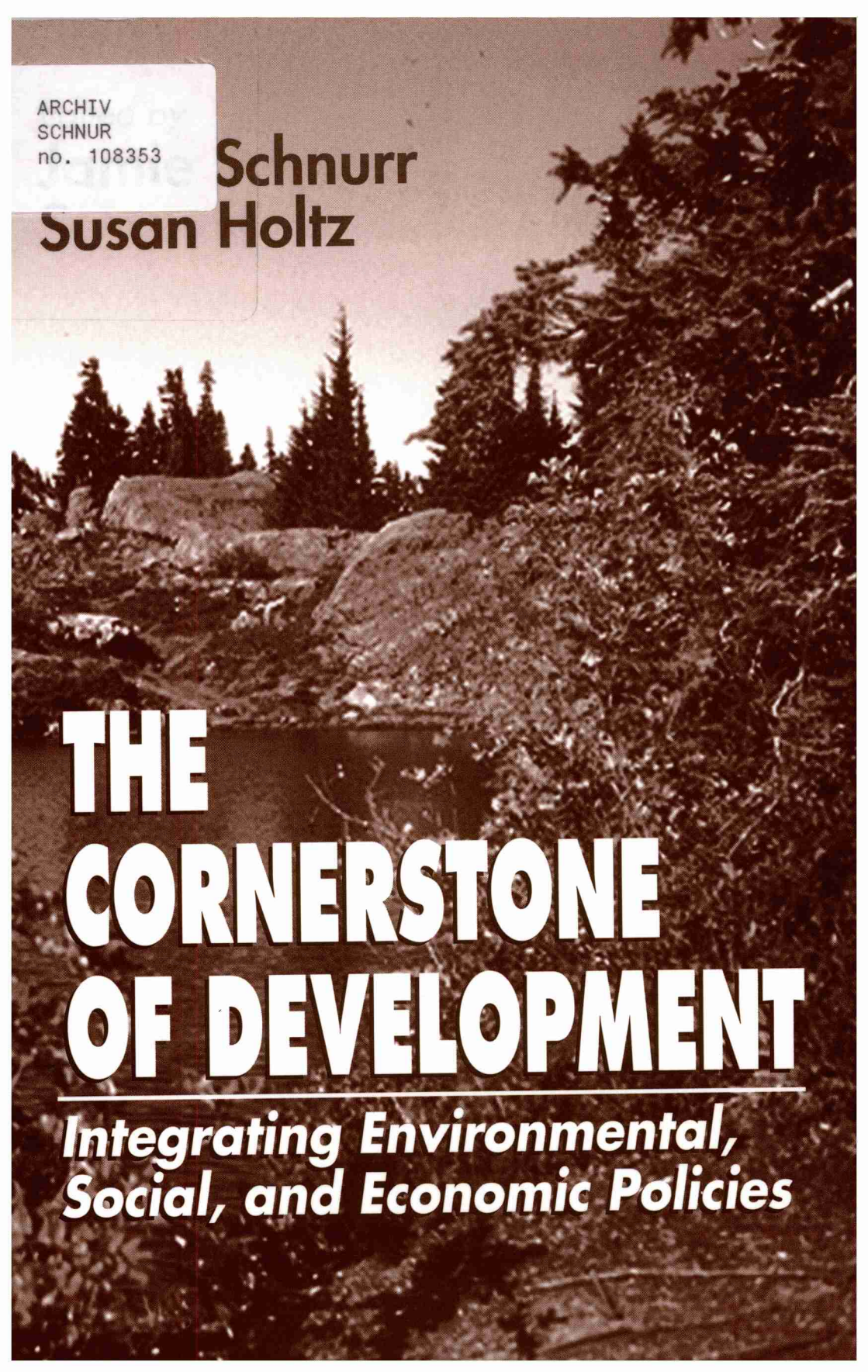


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# THE CORNERSTONE OF DEVELOPMENT

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*Integrating Environmental,  
Social, and Economic Policies*

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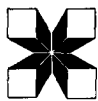
*Edited by*  
**Jamie Schnurr**  
**Susan Holtz**

# **THE CORNERSTONE OF DEVELOPMENT**

***Integrating Environmental,  
Social, and Economic Policies***



**IDRC**



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## Chapter 5

# ***Planning Act Reforms and Initiatives in Ontario, Canada***

G. Penfold



## **Introduction**

Historically, governments, businesses, and individuals involved in deliberate processes of development and change have focused on economic benefits and selected social benefits, with less regard for environmental and broad social impacts. Sustainability demands a new balance of the benefits and impacts of change, particularly as these relate to the natural and social environments. This chapter describes the reform of a land-use planning system, one of the key means of managing change, as an example of an attempt to better integrate the emerging values of sustainability with the traditional considerations of land-use planning. The resulting integration of social, environmental, and economic interests was part of both the reform process itself and the new policies and institutional arrangements that came out of that process.

A land-use planning system has been in place in the Province of Ontario, Canada, since 1946. The *Planning Act* established procedures and authority for making decisions about land-use change on private and municipal lands. Over time, several reviews and many amendments to the *Planning Act* resulted in a detailed and complex system of policies, procedures, roles, and authorities. In the last 20 years, this complexity led to increasing concern about the efficiency of the planning system and its effectiveness in addressing environmental and social impacts.

The idea of having a formal provincial policy to respond to these concerns began to be discussed in the 1970s, when the province established policies for the protection of agricultural land, mineral aggregates, and flood plains. These

policies acted as guiding principles for municipal policies and related planning decisions.

Despite these policies, concern continued to increase about both the effectiveness and the efficiency of the planning system. In response, the provincial government appointed a Commission of Enquiry (the Commission on Planning and Development Reform in Ontario [CPDR]) in 1991 to review the planning system and to make recommendations for change. One significant outcome of this process was a *Comprehensive Set of Policy Statements*, approved by Cabinet in May of 1994. Another was a revised *Planning Act*, approved in December 1994. These changes came into effect in March 1995. A provincial election in May 1995 resulted in a new political party taking power. The new government reviewed and amended both the provincial policies and legislation in May 1996.

## Case description

### The planning context in Ontario

Ontario has a variety of planning and development contexts and political and administrative structures. At the beginning of CPDR's work, the non-Aboriginal provincial population of more than 10 million was served by 792 local municipalities. Seventy percent of these municipalities were in rural areas and had populations of fewer than 5 000. At the other end of the scale, the Metropolitan Toronto regional government served a population of about 2.4 million, and the City of Toronto had a population of more than 600 000.

