



May 25, 2021

Submitted via email: PlanningConsultation@ontario.ca

Re: Conservation Ontario's Comments on the "Proposed changes to certain land division provisions in the Planning Act" (ERO #019-3495)

MMAH Staff:

Thank you for the opportunity to provide comment on the "Proposed changes to certain land division provisions in the Planning Act". Conservation Ontario is the network for Ontario's 36 conservation authorities (CAs). These comments are not intended to limit the comments submitted by individual conservation authorities as a result of this consultation.

It is understood that the province is consulting on proposed changes to the *Planning Act* that relate to the division of land. These proposed changes include, Subdivision Control (Section 50), Plans of Subdivision (Section 51), Consents (Section 53), and Validations (Section 57). These changes could be enabled through the passage of Bill 276, Supporting Recovery and Competitiveness Act, 2021. Schedule 24 addresses proposed changes to the *Planning Act* and the Bill is currently being considered by the Standing Committee on General Government.

Conservation Ontario has had an opportunity to review the proposal and in general find these proposed amendments to be practical and helpful in expediting approvals. These proposed amendments will assist the planning approval authority by addressing problematic areas in specific sections in the *Planning Act* related to the division of land. Conservation Ontario is also highly supportive of the proposal to align the requirements for public notice, information and public meetings for plans of subdivision with other instruments under the Act as this will assist the public in better participating in the commenting process.

Many conservation authorities through their provincially delegated commenting role related to natural hazards or through agreements with their municipal partners related to natural heritage recommend that these systems be maintained on the retained parcel to avoid fragmenting the system and complicating future planning approvals. It is therefore recommended that should the municipality/planning approval authority receive an amended consent application, that the commenting agencies should have an opportunity to review the amended application prior to its approval by the consent-granting authority. This circulation will avoid conflict and delay in the review and approval process.

It is further recommended that permission from the owner of a parcel should be required prior to allowing a purchaser to apply for a consent. Having permission from the landowner will help to prevent

issues in the future. Confirmation of ownership should be a condition of final approval of the consent. Conservation Ontario is supportive of the amendment which would provide a municipality or the Minister with the authority to extend the one-year period during which the conditions of a consent must be satisfied by up to one year.

Once again, thank you for the opportunity to provide comments on the "Proposed changes to certain land division provisions in the Planning Act". Should you have any questions about this letter, please contact me at extension 226.

Sincerely,

A handwritten signature in black ink that reads "Leslie Rich". The signature is written in a cursive, flowing style.

Leslie Rich, RPP
Policy and planning Liaison

c.c. CA CAOs/GMs