



March 6, 2003

Honourable David S. Young
Minister
Ministry of Municipal Affairs & Housing
17th Floor, 777 Bay Street
Toronto, ON M5G 2E5

**SUBMISSION TO THE GOVERNMENT OF ONTARIO REGARDING
CENTRAL ZONE AND NORTHWESTERN ZONE DISCUSSION PAPERS**

SMART GROWTH CONSULTATIONS

Dear Minister:

On behalf of the Ontario Professional Planners Institute (OPPI), please find attached a submission to the Government of Ontario regarding the Central Zone and Northwestern Zone Discussion Papers.

We would be pleased to discuss our submission in further detail with you and the Smart Growth Panel Chairs. To schedule a meeting, please contact Mary Ann Rangam, Executive Director, OPPI at 416-483-1873, ex. 23.

Sincerely,

Jeff Celentano, MCIP, RPP
Director, Policy Development
Ontario Professional Planners Institute

Copy:

Hazel McCallion, Panel Chair, Central Zone Panel
Glenn Witherspoon, Panel Chair, North Western Zone Panel
Michael Fenn, Deputy Minister, MAH
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Introduction:

Established in 1986, the Ontario Professional Planners Institute (OPPI) is the recognized voice of the province's planning profession and provides vision and leadership on key planning issues. Private industry, government, agencies and academic institutions employ the Institute's 2,600 practicing planners. Members work in a wide variety of fields including urban and rural community development, urban design, environment, transportation, health and social services, housing and economic development.

Summary of Interests in this Initiative:

OPPI is supportive of the efforts of the Province of Ontario to assess, analyse and provide an overall vision for the planning of future growth and managing its impacts. Growth management affects all communities, whether they are in urban or rural settings. The need for comprehensive and high-level planning strategies that set out goals, objectives and implementation approaches for the long-term cannot be overestimated. At all times, planning must be conducted in the broadest possible concept of the public interest, with comprehensive communication and consultation efforts throughout the process.

OPPI is making comments at this time to build upon our previous submissions of June 15, 2001 and November 20, 2001 to the former Minister of Municipal Affairs and Housing. OPPI's major interest is to advance good planning policy and practices for the benefit of the public and our member practitioners. Our earlier submissions outlined our perspectives on the general principles of Smart Growth and the Panels, along with the process the Panels would use to translate principles into policy proposals.

Given the nature of the process used by the Panels to this point in time and the extraordinary short consultation windows, the Institute wishes to put on record its concern regarding the consultation methods used in the Zones, and the brevity and lack of implementation detail in the Discussion Papers. OPPI has an equally strong concern regarding the lack of an over-arching Provincial vision and strategy for Smart Growth across Ontario. While OPPI does not advocate "one-size-fits-all" solutions, we are concerned that the Panel Discussion Papers are recommending solutions without reference to the other Zones or to an overall Provincial context.

The Institute reserves the right to make a future and more detailed submission to the Province once all of the Panels have reported and we have the opportunity to review all of the Discussion Papers.

General Comments on Central and Northwestern Panel Discussion Papers:

OPPI wishes to note that the Government's approach to analyzing the impacts of growth at a 'regional' scale is worthy of merit. We are uncertain that the Zones represent a true "community of interest" as the Zone boundaries are somewhat artificial. It is also possible the Government may derive an Ontario-wide 'vision' through a 'bottom up' approach, however, there is no indication in either of the Panel Discussion Papers regarding whether or not this is the intention of the Government. Knowing how the 'pieces' are intended to 'fit' is an important part of good planning. There is very little said in these papers about the role of the various Ministries of the Government and the parts they play now and should play in the future in order to implement the ideas generated through the recommendations of the various Zone Panels. Co-ordination will be a key to effective implementation and this is not articulated very well.

For the Central Zone paper, our concerns can be generally categorized into two areas at this time. First, it appears the material in the paper re-states many ideas and issues that have been outlined in regional growth management plans dating back to the 1970s and repeated more recently with Provincial initiatives such as the Office for the Greater Toronto Area (in the '80s and '90s). Specific recommendations regarding implementation and Government commitments (through the Ministries policies and through allocation of resources) for solutions are missing and need to be expressed. Second, the northern half of the Zone does not appear to receive the same level of scrutiny or analysis while it experiences or indeed will experience the same problems and issues. Such a deficiency needs to be addressed.

For the Northwestern Zone paper, there appears to be a different emphasis and different approach as the problems experienced by the Northwest are indeed different in many ways. The Government and the Panel are commended for identifying the unique circumstances of this region and proceeding from this foundation. The Northwest shares many of the same concerns expressed by other parts of the

Province, yet the Panel in its paper does not identify these issues. In addition, the reliance of future economic growth stimulus from 'traditional' resource industry activity may be overly focused if recent international trade disputes are any indicator. OPPI wishes to repeat the concern over absence of co-ordination between the Zones and the absence of implementation detail and commitments by the Government on solutions, along with the lack of consistency of issue identification, goals, alternatives and implementation relative to other Zones.

OPPI's Policy Leadership in Growth Management:

OPPI has been concerned with the issue of growth management for a number of years, as it is very much a part of the regular analysis of many of our member practitioners.

In addition to the Position Statement on Growth Management issued by OPPI in June 2001, the Institute also commissioned a policy research paper, which was published in September 2001, entitled *Exploring Growth Management Roles In Ontario "Learning from Who Does What Elsewhere"*. Among the key recommendations contained in the paper for reinvigorating Ontario's approach to growth management, OPPI suggests:

- Multi-layered and co-ordinated growth management strategies.
- Clearly defined roles for all three levels of government and key stakeholders.
- The adoption of innovative policy and legislation for both short-term and long-term approaches.
- Assembly of powerful and effective tools to compliment policy and legislation.
- Adoption of a parallel education and advocacy program to inform all stakeholders involved in growth management.

A copy of our June 2001 Position Statement is attached to this Submission. For a complete copy of our Growth Management Policy Paper, please go to the OPPI Website (www.ontarioplanners.on.ca), click on "Current Planning Issues" and follow the links.

At present, we have commissioned a new Innovative Policy Paper on Conservation of "Rural Character" in Community Design. OPPI is of the view that this will be a related issue for rural communities coping

with the impacts of growth across the Province in the coming years. This Paper is due for release in the early fall of this year.

Summation:

The Government is to be commended for attempting to consider the issue of growth management in Ontario. The issue is before us in the present day, the impacts are far-reaching, the costs are substantial and the solutions point to clear definitions, commitments and co-ordinated implementation approaches by all stakeholders. OPPI, however, wishes to express its concern over the approaches taken by the Government to this point in time regarding its "Smart Growth" initiative.

Our concerns relate to the process used, the lack of adequate public consultation, the absence of a well-defined over-arching Provincial 'vision' for managing growth in Ontario, the absence of discussion on alternative solutions and the lack of a clearly defined implementation strategy (including financial commitments by the Province).

Representatives from the Institute have had the occasion to attend consultation sessions and to meet with Ministry officials but OPPI does not have representation on any of the panels or sub-panels. Given the professional expertise of our members in the field of planning, we ask to be consulted and more formally involved as this initiative moves forward.

We ask the Government to clearly articulate its 'vision' for "Smart Growth" implementation across all of Ontario and obtain public comments before accepting the recommendations of the Zone Panels in this process.

OPPI reserves the right to make further comments once all of the Zone Panels have submitted their Discussion Papers for consultation, since our interests include broader planning policy and practice across the Province.

The Ontario Professional Planners Institute

Attachment – OPPI Policy Statement on Smart Growth and Growth Management in Ontario (June 2001)