



May 30, 2023

Ministry of Municipal Affairs and Housing (MMAH)

Growthplanning@ontario.ca

Re: **ERO Posting No. 019-6813**
Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Thank you for the opportunity to provide comments on the “Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form 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 thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?

Chapter 5.2 Natural Hazards

- LPRCA strongly supports the proposed retention of the natural hazard policy direction from the Provincial Policy Statement, 2020 (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 proposed policy direction for large and fast-growing municipalities and other municipalities?

LPRCA has no comments in response to this question.

3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?

LPRCA has no comments in response to this question.

4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?

LPRCA will provide additional comments when the natural heritage policies and related definitions are released by the Province.

5. What are your thoughts on the proposed policies regarding planning for employment?

LPRCA has no comments in response to this question.

6. Are there any other barriers to, or opportunities for accelerating development and construction (e.g. federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?

LPRCA recommends that the technical support guides that were developed to support and implement the natural hazards continue to be updated and the Province continues 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.

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,

Judy Maxwell

Judy Maxwell
General Manager