

April 2, 2026

Minister Graham McGregor
Ministry of Citizenship and Multiculturalism
56 Wellesley Street West, 14th Floor
Toronto, ON M7A 2E7

Dear Minister McGregor

Re: OPPI Feedback on ERO 026-0216: Heritage Framework Transformation: Proposals related to Ontario's Archaeology Program

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry's proposed changes to the *Standards and Guidelines For Consultant Archaeologists* which are intended to streamline processes, update policies and legislation, and modernize standards and guidelines in an effort to future proof Ontario's Heritage Framework.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5400 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the entire planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies, and academic institutions. Our members work across a geographically diverse cross section of Ontario communities of all sizes.

OPPI applauds the Ministry's transparent and thorough consultative process as it works to modernize Ontario's Heritage Framework which includes consultation with Indigenous communities, municipalities, developers, the archaeology and heritage sectors and the professional associations which represent members working in this area.

The Ministry's two key recommendations emerging from this ERO posting are:

- 1) **Archaeology assessments will become more site-specific.** This proposed change will allow a focus on areas of the actual disturbance rather than entire properties.
- 2) **Partial site clearance to allow development to start sooner.** This proposed change would formalize the ability to clear parts of a property for development while archaeological sites remain protected. A 50m protective buffer is proposed around archaeological sites requiring stage 3/further assessment, with areas outside the buffer cleared for development.

Overall, OPPI supports these proposals which could provide several positive outcomes including fewer report revisions, faster MCE reviews, and quicker progression to development approvals. This is a welcome step for the landowner, developer, and the municipality; one that will save considerable time and money which is critical to moving projects forward, especially in smaller/rural communities.

After reviewing the proposed recommendations, we offer a few supportive comments for your consideration:

1. As the framework continues to evolve, it will be important to clarify how approval authorities are to address partial clearance within planning approvals (draft plan of subdivision, site plan, building permit). Municipal approvals typically assume archaeological clearance for the entire development area before construction begins. The proposed partial clearance model introduces a different approach creating potential challenges related to determining what level of clearance is required before draft plan of subdivision/site plan approval.
2. Another item that will be important to contemplate is the ability to know and track which portions of a property have been assessed versus not over time. One potential solution would be to add a holding symbol to the unassessed portions of the lands which doesn't permit development or site alteration until an Archaeological Assessment has been completed. What is important is identifying who and how the data will be tracked and ensuring it is accessible by everyone including the public. To ensure this is useable data, consistency around what data is collected/reported will be important. We anticipate these considerations will be helpful as you work towards upgrading PastPort.
3. Regarding the 50 meter "buffer" around archaeological sites, we wonder if more than one buffer measurement, based on the total size of the property, would be easier to implement across any size parcel of land. On very small parcels, this buffer would not be possible. On very large parcels, there may be more than one area that needs to be buffered.
4. Indigenous consultation and relationship building is an important priority for municipalities. We know from day-to-day experiences that local conditions vary – from parcel to parcel – and that there is a chance that archaeological remains may be present before or after a site has been developed. It will be important to provide clear direction in the Standards and Guidelines as to how requests for an archaeological assessment from Indigenous communities are managed and

documented to ensure consistent reporting and data tracking. One possibility is to require Indigenous consultation at the time of an Archaeological Assessment Stage 1 or 2, rather than the current standard of not needing engagement until a Stage 3

OPPI is pleased to see the Heritage Framework Transformation project moving forward and we remain committed to participate in further discussions as you move to the next iteration. Additionally, we anticipate the role that member education and training will play in ensuring successful implementation. OPPI makes itself available to partner on this initiative for professional planners across Ontario.

If you have any questions or would like to schedule a meeting to discuss any elements of our submission or work that is still to come, please do not hesitate to contact us at (416)-483-1873 x2313 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Susan Wiggins, CAE, Hon. IDC
Executive Director

cc. Rebecca Ramsarran, ADM