



Ontario Professional Planners Institute (OPPI)
Submission to the Ministry of Public Infrastructure Renewal
Comments on the Places to Grow: Proposed Growth Plan for the
Greater Golden Horseshoe.
January 25, 2006

Introduction

The Ontario Professional Planners Institute (OPPI) is pleased to provide the Ministry of Public Infrastructure Renewal with comments on the *Places to Grow: Proposed Growth Plan for the Greater Golden Horseshoe*. OPPI has a long-standing interest in growth management issues and has participated throughout this process. This submission builds on our earlier submissions dated December 17, 2004, and April 18, 2005.

OPPI supports strong policies and mechanisms to direct anticipated growth in the Greater Golden Horseshoe (GGH). OPPI continues to be impressed by and supportive of the extent and breadth of the amendments proposed by the Province of Ontario through *Places to Grow* and Bill 51 initiatives. We commend the Province for the substantial work undertaken and its extensive consultation efforts. The dedication and hard work of the PIR and MMAH staff are apparent in the revisions to these initiatives.

We have solicited comment on the Proposed Growth Plan of November 2005 from our members through our Policy Committee and have summarized these comments below. We would be pleased to discuss any of these comments with you or your staff at your convenience.

General comments

The Proposed Growth Plan (PGP) provides greater clarity and stronger policy direction than the Draft Growth Plan of February 2005 in many areas. It uses a much-needed city-regional scale for managing growth, with a focus on promoting the development of compact, complete communities. This is a critically important component to managing growth in the GGH. In addition, the PGP will help municipalities and communities better understand the principles of intensification. The Technical Backgrounders also support the interpretation of these policies.

One of the strongest directions of the *Places to Grow* initiative is its emphasis on compact and integrated development patterns and coordinating infrastructure planning with community design and planning. However, since the PGP will influence community planning in Ontario for decades, we urge the Province to reinforce components which we believe are critical to creating complete, healthy communities. Now is the time to be bold as we are not likely to rethink planning in Ontario to this degree for some time.

Specifically, three components could be reinforced:

1. Provincial direction for more balanced transportation patterns could be strengthened. Given the health impact of deteriorating air quality in our cities caused largely by auto emissions, the OPPI will pursue policy initiatives in this area . The behavioural changes needed to lower automobile dependence will require a multifaceted strategy, including mode share targets and supportive land-use patterns.
2. The need to plan and design green and sustainable communities could also be emphasized. Senior-level governments such as New York State and the British national government are championing green building and green community design programs that include incentives, support, and education. There is an opportunity in the PGP to introduce a much higher goals for sustainable communities.
3. Support for building compact urban communities needs to be complemented with a fine-tuning of the natural systems approach to development in urban, greenfield, and rural areas. Although the natural system approach endorsed in the PPS and PGP strengthens protection for the natural environment, a generic application of policy to these three very varied contexts is likely to compromise both the intensification and natural heritage objectives.

In addition, we note that the implementation process and mechanisms to support this policy direction such as watershed plans, intensification strategies, and built area delineation review are critical to its success.

In addition to this overall comment, we encourage the Province the consider the following 10 specific comments.

1. Sub-area plans and local plans

The sub-area strategies provide an opportunity to tailor provincial direction to local conditions. This step is critical, but cannot replace the need for clear provincial direction on provincially significant matters such as housing affordability, waste management, and balanced transportation. We encourage the Province to provide more specific policy direction in these areas, possibly in the form of precise targets for affordable housing, waste diversion, energy reduction, and transportation modal splits. The targets could be used to set benchmarks and would be the subject of monitoring, rather than uniform application across the GGH.

2. Intensification and Density Targets

We support the application of the intensification and density targets and the definitions provided. In addition, the requirement in policy 2.2.3.6 for municipalities to prepare intensification strategies allows municipalities to balance the protection of stable neighbourhoods with areas of change where intensification is appropriate. This approach acknowledges that intensification

can take place only in the context of good planning and design principles on a site-by-site basis.

