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**Clean Air Council Submissions on EBR Registry Number: 012-7194 Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (part of the Co-ordinated Land Use Planning Review)**

The Clean Air Council would like to commend the Province of Ontario for the leadership it has displayed in developing and reviewing the four Land Use Plans (Growth, Niagara Escarpment, Oak Ridges Moraine and Greenbelt) and for undertaking extensive consultation to gather feedback on the Plans and the Proposed Changes to the Plans. These Plans are integral to protecting southern Ontario's natural capital, advancing policies aimed at supporting the building of more sustainable and efficient communities and to reducing the Region's air pollution and greenhouse gas emissions.

The Clean Air Council<sup>1</sup> (CAC) is a network of 27 municipalities and health units from across the Greater Toronto, Hamilton, and Southern Ontario Area. CAC members work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions and more information on the Clean Air Council is available in the accompanying Clean Air Council Declaration as well as at the CAC web page available [here](#). The CAC has undertaken a consultation process within its membership representation to provide feedback and input to the proposed changes to the above Plans but has particularly focused on the Growth Plan with a lens of implementation of the Growth Plan and increasing alignment with other Provincial Plans such as the Climate Change Action Plan (CCAP) and the forthcoming Climate Adaptation Plan.

One of the key priorities identified in the consultation process was the need for increased municipal and inter-ministerial coordination and collaboration in order to implement the Growth Plan (GP) as well as the Climate Change Plans. Increased coordination and collaboration between the Ministry of Municipal Affairs, Ministry of Environment and Climate Change, Ministry of Energy, Ministry of Health and Long Term Care and Ministry of Transportation and Greater Golden Horseshoe municipalities will need to be achieved in order to implement the various Ministerial Mandates and Plans.

Clean Air Council members<sup>2</sup> have a strong desire to work in greater partnership with the Province of Ontario and in particular with the above mentioned Ministries in order to further our ongoing collaboration and ensure the implementation of the Growth Plan and to increase synergistic policy goals with other provincial Plans such as the CCAP.

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<sup>1</sup> Municipal staff representatives on the Clean Air Council (CAC) were consulted in the preparation of this submission to reflect the feedback of member municipalities but direct endorsement of this submission by municipal councils was not sought as many municipalities are preparing their own independent submissions. CAC representatives are the municipal change agents within leading climate action municipalities and have been working collaboratively across the region for the last 15 years to support and enable progress on clean air and climate change actions. The consultation undertaken were facilitated and are endorsed by the Clean Air Partnership, a charitable environmental organization that serves as the secretariat for the Clean Air Council.

<sup>2</sup> CAC Municipal and Public Health Unit members include: Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Peel Region, Pickering, Richmond Hill, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Whitby, Windsor, York Region.

Below are some of the priority recommendations and feedback the Clean Air Council would like to highlight to the Ministry of Municipal Affairs and to the Province of Ontario; followed by more details related to these priorities as well as additional feedback that the Clean Air Council would like to provide on opportunities to increase the ability of the municipalities to achieve the goals and targets identified within the Growth Plan and increase synergies and alignment between the Growth Plan, the Climate Change Action Plan and the upcoming Climate Change Adaptation Plan.

**1. Priority Clean Air Council Recommendations and Feedback (please note these recommendations below are not in order of priority)**

