



May 2, 2024

Ministry of Municipal Affairs and Housing (MMAH)  
Growthplanning@ontario.ca

Re: **ERO Posting No. 019-8462**  
Review of proposed policies for a new provincial planning policy instrument

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Thank you for the opportunity to provide comments on the “Review of proposed policies for a new provincial planning policy instrument”.

Long Point Region Conservation Authority (LPRCA) offers the following responses to the consultation questions provided by the MMAH on the Environmental Registry proposal.

**1. What are your overall thoughts on the updated proposed Provincial Planning Statement?**

Chapter 1 Vision

- LPRCA strongly supports the proposed vision for the proposed Provincial Planning Statement and would encourage the Province to retain the following sentence from the currently approved Provincial Policy Statement, 2020 (PPS) “The Provincial Policy Statement directs development away from areas of natural and human-made hazards. This preventative approach supports provincial and municipal financial well-being over the long term, protects public health and safety, and minimizes cost, risk and social disruption”. The link between taking a preventative approach to keep people out of areas subject to natural hazards because of the financial impacts to the Province and/or the municipality, in addition to risk to life and property should be made within the proposed Provincial Planning Statement.

Chapter 5.2 Natural Hazards

- LPRCA strongly supports the proposed retention of the natural hazard policy direction from the PPS. Retention of these policies is vital to ensure the Province’s continued commitment to high standards for the protection of public health and safety from risk of natural hazards.
- LPRCA strongly supports that the text previously part of the preamble for Section 3.0 of the PPS 2020 is proposed to form a new general policy for natural and human-made hazards in the proposed planning instrument. The proposed approach will strengthen requirements to ensure that development is directed away from areas of natural or human-made hazards where “there is an unacceptable risk to public health or safety or

of property damage' and will ensure development does not "create new or aggravate existing hazards".

- A new general policy is proposed which states that "planning authorities shall identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance" (5.2.1). LPRCA is supportive of this proposed policy, with amendment, to ensure continued coordination with other planning and development related instruments, such as Section 28 of the Conservation Authorities Act and associated regulations. LPRCA recommends the policy be modified to include reference to "collaborating with conservation authorities, where they exist". Such an amendment would be consistent with Recommendation #3 from the "Independent Review of the 2019 Flood Events in Ontario" Report. LPRCA staff further recommend that the Technical Guides to implement the natural hazard policies be updated.

**2. What are your thoughts on the ability of updated proposed policies to generate appropriate housing supply, such as: intensification policies, including the redevelopment of underutilized, low density shopping malls and plazas; major transit station area policies; housing option, rural housing and affordable housing policies; and student housing policies?**

LPRCA has no comments in response to this question.

**3. What are your thoughts on the ability of the updated proposed policies to make land available for development, such as: forecasting, land supply, and planning horizon policies; settlement area boundary expansions policies; and employment area planning policies?**

LPRCA has no comments in response to this question.

**4. What are your thoughts on the proposed policies to provide infrastructure to support development?**

LPRCA has no comments in response to this question.

**5. What are your thoughts on the proposed policies regarding the conservation and management of resources, such a requirement to use an agricultural systems approach?**

LPRCA supports the continued protection of natural heritage systems as outlined in Chapter 4.

**6. What are your thoughts on any implementation challenges with the updated proposed Provincial Planning Statement? What are your thoughts on the proposed revocations in O. Reg. 311/06 (Transitional Matter – Growth Plans) and O. Reg. 416/05 (Growth Plan Areas)?**

LPRCA recommends that the technical support guides that were developed to support and implement the natural hazards continued to be updated and the Province continue to work with Conservation Authorities to update these documents. Specifically, LPRCA recommends the following technical guides to be updated by the appropriate technical specialists in consultation with Conservation Authorities: Technical Guide River and Stream Systems: Flooding Hazard Limit, 2002, Technical Guide River, Stream Systems: Erosion Hazard Limit, 2002, and the Technical Guide Great Lakes – St. Lawrence River System and large inland lakes, rivers and stream systems and hazardous sites, 2001. We understand that substantial work has been completed on parts of the technical guides and we urge the Province to continue to consult with Conservation Authorities regarding the updates and changes.

Thank you again for the opportunity to provide comments. We appreciate your consideration of the proposed changes in this submission to identify solutions that will increase Ontario's housing supply without jeopardizing public safety.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Chambers", written in a cursive style.

Robert Chambers  
Chair  
Long Point Region Conservation Authority