



June 19, 2009

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Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
Floor 14, 777 Bay Street
Toronto, Ontario M5G 2E5

RE: Draft Performance Monitoring Framework and Draft Indicators for the Provincial Policy Statement, 2005 (EBR #010-5700)

Dear Mr. MacIntyre,

Thank you for the opportunity to comment on the Ministry of Municipal Affairs and Housing's Draft Performance Monitoring Framework and Draft Indicators for the Provincial Policy Statement, 2005, which were posted for public comment on the Environmental Registry ([EBR #010-5700](#)). Conservation Ontario represents Ontario's 36 Conservation Authorities. Working in conjunction with Ontario municipalities, Conservation Authorities (CAs) deliver programs and services that protect the province's land and water resources on a watershed basis.

Conservation Ontario applauds the Province's commitment to developing a performance monitoring framework and indicators to measure the effectiveness of the policies contained in the Provincial Policy Statement, 2005 (PPS). Monitoring and evaluation are necessary to inform decision-making in order to improve implementation effectiveness. To assist the Province in this effort, the following comments and suggestions are submitted for your consideration based upon a review by staff from Grand River Conservation Authority, Toronto and Region Conservation Authority, Central Lake Ontario Conservation Authority and Conservation Ontario.

Conservation Ontario appreciates the revisions that were made to the framework and indicators to reflect our suggestions submitted in response to the consultation draft (dated Summer/Fall 2008), particularly for including a Natural Hazards subcategory under the category of Protecting Public Health and Safety. This subcategory was requested by Conservation Ontario given CAs' historic involvement in the protection of public health and safety through hazard land planning and management. Although it is acknowledged that several of our suggestions were incorporated into this draft, some of the concerns we identified previously with this initiative that have not been addressed are reiterated here.

The proposed Performance monitoring framework and draft indicators are a good first step, however Conservation Ontario is concerned that the Province's performance monitoring framework and draft indicators do not measure how well provincial interests are being supported in municipal planning documents (e.g. Official Plans, zoning by-laws, strategic plans) in any meaningful way. Conservation Ontario believes that to properly measure performance against policies within the PPS the Province will first need to monitor whether or not municipalities are incorporating provincial policies into their Official Plans (OPs) and other planning documents, as well as the strength of the policies. It then needs to assess whether or not municipal decision-making is consistent with the policies. Finally it should measure whether or not the policies help to achieve results on the ground (e.g. are the policies resulting in the

desired land use and transportation patterns). These measures should demonstrate whether or not the changes influenced by the planning process actually contribute toward meeting the overall policy goals.

1.5 Criteria for Developing a “Good” Indicator

Conservation Ontario recommends that the criteria for developing a “good” indicator be expanded. Additions to current characteristics, as well as some additional desirable characteristics that most “good” performance indicators have, are suggested in the table below in bolded text.

Table 1	Additional Suggested Characteristics of “Good” Performance Indicators
Relevance	Is it a good measure of aims, objectives, and policy? Does it provide pertinent information about the conditions/changes being monitored? Does it reflect provincial concerns?
Validity	Does it relate to a PPS policy objective? Is it relevant to the appropriate scale, sensitive to incremental changes or stressors in the system and pertinent to the stated goals or outcomes being measured?
Accessible	Is the data required available (now and in the future) and easily obtainable with reasonable cost and effort?
Credible	Is the data required supported by valid and reliable information and can it be interpreted in a scientifically defensible manner?
Sufficient	Can the data assess the scope of change and indicate the best course of action?
Unique	Does the indicator collect data that is not collected through another indicator for that specific policy objective?
Understandable	Can it be used to communicate local trends to the general public?

2.3 Benefits of Performance Monitoring

Section 2.3 of the draft lists important benefits in implementing a performance monitoring system for the PPS. It is suggested that the list be expanded to include the following benefits as well:

- Promoting accountability of municipalities and other agencies for their decisions with respect to provincial interests.
- Improving policies to achieve desired provincial outcomes.

2.4 Key Assumptions and Limitations

Section 2.4 considers the inherent limitations in policy performance monitoring frameworks. Conservation Ontario suggests that one of the key limitations of this framework is the fact that municipalities may have varying interpretations around the PPS, and that this should be reflected here.