- 1.1. The feedback and recommendations that follow **ultimately will require improvements to the coordination and collaboration between provincial ministries and local and regional governments** to identify and addresses the challenges related to implementing the Growth Plan, The Big Move, the Climate Change Action Plan and the upcoming Provincial Climate Change Adaptation Plan. There needs to be more opportunity for collaboration across the region, sharing best practices and identifying emerging issues and addressing implementation challenges. Advancing complete communities, climate change mitigation and adaptation opportunities and transitioning to a low carbon future will require innovative policy decisions, broader input into what these policies might look like, as well as testing out of policies within jurisdictions, and sharing of lessons learnt from implementation in order to improve and advance implementation policies and actions across the Region and beyond.
- 1.2. Clean Air Council believes **it is preferable that climate change be a lens that is applied over the whole Growth Plan rather than isolated to a specific section within the Growth Plan** (4.2.10.2). A climate change lens that considers climate change mitigation, impacts and resilience opportunities being applied across the Growth Plan sections and integrated with the Climate Change Action Plan (CCAP) and referencing the need to align with the forthcoming Adaptation Plan (AP) would do much to set an example for how municipalities could incorporate climate change considerations into their Official Plans. We recognize that the proposed revised Growth Plan was released prior to the CCAP and that the Adaptation Plan is still forthcoming but by relating the Growth Plan and the CCAP's Land Use Planning Action Area and referencing the need for planning decisions to align with the forthcoming Adaptation Plan will be a significant improvement in increasing alignment and synergies between the various Plans.
- 1.3. In addition to the above recommendation it is still recognized that **implementation would be strengthened if requirements and guidance were provided to municipalities for how to incorporate a climate change mitigation and adaptation lens into land use and infrastructure decision making**. This would also increase the likelihood that possible trade-offs between mitigation and adaptation are identified and considered by municipalities (ex. intensification and permeable surfaces and green space). At the same time, the use of a lens that considers climate change mitigation and adaptation will also identify synergistic action between mitigation and adaptation (ex. community energy that reduces greenhouse gases and increases community energy resilience). Advancing this would best be furthered via the increased coordination and collaboration within and between the provincial ministries and the municipal governments.

- 1.4. **There is the need to enable municipalities to be policy innovators by allowing municipalities to enact by-laws that go beyond provincial legislation.** Policy flexibility for municipalities to be policy leaders establishes capacity for improvement across the province by creating “living laboratories” for policy innovation and a “race-to-the top” for climate and energy ambition. The Province should set the “floor” by providing required elements that need to go into municipal climate-related plans and strategies (i.e. official plans, community energy plans, etc.) as a minimum, and enable municipalities to go beyond by providing guidance and resources to support higher ambition. This direction was identified within the Climate Change Action Plan but reference within the Growth Plan would provide a mechanism to increase the synergies between the Plans and build awareness and capacity within a greater diversity of provincial ministries and municipal departments.
- 1.5. To support the Growth Plan objective of creating net zero communities, the Clean Air Council recommends that the **Growth Plan provide direction to municipalities to better integrate energy planning into overall growth management and land use planning and thereby identify opportunities for small scale energy infrastructure within urban growth areas, as is done with transportation infrastructure in the current version of the growth plan.** This directive is already mentioned within the Provincial Policy Statement (PPS) and increased recognition and direction within the Growth Plan of the need to integrate energy planning within land use planning would reinforce that PPS direction as well as increase alignment with the Land Use Planning Action Area within the CCAP.
- 1.6. **There is the need for the Province to adhere to the Growth Plan just like municipalities are required to.** The Province is in charge of making infrastructure decisions that have the ability to support or undermine implementation of the Growth Plan. This would increase alignment between municipal and provincial investments (siting and timing of hospitals, public institutions and infrastructure investments such as 400 series highway & GO transit). These decisions are likely to have a significant impact on the ability or inability of municipalities to achieve the Growth Plan targets.
- 1.7. **The Clean Air Council believes there is a need for more transparency in the allocation of forecasts from the upper- to lower-tier municipalities** to reduce challenges of local politics playing too big of a role in the process. Bill 73 introduced a change to the composition of the mandatory planning advisory committee but it does not guarantee transparency. Additionally, it was felt that growth and intensification targets are complex between regional and lower-tier municipalities. Targets may make sense at a wider spatial scale but not necessarily at one regional or local scale, the Province should work with regional and local Municipalities to explore this further.
- 1.8. **Implementation of the Growth Plan can be undermined by the ability for targets to be amended/weakened in outer ring municipalities** (some of which are experiencing significant growth pressure). This enables the creation of two sets of rules in inner and outer ring municipalities and could increase growth pressure in outlying area where planned transit investment and infrastructure efficiencies will have limited impact.
- 1.9. The Province should provide greater support for Municipal adoption of the Growth Plan within their Official Plans and development decisions. **Making more aspects of the Official Plan**