More than 90% of the population lived in southern Ontario, in 12 regional- and 27 county-government structures. These municipalities had formed a second tier of municipal government, containing local municipalities. Almost 40% of the total provincial population lived in Metropolitan Toronto (22%) and the adjacent three regions (16%).

In northern Ontario, one-half of the 800 000 residents were living in six cities. The other one-half lived in small municipalities, with no second tier of municipal government. About 50 000 non-Aboriginal people came from unorganized areas, without a municipal structure. Some of these small municipalities and unorganized areas had appointed planning boards to deal with local planning matters; others had local service boards to provide basic services, such as roads and fire protection. In unorganized areas outside planning-board jurisdictions, the province administered planning.

### History of planning in Ontario

The *Planning Act* of 1946 established the authority for municipalities or joint municipal planning areas to develop official plans and zoning regulations. The initial application of this legislation was in cities and surrounding areas. As rapid growth and development occurred through the 1960s, planning became



established in most municipalities. Managing this complex system started to become an issue of public concern. A review of the planning system in 1971 by the Ontario Economic Council recommended, among other initiatives, “a basic policy on the allocation of provincial resources” and “a consistent philosophy on critical policy concerns including particularly environmental conservation, social and economic welfare, and community amenity” (OEC 1971, p. 97). This review did not result in changes that supported the idea of integrated policy.

A review of the *Planning Act* by the *Ontario Planning Act Review Committee* (PARC) in 1977 was more successful. PARC (1977, p. 30) recommended that legislation define provincial interests to include

*the distribution of economic and social resources among the residents and regions of the Province; the maintenance of the province's agricultural and rural base; and the distribution of activities which have an “undesirable” local impact but are necessary from an overall Provincial standpoint.*

Low-income housing and gravel extraction were used as examples. PARC also “expected that the principles will be elaborated from time to time as specific provincial policies.” These policies “should be implemented by way of regulations or other statutory orders, formally adopted by the provincial Cabinet and having the force of law.”

Subsequently, in 1983, the province amended the *Planning Act* to include defined provincial interests and procedures for the review and approval of policies by provincial Cabinet. Under the 1983 *Planning Act*, every municipality and planning board “may” develop an official plan to “provide guidance for the physical development of the municipality” while “having regard to relevant social, economic and environmental matters” (Ontario 1989, p. 3). The Minister of Municipal Affairs is given the authority to approve these plans. These official plans and zoning bylaws control private development and guide the planning and development of municipal infrastructure.

Provincial policies are implemented through a requirement in the legislation that all decision-making authorities, including local governments, are to “have regard to” provincial policies in their decisions (Ontario 1989, p. 4). All official plans are to be approved by the Minister of Municipal Affairs. Amendments to plans and large-scale developments, such as plans for subdivision, also require provincial approval. If conflict occurs over the implementation of policies, appeals may be taken to the Ontario Municipal Board (OMB), which can generally make final decisions on planning matters.

Between 1983 and 1992, the province adopted four policies:

- ♦ Mineral Aggregate Resource Policy (1986; Ministry of Natural Resources);
- ♦ Flood Plain Planning Policy (1988; Ministry of Natural Resources);
- ♦ Land Use Planning for Housing Policy (1989; Ministry of Housing); and
- ♦ Wetlands Policy (1992; Ministry of Natural Resources).

These ministries, which all had related mandates, took responsibility for ensuring the implementation of policies through the review and approval of municipal plans and development decisions. Interest groups and the public were involved in policy development through a process of review and response to ministry policy proposals. This approach generally proved to be challenging and conflict-laden. A long period between the establishment of policy concepts and final approval was the norm. The Wetlands Policy, for example, took more than 10 years to move from concept to approval. Imposition of policy by the province could have substantially shortened this time frame, but such action carries with it the risk of negative public reaction and was therefore considered a politically unacceptable strategy.

By 1991, various ministries had adopted guidelines as an alternative to formal policy. These guidelines addressed issues, such as noise, distance separating industrial facilities from sensitive land uses, and protection of significant areas. Because guidelines could be approved without consultation, they avoided the problems of conflict and time delay. However, lack of public and political support for these guidelines resulted in conflict during the review of official plans and development applications, and the legitimacy of giving guidelines the force of policy was also questioned.

Within this general framework of policies and guidelines, review of plans and development applications was subjected to long delays. Review time frames of 3–5 years were common for major plans and development applications. An additional 2 years was required if an approval was appealed to OMB. The public continued to raise issues about protection of environmental and social well-being. As well, graft and corruption were suspected to be occurring at the municipal level; this resulted in an investigation being conducted by a special unit of the Ontario Provincial Police, with charges eventually laid.

To respond to these problems, the government appointed CPDR under the *Public Enquiries Act*. CPDR's challenge was to make recommendations for changes to legislation, policy, or both, to resolve these various difficulties.

## **The Commission on Planning and Development Reform in Ontario**

CPDR was given a broad mandate. It was to recommend changes to the *Planning Act* and related policies that would restore confidence in the integrity of the planning process; better define roles, relationships, and responsibilities; and make the planning process more timely and efficient. A critical part of CPDR's mandate was to recommend changes that would better protect the public interest in planning and land development, including "environmental considerations." CPDR was directed to "consult widely, conduct research," "foster dialogue," and submit its final report by 1 July 1993 (CPDR 1993, p. 165).

The *Public Enquiries Act* gave CPDR the legal authority to access information and control public processes. CPDR also had more than adequate

financial resources: its \$2.8 million expenses were only about one-half its allocated budget. Its logistical and other support was provided by a special branch of the Ministry of the Attorney General.

### **CPDR's approach**

CPDR's goal was to make recommendations that would generally be acceptable to the public and to those involved in planning and development and that would have a realistic possibility of being implemented. The task was to find common ground among the various stakeholders involved in planning. CPDR used a participatory and solution-building approach that involved planners, developers, citizen activists, environmentalists, farmers, municipal staff and politicians, provincial staff and politicians, and others who work with the planning process.

Between the start of its activities in September 1991 and submission of its final report in June 1993, CPDR organized 15 working groups to generate proposals for discussion. These proposals were published and circulated in newsletters. CPDR held 46 public forums on these proposals, through four rounds of formal public hearings across the province. Thirty-eight less-formal community meetings were also organized. CPDR attended more than 80 conferences and workshops. These were usually organized by stakeholders and interest groups. In total, CPDR talked directly with more than 23 000 people. It also met regularly with organizations and interest groups, including provincial ministries, agencies, and politicians.

CPDR had a mailing list with more than 19 000 names for circulation of newsletters and reports. An additional 5 000–10 000 copies of documents were distributed at conferences and meetings. About 2 100 written submissions were received, including 1 200 on a draft report released in December 1992. CPDR also deliberately used the media as a resource, including a biweekly interview on CBC's *Radio Noon* program in Toronto and Sudbury; press releases and news conferences at major steps in the process; and meetings with the editorial staff of the daily papers in the public-forum venues.

