

# What We Heard

National Planning Permit Program



**Public & Indigenous Consultations**

**Winter 2022**

# Contents

- Executive Summary ..... 2
- Preface ..... 3
- What We Did ..... 4
  - About the Consultations ..... 4
- How We Consulted ..... 5
- Who We Heard From ..... 5
- What We Heard ..... 7
  - General – Public Engagement..... 7
  - General – Indigenous Consultation ..... 8
  - Theme 1: Simplicity ..... 9
  - Theme 2: Leading Locally ..... 10
  - Theme 3: Compliance & Enforcement..... 12
  - Theme 4: Parks Canada Capacity ..... 12
  - Site Specific Comments ..... 13
- What Comes Next..... 14
  - Land Use Planning Regulations ..... 14
  - Fees and Service Standards ..... 15
  - Improving our Services..... 15
  - Rolling out to all Parks Canada Administered Places ..... 16
- Conclusion..... 16

## Executive Summary

From January to March 2022, Parks Canada consulted on the foundational documents of the proposed National Planning Permit Program (NPPP) – the proposed *Land Use Planning Regulations* and corresponding Interpretive Guidelines. Consultations were conducted virtually due to the ongoing COVID-19 pandemic and built on initial consultations in 2018-2019. The NPPP is a proposal to improve how Parks Canada administers land use planning authorities and to improve overall service delivery.

During the consultation period, we heard from stakeholders, Indigenous partners and the general public. Comments generally fell within four themes:

- 1) Simplicity;
- 2) Leading locally;
- 3) Compliance & enforcement; and
- 4) Parks Canada capacity.

We heard continued support for the direction of the NPPP and a recognition that change to Parks Canada's current permit process is needed. We received comments on the proposed regulatory and policy framework, including what should be included in the regulations and Interpretive Guidelines, versus what is best dealt with in local field unit land use policies. Participants expressed that their feedback from the initial consultations had been integrated into the proposed foundational documents and continued to support a consistent process, stronger enforcement tools and greater transparency. Strong support was shown for clear regulatory direction for Indigenous engagement and public consultation. Overall, the design of the NPPP was supported by participants and stakeholders.

The main concerns raised during this round of consultation were around implementation. Stakeholders raised concerns with existing field unit staff capacity and how improvements in service delivery may warrant additional staff. Stakeholders were complimentary of staffs' efforts in service delivery to date, but continued to emphasize the need for improvements.

All comments received will be integrated into the draft regulations and Interpretive Guidelines, as appropriate. The intent of this What We Heard Report is to provide an overview of the comments received and next steps, as we move towards implementation. By bringing into force new regulations, Parks Canada will set a framework to streamline decision-making to optimize resources, create efficiencies and increase transparency. Our goal is to enhance recreational and visitor services without compromising ecological and commemorative integrity.

The next steps of the NPPP include the formal regulatory approval process for the *Land Use Planning Regulations*, consultations on fees and service standards, establishing digital tools to improve records management and facilitate prescribed public participation through the permit registry, and implementation planning. During these next stages there will be additional opportunities for public input on both the draft text of the proposed regulations and on fees and service standards.

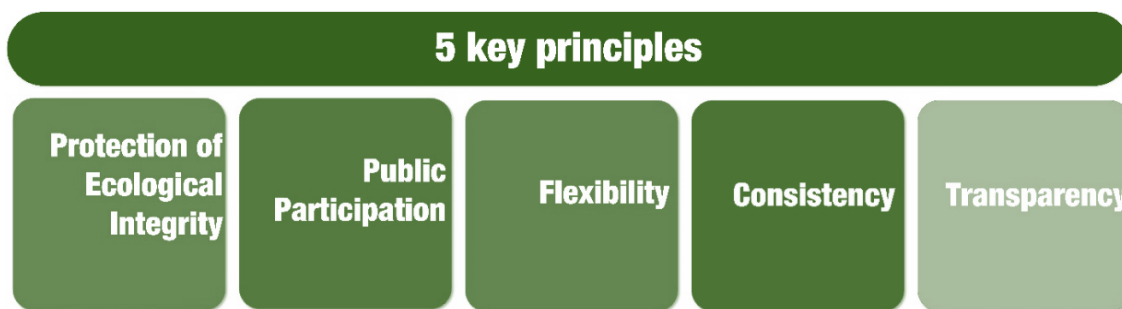
## Preface

Parks Canada administered places are a source of shared pride for all Canadians. Parks Canada manages and protects one of the finest and most extensive systems of protected natural and cultural heritage areas in the world. In very limited areas, controlled development is authorized according to strict guidelines to enhance recreational and visitor services without compromising ecological or commemorative integrity. These authorizations are made under four existing 1960s era regulations that were promulgated under the former *National Parks Act*. This approach to land use planning is outdated and no longer meets the needs of Canadians. Parks Canada is embarking on a modernized way to deliver permits, referred to as the National Planning Permit Program (NPPP).

