



# Regional Planning Commissioners of Ontario

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Please direct all correspondence to the office of the Chair

**Thom Hunt, MCIP, RPP, Chair**  
City of Windsor  
350 City Hall Square East  
Suite 320  
Windsor, ON N9A 6S1  
Tel: (519) 255-6543 ext. 6897  
Fax: (519) 255-6544

**Brian Bridgeman, MCIP, RPP, Vice-Chair**  
Regional Municipality of Durham  
605 Rossland Road East, 4<sup>th</sup> Floor  
P.O. Box 623  
Whitby, ON L1N 6A3  
Tel: (905) 668-7711 ext. 2535  
Fax: (905) 666-6208

**Steve Robichaud, MCIP, RPP, Vice-Chair**  
City of Hamilton  
71 Main Street West  
5<sup>th</sup> Floor  
Hamilton, ON L8P 4Y5  
Tel: (905) 546-2424 ext. 4281  
Fax: (905) 546-4202

[www.rpco.ca](http://www.rpco.ca)

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August 4, 2023

Hon. Doug Ford, Premier of Ontario  
Hon. Steve Clark, Minister of Municipal Affairs and Housing  
Legislative Building  
1 Queen's Park  
Toronto, Ontario  
M7A 1A1

**Re: Response to Proposed Provincial Planning Statement (ERO Posting Number 019-6813) – Part 2 of RPCO's Submission.**

Dear Premier Ford and Minister Clark:

On behalf of the Regional Planning Commissioners of Ontario (RPCO), please accept this Part 2 submission to the above-noted ERO Posting, which addresses the proposed Natural Heritage Policies, and also addresses other aspects of the proposed Provincial Planning Statement (PPS).

The Regional Planning Commissioners of Ontario (RPCO) is an organization made up of senior planning practitioners from Ontario's large single-tier Cities and upper-tier Regions. Members of RPCO provide planning services and planning advice to municipal Councils representing approximately 80% of Ontario's population. RPCO members are fully engaged on a daily basis in matters which are urban and rural; northern and southern; small town and big city. The universal importance of having a healthy development industry to support community vitality across Ontario is well understood and supported. We acknowledge and share your objective of building more

homes faster and a policy-led system of land use planning in Ontario. RPCO's web site is [rpco.ca](http://rpco.ca), and has a variety of information and analysis that you may also find helpful.

This submission highlights common themes we have heard, and that we see as having direct and material bearing on the prosperity of Ontario communities. These comments are in addition to RPCO's submission already made to the ERO through our letter dated June 5, 2023. Our member municipalities will also be making their own submissions that may be more detailed and specific to their communities.

We offer the following additional comments for your consideration:

1. **Natural Environment as critical infrastructure that supports our social and economic vitality.** We are grateful to see the proposed carry-over of many current policies, and the continued role of municipalities and the Province alike in protecting the natural environment.
2. **Further Clarifying Negative Impacts.** We appreciate that section 4.1 includes the prohibition of development and site alteration "...unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions". We would appreciate further clarification as to what the Province would deem such negative impacts to more specifically include and exclude. This would especially assist municipalities where studies are being submitted related to development applications, and where professional opinions differ.
3. **Confirmation of Wetland Status.** In the definition of "wetland", and in cases of conflicting evaluations, it is unclear who will make the final determination that lands are not wetlands, and are only "periodically soaked ... which no longer exhibit wetland characteristics". This may again happen through development applications where professional differences may arise.
4. **Adequate Provincial resources for timely review roles.** The definition of "significant" consists of four elements, and most are dependant on Provincial determinations. Does the Province have adequate resources to make such determinations in a timely manner, especially for development applications ?
5. **Cultural Heritage and Archaeology Resources.** The definition of "significant" now excludes reference to cultural heritage and archaeology resources that may have cultural heritage value. What is the basis for this change ?
6. **Preserving a Natural Heritage Systems approach.** We see from the draft PPS that a systems approach to natural areas protection and enhancement has not been carried over from the Provincial Growth Plan (*A Place to Grow*). We would strongly recommend that such a systems approach be included in a new PPS, especially as many of these features cross multiple municipal boundaries.

7. **Provincial Decisions outside the PPS.** Section 6.1.4 refers to the Minister's ability to "make decisions that take into account other considerations to balance government priorities". How will those considerations be evaluated?
8. **Indigenous Communities.** Section 6.2.2 places the onus on planning authorities to engage with Indigenous communities. How does the Province, as a planning authority, intend to engage with Indigenous communities on a go-forward basis? Municipalities would also benefit from a discussion with the Province around consistent and coordinated engagement approaches.
9. **Joint Municipal Planning Initiatives.** We appreciate the continued coordination of upper and lower tier municipal growth planning, and more specifically, the provisions of Section 6.2.7.
10. **Evaluating Natural Heritage Features.** Municipalities will be further limited in their ability to evaluate areas as potential natural heritage features. With the diminished role of Conservation Authorities and updates to the Ontario Wetland Evaluation System, we foresee the need to regularly engage the Province in matters of Natural Heritage features assessment and boundary delineation, which will require adequate Provincial review resources. We would also suggest revisiting the roles of Conservation Authorities in supporting such evaluations, especially in supporting efficient development application review.
11. **Rural Severances.** Members of RPCO were heartened to hear that Minister Thompson and her colleagues met with the Ontario Farmland Trust and announced that multi-lot severance policies will be completely removed from the final PPS. We commend you for arriving at this decision, and for recognizing that the protection of our agricultural lands is paramount in supporting our domestic food supply chains.
12. **The Critical Need for A Variety of Housing Affordability Types.** Members of RPCO have been working to ensure a more streamlined development review process to support the delivery of new housing (predominantly by the development industry). However, supply alone will not alone guarantee the delivery of affordable housing to Ontarians. We maintain that the PPS and associated Provincial policy need to speak directly to how housing affordability types will be delivered. This should include the considerations large scale public-private partnerships, and involving all levels of government.

Thank you again for the opportunity to provide our input. We trust these comments are helpful, and we invite you to call on RPCO as a resource to help address our mutual planning challenges.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thom Hunt", with a horizontal line extending to the right.

Thom Hunt, Chair  
Regional Planning Commissioners of Ontario

cc.  
Association of Municipalities of Ontario  
RPCO Members