SMART GROWTH TOOLKIT

Growth Plan Implementation and Public Engagement Tools

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environmental defence

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Possibility grows here.

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INTRODUCTION

This report is based on a workshop session in the "Beyond the Backyard, Exploring the Future of Community Building" conference held in Toronto on April 17, 2018. The workshop was entitled "Implementing the Growth Plan: Tools for Community Engagement", the need for which was identified in the action plan that emerged from the Smart Communities Lab conducted by Environmental Defence in June of 2017. Most of the 65 participants in the workshop were representatives of ratepayer groups and environmental NGOs. The purpose of the workshop was to explore what the 2017 Growth Plan and other recent changes to the planning framework mean in terms of opportunities and strategies for public engagement in the planning and development process. Some ideas for tools that might help residents engage with the planning system in this evolving context were also presented and participants then discussed the tools in a roundtable format and commented using a written questionnaire.

THE GROWTH PLAN = SMART GROWTH = HAPPY CITIES

The Growth Plan is widely considered one of the most progressive, forward-looking regional plans on the continent – a plan with vision and teeth. It came into being because the Greater Golden Horseshoe (GGH) was suffering from some major and systematic problems, namely:

- It was one of the most congested metropolitan areas in North America.
- Air pollution coming partly from all those cars was killing thousands of people annually in the region.
- Farmland was being eating up at an alarming rate.
- Forests and other natural areas were disappearing.
- Municipalities were not able to keep up with the high cost of building infrastructure to support sprawl.

There has been a lot of talk about happy cities ever since Charles Montgomery put out his book a few years ago with that title. The book explores how cities affect our physical and psychological well-being. There is no doubt that sprawl makes many people happy in that it's a very simple and sure fire formula to deliver lots of cheap housing on large lots and to create the transportation infrastructure for everyone to get where they want to go, mostly by car.

The problem with this approach is that it works fine for people at the individual scale, but not so well at the aggregate scale. No one designs a city to be congested, unhealthy, and sprawling into the countryside, but when people pursue their private happiness without a planning framework to shape overall growth, you end up with a dysfunctional system that interferes with everyone's happiness. That missing planning framework is called Smart Growth and it's the logic behind the Growth Plan.

What Does Smart Growth Mean?

The concept of Smart Growth originated in the US in the 1990s and was quickly imported into Canada to provide an alternative vision to sprawl. Among its precepts are:

- Plan for a mix of land uses so that people can access daily destinations without necessarily having to use a car.
- Design neighbourhoods to be more compact so that trips are shorter and less land is needed to accommodate the same amount of people and jobs.
- Provide a range of housing options to create "complete communities" that can appeal to people of different incomes, abilities, and ages.
- Create walkable and transit-friendly neighbourhoods.
- Preserve open space, farmland and environmental features.
- Direct development towards already built-up areas, especially to mixed-use centres well-served by transit and along transit corridors.
- Meet travel needs by investing in a variety of transportation options, including walking, biking and transit.

The Benefits of Smart Growth

A Smart Growth strategy promises to bring a number of mutually reinforcing benefits, including:

- Reduced congestion: By focusing growth in walkable, mixed-use employment hubs and transit corridors, smart growth means we can get by with fewer cars and less driving - so congestion is reduced, as is the need to keep building more, wider roads.
- Affordable housing: A mix of housing types – especially in locations close to transit or in walkable centers- makes housing more affordable for those who can't afford or don't want a single-detached home in a car-oriented area.
- More transportation options: By making walking, biking and transit available as realistic alternatives to cars, we increase transportation options and make jobs and services more accessible for everyone.
- Lower air pollution and GHG emissions: Less congestion and car use lowers air pollution and GHG emissions, while more compact housing reduces emissions from heating and cooling. Research shows that smart growth can reduce GHG emissions to a third compared to sprawled development.
- Public health improvements: After smoking, lifestyle diseases associated with physical inactivity are among the leading causes of preventable illness and death in Canada. When people live close to workplaces and services, they have the option to walk, cycle or take transit to get there, helping people to stay physically active and healthy.
- Aging in place: A mix of housing types and transportation options allows people to stay in their homes as they age, reducing dislocation and maintaining social networks, which are known to be essential for long-term well-being.

- Lower costs: Healthier, well-housed people with a variety of transport options are not only happier, but incur lower social costs. Also, smart growing communities have lower infrastructure and servicing costs because they are more spatially efficient.

- Preserve natural areas and farmland: Focusing growth in more compact communities means that we make a smaller footprint on the land and are in a better position to preserve natural areas in and around the community. This preserves our access to recreational opportunities and maintains the agricultural base that supports a whole way of life in rural areas outside the city.