### **Results of the review**

The final report of CPDR was released in June 1993. It contained 98 recommendations dealing with provincial policy, changes to legislation, and new administrative procedures and organizational arrangements. A key recommendation was that the province adopt a comprehensive set of policies addressing six policy areas. CPDR's recommendations also included implementation procedures and suggestions for resolving conflicts between policies (CPDR 1993).

On receiving the final report, the Ministry of Municipal Affairs reviewed and amended the recommended policies. The changes addressed concerns that the ministries and government felt were inadequately addressed in the recommendations. These changes were relatively minor. The Ministry of Municipal Affairs released a draft of the revised policies in December 1993 and asked for comment before the end of March 1994. About 600 written submissions on

these proposals were received. After further changes, Cabinet approved a *Comprehensive Set of Policy Statements* in May 1994.

The approved policies covered the same six policy areas recommended by CPDR:

- ♦ Natural-heritage, environmental-protection, and environmental-hazard policies;
- ♦ Economic, community-development, and infrastructure policies;
- ♦ Housing policies;
- ♦ Agricultural-land policies;
- ♦ Conservation policies; and
- ♦ Mineral-aggregate, mineral-resource, and petroleum-resource policies.

A section on interpretation and implementation was also included. Legislative changes put in place a requirement that planning actions be consistent with these policies. The intention of this change was to strengthen the former requirement to “have regard” for policies. To ensure implementation, the province retained the authority to approve county and regional plans. These second-tier governments were given authority to approve local plans, which also had to be consistent with policies and upper-tier plans.

In May 1994, the legislature also gave first reading to Bill 163, which amended the *Planning Act* and four other acts related to planning. Between September and December 1994, a standing committee of the legislature reviewed Bill 163. This review included public hearings in 12 centres across Ontario. Bill 163 received third reading in December 1994. Proclamation of both the policies and the new legislation took place on 28 March 1995. Implementation guidelines were also released at that time. They included more than 700 pages of background, interpretation, and suggestions for implementation of the approved policies.

### **Subsequent changes**

In the summer of 1995, after a provincial election, the Conservative party took power. It was elected with a mandate to control debt and deficit and to stimulate the economy. In this new political climate, social and environmental planning programs, policies, and regulations were seen as obstacles to economic growth. In early 1996, the recently adopted policies and legislation were reviewed through a process of circulating proposals and requesting submissions. A standing committee held hearings on new legislation, Bill 20: the *Land Use Planning and Protection Act*. By May 1996, revised legislation and policies were in place. Key changes included

- ♦ Withdrawal of the implementation guidelines introduced by the previous government;

- ♦ Removal of the requirement that the province approve upper-tier plans;
- ♦ Reinstatement of the requirement that planning authorities have regard for provincial policies; and
- ♦ New requirements for, and limitations on, public rights of review and appeal.

The new provincial-policy statement has three policy areas:

- ♦ Efficient, cost-effective development and land-use patterns — developing strong communities, housing, and infrastructure;
- ♦ Resources — agriculture, mineral resources, natural heritage, water quality and quantity, cultural heritage, and archeological resources; and
- ♦ Public health and safety — natural and artificial hazards.

Most of the areas addressed in the previous policy statement were retained in this revised format. However, the philosophy and content were substantially changed to give municipalities much more discretion to interpret policies in a local and regional context. For example, the previous policy statement required an environmental-impact statement for development proposals that had potential impacts on environmentally sensitive areas. The new policies require proof that the natural features or ecological functions of the area will not be negatively affected. Similarly, the previous policy statement required that 30% of new dwelling units be affordable to households falling in the lowest 30th percentile of the household-income distribution in the area housing market. The new policies encourage housing forms and densities designed to be affordable to moderate- and lower-income households. A requirement to permit two households in each single-family dwelling unit was removed. The changes effected by the new government shifted the emphasis of policies and implementation away from environmental and social concerns and toward economic concerns and shifted implementation from provincial control to local control. But the comprehensive models for policies and the challenges of integrating economic, social, and environmental priorities in local and regional planning still remain.

## **Case analysis**

### **Analytical framework**

CPDR's objectives were both substantive (for example, protection of publicly valued goals concerning the environment and agriculture) and procedural (for example, improving efficiency, openness, and accountability).

Available literature suggests that the public and academic sectors carried out considerable research on most of these issues. A key finding from a review

of this literature and the results of previous reviews of the planning system, in 1971 and 1977, was that the province needed to establish a policy as the basis for a strong planning system. Except for the four policies previously noted, the province had not developed an integrated set of policies.

CPDR's approach focused on developing recommendations with public, stakeholder, and political support. Changes in roles and procedures had to ensure that policy could and would be implemented. The aim was to use a consensus-building strategy to generate good policy recommendations and an agreement that policies should be adopted and implemented.

### Integrative elements

The work of CPDR was limited to a review of the *Planning Act* and related policies and legislation. General social and economic policy fell outside its mandate. The land-use planning context, therefore, limited the scope of integration of social, environmental, and economic policies.

Within this context, however, social-, economic-, and environmental-policy components did emerge in several ways. In Bill 163 (Ontario 1994), a new section defined the purposes of planning. Two subsections are particularly relevant:

- ♦ 4(1.1)a — “to promote sustainable economic development in a healthy natural environment”; and
- ♦ 4(1.1)c — “to integrate matters of provincial interest in provincial and municipal planning decisions.”

Section 5.2 of Bill 163 provided a definition of provincial interest. This definition covered such matters as protection of ecological systems — including natural areas, features, and functions — and the protection and conservation of agricultural and natural resources (environmental interests). It also covered the orderly development of safe, healthy communities and adequate provision of health, educational, social, cultural, and recreational facilities and a full range of housing (social interests), as well as protection of the economic well-being of the province and municipalities and the adequate provision of employment opportunities (economic interests).

The *Comprehensive Set of Policy Statements* elaborated on these interests. The natural-heritage, environmental-protection, and environmental-hazard policies require protection of water resources and natural features of significant interest, including wetlands, woodlots, and natural habitats. These policies also protect people from the consequences of development in hazardous areas, such as flood plains and areas subject to erosion or wave damage. The agricultural-land, mineral-aggregate, mineral-resource, and petroleum-resource policies address the goals of natural-resource protection. Conservation policies address issues in managing renewable resources, such as energy and water, and minimizing waste. Transportation components of this policy address both resource

and social concerns. Housing policy addresses the need for affordable housing (social interests). Finally, the economic, community-development, and infrastructure policies address issues in services and infrastructure (linking social services and facilities planning to land use) and also support planning for a diversified economic base (social and economic interests). These policy areas are also included in the revised set of policies developed in conjunction with Bill 20.

