

June 25, 2025

Hon. Rob Flack, MPP
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, On M7A 2J3

Submitted by email: PlanningConsultation@ontario.ca

Re: Schedules to Bill 17 – Reports from Professionals for Complete Planning Applications

Dear Minister Flack,

The Ontario Association of Landscape Architects (OALA) appreciates the opportunity to provide comments on the Ontario government's proposed regulations concerning Complete Applications, as outlined on the Environmental Registry of Ontario (ERO number 025-0462), posted May 12, 2025.

We strongly recommend that landscape architects be formally included in the list of recognized professionals whose studies and reports are accepted as required components of a Complete Application submitted to a municipality.

We recognize and support the government's goal of accelerating housing delivery and improving the efficiency of development approvals across Ontario. Our members play a vital role in the planning and development of communities across Ontario, contributing essential expertise that supports the public interest, environmental protection, and sustainable development. Recognizing landscape architects' studies and reports will help streamline approvals, avoid duplication of effort, and support faster housing delivery.

The Role of Landscape Architecture in Municipal Planning

Landscape architecture is a profession with a regulated title (landscape architect) that applies both design and scientific principles to the planning and creation of outdoor spaces. These professionals work at the intersection of natural systems and the built environment, to deliver cost-effective, high-performing outdoor spaces that maximize land use efficiency and minimize long-term maintenance costs for municipalities.

Promoting, improving and advancing the profession of landscape architecture and maintaining standards of professional practice and conduct consistent with the need to serve and to protect the public interest.

Landscape architects are actively involved in the preparation of documents that are required as part of the planning application process, including site plans, landscape plans, and plans of subdivision. These are critical components of municipal review processes that support timely decision-making and high-quality development outcomes.

Landscape architects also contribute to community assets that increase the value of developments and reduce municipal capital and maintenance costs, including:

- Public parks and recreational facilities that increase nearby property values and attract investment
- Trail systems and bicycle corridors that improve transportation efficiency and support active commuting
- Stormwater management features that reduce municipal infrastructure costs and prevent flood-related damages
- Urban plazas and streetscapes that increase commercial activity and support local businesses
- Site plans and community master plans that optimize land use to meet housing targets while lowering long-term service and maintenance costs

Addressing Today's Challenges

Landscape architects offer solutions to some of the most pressing challenges facing municipalities today:

- **Public Health and Safety:** Through the application of Crime Prevention Through Environmental Design (CPTED) principles, landscape architects help deter vandalism and improve safety in public and semi-public spaces using natural surveillance, lighting strategies, and clearly defined boundaries, reducing municipal enforcement and repair costs over time.
- **Resilient Infrastructure:** With expertise in grading, green infrastructure, and sustainable planting, landscape architects design systems that manage stormwater, mitigate flooding, and reduce the urban heat island effect. Green infrastructure projects can be built for **5–30% less** and maintained for **25% less** than gray infrastructure projects, while protecting developments from costly flood damages and extreme heat impacts.
- **Environmental Sustainability:** Tree planting, ecological restoration, and the design of permeable surfaces contribute to carbon sequestration, erosion control, and habitat conservation—essential components of long-term environmental stewardship. Tree planting and permeable surfaces also reduce infrastructure strain and long-term stormwater management costs.



Conclusion

As landscape architects continue to be integral to the planning and development process in Ontario, it is critical that their professional submissions be formally recognized as complete and authoritative by municipalities and the Province. This is especially important in areas such as site planning, park and trail design, stormwater and environmental management, and streetscape improvements. Recognizing these contributions will help the municipalities achieve its housing targets by facilitating faster project approvals, enhancing economic value, and delivering complete, cost-effective communities.

The OALA welcomes the opportunity to review and contribute to the development of any planned regulations. We look forward to working collaboratively with the Province to ensure that Ontario communities continue to benefit from the full scope of professional expertise available in shaping resilient, vibrant, and sustainable places.

Yours truly,
ONTARIO ASSOCIATION OF LANDSCAPE ARCHITECTS

Aaron Hirota, OALA, CSLA
OALA President
president@oala.ca

About the OALA

With more than 2,000 members, the Ontario Association of Landscape Architects (OALA) is a self-regulating professional association that has proudly served Ontario since 1968. As the provincial regulator of the landscape architect title, the OALA exists to serve the public interest by ensuring the competence, accountability, and ethical conduct of its members.

The Association sets professional standards for licensure, promotes the value of the profession to government and the public, and provides resources and continuing education to its members.