- More public engagement opportunities: A more robust planning framework used to direct development in smarter ways means more opportunities for people to engage in the planning and development process and shape their environments, which is what we are talking about here today.

THE CHANGING PLANNING LANDSCAPE AND COMMUNITY ENGAGEMENT

There are two recent changes to the planning landscape that will have a major impact on the strategies that are most likely to be successful when it comes to influencing planning and development decisions in our communities: the 2017 Growth Plan and the Local Planning Appeal Tribunal.

The 2017 Growth Plan

Provincial law requires that municipalities implement the Growth Plan by bringing their Official Plans (OPs) into conformity with the Growth Plan by 2022. In two-tier municipalities, first the upper-tier amends or revises its plan and then lower-tier municipalities carry through with changes in their own plans that reflect the decisions made at the upper-tier level. In single-tier municipalities, there is just one conformity process.

Some Growth Plan policies – like those related to climate change or complete streets - can be implemented through one-off Official Plan amendments. But certain key policies have to be implemented in an integrated manner through an official plan review process - this is called a Municipal Comprehensive Review (MCR). The policies involved in this integrated planning process are the policies related to growth management, which is at the heart of the Growth Plan.

According to the guidance documents that the Province has provided to help municipalities navigate the new Growth Plan, the Municipal Comprehensive Review process will proceed through a series of steps, with the early upstream decisions setting the frame for the later downstream decisions. The steps include:

- The allocation of population and employment growth to lower-tier municipalities.

- The identification of growth centres and major transit station areas destined for intensification.

- Setting intensification and density targets.

- The land budget, which determines how much new land will be needed to accommodate growth.
- And the identification of specific expansion areas.

These policies determine how growth will be shaped, where it will occur, and what type of housing will be produced over the coming decades. Municipal decisions on these matters will affect the agricultural base, the natural heritage system, housing supply, employment opportunities, travel patterns, and more. In other words, these policies have major environmental, economic, and social impacts.

The province also requires that a large number of background studies and strategies be prepared by the municipality in order to support the decisions the municipality makes as it moves through the MCR steps. The list of studies includes:

- An intensification strategy that would identify existing areas that can accommodate further development.
- An employment strategy.
- A housing strategy.
- An analysis to justify any conversions of employment areas to non-employment uses.
- An analysis to justify any refinements to the Natural Heritage System or Agricultural System.
- Infrastructure plans for water, wastewater and transit.
- A transportation demand management strategy.

Implications for Residents

What this means for residents is that if they want to have an impact on downstream issues, like whether there is going to be an expansion of the settlement area onto adjacent agricultural land, it would be wise to be involved in upstream decisions, such as the setting of intensification and density targets. These upstream decisions might take place two or even three years before the announcement that the municipality is expanding the settlement boundary.

The step-by-step process for the MCR and the large number of background plans and strategies also mean that there will be many entry points for citizen engagement in the process. Although the province doesn't require public consultation on most of the background strategies, municipal councils will likely want to get citizen input on them given their importance to shaping growth for decades to come.

Another implication of the new Growth Plan is that in two-tier municipalities, it gives the upper-tier a more prominent role in the implementation process. Basically, the upper-tier municipalities are mandated to make the key growth management decisions using the MCR process and then the lower-tier municipalities adjust their OPs accordingly and carry out more detailed planning exercises. In other words, in two-tier municipalities, the upper-tier is

making many of the high-level decisions and citizen groups would benefit from being aware of their pivotal role when developing strategies to influence growth management decisions in their communities.

The Local Planning Appeal Tribunal

The other major change to the planning landscape that will have a big impact on citizen engagement opportunities and strategies is the new OMB - the Local Planning Appeal Tribunal (LPAT). The LPAT gives more authority to municipalities to make planning decisions by changing three things:

- The types of planning decisions that can be appealed.
- The types of arguments that can be used in an appeal.
- And the nature of the appeal process.

In terms of matters that can be appealed, most importantly, developers (or anyone else) will no longer be allowed to appeal provincially approved upper- and single-tier official plans, including the MCR policies they contain. At the lower-tier level, no appeal will be allowed of intensification polices related to the areas around major transit stations. This means that once the new upper-tier and single-tier OPs are in place, their provisions will have staying power. The areas slated for intensification, density and intensification targets and the rest of the matters dealt with in the MCR process will be beyond appeal by developers or anyone else.

In terms of arguments, the LPAT rules allow only three grounds for an appeal:

- Inconsistency with the Provincial Policy Statement.
- Nonconformity with the Growth Plan.
- And conflict with an Official Plan.

