



June 19, 2009

Kyle MacIntyre  
Team Lead  
PPS Performance Monitoring Framework  
Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay Street, 14<sup>th</sup> Floor  
Toronto, ON M5G 2E5

**Re: Draft Performance Monitoring Framework and Draft Indicators for the  
Provincial Policy Statement, 2005**

Dear Mr. MacIntyre:

On behalf of the Ontario Professional Planners Institute (OPPI), I would like to thank you for the opportunity to comment on the Draft Performance Monitoring Framework and Draft Indicators Discussion Paper. We welcome and support better tools to measure and monitor the effectiveness of Provincial and municipal planning policies.

Established in 1986, OPPI is the recognized voice of the Province's planning profession and provides vision and leadership on key planning issues. The Institute's more than 3,000 members work in government, private practice, universities and non-profit agencies in the fields of urban and rural development, urban design, environmental planning, transportation, health and social services, heritage conservation, housing, and economic development.

Our comments on the Performance Monitoring Framework and Draft Indicators are structured as responses to the questions posed in the discussion paper. We would be pleased to continue to comment and offer our professional insight as key stakeholders as this process evolves.

**General comments:**

There remains a plethora of challenges and details to be resolved related to scale of measurement, metrics, data sources and implementation of the monitoring which in itself would be worth seeking input and having consultation on. In the absence of this detail, our comments on the relevance or success of the proposed indicators are limited.

Reliance on census data is a good first step. However this reliance may limit our ability to understand more localized changes or regionally specific changes as the Census Metropolitan Area (CMA) geographies do not always align with municipal boundaries. Over the long term, municipalities should seek more specific means for data gathering and monitoring. Utilizing the measures set out in the Growth Plan (e.g. people + jobs per hectare) will provide for demonstration of how these measures can be implemented and a consistency with stated policy objectives.

### **Discussion Paper Questions:**

#### **1. Based on your knowledge of the PPS, review the broad categories and subcategories proposed for monitoring. How can they be improved?**

The recommended broad categories appear to be consistent with the structure of the PPS. We also recommend you consider including a category related to the achievement of the Part IV, PPS Vision.

The subcategories seem to be missing reference to community facilities and community infrastructure beyond parks and open spaces. This would most appropriately be found under Category 1.

Category 3 should be strengthened to address the wise use of land. Although this is addressed to a degree in the Category 1 compact form indicators, there may also be merit in measuring the rate of absorption of Greenfield land and urban land expansion.

Built form change occurs slowly, especially in established communities and within the built up areas. Where change occurs slowly broad measurements (such as census data) won't detect much and are unlikely to be effective indicators.

Under the topic "water", measuring the number of municipal official plans that identify sensitive surface and subsurface water supplies measures where the designations were created through legislative processes outside the Planning Act, needs more thought. As stated, the proposed indicator measures enforcement and not the effectiveness of the proposed designation. Under the Clean Water Act, there will be approval processes that address risks posed by development in these sensitive areas. The objective to be monitored is whether the designations are effective in terms of addressing this risk. Incorporating the designation doesn't address whether the risk management is effective or not.

## **2. Looking at the draft proposed indicators found in the appendix, do you think they will likely provide useful information to assist in measuring the effectiveness of the PPS?**

Some will and some won't.

If a policy is to be effective, the manner in which it is applied in decision-making needs to be assessed. The performance to be measured is the application of the policy or the quality of the decision-making. Case studies of selected applications that meet the standards sought need to be compared with actual decision-making when the policy is applied to determine whether the policy is being met.

With respect to official plans setting minimum housing targets, etc., monitoring these may bear no relationship to what happens on the ground. It measures conformity, not the effectiveness of the policy.

## **3. Can the indicators be improved or refined to provide more useful information?**

Monitoring presumes we have some sense of what is the preferred physical development of our municipalities. That sense will vary depending upon where in Ontario that municipality is situated. We recommend you go back to Part IV, the "Vision for Ontario's Land Use Planning System" and benchmark what that physical development vision would entail in Ontario's municipalities. Once set, the indicators can be related directly to elements of that vision, regionally adjusted.

We also suggest using unit measures similar to other provincial policy (e.g., persons per hectare, rather than persons per square km).

We also suggest under Category 1:

- Housing - that compact form also be measured by change in average Greenfield density both residential and employment;
- Energy and Air Quality - that measures of walkability be considered e.g. percentage of population within 10 minutes of parks, or school;
- Energy and air quality - recommend additional indicator around housing density not just lot size;
- Energy and Air quality - recommend the addition of hospital admissions during poor air quality and extreme heat events; and
- Indicators related to employment areas absorption and densities will be important to monitor; also the number of jobs within centres and corridors are important to understand.

Under Category 2, we suggest:

- Transportation and transit - monitor the change in people and job density around major transit stations.

Under Category 3, we suggest:

- Natural Heritage - in addition to the number of Official Plans there should be a determination of how many new hectares of natural heritage come under this protection.

**4. Are there any other sources of data/information for the draft indicators that you believe could be used to support their further development?**

Data needs to be generated that measure the effectiveness of the policy application in decision making. Specifically consider this as part of the implementation of Growth Plan and Greenbelt Plan – in other words as policy directions on 40% intensification, 50 people and jobs per hectare on Greenfield, 200 people and jobs per hectare in Urban Growth Centres.

**5. Would you/your organization find the information from the indicator useful to your own performance monitoring program(s)?**

See below.

**6. What are some indicators that you would suggest the government use to monitor the effectiveness of the PPS? Please identify what policies of the PPS your suggested indicator is measuring.**

In terms of active healthy communities, there are several web based tools and an emerging Leadership in Energy and Environmental Design - Neighbourhood Development (LEED ND) standard which provide measurements useful to assessing whether an existing community or proposed development would be or contribute to be an active community. Use some of these standards as measures upon which to develop monitoring parameters to measure the effectiveness of the planning policy and its application.

See above for additional detailed comment on metrics.

**7. What data sources are currently available to support monitoring of your proposed indicator(s)?**

We need to work more closely with other professions (e.g. health), who are generating data to use their information as indicators. For example:

- Hospital admissions during poor air quality and extreme heat events are a sure indicator as to the effects of poor air quality.
- Transit operators have detailed information on changes in ridership.
- Environmental master plans are being created to manage impact of broad settlement patterns.

**8. Considering the criteria for a good indicator, what are some of the key strengths and weaknesses of your proposed indicator(s)?**

It is essential that the monitoring program be capable of measuring whether decisions achieve the vision of the statement. Unless that vision is articulated with more clarity in the various contexts municipalities find themselves, the indicators won't help much.

**9. Would the proposed new indicators be appropriate to monitor the identified objectives province wide? Or are the proposed indicators more regionally based?**

This is a large Province with widely varying conditions throughout. While deriving a Province-wide benchmark could be provided relatively easily to create a baseline, Province wide indicators alone may not be an effective way to proceed. Regional municipality based indicators would allow for regional context and patterns and would be consistent with many of the objectives and monitoring that will be required for conformity to the Greenbelt and Growth Plans.

To schedule a meeting or for further information, please have your staff contact Loretta Ryan, MCIP, RPP, Manager, Policy and Communications at (416) 668-8469 or by e-mail at [policy@ontarioplanners.on.ca](mailto:policy@ontarioplanners.on.ca)

Sincerely,



Wayne Caldwell, MCIP, RPP  
President,  
Ontario Professional Planners Institute