Appendix 1: Summary Tables of Proposed Draft Indicators

Conservation Ontario is concerned with the wording of the indicators for several policies that will assess “*change in the number of municipalities*” that have incorporated certain policies into their OPs. The answer in any given year could be a whole number such as 10 or 23 or 47, which, without context, doesn't convey useful information such as whether those numbers represent positive or negative results. A change of zero could be interpreted as negative because no additional municipalities have incorporated the policy into their OP, or as an indicator of success because all municipalities in the province now have the policy in their OP. Therefore, it is suggested that these indicators be changed to the percentage of municipalities that have incorporated the policy into their OP. In this way results such as 10%, 23% or 47% clearly show the level of progress being made province-wide as well as the annual degree of change.

The framework recognizes that cause-and-effect relationships are complex and that it is difficult to attribute change to one action when the actual results on the ground are the product of many actions and

activities which lead to either positive or negative impacts. Conservation Ontario believes it is important that the Province monitor to ensure that “inputs” (e.g. OP policies) reflect the objectives and provincial standards outlined in the PPS. Attributing change as a consequence of the presence of policies, however, is not very informative. Since change can be attributed to many factors, it may be difficult to correlate results on the ground with a written policy. It is also difficult to trace through the policy objectives since many of the statements state that: if you do A (e.g. develop a policy) then B will occur (e.g. there will be a change in land use and development patterns) followed by C (e.g. there will be an improved mix of employment and housing uses) which will result in D (e.g. shorter commute journeys) and E (e.g. less congestion), which will in turn result in F (e.g. energy efficiency) and G (e.g. improved air quality). For example, Policy 1.8.1 (d) of the PPS states that “*Planning authorities shall support energy efficiency and improved air quality through land use and development patterns which: d) improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion.*” To measure how well this policy objective is being met would require a number of indicators. Many gaps are present in the indicators provided in the Summary Table (Appendix 1) because they are only providing a measure of a small part of the policy objective.

It is suggested that the Ministry focus performance monitoring at two levels; the first level would measure outputs, and the second level would measure outcomes (using the Ministry’s terminology). It is suggested that in measuring outputs the following questions be addressed:

- Are municipalities developing appropriate policies in keeping with provincial direction and standards and incorporating them into their OPs?
- Are the land use changes set out by municipal OP policies and considered “consistent with” the PPS policies resulting in the desired land use changes (i.e. first level of outcome).
- Are OP policies being compromised by the application of inconsistent zoning by-laws or by decisions of the municipality and/or Ontario Municipal Board, or other factors (i.e. factors affecting outcome)?
- Do conflicts arise when municipalities try to be “consistent with” all of the PPS policies (i.e. factors affecting outcome)?

The second level of monitoring, focused on outcomes, could address the following questions:

- Which land use changes can be attributed specifically to the implementation of OP policies? Do these changes result in the desired outcomes?
- Which on-the-ground changes need to be assessed on the basis of cumulative effects or multiple inputs? For example, environmental policy objectives such as water quality, water quantity or air quality need to be assessed on the basis of cumulative effects or multiple activities. This is where broader monitoring needs to take place because the desired results cross municipal boundaries. For these types of policy objectives the use of subwatershed and watershed report cards could be of value.

Comments regarding the indicators found in Appendix 1, and suggestions for additional indicators, have been inserted into the table below. It is noted that these suggestions would need to be screened against the “Characteristics of ‘Good’ Performance Indicators”. For example, it is recognized that “accessibility” across the Province may be a current issue for some of these suggestions.

Sub-Category	Comments	Suggested Indicators
Category 1: Building Strong Communities (Healthy, Active, Liveable and Prosperous Communities)		
Energy & Air Quality (the policy objective)	The indicators chosen focus on one aspect of the objective. They do not measure whether or not the land use and development patterns have changed to improve the mix of employment and housing uses or whether or not congestion has been reduced.	<ul style="list-style-type: none"> ▪ Change in development patterns and land uses.