This means that citizens won't be able to argue that a development is unsightly, blocks their sun, or is out of character with their neighbourhood. If the development meets the policies of the OP, it can't be fought at the LPAT. Furthermore, only arguments introduced during council proceedings can be used at the LPAT to influence the tribunal's decision on an appeal. This suggests that citizens would be well advised to take council deliberations very seriously and engage fully at the official plan review level, not just at the level of site-specific development applications.

In terms of the process, the new rules are designed to make the LPAT more citizen-friendly. To begin with, the tribunal will take time to explain things to people involved in an appeal in order to level the playing field between developers, municipalities and residents. Secondly, the new rules place strict limitations on the amount time parties can take to make their arguments. Finally, the new LPAT Support Centre will provide support for citizens who want to participate in an appeal process. These changes should make hearings less adversarial, cheaper, and bring a better power balance between developers, municipalities, and residents.

Implications for Residents

As an upshot of these changes to the appeals process, we can expect to have a more policy-driven planning process in the GGH that gives more authority and weight to Official Plans. A more policy-driven process means more opportunities for meaningful public input, but only if residents understand the system and how to use it to get their points across. For example, debates about whether a development is desirable or not will really come down to whether it's consistent with the Official Plan and Growth Plan or not.

This implies that if citizens want to influence development patterns on the ground, they can't wait until the rezoning signs go up – citizen groups need to be paying attention to the upstream MCR and Official Planning review process. And for those in two-tiered municipalities, this means getting involved at both tiers, but especially the upper-tier level. Unfortunately, citizen involvement in Official Plan reviews to date has often been lukewarm, especially at the upper-tier. The challenge, therefore, is to find ways to mobilize people for this early involvement in the MCR and Official Plan review process.

PUBLIC ENGAGEMENT IN MUNICIPAL COMPREHENSIVE REVIEWS

The preceding considerations imply that citizen involvement in the MCR process is going to be crucial at both the big-picture planning scale and the individual development scale. In this section, we discuss some of the opportunities for engagement in the MCR processes and the OP reviews needed to implement the new Growth Plan. First, the legally required opportunities that municipalities have to provide will be identified, and then some emerging approaches beyond statutory requirements will be mentioned, including both in-person and on-line techniques. Finally, the York Region Consultation Plan is presented as a promising model of citizen engagement in the MCR process.

Legally Required Public Consultations on Official Plan Reviews

A municipality has two options for revising its Official Plan to bring it into conformity with Growth Plan policies – it can either undertake a full review of its existing OP or it can do a more limited OP amendment, depending on how extensive the changes are. To undertake an OP review, the Planning Act requires a minimum amount of public consultation. Specifically, your municipality must ensure that:

- The draft plan is released to the public.
- An open house is held to present the draft plan and answer questions.
- Notice is given for a public meeting where citizens are invited to make oral or written deputations on the draft plan.
- A special meeting of council is held to consider the draft plan, which is open to the public.
- Then the plan is approved by council and sent to the province or upper-tier municipality for approval.

Not only are these requirements modest, but past experience shows that they often don't attract a lot of public interest.

Other Options

Fortunately, municipalities in the GGH are exploring many other ways to boost citizen involvement in OP reviews, including both "high-touch", or face-to-face events, and high-tech measures using the internet and mobile communication technology. In terms of high-touch options:

- Workshops: Some municipalities stage workshops to engage in intensive discussion on planning issues or to help develop growth management options.
- Pop-up kiosks: This involves setting up displays in high-traffic places like shopping malls, with planners there to answer questions, provide pamphlets and invite people to upcoming consultation events.
- Storefront planning: Another approach is to set up a planning "storefront" on a main street during the OP review period, where planners are available to offer information and answer questions.
- Piggy-backed presentations: This is when planners reach out by making presentations at community events rather than trying to get the community to come to an open house.
- Planning advisory committees: Some municipalities appoint citizens to a planning advisory committee that provides input on the plan review as it moves along.
- Walking tours: Planners may take a group of residents on a walking tour of specific sites in order to explore different ways to accommodate growth.

Technology is also opening up new options to engage the public, including things like:

- Surveys: on-line surveys to gather citizen opinions on growth management options.
- Social media: to reach out to new people through friendship networks.
- Digital newsletters: to circulate news about the OP review.
- One-stop web portals: for generating discussion, archiving documents, tracking the MCR process and disseminating surveys.
- Ideas forums: where participants share their opinions on-line and vote or comment on each other's ideas.
- Webinars: to discuss strategic documents as they are released by the municipality during the MCR process.