Some of these policies are exclusionary (for example, no development in significant wetlands), and related land-use conflicts are relatively easy to resolve. However, other policies may conflict in specific situations, with no clear direction about which policy goal takes priority. For example, good-quality agricultural land can be located over good-quality aggregates. In this case, the policy-implementation process would have to define the highest priority in this context, or minimize conflicts through mitigation processes (for example, rehabilitation of the site to agricultural use after aggregate extraction), or both. Planning is primarily concerned with the identification and resolution of these conflicts. Thwarting the purpose of the planning process by ignoring or overriding one or another interest is much more difficult under a comprehensive policy framework.

## CPDR's policy process

### The political environment

Several factors in the external environment contributed to the success of CPDR's policy process:

- ♦ The government in power (the New Democrats) was newly elected and was interested in change. When it was in opposition, it had been critical of the lack of attention to provincial interests in planning and supportive of better protection of the environment.
- ♦ Several recent public reviews and appeals concerning planning problems had criticized the planning system. The Royal Commission on the Future of the Toronto Waterfront was one of these significant reviews. In one of its reports, "Planning for Sustainability," the Royal Commission stated that "a major weakness in the land-use planning system in Ontario is the provincial government's lack of leadership, coordination and direction in the land-use planning process" and that "the Province's first step in reestablishing leadership in this area would be to establish provincial interests by developing policies as envisaged and provided for under Section 3 of the *Planning Act*" (Doering et al. 1991, p. 81). The final report of the Royal Commission promoted the idea of an ecosystem approach to planning, with a particular emphasis on watershed planning (Crombie 1992).
- ♦ The province was directly engaged in regional planning issues. The Provincial Office of the Greater Toronto Area had been working with

Toronto-area regions and municipalities to coordinate growth management and infrastructure policies. A similar exercise was under way to coordinate regional and local planning policies on the Oak Ridges Moraine, a significant natural area north of Toronto. The difficulty in providing coordination without a provincial policy framework was evident in both exercises.

- ♦ Ontario Ministry of Municipal Affairs and other ministries had been working internally on an umbrella policy, an initial attempt to create a comprehensive set of provincial policies.

### **Comparison with the traditional process**

The traditional approach used by policymakers and by most commissions is to develop policy based on the perspective of the political and administrative systems of government, with limited public participation. The public is usually asked for opinions on issues and approaches but rarely has a chance to comment on policy proposals until the process is virtually complete. These processes often have open-ended time frames, with little public understanding of how or when decisions will be made.

The establishment of CPDR provided the opportunity for a different approach. The first challenge was to identify individuals to act as commissioners. The government asked John Sewell, former council member and mayor of Toronto and Chair of the Metro Housing Authority, to chair CPDR. Toby Vigod, environmental lawyer and executive director of the Canadian Environmental Law Association, and George Penfold, an associate professor at the University School of Rural Planning and Development at the University of Guelph, were also asked to be commissioners.

Before accepting the appointments, the three selected candidates met several times to establish a common understanding of the mandate and a general strategy for carrying it out. They asked for several changes to the mandate as a condition of acceptance of appointment: one of these was to add "the goals of land use planning" to the review (CPDR 1993, p. 165). This request resulted from an agreement among the candidates that policy would be key to any significant change in the planning system. This request also put the Minister of Municipal Affairs and Cabinet on notice that policy would be a focus of CPDR's work.

CPDR appointed Wendy Noble as its executive director. Noble was a manager in the Ministry of Municipal Affairs and had led the provincial umbrella-policy review. She had an excellent understanding of the interests and concerns of the various government ministries. Also, in appointing John Sewell to chair the commission, the government selected a well-known public activist, who was oriented to reform, a supporter of community interests, and a media figure. This appointment made it clear that this review was not another bureaucratic exercise and created an immediate public expectation of change.



Implementing the objective of policy and legislative change that would be generally agreed to among the various stakeholders — including the province — meant creating innovative public processes and forums to allow all interested parties to hear each other's concerns. Several approaches were used. First, CPDR established a specific schedule of activities. All stakeholders knew within 3 months of the start of CPDR's work that it intended to submit its final report by April 1993. A draft report was scheduled for December 1992. Three scheduled rounds of public forums would precede the draft report. This allowed participants to organize their resources to respond to CPDR's schedule.

Second, CPDR established working groups to generate ideas for discussion. The working groups comprised stakeholders dealing with the various planning contexts in the province: urban areas, urban-fringe areas, rural areas and small settlements, cottage country, and two groups in northern Ontario (east and west). The working groups typically represented the perspectives of ratepayers' associations, municipal administrators, municipal planners and politicians, provincial ministries, environmental interest groups, lawyers, First Nations, development interests, and economic-development planners. However, group members were asked to bring their individual views to the table, not those of an organization. CPDR selected group members based on their reputation for being skilled and thoughtful individuals respected by their peers.

The first six groups were asked to generate ideas about goals and policies for planning. These groups met in sessions of 2–3 hours each, for a total of about 12 hours. CPDR published and circulated the results of these deliberations in a newsletter, *The New Planning News*. Public forums in nine centres across the regions of the province followed in January 1992. People were asked to present either written or verbal comments on these proposals or their own ideas. CPDR consolidated the comments and prepared a comprehensive set of draft policies.

CPDR discussed these revised policies with the committees and task forces established by the working groups. After further revisions, the proposed policies were published in the April 1992 issue of the newsletter. Another round of forums followed. Revisions from this review and further consultation with interest groups resulted in revised policies, which were published in the draft report in December 1992. Comments from the final round of public forums and meetings with interest groups resulted in the policies included in the final report. These recommended policies were subsequently revised by the Ministry of Municipal Affairs and were circulated for comment in December 1993. The ministry provided a 3-month period for comments. After further revisions, a final set of policies was approved by Cabinet in May 1994.

Draft policies were also discussed on biweekly radio broadcasts, in news articles, at conferences and seminars, and at open public meetings. In sum, over a period of 2 years, the policies went through five stages of refinement and public review. A similar process was used to create recommendations on issues of planning process and development control.

### **Roles of beneficiaries, organizations, and institutions**

Stakeholders played several roles. First, individuals with experience in dealing with stakeholder interests were members of working groups. In addition, most participating organizations formed planning-review committees or task forces. These committees met directly with CPDR to discuss their concerns, as well as presenting positions at the various public forums and interest-group seminars and conferences.