The current development, building and occupancy permit process is divided among several statutes, regulations and local policies. Under the *Canada National Parks Act*, this includes the *Building Regulations*, *Cottage Regulations*, *Signs Regulations* and *Town of Jasper Zoning Regulations* as well as the associated policies and operating procedures. These regulations date back to the 1960s and no longer align with federal regulatory best practices nor with the Act itself, which came into force in 2001. Separate legislation and regulations set out similar authorities for other Parks Canada administered places such as historic canals, national marine conservation areas, heritage lighthouses and heritage railway stations.

In 2018, the Minister of Environment and Climate Change committed to “undertake a review of development and land use management decision making tools to ensure a consistent and transparent process for development decisions at Parks Canada places” ([Response to Minister's Round Table on Parks Canada](#)).

In 2018 and 2019, Parks Canada first consulted on the proposed National Planning Permit Program. Through those consultations, five key principles were established - protection of ecological integrity, transparency, consistency, flexibility, and public participation. These principles provided the foundation of the NPPP, guiding what should be in regulation, what should not, what should be consistent across Parks Canada, and what should be administered by field units.



**Figure 1.** The 5 key principles delivered through the 2018-2019 consultations.

From 2019 to 2021, Parks Canada developed two foundational documents - the proposed *Land Use Planning Regulations* and corresponding Interpretive Guidelines. These documents were developed based on initial consultation, extensive internal workshops, significant policy analysis, and a review of regulatory best practices. These two documents were the central focus of this round of consultation and engagement in 2022.

## What We Did

### About the Consultations

From January to March 2022, Parks Canada sought input on the proposed National Planning Permit Program (NPPP). Parks Canada is proposing a new land use planning regulatory and policy framework. The intent is to modernize the 1960s era regulations and update planning permit policies to reflect best practices in land use planning and to ensure that all proposed construction and renovation projects receive the highest standard of scrutiny through an updated planning permit process.

The proposed *Land Use Planning Regulations (LUPR)* and corresponding Interpretive Guidelines were the central focus of this round of consultations and engagement.

The *Land Use Planning Regulations* are intended to repeal the *Building Regulations*, *Cottage Regulations*, *Signs Regulations* and *Town of Jasper Zoning Regulations* and replace them with a consolidated regulatory land use planning regime. The proposed *LUPR* are designed to be high-level and flexible to provide Parks Canada officials with the authorities needed to approve and enforce permit requirements. The proposed regulations prohibit anyone from undertaking regulated uses and construction projects without a permit, while also broadening inspection powers, enforcing minimum property standards, and requiring Indigenous and public consultation. They set the stage for how Parks Canada aims to improve service delivery in administering its land use planning authorities.

The proposed Interpretive Guidelines is a standard for how applications for land use and construction permits across the country are to be assessed. They lay out the types of permits that might be issued for different regulated activities, the steps Parks Canada will take in their review of permit applications, and a number of administrative standards. The Interpretive Guidelines define the specifics of the decision review framework; policies, plans, and guidelines are explicitly referenced.

We engaged with Indigenous partners, as well as stakeholders and members of the public during this round of consultations. Our big question going back out to Canadians with the *LUPR* and Interpretive Guidelines was, “Did we get it right?”. We sought to understand if the right balance between regulation and policy was struck; if the 5 key principles were properly integrated into the foundational documents; and what needed further attention moving forward.



## How We Consulted

Public health measures established in response to the COVID-19 pandemic necessitated virtual consultation. A variety of tools and outreach materials were used to ensure robust engagement. The primary consultation platform we used was [Bang the Table](#), along with virtual stakeholder meetings and public information sessions.

Bang the Table is a widely used engagement platform that allows participants to engage in a number of different ways. The website was available in both official languages. The site hosted background material to inform stakeholders of the work that has gone into the NPPP to date, along with interactive tools. Information was provided in multiple formats and medias, including Frequently Asked Questions (FAQs), background documents, infographics, and a video presentation.