**unappealable at the OMB would greatly enable municipalities to conform with the Growth Plan at a faster pace.**

## **2. Building Complete Communities**

**The Clean Air Council expresses strong support for intensification as being fundamental to creating compact, complete and transit-oriented communities.** In addition, the Clean Air Council would like to **express strong support for transit priority corridors** that will help to better integrate the Growth Plan with regional transportation planning and thereby help ensure that the existing and planned public transportations infrastructure investments are best able to advance the regional modal shift towards public and active transportation.

2.1 There is however still substantial challenges to increased density in many communities in the region that poses a barrier to the achievement of Growth Plan objectives. As such, Growth Plan implementation needs to do much more to address the challenges of achieving the intensification targets and transitioning towards more complete and lower carbon communities. See recommendation 1.1 for the structure that would best enable these challenges to be explored and addressed.

2.2 **The Complete Streets policy language within the approved Growth Plan and the next Provincial Policy Statement would benefit from stronger, more direct language to ensure that municipalities plan streets for walking and cycling.** For example the Growth Plan (and the next Provincial Policy Statement) should provide more direction to ensure that municipalities plan and prioritize streets for walking and cycling in their municipal Transportation Master Plans and Official Plans. Tools have been developed to help municipalities with this, for example the ten elements of a comprehensive Complete Streets policy (<http://completestreetsforcanada.ca/policy-elements>) and the 5 E's (Engineering, Education, Encouragement, Enforcement, and Evaluation & Planning) aligned with the Bike Friendly Communities program (<http://www.sharetheroad.ca/bicycle-friendly-communities-p138264>).

2.3 **In Section 3 of the Growth Plan (Infrastructure to Support Growth) it is recommended that the references and discussion related to the role and state of the urban forest in settlement areas be expanded in order to recognize the challenge that growth presents for protection and enhancement of this valuable asset, and thereby strengthening recognition of both rural and urban forest as integral infrastructure and the need for policies to ensure its protection and enhancement.** Throughout the document the following terms are being used to describe vegetation or/and open spaces within settlement areas: natural heritage, natural areas, natural environment, urban forest (in the definition of "**green infrastructure**") while proposed policies address **only** specific components/types of "soft" areas, specifically the ones which are defined in the document: **natural heritage features and areas, key natural features and key hydrologic features, agricultural system.** It is important to acknowledge in the context discussion the important role that the balance of the natural or "soft" areas plays for sustainability of the settlement areas and it is important to **add or to expand the proposed policies** to include protection and enhancement of the other components of the natural environment and open spaces such as urban trees, landscaping, small natural areas/features and urban agriculture. Urban forests are a vital asset and must be planned and managed as essential infrastructure within settlement areas. Urban forests provides significant and valuable services and is critical in mitigation of climate change. It provides additional benefits that include, but are not limited to: creating carbon sinks and reducing air temperatures in

urban areas, improving air quality and reducing particulate pollution, reducing and treating runoff, creating public health benefits, and increasing or improving habitat. Accordingly, enhancing the capacity of municipalities to value the benefits associated with natural assets such as forests and integrating this information into land allocation decisions and infrastructure planning could support efforts to achieve both development and environmental goals. **We recommend adding in the expectation of advanced policies to support municipal natural capital assessments.**

2.4 Section 2.2.1 g) states that complete communities are expected to feature **“high quality of built form”** while there are no policies related to “quality of built form” or discussion clarifying what “high quality built form” in this context means (if it is design quality, resilience and durability, adaptability, compatibility, accessibility, energy efficiency, etc.). **We recommend clarifying 2.2.1 g) and adding in the expectation of advancement of policies to support quality of built form.**

