

1 April 2019

Dear Sir/Madam,

Canadian Institute of Planners' response to the draft Federal Sustainable Development Strategy 2019-2022

Thank you for the opportunity to comment on the draft Federal Sustainable Development Strategy (FSDS). The Canadian Institute of Planners (CIP) is the national voice of Canada's planning profession. Since 1919, CIP has been dedicated to the advancement of responsible planning throughout Canada. CIP has over 7,000 members working at the local, regional, provincial and national level, in both government and the private sector. Our members design, manage, regulate and operationalize sustainable development in Canada. For more information about the role of CIP and the planning profession, including what planners do, you are invited to visit CIP's website.¹

CIP's response, approved by the Board of Directors, has been compiled taking into account views of a committee of specialist professional planners with an interest in sustainable development. The response is framed in the context of the questions posed in the consultation. However, the opportunity has been taken to offer feedback on the strategy.

CIP would be happy to discuss its answers or any of feedback in the response at your convenience. If you require any clarification or have any questions, please do not hesitate to contact us.

Yours sincerely,

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Director, Policy and Public Affairs

¹ cip-icu.ca/About/About-Us

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of Canadian professional planning*

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General

1. On a general note, it appears that direct links to other Federal Government initiatives and strategies that contribute to sustainable development are not as clear as they could be. This has led some of CIP's members to the conclusion that the FSDS is weighted more towards environmental milestones, as opposed to social and economic ones. This weighting brings into question whether the strategy is less a *sustainable development* strategy and more of an *environmental strategy*. Reasons for this include:
 - Out of 13 goals, there are no specific ones related to social and economic improvement, and where such issues *are* mentioned within the goals, they are less specific and measurable than environmental ones;
 - Goals that include the creation of jobs are only focused on those which would be created by the growth of the renewable technologies sector, as opposed to, for example, those communities which would be affected by industrial decline;
 - The healthy communities goal is focused predominantly on air quality.
2. CIP recognizes that the Federal Government is far from silent on social and economic initiatives (please refer to the CIP Budget 2019 response)². As such, a sustainable development strategy should incorporate these initiatives to reflect the true nature of its title. With this in mind, CIP offers the following answers to the questions posed by the strategy:

What does Sustainable Development mean to you?

1. Broadly, CIP agrees with the definition given in Canada's Sustainable Development Act (development that meets the needs of the present without compromising the ability of future generations to meet their own needs). The UN Sustainable Development Goals are a useful codification of the concept. Planners practice in a manner that respects the diversity, needs, values, and aspirations of the public, as well as acknowledge the inter-related nature of planning decisions and the consequences for natural and human environments.
2. More specifically, CIP and its members understand sustainable development through a spatial lens. That is, how physical development occupies space, how it impacts the social, economic, and natural environment, and in turn, how these three considerations affect how – and why – development happens. An obvious example of how a spatial planning lens might be applied to a discussion about sustainability, would be around how to minimize urban sprawl. Therefore, planners facilitate sustainable development, frequently balancing social, economic and environmental issues in their day-to-day decision making. CIP have also identified many areas within the strategy where there is alignment with CIP's understanding. For example, like the FSDS, CIP's policy on climate change (see below) also identifies the precautionary principle as an approach to decision making.

² cip-icu.ca/News-and-Events/Newsroom/News-Releases-and-Public/Policy-Statements/Planners%E2%80%99-Perspectives-on-Budget-2019#.XJu2WJhKiUl

What is your vision for a sustainable Canada?

3. CIP's vision for a sustainable Canada is best reflected in our policies on Healthy Communities³, Climate Change⁴ and Indigenous Planning⁵, which call planners to action to plan, design, develop, and manage places to become more resilient, liveable, and equitable. In review of the FSDS vision, CIP supports and is aligned with its focus on improving overall quality of life.

Which sustainable development issue do you see as the highest priority over the next 3 years?

4. All sustainable development issues are important. However, as reflected in various statements, such as CIP's collaborative support for integrated climate action⁶, CIP believes that climate change is the single largest threat to Canada, the broader world, and the communities we live in.⁷

How well do our goals align with your sustainable development vision?