The draft *Land Use Planning Regulations* and draft Interpretive Guidelines were posted online using Konveio, an interactive PDF tool. Participants were able to click anywhere on the PDF documents and add their comments. Staff and other participants could reply to posted comments or “like” them. Participants were easily able to review and react to the proposed documents.

Participants also had the option to pose questions to staff, propose ideas, or answer a survey. The survey was organized around the 5 key principles - protection of ecological integrity, transparency, consistency, flexibility and public participation. The survey gauged whether we appropriately integrated the 5 principles into the regulations and Interpretive Guidelines and where improvements were needed.

In addition to the consultation website, virtual stakeholder meetings and public information sessions were hosted through Zoom. In these meetings, staff provided an overview of the NPPP and then sought feedback from participants. Sessions were designed in more of a Q&A format; after the staff presentation, participants were invited to ask questions or provide comments.

Parks Canada also engaged stakeholders through the national Parks Canada Twitter and Instagram accounts and through local newspaper and individual Parks’ social media channels. The professional planning community was engaged through an article on the NPPP in the Canadian Institute of Planners Plan magazine in Fall 2021. Consultations were also posted on the Consulting with Canadians website and Parks Canada’s website.

## Who We Heard From

Parks Canada conducted 3 public information sessions, 4 stakeholder meetings, received 70+ unique comments on the proposed regulations and Interpretive Guidelines, as well as over 330 unique visitors to the consultation website. Those who engaged with Parks Canada included Indigenous partners from across Canada, cottage and cabin owners, full-time residents, representatives of local governments, Parks Canada visitors, recent permit applicants, professional planners, local business and commercial accommodations, ski hill operators and local chambers of commerce. Participants from across Canada engaged in this round of consultations, with most members of the public and stakeholders living in, or near, park communities or along historic canals and waterways.

Opinions expressed were wide ranging and further refined the scope of what should be in the proposed *Land Use Planning Regulations* versus the Interpretive Guidelines and local land use policies. Participants showed significant interest in implementation and expressed that previous comments had been appropriately included in the proposed documents. Many comments provided by stakeholders were echoed by general members of the public, and as such are not segregated in this report. Comments provided by Indigenous partners are highlighted throughout this report. As visitors, residents and stewards of Parks Canada places, one common theme that arose was the passion for ensuring continued protection.



### Bang the Table - Consultation Website

- 400+ site visits with 330+ unique visitors
- 100+ informed visitors who interacted with one or more elements of the website (e.g. watched a video, completed the survey)
- 15 survey respondents

### Konveio - Consultation Website

- 70+ unique comments on the draft *Land Use Planning Regulations* and corresponding Interpretive Guidelines



### Social Media Posts

- 58 000+ people reached through social media channels
- 176 link clicks to learn more
- 101 re-tweets or shares
- 500+ likes/reactions

### Virtual Information Sessions and Meetings

- 3 public information sessions with 13 attendees
- 4 stakeholder meetings with 32 attendees



Figure 2. Consultations by the numbers infographic.

# What We Heard

## General – Public Engagement

Overall, Parks Canada was encouraged by the positive response received throughout the consultations. Participants supported the overall approach proposed in the *Land Use Planning Regulations* and direction of the NPPP. Overall:

- Participants agreed that the new regulations should be less prescriptive than the current regulatory approach, as proposed;
- Participants agreed that the proposed regulations should focus on the authority to issue permits, and not the details of zoning; and
- Participants agreed with the idea that zoning provisions should be in local land use policies.

Importantly, stakeholders told us that they felt heard through consultations and were happy with the consultation efforts made to date.

Throughout the consultations, we asked how participants felt about new measures proposed for the National Planning Permit Program. Overall, we heard that we met expectations when it came to integrating the five key principles into the key documents of the NPPP. There was strong support for new mechanisms for variances, regulatory exemptions for small and routine projects, permit classifications, and national standards for public notification and consultation. These measures were largely supported by public information session and stakeholder meeting attendees.

---

"Without question, this is the most professional, and I want to say the most sincere [consultation] process that I've been aware of for quite a long time."