Sub-Category	Comments	Suggested Indicators
being PPS 1.8.1 (d))	Indicators should be developed that address these two aspects to determine the correlation between land use/development patterns, employment/housing and length of commute and congestion.	
Energy & Air Quality (the policy objective being PPS 1.8.1 (a))	The indicators chosen only address one aspect of compact form. Density is another measure of compactness.	<ul style="list-style-type: none"> ▪ Change in persons per square km in urban cores and fringe areas (see Settlement Areas and Rural Areas). ▪ Energy use per capita. ▪ Air quality measures.
Category 2: Providing and Maintaining Infrastructure and Public Service Facilities		
Sewage and Water	It is unclear how the indicator chosen (i.e. change in the percentage of population (dwellings) serviced by both municipal sewage services and municipal water services) measures "the promotion of efficient use".	<ul style="list-style-type: none"> ▪ Per capita water and sewer use in a municipality. ▪ Percentage of municipal plans that incorporate conservation strategies and efficiency measures.
Category 3: Wise Use and Management of Resources		
Natural Heritage (the policy objective being PPS 2.1.2)	<p>The indicator chosen (i.e. change in the number of municipalities identifying natural heritage systems and incorporating policy into their OPs that meets a provincial policy standard) is a measure of input only and doesn't measure whether or not the natural heritage system links terrestrial, surface and groundwater features (unless this is the provincial standard).</p> <p>Baseline data and monitoring of the ecological functions and biodiversity and the nature and extent of linkages (existing and potential) are required.</p>	<ul style="list-style-type: none"> ▪ The number and size of intrusions permitted into the natural heritage system (including linkages). ▪ The number of intrusions avoided.
Natural Heritage (the policy objectives being PPS 2.1.3 (b) (c), 2.1.4 (a), 2.1.6)	<p>The indicator (i.e., change in the number of municipalities identifying significant woodlands and incorporating policy into their OPs that meets a provincial policy standard) again measures input and not outcome. Eventually, the merits of allowing any development in a Provincially Significant Wetland (PSW) has to be assessed to determine whether this policy is effective in protecting PSWs.</p> <p>It may be beneficial to differentiate between wetlands in the Niagara Escarpment Plan area/Greenbelt Plan area/Oak Ridges Moraine Plan area, and those wetlands outside of these provincially designated areas. This could provide important information in comparing the effectiveness of the named provincial plan policies versus similar PPS policies. It would also be very interesting to assess whether there is a difference in the spatial changes to wetlands versus woodlands, given the differing level of protection that the PPS affords to these two features.</p>	<ul style="list-style-type: none"> ▪ Percentage of municipalities incorporating an Environmental Impact Statement (EIS) as a requirement for intrusions into PSWs. ▪ Number of intrusions into PSWs permitted supported by an EIS. ▪ Number of intrusions into PSWs permitted without an EIS. ▪ Impact of intrusions on natural features and ecological functions (which would require science, baseline data and monitoring).
Water (the policy objective being PPS 2.2.1 (a))	The indicators chosen do not appear to address water protection in urbanized areas. Subwatershed plans could be used to address how the existing quality and quantity of water can be improved in areas already developed to address this policy. These indicators also address input but not outcome in order to assess whether the policy is achieving the desired outcome.	<ul style="list-style-type: none"> ▪ Water quality monitoring trends (some CA watershed reports may address this to an extent, depending on the scale and scope) at the subwatershed scale. ▪ Changes in water balance.

Sub-Category	Comments	Suggested Indicators
Water (the policy objective being PPS 2.2.1 (c) (e))	The indicator chosen is: changes in the percentage of natural vegetation in tertiary watersheds. Depending on the definition of tertiary, Conservation Ontario is concerned that this scale is too small to be of much use. It is suggested that the municipal or upper tier scale be used.	<ul style="list-style-type: none"> ▪ Percentage of municipalities identifying natural heritage systems and incorporating policy into their OPs that meet provincial policy standard. ▪ Water quality trends in larger watersheds. ▪ Water balance in larger watersheds.
Water (the policy objective being PPS 2.2.1 (c) (d)1., (d)2., and (f))	The indicators chosen relate to input and not outcome. There is no indicator provided to address practices for water conservation and sustaining water quality.	<p>See above comments re. water quality and water budget.</p> <ul style="list-style-type: none"> ▪ Percentage of municipalities that have implemented water conservation strategies. ▪ Change in per capita water use by municipality.
Natural Hazards	The indicator chosen does not address other natural/human-made hazards (e.g. erosion) or measure how well public health and safety has been protected.	<ul style="list-style-type: none"> ▪ Number of buildings/structures permitted in the floodway. ▪ Percentage of municipalities incorporating up-to-date erosion hazard mapping into their OPs and meeting a provincial policy standard. ▪ Percentage of municipalities that have fully incorporated hazard land mapping into their OPs and zoning bylaws.

Thank you again for the opportunity to provide comments regarding the Draft Performance Monitoring Framework and Draft Indicators for the Provincial Policy Statement, 2005. If you have any questions regarding these comments please contact myself at (905) 895-0716 ext. 223, or Natasha Leahy at ext. 228.

Sincerely,



Bonnie Fox
Manager, Policy and Planning

c.c. All Conservation Authorities, CAOs/GMs