5. CIP believes that the goals relate well to CIP's vision of sustainable development. However, within the goals there should be more emphasis on how objectives and actions will impact Canada's social and economic environment.
6. Although CIP's vision is from a planning practitioners' perspective, we recognize the role of all other stakeholders in delivering sustainable development. On this theme, CIP notes that the FSDS appears to rely heavily on the provinces, territories, and not-for-profit groups for effective implementation and monitoring of the goals. It is therefore less clear what measures the Federal Government can take to ensure many of its goals are met, and CIP suggests that the strategy could be improved in this regard. Furthermore, if the FSDS considers some of its goals should be achieved by other public sector and non-profit stakeholders, then it should be more explicit about the roles and expectations of other stakeholders too, such as those in the private sector. On this note, it is important that stakeholders who do not already have responsibilities outlined in the strategy by default receive appropriate support from the Federal Government to help develop them.

Effective action on climate change

7. CIP considers that some short-term milestones can be improved. For example, "By 2019, 60% of communities should identify adaptation measures in their plans," seems a loose requirement, with no measures identified to hold relevant stakeholders to account.

³ cip-icu.ca/Files/Policy-2018/policy-healthy-eng-FINAL.aspx

⁴ cip-icu.ca/Files/Policy-2018/policy-climate-eng-FINAL.aspx

⁵ cip-icu.ca/getattachment/Topics-in-Planning/Indigenous-Planning/policy-indigenous-en-interactive.pdf.aspx

⁶ act-adapt.org/national-professional-associations-support-integrated-climate-action/

⁷ cip-icu.ca/News-and-Events/Newsroom/News-Releases-and-Public-Policy-Statements/Canadian-Institute-of-Planners-Strong-on-Climate#.XJAtwOhKg2w

This milestone could be more ambitious, with both adaptation *and* mitigation measures recognized as being within the responsibility of communities. The need to adapt to and mitigate against climate change is just one reason why local government plans should be updated regularly and why investment in community planning functions should be prioritized, as well as enabling legislation that motivates and supports compliance.

Greening Government

8. CIP supports this goal. As well as taking steps to reduce carbon footprints in purchasing, embedding a contract requirement and developing policy for innovation which supports sustainability could be another useful addition to procurement measures. The strategy should also focus on mechanisms to ensure a sustainable approach to managing and selling off assets such as land (i.e. price should not be the only consideration if a potential buyer proposes a land-use which would be compatible with a wider local sustainable development strategy and the public interest).

Clean growth

9. CIP supports investment in renewables and all associated funding and programs. While this goal considers the spillover benefits of investing in renewable technology development, CIP considers that there should be a more cohesive economic transition strategy aligned with the FSDS. This could, for example, tie together initiatives to replace climate-damaging industries and promote a wider mix of incentives and disincentives to change consumption behaviours. This would include encouraging the use of new technologies by consumers as opposed to just supporting the development of new technologies.
10. CIP would also like to point out the role planning can play in creating places in which the technology industry thrives. It is well documented that “clustering” is key to fostering knowledge transfer and opportunities for tech employees to network and in many places in the world. Governments at all levels can motivate this type of development, linking private and public interests effectively, and facilitating the development of renewable technology.
11. It also follows, echoing how CIP sees sustainable development, that clean growth should be considered in a spatial context. To ensure that when new development occurs, whether at the national, regional, city, town, or rural scale, it happens in a way that reduces the need to expend energy. This follows through to buildings themselves, which should be built in accordance with passive energy design principles.
12. As a further observation, it would be helpful if the strategy made a clearer link to other actions government have taken or intend to take, over reducing plastic waste, fossil fuels, and vehicle emissions regulations.

