

Re: Comment from the City of Kawartha Lakes in Response to ERO No. **025-1101**

November 21, 2025

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch

13th Floor, 777 Bay St.
Toronto ON M7A 2J3
PlanningConsultation@ontario.ca

Dear Minister Flack:

Thank you for this opportunity to provide comments on the consultation on enhanced development standards.

We are concerned with the approach and tone the province appears to be taking. While there are gestures towards “streamlining” or “standardizing,” it appears the province is looking (as stated twice in the ERO posting) “to *prohibit* enhanced development standards.” We are also disappointed this is being pursued to reduce “complexity for builders working in multiple municipalities” rather than much more pressing issues such as the impact of climate change on local communities. We would also point out that different municipalities may have different development standards to suit their local context. Here in Kawartha Lakes we have development standards to protect and enhance our lakes, whereas a municipality with more intense development might have development standards to address potential flooding.

The ERO posting notes the need to ensure health and safety. It also acknowledges the PPS includes policy direction that planning authorities have plans to reduce greenhouse gas emissions and prepare for the impacts of a changing climate, including through approaches that promote green infrastructure, low impact development, and active transportation.

Furthermore, the provincial interests identified in the Planning Act at section 2 include the “protection of ecological systems” (2 (a)), “conservation of energy and water” (2 (e)), “development that is designed to be sustainable” (2 (q)), and “mitigation of greenhouse gas emissions and adaptation to a changing environment” (2 (s)).

Prohibiting the enhanced development standards noted in the ERO prevent municipalities from following the policy directions in the PPS and having regard for these provincial interests.

A number of the examples of enhanced development standards do, in fact, support “maintaining health and safety”:

- Bioswales are vegetated, shallow channels designed to manage stormwater by slowing runoff, filtering out pollutants, and allowing water to infiltrate into the ground or be safely conveyed to a drainage system. They are an important low-impact development practice that improves water quality, recharges groundwater, and provides numerous ecological benefits.
- Permeable pavement offers numerous benefits, primarily by managing stormwater to reduce flooding and pollution through natural filtration as water soaks into the ground. It helps recharge groundwater, lowers urban heat island effect, can improve air quality, and provides benefits like reduced slip hazards and improved lawn and garden health.
- Native trees and vegetation lower maintenance costs as they are adapted to the local climate and more resistant to local pests and diseases. They improve the environment by enhancing biodiversity, preventing soil erosion, and helping to filter pollutants.
- Providing outdoor bicycle parking is an easy way to encourage public health, and the cost is so minor it doesn’t even budge most project’s bottom line. The province should concern itself with matters of greater importance. This is the proverbial “small potatoes.”

Here at Kawartha Lakes, our Council recently adopted a consolidated Rural Zoning By-law (currently under appeal). One of the general provisions concerns a water setback and a shoreline naturalization buffer. Development within the water setback or any development on an undeveloped lot with a water setback is required to maintain native vegetation along the shoreline for the purpose of protecting natural habitat. The intent



of the shoreline naturalization buffer is to protect waterways from shoreline development, invasive species, and other stressors. We would encourage the province to support this type of "enhanced development standard." Our lakes are important resources that supply our drinking water, maintain property values, sustain an agricultural industry, and support tourism.

Should you wish to discuss this matter further, please reach out at your earliest convenience.

Sincerely,

A handwritten signature in blue ink that reads "Mark Jull".

Mark Jull, PhD, RPP, MCIP
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City of Kawartha Lakes
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