The credibility of the policy depends on recognition that the 40% target may already be exceeded in some of the older urban areas. A mechanism should be included to ensure that the targets be reviewed regularly for these areas to ensure that the threshold remains relevant during the periods between the 10-year reviews.

In the policies for *urban growth centres*, *major station areas*, and *intensification corridors*, no mention is made of the identification of areas where re-use and redevelopment might strengthen existing natural heritage features. There is a need to recreate natural habitat in strategic areas such as flood plains and coastal areas where there has been urban encroachment in the past. In some older industrial centres in Canada and the United States, efforts to recreate natural heritage features have been remarkably successful (for example, the [Tiff Farm Nature Preserve in Buffalo](#)). The requirement to analyse natural heritage features and natural systems should not be limited to greenfield or rural areas.

Additional clarity is needed for the density target outside *natural heritage features and areas*. Roads, infrastructure, and public facilities such as parks and schools are not included in *natural heritage features and areas*. The Province should make some allowance for parks, schools, and other public facilities (such as hospices and other health-related infrastructure, which would benefit from a natural heritage setting) to overlap or even occupy the areas designated as *natural heritage features and areas*, provided that potential impacts can be mitigated and sensitive design is used. Otherwise, the Plan may be drawing too hard a line between natural and cultural landscapes.

Natural and human-made hazard lands have not been addressed in the density calculations and mapping. These may or may not occur within natural heritage features and areas. This concern needs to be addressed, particularly in areas subject to density targets and within growth centres.

The density targets for *urban growth centres* and *designated greenfield areas* are set as population and numbers of jobs per hectare. However, many industries include extensive operations for storing and moving materials and products around. These operations do not translate easily into "jobs per hectare," but gross floor area and lot coverage measurements do. Measures other than jobs per hectare should be used to establish intensification objectives.

Furthermore, in areas in which both employment and housing is provided, greater attention needs to be given to land use compatibility between industrial operations, which require licensing under the *Environmental Protection Act*, and surrounding uses, which may be sensitive to adverse

effects. This is one area where an integrated provincial approach is possible at a time when major changes to both pieces of legislation are being considered (see, for example, Guidelines D1 through D6 from the Ministry of the Environment).

3. Balanced Transportation Systems

The introduction of specific modal split targets would reinforce the policy to reduce auto dependency. In addition, we support consideration of alternative regulatory zoning structures, such as performance zoning, to encourage flexibility of uses to help reduce auto dependency.

We support the introduction of a GGH transportation coordinating body such as the GTTA and would request additional details on such an agency as they become available.

4. Complete communities

We endorse the inclusion of community infrastructure as a key component of planning for complete communities – in particular, the requirement that development take into account the provision of these services in a logical fashion. The link to coordinated infrastructure funding is critical and cannot be strongly enough stated.

The requirement for municipalities to include pedestrian and bicycle networks in transportation planning, in particular within *intensification areas*, also supports objectives related to healthy communities. Additional policies encouraging balanced road designs that favour transit, bicycles, and pedestrians would support this policy.

5. Urban Design

The importance of excellence in the urban design of our cities and communities is not sufficiently well represented in the PGP. In September 2005, OPPI's Urban Design Working Group of OPPI's Policy Committee submitted comments for the Province's consideration (this document is attached). We recommend including additional policies, as described in this submission, in the PGP. The strength of provincially stated policies on urban design would come through the local implementation of design guidelines and tools. In addition, provincial leadership, through the preparation of a best practices reference document, would be extremely useful for municipalities, similar to the Alternative Design Standards and Transit-Oriented Development Guidelines prepared by the Province.