After the first round of working groups, CPDR formed a Leaders Group, consisting of either the leaders of organizations or the chairs of the interest-group committees or task forces dealing with the planning review. This group had representatives from 21 different organizations, including provincial agencies. It remained in place for the remainder of CPDR's work. The Leaders Group provided a forum for CPDR to announce details of schedules, bring issues of common concern to the table, and test options. It gave organization leaders an opportunity to hear each other's positions and to discuss them in a nonpublic forum.

Most organizations invited CPDR to take part in their annual conferences or workshops. Some, such as the Ontario Professional Planners Institute, organized a series of regional meetings so that members could talk directly with CPDR. Several organizations, such as the Urban Development Institute, Canadian Environmental Law Association, and Ontario Professional Planners Institute, attended CPDR press conferences and issued their own press releases on CPDR's work.

In addition to organized interest groups, the general public wrote submissions and participated in public forums and meetings. Communication links were provided through radio broadcasts, phone-in programs, other media — such as television and newspapers — and a 1-800 telephone number.

### **Involvement of decision-makers**

In this planning-reform process, three groups of formal decision-makers were important: provincial politicians, municipal politicians, and provincial bureaucrats. Provincial politicians were important because final approval of policies was in their hands. Municipal politicians were important because they ultimately carried significant responsibility in implementing policy and also because they constituted an important lobby group — strong objection to policy by this group could mean new policies would not be adopted. The provincial bureaucrats were important because they made recommendations to their respective ministers on the content of recommended policies and were responsible for administration of policy implementation.

Provincial politicians were difficult to involve because of the limited time they were available. Information distributed by CPDR was sent to all sitting Members of Provincial Parliament (MPPs) and to their constituency offices. Commissioners or representatives of CPDR met twice with the caucuses of the

opposition parties and three times with the government caucus before submitting its final report.

CPDR met regularly with the Minister of Municipal Affairs and with other ministers at their request. Regular meetings were held with representatives of Cabinet Office, and two meetings were held with a subgroup of Cabinet. Some sitting MPPs attended the public forums in their constituencies. After submitting its final report, CPDR met with individual ministers and the Premier between June and August 1993 to review proposed changes.

In the June 1992 interim report to the Minister of Municipal Affairs, CPDR asked the government to regard the review of the proposed policies in the draft report as fulfilment of the requirement for review of policies under the *Planning Act*. This would allow the government to approve some or all of the policies in the final report without further consultation. The request had the effect of asking the Minister of Municipal Affairs to show support for the idea of a comprehensive set of policies while CPDR was still refining policy proposals. The affirmative response by government led to significantly increased interest in CPDR's work. CPDR received more than 1 200 submissions on the draft report. This step also established an implicit agreement from provincial politicians that comprehensive policies were a useful approach to resolving some concerns about the planning system.

Municipal politicians were easier to involve in the process. Some participated in working groups. Through the Association of Municipalities of Ontario (AMO), the municipalities had a task force to deal directly with CPDR. The chair of this task force also sat on the Leaders Group. AMO invited the commissioners to several local and provincial conference sessions on planning reform.

CPDR arranged meetings with local and regional or county politicians in public-forum venues before the public forums. Some politicians also participated in the forums by making presentations or by observing the proceedings. Local politicians sent individual submissions; municipalities sent submissions; and AMO submitted briefs through its task force. AMO representatives also attended all of CPDR's press conferences.

Insofar as provincial bureaucrats were involved, the staff of relevant provincial ministries and agencies provided support through initial briefings and information and by inviting CPDR to internal committee meetings. For example, CPDR met with a committee of deputy ministers from seven key ministries and with an interministry land- and water-use committee at each stage of the work. These were briefings and provided opportunities to discuss concerns and answer questions.

CPDR also established its own interministry group of provincial officials, with representatives from 13 ministries. As issues emerged individual ministries arranged working sessions that included both central office and field staff. This happened most often with ministries of Municipal Affairs, Environment, and

Energy and Natural Resources. While conducting public forums CPDR visited several regional offices of provincial ministries.

The province's decision to consider the consultation on the draft-report policies as fulfilment of the requirement for consultation under the *Planning Act* meant that consultation on the draft report became a joint CPDR and provincial consultation. At the bureaucratic level, the province formed an interministry policy committee to consider provincial concerns and to provide ideas on the policies that were going into the draft report. This group also remained in place to address CPDR's final recommendations on behalf of the government, thus reducing the time required to review and implement policy recommendations.

### **Resolution of conflicts**

A key to reaching common ground on CPDR's recommendations for new policies and implementation procedures was the general dissatisfaction with the existing system. Concerns varied. For example, the development industry was interested in a more timely process, whereas environmental interest groups wanted to improve environmental protection.

Several aspects of the process helped the participants reach agreements. First, CPDR did not set out to reach a consensus. The terminology used was *common ground*, in recognition that total agreement might be impossible but that even with some level of disagreement, a political decision could be made. This approach meant that one interest group could not stop the process by saying their concerns were inadequately addressed.

Second, the process was very open. The presentations from different interest groups were available through the public forums and through public access to submissions. Open press conferences allowed the media direct access to the interest groups and their positions, which could then be challenged by other interest groups and the public. This openness allowed interest groups to test the public acceptability of their viewpoints. Positions that were unfavourably received were generally amended.

Although the process was open, the Leaders Group and working groups also allowed various interest groups to explore their differences and areas of agreement in a private forum. Members commented that otherwise they rarely had the opportunity to discuss their concerns with other stakeholders in a non-threatening way. This approach helped to build understanding and trust among the participants, who, as influential members of their interest groups, exported this trust and relationship-building to their organizations.

The process was highly iterative, and this, too, was important to resolving conflicts. Ideas could be proposed and tested without their proponents' asking for a firm commitment, and agreement was built slowly and incrementally. Relevant information could be assembled to inform participants about issues and options. This process allowed participants to learn and to make the internal adjustments needed to convey their understanding and support to their various organizations.

Separate, closed meetings with interest-group task forces and committees allowed for frank discussions with CPDR. Concerns and frustrations could be expressed without the scrutiny of the public and the media. These sessions also allowed CPDR to challenge interest groups and to test their positions, new proposals, and options. These meetings helped build a level of trust and a relationship between CPDR and interest groups. Stakeholders began to understand that their interests were not being ignored and that innovative solutions were needed to reach a common ground.

Finally, CPDR continually searched for common interests. For example, in the working groups it became apparent that the development industry did not oppose environmental protection but did wish to have clear rules about what was to be protected and fair treatment during the transition to a new system. Similarly, environmental interests were not opposed to a more timely process. If policy could address their concerns, they could be relieved of some of their watchdog responsibilities and the significant personal costs involved. Both groups had a common interest in good policies.