Modern and resilient infrastructure

13. CIP agrees that upgrading public infrastructure is crucial and many of the actions in the goal relate directly to the principles of good planning.
14. Upgrading public infrastructure should also mean installing new public infrastructure to encourage more sustainable modes of travel. It is also important to explain how support

for autonomous vehicles aligns with this goal. Autonomous vehicles may still present the same challenges as non-autonomous vehicles, not least in terms of impacts on health and congestion in cities. CIP also notes that waste disposal, which is a looming infrastructure problem for many municipalities, is not recognized as a sustainable development issue.

Clean energy

15. CIP is encouraged by initiatives under this heading for green buildings and net zero energy. However, viewed through a spatial lens, it is noted that this section does not address the issue of urban sprawl and the benefits of intensification of settlements. The impact that this approach to planning can have on reducing energy consumption is significant.

Healthy coasts and oceans

16. CIP supports this goal, particularly its emphasis on marine spatial planning as a means of achieving it. CIP also notes that in order to achieve this goal, consideration should be given to the fact that many coastal lands are owned by the Federal Government and so coordination with local authorities controlling land use policies on surrounding land is imperative. Another connection to be made in relation to plastics in the marine environment, is with packaging in the agriculture and food industries. CIP supports all items listed in the regulations/legislation.

Pristine lakes and rivers

17. CIP supports this goal and is aware of many ongoing initiatives which will help achieve it. These include the Great Lakes⁸ and St Lawrence Cities initiative, as well as the Blue Flag Beaches program.⁹
18. CIP would also like to highlight the important role of planners in implementing Integrated Watershed Management¹⁰ as a means of achieving the goal. CIP recommends that further iterations of the strategy incorporate support for watershed planning and recognize conservation authorities, councils, stakeholder groups (e.g. agriculture groups, cattlemen and fertilizer organizations), and watershed agencies as partners.

Sustainably managed forests

19. CIP supports this goal and suggests that invasive species and the function of natural resources for carbon sequestering, and their role in resiliency as it relates to climate change, should be acknowledged.

⁸ glslicities.org/initiatives/collaborative/

⁹ environmentaldefence.ca/blue-flag/

¹⁰ ec.gc.ca/eau-water/default.asp?lang=En&n=13D23813-1&pedisable=true

Healthy wildlife populations, clean drinking water, sustainable food, connecting Canadians with nature.

20. CIP supports these goals, echoing the point above about the importance of watershed planning and source protection in relation to drinking water. The absence of urban agriculture programs in the *Sustainable Food* goal has been noted, and that agriculture is only mentioned in relation to food, when it covers a much wider spectrum of activity (e.g. contributing to soil conservation), which is largely absent from the strategy. The absence of tourism, as contributors to *Connecting Canadians with Nature* has also been noted, and it is suggested these are included in the strategy.

Safe and healthy communities

21. CIP considers that this goal should be much broader in scope. Please see our policy on Healthy Communities¹¹ for a better understanding of what this means in a planning context.
22. Air quality can be vastly improved through spatial planning decisions, which is not as apparent in the strategy.
23. Creating pedestrian-friendly, mixed use streetscapes with accessible public spaces, can reduce car dependency, as can investment in public transport. CIP considers there is not enough cross connection in this section between public transit expansion and the health of communities.

How can we continue to address Canada's sustainable development challenges?

24. CIP applauds the Federal Government for having a Sustainable Development Strategy and a concerted effort to monitor the implementation of the Sustainable Development Goals in Canada.
25. The role of planning should be further embedded in the strategy and considered as a key tool in addressing the challenges. While it is acknowledged that land use and spatial planning may most obviously be associated with municipal activities, there is an enormous influence that provincial government and the Federal Government can have on municipal plans, in providing a strategic lens that highlights how municipal policies can be better aligned to meet sustainable objectives. Provincial policy statements and specific funding incentives are the most obvious ways it could be done.
26. CIP supports the Federal Government's consideration of partnerships as key to realising Sustainable Development Goals. However, CIP is concerned that many professionals including planners, architects, engineers, etc., are rarely mentioned in the strategy. CIP encourages the Federal Government to consider more the role of these professions in achieving sustainable development, particularly given joint commitments and declarations already made, such as the joint statement from Canada's national professional associations on advancing integrated climate action.¹²

¹¹ cip-icu.ca/Files/Policy-2018/policy-healthy-eng-FINAL.aspx

¹² act-adapt.org/national-professional-associations-support-integrated-climate-action/

What will you do to make a difference over the next 3 years?