6. Infrastructure

Policy direction on stormwater management is limited in the PGP. We are concerned about urban intensification in communities that extend into floodplains or that have combined storm and sanitary sewers. Where retrofitting is required, new stormwater management facilities may be very expensive. It may be also necessary to consider off-site compensation (financial and otherwise) to achieve stormwater objectives and minimize hard

surfaces in areas of infill, redevelopment, and greenfield development. This is one area where innovative solutions found in some older neighbourhoods, such as open ditches, should be explored to avoid the need for costly facilities.

7. Natural Heritage

In the 2005 Provincial Policy Statement, *natural heritage features and areas* are defined as selected features (e.g., significant wetlands, etc.), and *natural systems* are defined as such features linked by natural corridors necessary to maintain diversity, natural functions, viable populations and ecosystems.

In the PGP, although *natural heritage features and areas* are defined, *natural systems* are not. *Natural systems* are subject to "Implementation Analysis" (Policy 5.1.2.4 iv). In Policy 4.2.1, titled "Natural System," the *natural system* is to be identified by MPIR and MNR in consultation with upper-tier municipalities. Planning authorities will be encouraged to identify locally significant areas that link and augment the *natural system*. The PGP also includes sensitive and vulnerable surface and groundwater features in the natural system.

Since the natural system is defined differently in the PPS, planning instruments subject to the *Planning Act* will be approved according to one natural system analysis and those subject to the Proposed Growth Plan under another. The Province should adopt a consistent definition. The inclusion of surface and groundwater features can be best addressed through source water protection plans.

Policy 4.2.1.6 provides for innovative approaches to providing urban open space (e.g., rooftop gardens). It would be useful to link such measures to the larger natural heritage system and servicing, since stormwater management calculations depend on the treatment of roof areas, and runoff from these areas can be conveyed separately to receiver streams. It would also be useful to integrate these design measures into the comprehensive treatment of the natural heritage system, especially in *urban growth centres*, *major station areas* and *intensification corridors*, where natural heritage definitions and policies cannot be applied in the same manner as in greenfield areas.

8. Agriculture

In OPPI's submission on the Greenbelt Plan February 2005, we identified the challenge of protecting prime agriculture land without having a sustainable agriculture strategy in place. The agricultural policies in the PGP attempt to address issues of compatibility with adjacent development, and leave the identification of prime agricultural land to the sub-area analysis. We believe that without an integrated and coordinated provincial strategy for sustainable agriculture, the agricultural areas not protected by the Greenbelt will continue to be at risk of urbanization.

9. Aggregates

We support the preparation of a long-term aggregate strategy to ensure the conservation, availability, and management of these resources. Additional detail on the timing, scope, and process for this strategy would be appreciated.

10. Implementation is Key

In our opinion, the PGP offers a strong policy foundation to direct growth. The challenge ahead is the implementation of the required planning analyses, mapping, and coordination of parallel policy objectives. More specifically, municipalities need to understand the implications of failing to achieve a particular target in the plan. It would also be helpful to understand how the results of monitoring will be disseminated.

There is much work to be done in confirming mapped lines such as *urban growth centres, built-up areas, and prime agricultural areas*. Watershed plans, agricultural strategies, aggregate strategies, and other documents need to be prepared. Municipalities also are anxious to know what resources will be made available to them to undertake these processes and the process for working collaboratively with provincial staff teams.

Educating the public about the relevance, importance, and meaning of these policy directions is essential. OPPI and its members are prepared to help the Province undertake this task.

Equally critical will be providing technical support to municipal planners in implementing the PGP. We encourage the Province to use the model technical and reference documents that have already been prepared to further clarify the intent and interpretation of definitions, targets, and additional plans or strategies that are to be prepared at the local level.

In conclusion, OPPI commends the Province for its ongoing leadership and efforts related to growth management. We appreciate the opportunity to comment on the Proposed Growth Plan and offer these comments in an effort to ensure the final Growth Plan is as effective in its objectives as it can be. We would be willing to discuss or expand on any of the items raised in this submission with Minister Caplan or PIR staff.