



Ontario Association of
Landscape Architects

A component organization of the
Canadian Society of Landscape Architects

October 21, 2019

Planning Consultation
Provincial Planning Policy branch
777 Bay Street, 13th floor
Toronto, ON M5G 2E5

Re: Provincial Policy Statement Review proposed policies

On behalf of the Ontario Association of Landscape Architects (OALA), thank you for the opportunity to provide comments on the review of the proposed changes to policies in the Provincial Policy Statement (PPS).

The OALA is the regulatory body whose mission is to promote, improve and advance the profession of landscape architecture and maintain standards of professional practice and conduct, consistent with the need to serve and protect the public interest. Through their work, our members have made great contributions to the ecological, social and economic viability of Ontario.

In updating the PPS three top priorities were identified: increasing housing supply, supporting jobs, and streamlining development approvals. Key policy directions include: encourage the development of an increased mix and supply of housing; protect the environment and public safety; reduce barriers and costs for development and provide greater predictability; support rural, northern and Indigenous communities; support the economy and jobs creation.

The OALA agrees that a clean and healthy environment is key to “the long term prosperity and social well- being of Ontario” and were pleased to note that there were no changes to policies for protection of natural heritage and green infrastructure. We are also supportive of changes which emphasize climate adaptation.

We do have questions regarding the proposed revision to Policy 2.5.2.2 which states that, outside the Greenbelt area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions. Clarity is needed regarding what “long-term rehabilitation” means, and the OALA is concerned that this could mean that sites are not restored for many years, having a detrimental impact on ecosystem features and functions in that time period.

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Although there are no proposed changes to the language in 2.1 Natural Heritage we suggest that language of 2.1.2 be consistent and that “should” be replaced with “shall” so that the policy reads: “The diversity and connectivity of natural features in an area, and the long term ecological function and biodiversity of natural heritage systems, **shall** be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.”

Also in 1.6 Infrastructure and Public Service Facilities, suggest revise 1.6.2 by replacing “should” with “shall” so that it reads “Planning authorities **shall** promote green infrastructure to complement infrastructure.”

Landscape architects are trained to understand natural features and processes, and to address these through thoughtful design. In so doing, landscape architects play a highly important role in the design and execution of safe, functional and beautiful environments.

We note that 1.6.6.7. states that “Planning for stormwater management shall: minimize ... increases in contaminant loads, erosion and changes in water balance and prepare for impacts of a changing climate; mitigate risks to human health, safety, property and the environment; maximize the extent and function of vegetative and pervious surfaces; and promote stormwater management best practices including stormwater attenuation, water conservation and efficiency and low impact development”. Landscape architects excel at delivering solutions to all of these issues.

The PPS notes that Section 3.1 Natural Hazards is currently under review by the Province’s Special Advisor on flooding. As a profession whose members are very engaged in the design and implementation of solutions to overland and riverine flooding, the OALA would be pleased to provide comments on any further proposed changes.

We look forward to continuing to work with your government and for the people of Ontario.

Yours truly,
ONTARIO ASSOCIATION OF LANDSCAPE ARCHITECTS

A handwritten signature in black ink that reads "Jane M. Welsh". The signature is written in a cursive, flowing style.

Jane Welsh, OALA, FCSLA
OALA President

cc: OALA Council