



Association of Professional Archaeologists (Ontario)

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October 21, 2019

Minister Steve Clark
Ministry of Municipal Affairs and Housing

Dear Minister Clark,

Thank you for the invitation to review the proposed Provincial Policy Statement Revisions. We are aware of the need to balance the need for affordable housing development with significant cultural and heritage resource preservation for the future of all people in Ontario. The Planning Act and the Ontario Heritage Act (OHA) are required to be consistent with the Provincial Policy Statement (PPS); therefore, the PPS must include strong statements regarding seeking out and protecting cultural heritage resources. We encourage statements that emphasize the importance of shared stewardship of those resources by the Crown, First Nations, and heritage industry professionals. For instance, current practice using Archaeological Checklists relies on Municipal Authorities to have an informed basis for making those determinations. Since they generally lack archaeological training, access to the archaeological and built heritage sites databases, or an understanding of why specific criteria are significant, the current system does not work well. Determinations of archaeological potential should not be done at the Municipal level unless there is a marked improvement in training provided to all municipalities in Ontario. The proposed PPS revision to have Municipalities engage with First Nations, and the PPS Revision language is “shall engage”, is a positive step but it also risks the entanglement of Municipal officials in many overlapping claims of First Nations territories and priority, again with little or no guidance from the provincial government, and probably no background training in Ontario’s First Nations Treaty history and associated obligations.

In the PPS proposal details, the primary reference to Cultural Heritage and the Ontario Heritage Act is in the section “Reducing Barriers and Costs”, which presupposes that heritage sites are a barrier rather than a resource for the people of Ontario and an important link to First Nations cultural heritage. The language of the document needs to clarify the importance of heritage resources and their potential to enhance the lives of Ontarians. The provincial government has asked for specific commentary on whether proposed policies effectively support goals related to increasing housing supply, creating and maintain jobs, and red tape reduction, while continuing to protect the environment, farmland, and public health and safety. Conspicuously missing from this question is protection of historic and pre-contact cultural heritage resources. We would answer the question, “Do the proposed policies strike the right balance? Why or why not?” by saying that more balance is needed towards heritage preservation and that ignoring this



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for shorter-term housing goals will not have long term benefits for Ontarians. To the question “Are there other tools that are needed to help implement the proposed policies?” our primary answer would be education about heritage resources. Municipal authorities and communities require education about heritage resources as well as First Nations concerns, and this is a key role of the MMAH and for the Ministry of Heritage, Sport, Tourism and Culture with which organizations such as the Association of Professional Archaeologists might be capable of providing assistance.

Section 1.2 "Coordination" on page 15 does offer a good balance between development concerns and heritage conservation. However, this still contrasts with statements on page 37 of the proposed PPS which do not appear to place sufficient value of heritage resources in the face of land use planning decisions between development and conservation. Emphasis on the enhancement and effective use of Municipal Archaeological Master Plans across the province is critical and will not hinder development or public works, but rather will ensure that properties with high potential to contain burial grounds and other significant cultural heritage resources are properly assessed and managed so that incidents like what unfolded at Ipperwash and Caledonia to not recur.

We commend the province on initiating review of its Policy Statements and hope that greater attention will be given to the significance and possible permanent loss of irreplaceable resources without clear guidance to municipalities. We also urge the Crown to engage with all First Nations Treaty holders in Ontario on rights and obligations related to those treaties.

Sincerely,

Lawrence Jackson, Ph.D.

President, Association of Professional Archaeologists (Ontario)

on behalf of APA Executive: David Norris, Cathy Crinnion, Laura McRae, Jeffrey Dillane, Nadine Kopp, Benjamin Mortimer, Norbert Stanchly

cc: Hon. Lisa MacLeod, Minister, Heritage, Sport, Tourism and Culture Industries

cc: Hon. Greg Rickford, Minister, Indigenous Affairs