## **Outcomes and impacts on policy design and implementation**

The key outcome of this process was approval of a set of comprehensive policies. Most stakeholders saw these policies as beneficial. The provincial government and bureaucrats saw policy as essential to protecting public interest. The development industry, although not unanimously, perceived policy as a way of clarifying the rules they would have to recognize. The industry anticipated reduced delays in approval processes if decision-makers respected the policies. Municipal politicians, again not unanimously, saw increased emphasis on provincial policies as a trade-off for gaining more local control over specific development decisions, although some doubted that delegation of approval powers would follow. This scepticism was reinforced by the release of the extensive implementation guidelines, which seemed to represent further government red tape and an infringement on municipal decision-making powers. Some municipalities saw provincial policies as giving support to what they were already attempting to achieve and welcomed the new policies. Citizen and environmental-interest groups saw policy as a safeguard against municipal governments' making short-term, politically expedient decisions.

A second outcome was to demonstrate the use of a participatory decision-making model by a provincial commission. Use of a commission — an arm's-length agency — allowed a focused debate to take place on public interest in issues in a way that avoided parochial ministry or interest-group positions. It allowed all sides to have a voice in the process. As a result of the working-group structures, various interests could learn of about each other's views first hand and discuss their perspectives with each other in a private forum. This had the effect

of building relationships that in the future might help in implementing the policies and in resolving new issues of common interest.

The government extended the working-group model to the implementation process, establishing stakeholder working groups to help develop the implementation guidelines. The direct use of multistakeholder groups was an innovation at this stage of the process, which had previously been left in the hands of the bureaucrats.

The framework for policy development was intended to be strategic and flexible. Even in this context, however, two vital aspects of the process evolved that were different from or more important than anticipated. First, the provincial government decided to consider the consultation on the policies in the draft report as fulfilment of the requirement for consultation on provincial policy, under Section 3 of the *Planning Act*. This idea emerged after it became clear that people were in general agreement about the need for policy and gave considerable support to the draft policies circulated in the April 1992 newsletter. CPDR's rationale was that endless consultation would not be constructive. Government support for CPDR's request brought attention to, and an increased engagement in, the CPDR process of policy development. It also forced the ministries to clearly define their policy interests.

Second, the media coverage and interest-group newsletters and publications became an asset to the process. CPDR had a communication plan, developed by a communication consultant, that involved the media in a substantial way. Nevertheless, the extent of positive response from the media was unanticipated. They actively sought out CPDR for interviews and participation in media programs. This allowed CPDR to have greater access to the public than would have otherwise been possible.

In addition, for many articles, the media selected general issues identified in the policy process and investigated these in the local context. This provided the public with information that CPDR had neither the time nor the resources to develop.

## Research

CPDR gathered research with the help of consultants, a full-time researcher, a full-time librarian, staff of provincial ministries, and participants. Written submissions were analyzed by CPDR staff. The research was specifically aimed at supporting the process of policy development. Basic research on fundamental issues of policy (for example, water quality) was not part of this process. Policies were developed in the context of existing knowledge and professional experience. Although this might have seemed to be a limitation, it was apparent that there was a considerable gap between existing knowledge and its application.

A second aspect of research was the issue of whether full knowledge of how to address problems was needed before policy approval. CPDR's position was that establishing planning goals or policies without absolute clarity on how

those ends could be achieved was not only feasible but desirable. Resources, including research, could then be organized to respond to that goal. However, given the political nature of policy development and the voice and power of stakeholders, CPDR recognized that its ability to set goals well beyond the confines of current knowledge was limited. The objective of research was to ensure that the commissioners and staff understood the current information on a topic and that the information was incorporated into the process.

For example, one set of issues — specifically, time delays, conflicts leading to OMB hearings, and related matters — needed better documentation. CPDR hired a consultant to study the actual operational realities of the planning system. This took 6 months, cost about \$80 000, and involved a series of 26 municipal case studies in various planning contexts throughout the province. The studies collected data on planning activities; as well, planning officials were asked to give their opinion about problems in their jurisdictions and to suggest solutions.

A legal consultant was hired in the fall of 1992 to review the legal implications of the terminology used for requirements in legislation to implement policy. One issue was whether *have regard to*, *conform to*, or *be consistent with* should be used in policy statements. This was a short-term contract, costing about \$5 000.

The full-time staff researcher investigated issues and concerns that arose during the policy-development process. Usually, the researcher consulted secondary data, professional reports, journals, government publications, or other sources of relevant information; key-informant surveys were also used to inventory both opinions and experience, as well as to suggest sources of information. In total, the researcher prepared 114 written research briefs for the commissioners and staff. In at least as many cases, the researcher presented verbal briefs on smaller research items. The researcher also built the glossary of terms used for policies and for the final report (Moull 1993). The cost for the researcher's services, including salary and benefits, was about \$160 000.

The full-time librarian was engaged to collect and organize relevant information and to find the documents requested by the commissioners, the researcher, and staff. The librarian recorded the title and author and prepared a brief description for each document as it was received. By the end of the commission's work, the library contained more than 6 000 items.

At the start, the commissioners were briefed by officials from relevant provincial ministries and agencies on information related to policy and planning reform, as well as on their mandate, roles, and activities. Typically, staff of key ministries met several times with CPDR over the course of the work to provide updates and to respond to CPDR's initiatives. CPDR received both opinion and information as part of the consultation process. Municipal studies, reports, individual research reports, and papers were also presented at public forums or sent to CPDR.

The internal approach to research was one of collaboration and mutual assistance. CPDR drew on staff, as necessary, to provide support for the process, and the staff occasionally asked the commissioners to help in operational matters, such as packaging reports and newsletters. Mutual respect and a team attitude were highly valued. When time permitted, the commissioners would take on research tasks directly, usually on topics related to policy and institutional change. For example, a commissioner prepared the background research on roles of and relationships between First Nations and municipalities. The staff researcher helped by collecting data on the number and location of reserves, land claims, and similar information.

CPDR undertook little direct training other than development of skills in the use of computer software. The researcher and staff went to a limited number of conferences and seminars on planning and policy issues and research methods used for the work; for instance, they attended a meeting of the Urban and Regional Information Systems Association. All staff attended some of CPDR's scheduled events, such as working-group sessions, public forums, and meetings with committees, to gain insight into the process and have first-hand experience of how the information was used. The researcher also attended most briefing sessions with ministry staff.