By using "high-touch" and high-tech consultation options in combination, some municipalities in the GGH are finding that they can reach thousands of individual residents and do a better job of mobilizing citizen groups to engage with the OP review process.

York Region case study

York Region is one of the few municipalities in the GGH that has already (i.e., by April, 2018) released a Consultation Plan for the upcoming MCR process, providing some indication of what to expect in the coming months from upper-tier and single-tier municipalities as they move towards undertaking their MCRs and implementing the new provisions of the GP. In preparing the plan, the Region scanned innovative consultation practices elsewhere in Canada and the US and incorporated many of the best ideas into the Consultation Plan. The plan consists of five phases over two years, each of which will be accompanied by specific public engagement events or processes:

- Phase 1: Launch of the public consultation process
    - ✓ Educational videos on planning topics: The Region plans to produce several educational videos, including what is an MCR and Official Plan? How is York Region growing and where? Why should you be involved?
    - ✓ "Good planning" photo contests: Ask residents to post photos of their favourite public places on Instagram with comments explaining their choices.
    - ✓ On-line survey: Ask residents what they like about York Region, what needs to be preserved, how best to accommodate expected growth, etc.
- Phase 2: Consultation on the MCR background studies
    - ✓ Interactive mapping: At either on-line or in-person workshops, residents will be invited to tag locations and enter comments in response to questions. For example, tag an area where intensification was successful and say why.
    - ✓ Webinars to get public feedback on MCR background studies: Residents will be invited to participate in webinars on housing, employment, visualizing good density, intensification areas, etc. Webinars will be archived and people will be encouraged to watch them and respond to survey questions or provide comments on-line.
- Phase 3: Seek further public input on policy options and on Strategic Directions reports
    - ✓ Walking tours of proposed growth areas: Planners will conduct walks of downtowns and transit station areas where growth is anticipated. They'll show people what type of density needs to be achieved to meet Growth Plan targets, asking them to comment on mobile devices as they walk along. Videos of the walks will be produced and posted on-line.
    - ✓ Videos and infographics to confirm public input: Planners will compile public consultation feedback and release it as videos and infographics and ask the public to say whether they are getting it right or not.
    - ✓ On-line consultation on strategic directions reports: When reports with policy direction on housing, employment, etc. go to council, the public will be asked to provide their comments on-line.
- Phase 4: Publish Draft Regional Official Plan

- ✓ Online conferencing: with members of the public to highlight important features of the draft document and get comments.
- ✓ Public open houses at community events and gathering places: Planners will reach out to organizers of community events to get permission to present the draft plan at public places – e.g., at libraries, meetings of citizens groups.

- Phase 5: Adopt the Regional Official Plan
  - ✓ Assemble comments on Draft Official Plan and finalize plan.
  - ✓ Council adopts Regional Official Plan at a meeting open to the public.

- Throughout all five phases
  - ✓ One-stop-portal for everything associated with the OP: A hub for the surveys, webinars, video archives, planning studies and draft plan, etc.
  - ✓ One email address for residents to send questions and suggestions: Regular updates on the progress of the plan will be sent to an email distribution list (currently over 1,000 people on the list).
  - ✓ Facebook and Twitter will be used to share information and network with other groups and organizations.
  - ✓ Staff will be available to present on ROP progress and answer questions upon invitation by citizen groups.
  - ✓ Council will seek input from York Region's Planning Advisory Committee: Since 2016, provincial legislation requires that all upper-tier and single-tier municipalities have a planning advisory committee and that they appoint at least one citizen to sit on it. York Region's PAC has three politicians and eight residents who are not allowed to be directly affiliated with the development industry. The committee advises regional council on matters related to the review and amendment of the ROP.
  - ✓ Staff will seek input from lower-tier municipalities: Working groups on the different aspects of the MCR process have been set up to coordinate input into the MCR process from lower-tier municipalities. The committees are looking at things like population and employment forecasts, intensification targets, employment lands, and housing. The lower-tier municipalities will be conducting their own public consultation exercises and feeding public input to York Region through these committees. In some cases, York Region and the lower-tier municipalities may coordinate their public consultation events and strategies.

PUBLIC ENGAGEMENT BEYOND THE GROWTH PLAN CONFORMITY EXERCISES

Up to this point, this report has focused on how changes to the planning landscape may affect opportunities for public engagement in the MCR process and the review of official plans to bring them into conformity with the Growth Plan. But many ratepayer groups are trying to shape growth at a more site-specific level. This section looks at two other pieces of the evolving planning system that link more directly to influencing development

applications: these are the Community Planning Permit system and Complete Application Requirements system. Both of these approaches require that municipalities adopt enabling policies in their official plans in order to make use of them, which this provides yet another incentive for ratepayers to pay close attention to OP reviews and amendments.