What will planners be doing?

27. Professional planners provide technical leadership towards making stronger communities, while acting in the public interest. Planners work for municipalities, conservation authorities, provincial, and federal government agencies, private sector, and others, as well as playing a key role in integrated watershed management. Owing to the nature of their work, planners are sustainable development practitioners.
28. “Planning” is the scientific, aesthetic, and orderly disposition of land, resources, facilities and services with a view to securing the physical, economic and social efficiency, health and well-being of urban and rural communities.
29. Responsible planning has always been vital to the sustainability of safe, healthy, and secure urban environments. Planners engage in projects that address:
 - Conversion of land from natural habitats to urban built areas.
 - Maintenance and use of natural resources and habitats.
 - Patterns of land use and design of facilities.
 - Development of transportation-related infrastructure.
 - The delivery of social, health-related, and economic development services.
 - Ensuring environmental protection, including drinking water and water source protection.
30. One of CIP’s activities is to bring attention to the work planners are involved in. Our Awards for Planning Excellence showcase the very best examples of planning practice that demonstrate sustainable development principles, from climate change planning to healthy communities. You are invited to view all of them on the resource library of CIP’s web page.¹³ To highlight a few recent examples:

Rainy River First Nations Land Use Plan

31. Planners facilitated a community-focused approach, which finds a delicate balance of planning for traditional and non-traditional uses interweaving land use, economic development, infrastructure and cultural planning. It is a true example of a sustainable development strategy at a local level.

Project Bonaventure, Montreal

32. This planning project from Montreal involves the transformation of a former expressway into a new boulevard designed at the pedestrian scale, incorporating trees, civic spaces and public art.

¹³ cip-icu.ca/Honours-Awards/Awards-for-Planning-Excellence-Recipients

New Westminster Urban Forest Strategy

33. Planners at the City of New Westminster and Diamond Head Consulting were recognized for this urban forest strategy to reverse the trend of the city's declining forest canopy, which is vital to conserving quality of life and countering the effects of climate change.

City of Ottawa Transport Impact Assessment

34. This is a good example of how planners are implementing strategies at the local level to encourage integrated and sustainable modes of transportation, moving away from traditional approaches such as providing additional road capacity (which negatively impacts on sustainable mobility choices).

What will CIP be doing?

35. In its capacity as Canada's national professional planning institute, CIP addresses planning and planning related issues. We also provide a forum to share ideas about sustainable development in practice and provide continuing professional development opportunities for our members. We encourage the review of a wide range of resources we make available to our members, including the Climate Atlas of Canada¹⁴ a comprehensive tool that provides valuable spatial data in a straightforward, easily accessible way - as it provides practitioners with evidence to assess the causes and consequences of climate change.
36. CIP's five priority policy areas for the current year are reflective of the pillars of sustainable development principles (climate change, healthy communities, social equity and diversity, housing and community development, and reconciliation). CIP will be undertaking a range of activities to help our members contribute to the implementation of sustainable development through their professional practice, including:
- Continued Professional Learning.
 - Surveying members' knowledge and understanding of climate change, through Natural Resources Canada's Building Regional Adaptation Capacity and Expertise (BRACE) program.
 - Hosting a national conference for planners this year in the Nation's Capital, which includes showcasing the best examples of sustainable development from climate change to healthy communities.
 - Supporting the Canadian Network of Asset Managers (CNAM) Municipal Asset Management Program.
 - Updating existing climate change planning training materials, in partnership with the Province of Manitoba and the Manitoba Professional Planners Institute.

¹⁴ cip-icu.ca/getattachment/Topics-in-Planning/Climate-Change/ClimateAtlas-Guidebook_V1_Nov2018-1.pdf.aspx