### **Research methods**

The commissioners, along with the researcher, executive director, and communication consultant, established the research agenda. Agreements on research priorities, schedules, and implementation were reached by consensus at weekly staff meetings. Occasionally, initial research uncovered either substantive or methodological issues that resulted in further discussion by the group.

Information and data were usually collected from secondary sources, although some primary research was conducted that involved data analysis (for example, defining municipal planning costs as a component of municipal expenditures). Typically, the research was oriented to gaining an understanding of practices, standards, and procedures used in the planning system.

Although much of the research focused on procedural concerns, work was also done on some substantive issues related to the environment, land stewardship, and resources. Administrative matters were the focus of the economic research. Social concerns were addressed through specific issues, such as housing, public transit, and servicing. This research was straightforward — no innovative or complex methodologies were used.

Although procedural and environmental issues still dominated the agenda, the consultation process created an important balance of opinion and information. Personal experiences, concerning such matters as the costs of development, financial issues in farming, illegal rental units, and social housing, were presented in this context. This information was retained in the process through the commissioners' reading of all submissions. As well, summaries of comments and suggestions about policy or other recommendations were prepared and made available to the commissioners as they revised their recommendations.



CPDR's orientation to public involvement helped to ensure the rigour of the research. Through the newsletters and public forums and discussions, most research results became part of the public debate, and the participants effectively provided a check on accuracy and completeness. Any error of omission or content became a point of criticism of CPDR, making it in the commission's interest to avoid these errors.

### **Roles of disciplines, institutions, and organizations**

The commissioners and staff had qualifications as lawyers, engineer, geographer, planners, and agronomist. The commissioners and most staff also had experience in applied research.

CPDR had no direct link with other organizations. A number of organizations were consulted for information and comments on proposals but played no direct role in setting the research agenda, carrying out the research, or developing recommendations. Several individual researchers approached CPDR with proposals of their own. These research proposals tended to focus on further details about the current situation or innovation in the system. CPDR funded none of these proposals, because it felt that problems in the system were adequately documented for the commission's purpose.

Although several individual academics from professional and related programs followed CPDR's work, sending submissions and presenting these at public forums, academic and research organizations did not engage in this process. CPDR reached out to this sector by visiting several research institutions and schools and providing information through seminars and classes. As well, CPDR had the relevant academic programs placed on its mailing list. However, these mailings generated little interest or response, and it is unclear why academic and research organizations oriented to public policy and planning took little interest in becoming involved in CPDR's work.

### **Research and policy links**

In terms of policy development, CPDR's research made three main contributions:

- ♦ It helped to set the context. Before and during CPDR's work, considerable research was done that focused on various planning concerns, such as watershed planning studies, urban-transportation studies, comparative studies of planning systems and policy approaches, and the work of the Royal Commission on the Future of the Toronto Waterfront. This information raised awareness about issues and provided priorities for policy development. The importance of this body of research to the decision to appoint a commission and to the subsequent success of the policy development is impossible to precisely define, but clearly it helped to politicize planning concerns.
- ♦ It played an obvious role in the development and approval of recommendations and policies. Policies had to be designed primarily on the basis of the large body of information that was then available.

- ♦ It informed the policy implementation. However, although some information and methods are available to address emerging issues — such as cumulative impacts and the ecological significance of specific natural features — both information and techniques must be improved if high expectations about the usefulness of the policies are to be met. Ongoing research efforts will be needed to address both the anticipated and the unforeseen issues that emerge as attempts are made to implement and monitor the new policies.

Background studies involving more than one stakeholder (such as joint municipal–provincial or private-sector–public-sector studies) seemed to carry the most credibility with interest groups. Such research had the effect of bridging institutional and organizational differences.

## **Concluding observations and links with theory**

### **Characteristics of the process**

Several key characteristics of the process of developing integrated policy emerged from the case study:

- ♦ The political, social, economic, and information contexts for policy development were opportunistic. A need for policy had been recognized for more than 20 years. The province had initiated planning initiatives (such as that for the Oak Ridges Moraine), in part because of a lack of policy, and had then encountered considerable difficulty because of the lack of a policy framework. Finally, a new government was in place and was interested in making changes to the planning system.
- ♦ The use of an independent Commission of Enquiry allowed debate on policy proposals and related amendments to occur outside the context of partisan politics. This approach meant that the focus could be kept on the substance of policies.
- ♦ The selection of the CPDR chair established the expectation of change. The chair was an individual well known to the public and to politicians and had acted as a champion of change and provincial policy.
- ♦ CPDR established a public agenda for the review and placed policy development on that agenda. A clear schedule helped CPDR and the interest groups anticipate developments in the process and organize their resources accordingly.

- ♦ CPDR set out to recommend policies that would address concerns and had enough support that the government would adopt them. CPDR did not set out to recommend ideal policies based on normative research. Because of this, individual stakeholders recognized that specific details or concerns had to be traded off to accommodate other interests.
- ♦ CPDR aimed to emphasize general principles and values in policy content. In some cases, these values precluded any change (for example, no development on significant wetlands), but often they encouraged change (for example, affordable housing). It had to be recognized that in specific contexts, these values might conflict.
- ♦ Integration of policies and values is not possible at the provincial level. Policy details and conflicts were seen as being best resolved at local and regional levels and by OMB. Integration would occur through actions, rather than through the specific content of policies.
- ♦ The process used by CPDR was inclusive and iterative. An iterative learning process takes considerable time and energy from all the participants. Those who wished to participate fully had the opportunity to do so. Several types of forums and other mechanisms were available to allow stakeholders to participate. The process provided the opportunity for individuals and organizations to explore options and learn along with CPDR.
- ♦ Stakeholders were active participants in the process. Ideas for policy and other proposed changes were generated by many people involved in the planning system.
- ♦ Research generated information needed to resolve concerns as they emerged. This approach assumed that sufficient information and experience to develop and implement recommendations and appropriate policy was either in the system or could be developed with some effort. Research was integrated into the process of formulating policy, finding specific details on issues, developing options for solutions, and approving and implementing policy.
- ♦ Implementation was part of the policy-development process. A major component of CPDR's work and recommendations dealt with changes to the system to make it more functional and to ensure that policy would in fact be implemented; any proposed solution had to be seen as being feasible to implement. Shifting authority to local levels was a significant related thrust in the recommendations.
- ♦ The public process was open, timely, and efficient. CPDR's review of the planning system, including development of policies, took less than 2 years. Government review of the recommendations and approval of new legislation and policy took an additional year.

## Additional observations

To validate these observations, Marshall et al. (1995) undertook a survey of 13 key informants. These informants were directly involved in CPDR's review process; the process used by the government to review, amend, and approve the recommendations; or both. Respondents represented interest groups, government, and CPDR. They generally agreed the process had the characteristics as described above. However, two areas of difference or concern emerged from the survey.