The Community Planning Permit System

The Community Planning Permit system – or CPP – can have a major impact on how citizens are able to intervene in development decisions in specific areas of their municipalities. If a municipality wants to use the CPP System, it adopts an Official Plan policy to this effect and then passes a separate CPP bylaw under the OP policy laying out the development rules for each area.

A municipality that uses this approach can pre-approve development in a whole district by passing a single bylaw that lays out not just the land use, height and density that will be accepted there, but the landscaping requirements, road patterns, urban design, and affordable housing requirements. In a district subject to a CPP by-law, the normal consultation process on development is suspended - developers don't have to go through a rezoning application on each parcel. If the development proposed is consistent with the OP and the CPP bylaw for that area, it can't be turned down by the municipality.

Implications for Residents

The Community Planning Permit system is attractive to municipalities because it can be used to bring a detailed planning vision to a whole area of town – such as areas slated for intensification – while developers like it because they get a more predictable and streamlined planning approvals process.

But for citizens, the CPP system may be a double-edged sword: On the one hand, it provides them with an opportunity to influence development outcomes in a large area without having to engage developers over each individual proposal and it also helps avoid surprise increases in density negotiated secretly with individual developers on particular parcels of land. On the other hand, if residents aren't paying attention, they could miss out entirely on influencing development decisions in the affected area.

The OP policies and CPP bylaw could be adopted years in advance of actual development applications, and other than notifying citizens of the various applications coming in, it is possible that there would be no further opportunities for public consultation in the affected area. Moreover, the outcome of an application in a CPP area is not appealable by citizens to the new LPAT- if the application is approved by the municipality, that's the end of the road - only the developer can appeal if the application is turned down.

The CPP system has been around for over a decade and originally wasn't much used, but it seems to be attracting more attention recently. In the GGH, at least Toronto, Brampton, and Ajax have CPP systems in place. Innisfil and Niagara-on-the-Lake are also currently exploring the use of a CPP system.

Complete Application Requirements

Another feature of the planning framework that could shape opportunities for citizen involvement in development approval decisions is the Complete Application Requirement system. This has also been around for over ten years, but only about a third of municipalities within the GGH are using the Complete Application Requirement system.

According to the Planning Act, municipalities are permitted to adopt an OP policy that requires a developer to consult with municipal planners prior to submitting an application. As part of this pre-consultation, the municipality can require that a developer provides whatever information or studies the municipality thinks is necessary to properly assess the application. The application isn't considered complete until all the required information is submitted.

Here are some examples of the type of studies that could be required:

- Planning studies, such as a Land Use Compatibility Study.
- A Traffic Impact Study.
- A Cultural Heritage Impact Assessment.
- A Noise and Vibration Study.
- Urban Design studies.
- An Environmental Impact study.
- A study on municipal financial impacts of the proposed development.

Implications for Residents

As many citizen activists know, by the time a proposal gets to a public hearing, the design process is already well advanced and options for change are limited. The Complete Application Requirement system is interesting because it provides citizens with the information they need to understand a development proposal and express their point of view before the developer starts negotiating with planners. With the new LPAT system, the opportunity is to negotiate development proposals based on planning merits, and the Complete Application Requirement system can give residents the information they need to do just that.

CONCLUSION

The evolving planning landscape in Ontario generally - and in the Greater Golden Horseshoe more specifically - is creating new opportunities and pitfalls for citizen engagement in the planning and development process. The overall direction of this evolution is towards a stronger policy framework, one that provides municipalities with more guidance on managing growth in the public interest, gives more authority to municipal governments to shape

development, and affords fewer recourses to developers who want to challenge municipal decisions. The overall effect of these changes is to multiply the potential for citizen participation in the planning and development approval process at every stage, from the earliest stages of the growth management process affecting whole regional municipalities, to the pre-planning of districts within a municipality, to the review of development applications on particular sites.

From another viewpoint, however, this evolving landscape presents new risks to citizen engagement. The interlocking policy pieces and step-wise nature of the planning process makes it imperative that citizens remain vigilant of planning issues and intervene at the earliest stages in order to have maximum impact. Historically, this has been hard to achieve as citizens often wait until an immediate threat is posed to them individually before getting involved in planning matters. The new framework increases the potential benefits of early involvement and the potential costs of inattention. The role of smart growth advocates under these conditions is clear: help citizens track important planning initiatives, provide information, training and support to increase citizen ability to intervene in growth management and development control processes, and collect stories of success and misstep so that citizens can learn collectively how best to use new opportunities for engagement.