2.5 Section 4.2.5 states that municipalities are **“encouraged”** to develop a system of publicly accessible parkland, open space and trails within GGH. Open space system planning is integral to planning for growth and must be coordinated with all other aspects of planning: land use, transportation, services (including environmental services) and community amenities. **We recommend replacing “encouraged” with “municipalities will coordinate open space planning to implement this Plan”.**

2.6 Subsection 4.2.9 1 b) ii states that municipalities will develop **“urban design standards”** to support energy-efficiency and demand reductions and opportunities for alternative energy systems. While urban design standards may facilitate energy efficiency of the communities, the role of urban design is not limited to this area. **We recommend replacing “urban design standards” in this subsection with “development standards” (which may include urban design standards). We also recommend adding (throughout the document) policies related to high quality of urban design in settlement areas as related to built form, mix of land uses, infrastructure, open spaces, sense of place and protection of resources including urban forest and cultural heritage.** Quality of urban design is integral in creating complete, compact, resilient and adaptable communities.

### 3. Supporting Agriculture

The Clean Air Council would like to emphasize the importance of the Growth Plans in containing sprawl and protecting land needed for local food production.

3.1 It is worth exploring opportunities to stimulate the creation of local food hubs alongside planned transit hubs to provide market access for agricultural producers in the region, address existing and emerging food deserts and limit the need for consumers to solely rely on their automobile for food purchases. **The Province should consider strengthening the agricultural section of the Growth Plan to include support for local food hubs in urban growth centres and transit hubs.**

3.2 An additional intersection between food policy, growth management and low carbon transport emerges in the goods movement sector, especially when considering urban freight movement. In dense urban areas, moving goods and delivering services, accessing urban

markets, and supporting urban communities have been a challenge for goods movement businesses due to congestion and construction. The Province should look to better integrate the goods movement sector (including the agricultural freight sector) into the Growth Plan and Big Move Plan. Freight Villages/Hubs in one particular region can be explored to enable aspects of goods movement, such as supply chain or logistics, to locate in a particular region in order to potentially move more efficiently, reduce wasted movement and share infrastructure. Urban Consolidation Centres (UCC), which could be an urban variation of Freight Villages/Hubs, could be explored as a mechanism that enables the supply chain to move more efficiently and safely in urban areas to support residents' quality of life.

**Resources:** [Metrolinx's Urban Freight Research and Projects](#) and [A Plan for Urban Goods Movement Data in the GTHA](#), and [Freight Village Concept by McMaster Institute for Transportation and Logistics Freight Village](#).

#### 4. Protecting Natural Heritage and Water

- 4.1 The decision to incorporate watershed and subwatershed plans into the amended Growth Plan (GP) represents a significant improvement. However the Clean Air Council would like to better understand why "integrated watershed management" (IWM) wasn't included, noting that the proposed definition in the Growth Plan is very water-centric (quality and quantity; cumulative impacts) and feature-specific (hydrologic features and areas) and does not include consideration for broader, landscape-level natural heritage management.
- 4.2 Related to the above point is the context that the existing IWM plans have been authored by Conservation Authorities in significant consultation with municipal partners and other stakeholders. Clarification is requested on how these existing, broader scoped watershed plans will be considered under the amended Growth Plan as major investments have been made to produce these comprehensive plans and knowing how the local knowledge they contain will be used in future land use planning decisions is important.
- 4.3 Notwithstanding the overall positive response around including watershed and subwatershed planning in Growth Plan policies, the need for clarification around the implications of policy 4.2.1.3 (under Water Resource Systems) was identified. It is unclear whether the allocation of growth, together with water resource planning, would also result in deciding the **location** of water servicing. This seemed a potential 'red flag' if the **more detailed and comprehensive** subwatershed plan is **not** used to inform this first, critical step which could create a 'done deal' before understanding the sensitivities of the aquatic and terrestrial ecosystem.
- 4.4 Related to the above Policy 4.2.1.3 was whether the use of watershed planning to inform growth allocations means that 'no growth' could be assigned to an area based on "unacceptable" impacts to water quantity (for water taking/drinking supply) or assimilative capacity of watercourses to manage water quality?
- 4.5 Additionally, it is unclear how the consideration of climate change impacts and severe weather events (on water resources) would be used to set watershed plan goals or define unacceptable impacts, especially without knowing the future climate scenarios that would be used. For example vulnerability assessments could be required but clear direction of how