The first of these was the extent to which the comprehensive set of policies was integrated. Respondents generally agreed that in terms of scope and integration, this set of policies was less than ideal; in particular, the policies were weaker in social and economic terms than in environmental ones. One possible explanation for this is that we still lack a good understanding of genuinely well-integrated policies. Another is that the mandate of CPDR's work and of the *Planning Act* emphasized physical and environmental considerations, so the work inevitably focused more strongly on these matters.

The second of these concerns was about the linkage between CPDR's work and the government review and approval of its recommendations. The review process was transparent and accessible under CPDR's management. However, once the final report was submitted, the Ministry of Municipal Affairs managed the review and approval process and the development of implementation guidelines, and respondents felt that this stage of the process was less open and accessible. The result, particularly in the view of interest groups, was that policies and proposals for legislative change began to reflect the interests of the government and bureaucracy, rather than of the stakeholders.

The role that CPDR played in this final stage was that of independent critic of the government's proposals. The former commissioners made comments in the media, at conference presentations, and before the standing committee of the legislature that reviewed the draft legislation. These actions were alienating to the bureaucracy, but they failed to go far enough in the view of the interest groups. A closer relationship was obviously needed between the policy-building process and the formal policy-approval process.

## Related theoretical models

CPDR's review process does not fit the traditional model of comprehensive planning and policy analysis, which is based on the assumptions that objective methods can and should be used to make policy decisions more rational; that rational decisions materially improve the problem-solving ability of organizations; and that management and decision-making systems are comprehensible in terms of inputs, outputs, their environment, and feedback loops (Friedman 1987). In this traditional model, used in a planning context, analysis and research directly inform policy; the state exercises considerable authority; and

the outcomes are plans or policies that are effectively regulations in their degree of detail.

CPDR's process differed from this model for two reasons: one is philosophical; the other, practical. First, land-use planning and planning policy affect private as well as public lands. The state has control over public resources and public land, and state-derived policy tied to state management systems and based on a traditional model may indeed be feasible for the sustainable management of these resources. However, on private lands, change is initiated by private landowners. In a democratic system, imposed state control over some of these changes may not be legal, but even when it is legal, negative public reaction to such imposition can result in poor implementation, a change in government, or both. In these situations, "ownership" of a policy must be shared between the state and the private sector. The philosophy underlying effective planning policies, then, is to actively seek community engagement in the process, rather than merely relying on a good analytic rationale.

The second reason is practical. If the state developed and approved policies unilaterally, it would require a large bureaucratic infrastructure to enforce implementation. In Ontario, deficit budgets and high debt have forced substantial restructuring in the public service, which is reflected in the Conservative government's decision to further amend the legislation and remove provincial approval. The province simply doesn't have the resources to monitor and enforce implementation of planning policy. Furthermore, considerable authority in planning had already been delegated to regional municipal governments. Their cooperation would be needed for implementing any policy.

CPDR's model has its roots in the idea of strategic planning. In this model, policies constitute a framework of aims. A common philosophy becomes the basis for action. Organizational and interorganizational complexity is assumed. Investigating facts, clarifying values, and building working relationships are all considered components of decision-making. Uncertainty and a complex relationship between the technical and political aspects of the decision-making process prevail. The approach to making choices is synoptic, elaborative, interactive, accommodative, and decisive. The linearity, objectivity, certainty, and comprehensiveness of traditional approaches are replaced by cyclicity, subjectivity, uncertainty, and selectivity (Friend and Hickling 1987).

In their book, *Leadership for the Common Good*, Bryson and Crosbie (1992) emphasized the complexities of shared-power relationships in formulating and implementing public policy. They identified key tasks in the policy-change system:

- ♦ Understanding the social, political, and economic givens;
- ♦ Understanding the people involved, especially oneself;
- ♦ Building teams;

- ◆ Nurturing effective and humane organizations, interorganizational networks, and communities;
- ◆ Creating and communicating meaning;
- ◆ Making and implementing legislative, executive, and administrative policy decisions;
- ◆ Sanctioning conduct — that is, enforcing constitutions, laws, and norms and resolving residual conflicts; and
- ◆ Putting it all together (actions and outcomes that are noticeably better).

These concepts fit well with the consultative approach used by CPDR, but Bryson and Crosbie did not discuss the important role of research. Information is explicitly or implicitly assumed to be part of the process, but strategies for generating information are not clear.

Strategic approaches to policy development are most clearly reflected in ideas about information in the literature on soft-systems methods. This approach emphasizes the search for meaning, rather than analytically generating integrated solutions. Information is based on experience and action, and integration is part of a social-learning process (Checkland and Scholes 1990). This puts research into the policy-making process, as part of the search for meaning. Some theoretical approaches to policy formulation and research can therefore be said to generally fit the case study. Although CPDR did not explicitly draw on this literature in formulating its concepts, in practice it shared a philosophical common ground and similar methods of operation.

## Implications

The CPDR process is a model that could be used for policy development in other jurisdictions. However, its general applicability has several limitations. First, the idea of integrated policy conflicts with the reality of political and administrative structures. Getting political agreement on a mandate to create integrated policies is difficult. Moreover, the scope of policies and the extent of integration are limited by the structures government uses to create and implement them.

Second, good process and information act only as partial buffers to political and administrative agendas and priorities. In this case, representatives of government agencies and elected officials were included in the process. However, once in charge of the formal approval process, the political administrative system made changes that conflicted with some agreements and understandings that had developed through CPDR's work. There was no obvious way to strengthen this linkage.

Third, this is a resource-intensive process. Although CPDR's budget was reasonable, the time spent by public and private interest groups would be unaccounted for in a costing based only on public expenditures. This is a real

expense that increases the total cost several times over the actual dollars spent on CPDR.

Fourth, this is a professional process. In this case, most interest groups used planners or lawyers to prepare or present submissions and comments. These individuals were generally familiar with planning issues and related studies, and this level of expertise allowed the process to proceed relatively quickly, with limited effort in basic education and research.

Finally, this process came out of a tradition of planning and a history of review of the system going back at least 20 years. This context was important to CPDR's success but may not exist in other jurisdictions. Also, a significant body of relevant information and research was available; the chair was exceptionally well respected; and the sociopolitical environment was pluralistic, with an established participatory tradition. The media were generally supportive, and — perhaps most significant — the process took place in a context of general dissatisfaction: no change was not an option.

Although there is much that might be learned from this case study, every policy process has a unique history and context. This uniqueness must be understood and respected to ensure the success of such policy exercises.