

MEMORANDUM

To: Ministry of Municipal Affairs
From: Nick McDonald, RPP
Date: November 17, 2022
**Re: Review of A Place to Grow and Provincial Policy Statement - ERO
Number 019-6177**

Purpose of Memorandum

I am writing on my own behalf as a Registered Professional Planner to request that the Province consider retaining a key element of both the PPS and Growth Plan dealing with Regional planning.

Role of the Upper Tier

As it relates to those municipalities proposed to have no planning responsibilities in accordance with Bill 23, it is my opinion that the affected Upper Tier planning authorities should continue to be responsible for coordinating matters of Provincial interest that cross local municipal boundaries.

These include managing growth and development (which includes establishing settlement area boundaries) and protecting natural heritage and agricultural systems. This is because proper planning at this scale allows for the making of the best decisions on where urban development and new infrastructure should be directed and allows for a common approach to protecting what is valuable. This means that in addition to establishing settlement area boundaries, the Upper Tier Official Plans should continue to identify

natural heritage systems and key features and prime agricultural areas.

In recognition of the desire to reduce duplication, it is my opinion that the Local Municipalities should then have the sole responsibility for managing planning approvals in their municipalities in accordance with the direction established by the Upper Tier planning authority.

The above essentially means that the Upper Tiers would continue to be responsible for strategy development (with the Local Municipalities providing input) and the local municipalities would then be solely responsible for implementation.

All of the above would of course be in alignment with an over-arching Provincial policy framework that deals with growth management and protecting what is valuable.

With the above in mind, and to further reduce duplication, all Upper Tiers subject to the Growth Plan should no longer be required to designate employment areas and identify Major Transit Station Areas. The Local Municipalities are very able to do this and there is no need for there to be two processes to establish these designations and areas. This means in the end; an Upper Tier Official Plan should only include the following on a map:

- a) Settlement Area boundaries;
- b) Natural Heritage Systems and Key Features;
- c) Prime Agricultural Areas; and
- d) Key Regional infrastructure (Regional Roads and waste management areas).

The above will allow the Upper Tiers to focus on what they need to. If there is a desire on the part of a Local Municipality for the Upper Tier to assist in the implementation of Upper Tier policies (such as reviewing environmental impact studies for example), this can be worked out between the two municipalities.