those vulnerability assessments should be undertaken would be essential.

## 5. Growing the Greenbelt

- 5.1 The Plans should provide greater impetus for the development of municipal and regional Natural Heritage System Plans and the integration of those Regional and Municipal Plans with Provincial Plans. In addition the Plans should also provide greater impetus and direction for incorporating natural assets and green infrastructure into Asset Management Plans.
- 5.2 The extension of the Greenbelt to include Urban River Valleys (URV) and the application of similar Greenbelt level protection to lands within the mapped natural heritage system raised the following questions:
  - a) URV already have protective legislation (i.e., hazard lands) and are not generally under development pressure, so the new designation under the GP is nice but doesn't really add much to the current planning 'tool box'; and
  - b) the application of similar Greenbelt level protection to the mapped natural heritage system seems to be a good move for greenfield planning and urban expansion areas, however, rather than promoting increased integration and enhancement of the terrestrial natural heritage system, the focus of Growth Plan policy (see 4.2.2.2) is to stipulate how expansions can occur within the natural heritage system. It is unclear if the existing urban areas are even more vulnerable to this policy focus.

## 6. Addressing Climate Change

- 6.1 As was previously mentioned in 1.2 the Clean Air Council believes that it is preferable that climate change be a lens that is applied over the whole Growth Plan rather than isolated to a specific section within the Growth Plan (4.2.10.2). Better integration of, and reference to climate change within the Growth Plan would enable increased integration for provincial ministries and provide that direction to municipalities as well.
- 6.2 Reference to the provincial greenhouse gas reduction targets within the Growth Plan would improve the ability of the Growth Plan to align with the CCAP. Reference to the important role land use and growth management plays on influencing community energy use within the Growth Plan would increase recognition of the important role the Growth Plan plays in helping to reduce community greenhouse gas emissions and achieving the goals of the CCAP. In addition mention and integration of the Land Use Planning Action Area of the CCAP within the Growth Plan would also reinforce the alignment between the two Plans.
- 6.3 The Clean Air Council is in support of Section 4.2.10.1 to Official Plans requiring climate change policies that reduce GHG emissions and address climate change adaptation goals, but questioned why 4.2.10.2 weakens this important first step by only *encouraging* municipalities to develop strategies, etc.
- 6.4 **More definitive language on how municipalities need to incorporate climate change into Official Plans would greatly facilitate the ability of Official Plans to bring climate**

**change into overall plan development and decision making. Increased guidance on how to do this would be of great value.** In addition, information on climate change integration into Official Plans and decision making needs to be shared across municipalities, and separate treatment of upper and lower tier municipalities and smaller communities would be helpful. Guidance, training and capacity building on how existing land use policies (ex. site plans, subdivision/area plans and parkland dedications) can be used to advance climate change incorporation would also be beneficial.

