is also administered by a development permit system and has been reviewed twice.

More recently the approval of the Lake Simcoe Protection Plan adds a further layer of policy to certain Oak Ridges Moraine Plan and Greenbelt Plan areas, which further affects comparability among and between areas within the larger Greenbelt Plan. There are significant differences between the four plans and we agree, these need to be addressed.

Question #2: Section 2.0 introduces the pressure-state-response (PSR) framework as an effective method to measure and evaluate broad policy issues and programs. Do you agree with the rationale for using a pressure-state-response framework in the context of Greenbelt Plan performance monitoring program?

Answer: There are many challenges that make application of this approach difficult in the short term. We suggest that it may be preferable to select areas within each plan and address them as case studies. Air and satellite imagery can be used together with municipal and Provincial data sources, some of which are mentioned in the report, to develop a thorough understanding of these areas for the purposes of evaluation.

We also prefer a more “bottom-up” monitoring approach that reflects the goals and objectives of each individual plan as expressed through its policies, drawing together common themes as they arise. It is clear that land-based data can tell only part of the story. Systematic interviews of municipal officials, local residents and sectoral groups can provide a good sense of how the area has evolved, pre and post approval of the Greenbelt Plan and its constituent plans, providing a means of interpreting the trends behind the numbers. The Niagara Escarpment Commission used this approach in the first five year review of the Escarpment Plan, albeit perhaps not as effectively as could have been the case.

The scope of the monitoring should draw from issues raised through the conformity processes, and should not exclude unintended consequences such as allowing only temporary new farm help residences in the Oak Ridges Moraine and the possible effects of this on the equestrian industry, and the treatment of larger agricultural barns as “major development” and possible effects of this on the ability of some agricultural sectors to respond to changes in their industry.

Question #3: Section 3.0 presents four guiding principles that were developed by an inter-ministry working group to guide the development of the performance monitoring framework. Do you agree with these guiding principles?

- **A layered monitoring framework**
- **Adaptive monitoring**
- **Trends**
- **System level approach**

Answer: We think it may be a stretch to apply the three Greenbelt Visions to each of the constituent plans. Furthermore, it is difficult to apply the four guiding principles without more detail on their application. We have difficulty visualizing how Figure 6 could be implemented.

While “adaptive monitoring” can be appropriate, this should also be seen in the context of the need for consistent data gathering and interpretation over the longer term.

Question #4: Section 3.0 also outlines our goal-based approach to developing performance monitoring indicators using the Greenbelt Plan’s broad vision. These policy theme categories are identified in Figure 6 (pg 15). Do you agree with a vision-based approach? Can you identify any additional policy themes that should be included?

Answer: The vision does not appear to match well with the purpose and objectives of the Niagara Escarpment Plan or for that matter the Oak Ridges legislation. There are policy themes that find expression in each of the plans that have greater consistency between the plans. These may provide a better thematic framework.

As noted above, we believe that an approach led by the actual policies and objectives rather than goals and visions would provide a clearer indication of how each policy is working, while enabling the broader picture to emerge.

We also believe that consultees will be more responsive to an approach that explicitly deals with their specific concerns, than with a “higher level” approach that may appear to exclude them.

Question #5: Section 4.0 provides an overview of the next steps proposed in the Greenbelt Plan Performance Monitoring Framework. Do you agree with these steps as outlined? Are there additional steps that should be taken to address other issues you feel are important?

Answer: Some focusing is required in order to undertake a work program within the scope of the review time framework and level of resourcing that will be available. A review isn’t a “re-doing” of the plan.

The Escarpment Plan has been reviewed twice. In the second effort, the scope of the review was focused. We recommend that you revise Steps 3 and following to provide scoping on those issues using stakeholder recommendations, following consultation.

Question #6: Appendix 1 presents a list of sample indicators and indicator profiles. Do these sample indicators reflect the direction proposed in the draft performance monitoring framework?

Answer: The sample indicators support our previous recommendation that select study areas be focused upon as opposed to applying these statistics generally across the plan areas.

When dealing with lot creation for infrastructure we suggest that a distinction be made between point-form infrastructure (some forms of stormwater management, energy generation) for which there is often a choice of locations, and linear (corridors etc.) infrastructure that often leaves less choice.

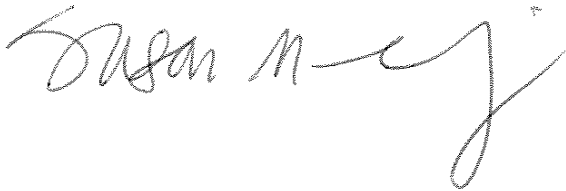
We share your concern that some indicators may suggest negative or positive trends where none exist. For example, a larger lot size may not be as critical for specialty crop areas, where farms are smaller as a rule than in other agricultural areas, and some lot creations may not result in negative effects, or may result in an overall benefit to agriculture.

Question #7: Are there any other suggestion you would like to make regarding the proposed monitoring framework? If so please provide us with your comments.

We suggest you address the recommendations of the Expert Panel on Climate Change Adaptation in this monitoring framework. As a matter of public policy, the question as to how well these plans address climate change adaptation will be important. Special attention should be given to endangered species, a focus of concern where climate change is concerned. The development of trails systems to encourage active living and recreation is another area in which emphasis is needed.

I would be pleased to discuss our comments further with you. Please feel free to have your staff contact Loretta Ryan, MCIP, RPP, Manger of Policy & Communications at 416 483-1873 x 226 or by e-mail at policy@ontarioplanners.on.ca for follow-up or to schedule a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cuming". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Susan Cuming, MCIP, RPP
President
Ontario Professional Planners Institute

Copy: Loretta Ryan, MCIP, RPP, Manager, Policy & Communications, OPPI
George McKibbin, MCIP, RPP, Chair, Policy Development Committee, OPPI
Steven Rowe, MCIP, RPP, Chair, Environment Working Group, OPPI