- 6.5 **There are targets for intensification but no requirement for municipal greenhouse gas reduction targets or further guidance for what bringing climate change into municipal Official Plans should look like. Increased clarity on requirements associated with that would be helpful.** It would also be useful for the Province to work in coordination with Municipalities to develop options for some key performance indicators that could be used to track what bringing climate change into Official Plans could look like. There is also the benefit to speaking to how climate change being incorporated into Official Plans will trickle down into Transportation Plans, Growth Management Plans, Asset Management Plans, Infrastructure Plans, etc.
- 6.6 **It is also suggested that 4.2.10 should include a reference to Ontario's forthcoming climate adaptation plan/strategy, and generally increase references to adaptation.** Currently that section refers much more clearly to mitigation efforts (i.e. GHG emission reductions) than adaptation. Greater detail and direction is needed about what adaptation polices in Official plans will speak to (e.x. assessing, identifying, mapping and reducing sector-based vulnerabilities, with the ultimate goal of minimizing risk and increasing resilience under future climate change scenarios).
- 6.7 As was previously mentioned in 1.4 but bears mentioning again due to its significant importance on enabling municipalities to act on climate change and land use planning opportunities; **there is the need to enable municipalities to be policy innovators by allowing municipalities to enact by-laws that go beyond provincial legislation.** Policy flexibility for municipalities to be policy leaders establishes capacity for improvement across the province by creating "living laboratories" for policy innovation and a "race-to-the top" for climate and energy ambition. The Province should set the "floor" by providing required elements that need to go into municipal climate-related plans and strategies (i.e. official plans, community energy plans, etc.) as a minimum, and enable municipalities to go beyond by providing guidance and resources to support higher ambition.
- 6.8 To provide more details related to the previously mentioned 1.5 recommendation, the Ministry of Energy's Municipal Energy Plan Program has been instrumental in advancing municipal leadership on advancing community energy planning within Ontario. To support the Growth Plan objective of creating net zero communities, the Clean Air Council recommends that the Growth Plan provide direction to municipalities to better integrate energy planning into overall growth management and thereby identify opportunities for small scale energy infrastructure within urban growth areas, as is done with transportation infrastructure in the current version of the growth plan. Integrating energy generation infrastructure into the urban fabric through land use planning



decisions can address current or foreseen capacity constraints, as well as unforeseen capacity constraints that may emerge as electric vehicle penetration increases. Distributed generation also reduces the need for new large scale transmission infrastructure to deliver energy from further afield. For example energy planners at IESO, LDCs need to be brought into the land use planning decision-making processes at a much earlier stage than is currently the case. Currently LDCs/IESO and gas utilities are brought into the land use planning process at the “end of pipe” (i.e. when new residential/commercial development plans are approved). By bringing energy planners into the conversation earlier, opportunities for small-scale generation infrastructure can be considered to support the creation of “net-zero communities”.

- 6.9 Municipalities currently face considerable constraints in developing new distributed energy generation infrastructure. They are not eligible to participate in the large renewable procurement (LRP) program, and the role of LDCs in generation is also limited. The Clean Air Council recommends that the province **consider removing exclusionary criteria which limits municipal participation in the development of new energy generation at the neighbourhood/community scale in order to better enable growth management and energy planning to be better coordinated**. This is another example of where the need for increased inter-ministerial and municipal coordination and collaboration is required to advance the provincial and municipal growth, financial, energy and climate change policy goals.
- 6.10 Municipalities need real data to support municipal land use planning innovation that addresses the energy and carbon challenge. While the CCAP’s support for energy mapping is a positive step, data sharing protocols however must be established between municipalities (upper and lower tier), local distribution companies and the province in order to ensure coordination across planning and mapping initiatives. The Growth Plan should provide more direction to municipalities and provincial ministries to ensure that the data and direction advances the ability of municipalities to apply an energy lens to their land use plans and decisions.
- 6.11 The Clean Air Council noted that the Growth Plan definition of “net zero communities” is currently unclear, and is inconsistent with CCAP’s focus on “net zero homes”. In both cases, it is unclear what constitutes a net zero home or community. The Clean Air Council has identified a preference for the Growth Plan’s net zero communities approach, which it saw as being more equitable to lower income communities where housing affordability is a concern as well as providing municipalities with increased flexibility to decide on the geographic scope (building, neighbourhood, district, whole municipality) that is appropriate given local circumstances.
- 6.12 The **Clean Air Council supports the Energy Benchmarking and Energy Labelling policies being considered by the Province as these policies are instrumental in building the energy literacy of the public and building the energy efficiency market and are integral policies that will enable progress towards the net zero communities Growth Plan goal**.
- 6.13 The Clean Air Council also noted that the climate change section of the proposed Growth Plan (4.2.10) doesn’t refer back to watershed planning, in spite of there being an integral connection between the two. It was suggested that the Province look to

increase integration of climate and watershed planning in both the Growth Plan and CCAP. Indeed, while the CCAP does not refer at all to watershed planning, it does include a number of references to land based carbon sequestration in forests, wetlands, grasslands and agricultural areas which will need to be integrated with watershed planning efforts.

## 7. Integrating Infrastructure

- 7.1 The Growth Plan is weak around resilience; lacking reference to how the Growth Plan will support or address resilience. A Provincial 2017 Adaptation/Resilience Plan is forthcoming but if the Growth Plan does not address climate change resilience, there is the possibility of a missed opportunity. In addition, **clarity on what “consideration of a changing climate” means as it relates to infrastructure decisions referenced in the Growth Plan is also badly needed.** For example vulnerability assessments could be required for requests for infrastructure and other grants of provincial money; but clear direction of how those vulnerability assessments should be undertaken would be essential.
- 7.2 Integration between the Growth Plan and the CCAP would be strengthened if requirements and guidance were provided to municipalities for how to incorporate a climate change mitigation and adaptation lens into land use and infrastructure decision making. This would also increase the likelihood that possible trade-offs between mitigation and adaptation are identified and considered by municipalities (ex. intensification and permeable surfaces and green space). At the same time the use of a lens that considers climate change mitigation and adaptation will also identify synergistic action between mitigation and adaptation (ex. community energy that reduces greenhouse gases and increases community energy resilience).

## 8. Improving Plan Implementation

- 8.1 The Province should provide greater support for Municipal adoption of the Growth Plan within their Official Plans and development decisions. **Making more aspects of the Official Plan unappealable at the OMB would greatly enable municipalities to conform with the Growth Plan at a faster pace.**
- 8.2 Increased and ongoing collaboration between the Province and Municipalities on Growth Plan implementation, especially as it relates to supporting the market for intensification and transit investment is required.
- 8.3 As was previously mentioned in section 1.6 **there is the need for the Province to adhere to the Growth Plan just like municipalities are required to.** The Province is in charge of making infrastructure decisions that have the ability to support or undermine implementation of the Growth Plan. This would increase alignment between municipal and provincial investments (siting and timing of hospitals, public institutions and infrastructure investments such as 400 series highway & GO transit). These decisions are likely to have a significant impact on the ability or inability of municipalities to achieve the Growth Plan targets.

- 8.4 There is the need for inter-ministerial coordination (at the provincial level) as well as inter-departmental (at the municipal level) to take place in order to support Growth Plan implementation. Reference to that within the Growth Plan would be useful.
- 8.5 As was also previously mentioned in section 1.8 **implementation of the Growth Plan can be undermined by the ability for targets to be amended/weakened in outer ring municipalities** (some of which are experiencing significant growth pressure). This enables the creation of two sets of rules in inner and outer ring municipalities and could increase growth pressure in outlying area where planned transit investment and infrastructure efficiencies will have limited impact.
- 8.6 There is a **need to explore the price signals related to growth** (ex. development charges, property taxes, utility infrastructure costs, transit investments/cost, etc.) **in order to explore where there are possible misalignments between fiscal instruments and growth management** goals and where there are opportunities to increase alignment between economic instruments and policy goals. The Growth Plan should have addressed this, but it doesn't clearly enough reference that the growth policy is set within an economic framework and misalignments between the two will undermine implementation of the Growth Plan and the CCAP.
- 8.7 The Clean Air Council believes **there is a need for more transparency in the allocation of forecasts from the upper- to lower-tier municipalities** to reduce challenges of local politics playing too big of a role in the process. Bill 73 introduced a change to the composition of the mandatory planning advisory committee but it does not guarantee transparency. Additionally, it was felt that growth and intensification targets are complex between regional and lower-tier municipalities. Targets may make sense at a wider spatial scale but not necessarily at one regional or local scale, the Province should work with regional and local Municipalities to explore this further.
- 8.8 There is a significant time lag between the Provincial adoption of the Growth Plan and the integration of the Growth Plan into Official Plans. **More direction on timelines would be of benefit.** What is the timing related to the amended Growth Plan and how does that timing remain consistent with already developed Growth Management Plans?
- 8.9 **Further consultation between the Province and Municipalities is required around monitoring and reporting regarding implementation of the Growth Plan.** It would be ideal however that data sets that are collected relating to Growth Plan implementation should be aligned with the Census and Transportation Tomorrow data sets, while also prioritizing what data is critical to the three Ps of climate mitigation and adaptation action: purposeful, pertinent, and productive.
- 8.10 **The Province should develop a consistent process and program for municipalities to collect data on pedestrians and cyclists.** Currently available travel behavior surveys, for example the Transportation Tomorrow Survey for the Greater Golden Horseshoe, significantly under-report walking and cycling trips.
- 8.11 While the key performance indicators should be developed in consultation with municipalities and other stakeholders, it should be made clear who is ultimately responsible

for the collection, tracking, and reporting of selected key performance indicators. The performance monitoring frameworks for the Growth Plan could be expanded to align with relevant plans including the Big Move and the CCAP.

## 9. Measuring Performance, Promoting Awareness and Increasing Engagement

- 9.1 **There is a need to raise awareness and capacity within municipal government, including both elected officials and staff of the importance of the Growth Plan to ensuring growth management, climate change and energy goals and municipal financial sustainability.** In addition a comprehensive education effort aimed at the public to demonstrate the benefits of living in more complete, compact transit-oriented communities, including cost and convenience, is needed.
- 9.2 Engagement techniques should include visualization techniques that demonstrate how regional land use planning, when coupled with effective municipal policy implementation, can translate into positive changes “on the ground” within particular communities. Through the reinforcement of positive narratives, public buy-in and political support at the municipal scale can be enhanced. Furthermore, there is the need to ensure that transit planning is aligned with urban development patterns so that areas with density and/or jobs are receiving sufficient transit service in a timely manner.
- 9.3 Outreach efforts should focus on demonstrating how the Growth Plan is about addressing economic as well as environmental challenges by highlighting the economic connection between land use, growth, and infrastructure capital, operation and rehabilitation costs. How implementing the Growth Plan will determine whether we increase our infrastructure deficit (resulting from deferred maintenance and rehabilitation investments) or if the Region grows more efficiently and sustainability and thereby addresses our growing infrastructure deficit.
- 9.4 It would also be important to communicate how climate action is already part of municipal government mandates: e.g., stormwater management and flood prevention; encouraging active transportation to improve residents’ health and well-being; advancing community energy efficiency and energy generation to reduce vulnerability to energy price increases and advance economic development. By demonstrating how the responsibilities and actions of various municipalities already support achievement of climate goals; buy-in and support for the Growth Plan and the CCAP can be enhanced.
- 9.5 It is suggested that a Standing Roundtable be created to improve public engagement in land use planning policy development and implementation. Core membership in this Roundtable would be nominated among various stakeholder groups but materials and discussions should be open to the public. The Roundtable should be interdisciplinary and balance scientific expertise and grassroots knowledge.
- 9.6 It would be worthwhile to explore engagement techniques used elsewhere such as in Metro Vancouver, which was focused on actions needed at the highly localized level to realize the broad plan goals, as good examples of this approach. It is also worth exploring the use of [community service hubs](#) as places where info on planning is disseminated and where the Province can solicit input from citizens.