-Public Information Session Participant

---

While still supported by the majority of participants, less support was received for the proposed creation of different permit types. Through guidance documents and implementation, the permit types will be clearly communicated to provide value to both Parks Canada and applicants. As we move to implementation, we will continue to ensure that any new measure brought into the planning process provides value and leads to better outcomes.

While we heard support for the design and general structure of the proposed NPPP, we also received a number of more targeted comments through our survey, public information sessions, and stakeholder meetings. These have been combined into four broad themes: Simplicity; Leading locally; Compliance & enforcement; and Parks Canada capacity.



## General – Indigenous Consultation

Indigenous consultations were held in parallel with public consultations. We are grateful for the insights into the proposed process received from Indigenous partners. Generally, comments received were supportive of the NPPP and the ways Indigenous interests are better integrated into the permit process. Participants emphasized that meaningful, robust engagement through the policy development process, which occurs upstream of the permit process, is fundamental in ensuring that their rights are respected.

### Early & Continuous Engagement

While engagement with Indigenous partners through the policy development process allows for a more thorough discussion on rights and interests, and allows for these to be clearly defined for all parties, Indigenous partners continued to assert that they have a role to play in the permit process. They emphasized that engagement should occur at the earliest possible opportunity. Partner's noted that projects can benefit from early engagement through the integration of Traditional Knowledge and the unique insights that the community will have on the proposed project site.

The NPPP prioritizes Indigenous engagement at the beginning, before permit applications are accepted.

Partners noted that they should continue to be engaged through the permit process, especially in the case of large projects. Changes to projects that have the potential to create new impacts or that provide an opportunity to advance reconciliation or Indigenous interests are generally those of the most interest. Indigenous partners also highlighted the importance of their involvement through the Impact Assessment process.

### Traditional Knowledge Systems

The consultation draft of the Interpretive Guidelines includes multiple references to ensuring that Parks Canada policies, legislation, and plans are integrated into decision making. The consideration of public and partner comments is also referenced. Through our consultations Indigenous partners identified a gap in terms of the inclusion of Traditional Knowledge systems in decision making. While it was emphasised that this may play a larger role during the policy development process, Traditional Knowledge has a role to play in the permit evaluation process, especially in terms of the identification of impacts and in the case of larger projects.

One tool that field units can access to improve the inclusion of Traditional Knowledge in the process is Advisory Committees (proposed in Section 40 of the *Land Use Planning Regulations*). Through both public and Indigenous consultations, we received comments asserting that these committees should include representatives of Indigenous communities with interests in the area.

### Protection of Rights

Any project permitted by the regulations must account for Indigenous rights and interests. The NPPP includes the flexibility to allow for engagement to happen based on different protocols, levels of interest and capacity. Fundamentally though, this engagement must address Indigenous rights and interests as established through Section 35 of the *Constitution Act*. These rights are fundamental and cannot be infringed upon.

## Theme 1: Simplicity

The first theme that emerged was the need to strive towards simplicity. In the context of the NPPP, we heard that simplicity will be key in creating an easy to understand process that will be consistent across Parks Canada. This consistency is imperative to improve services and provide enhanced tools to field unit staff.

### Standardizing the Process

We received strong support for a standardized permit process. We heard that that each step in the process must provide value and that any extraneous requirements be eliminated. New requirements, such as public consultation, should be designed and implemented in a way that does not add unnecessary complications. A centralized digital permit registry, proposed in the Interpretive Guidelines, is the key tool proposed for public consultation and notification. The tool will streamline the consultation process, bringing more transparency to the public and stakeholders while limiting operational impacts on staff.

In many Parks Canada administered places, a 3-stage process is already being used for the review of development and building permits. The draft Interpretive Guidelines clearly formalize and define this process to be consistent Parks Canada-wide. We heard strong support for the 3-stage process through the survey, meetings and stakeholder comments received.

The requirement for a pre-application meeting is a new regulatory requirement for complex projects. This standardized meeting is intended to support better communication between applicants and Parks Canada. Already informally adopted in some field units, we heard very strong support for this requirement through both the survey and meetings.

New permit types (minor alteration, minor/major development) will help to standardize the review process, fees, and timelines to meet Parks Canada and government-wide requirements.

### Clear Communication and Regulatory Language

Generally, participants felt that the regulations and Interpretive Guidelines were easy to understand. We did receive a number of comments on specific wording or language in the proposed *Land Use Planning Regulations*. For example, we received comments that certain sections of the regulations were unclear or difficult to understand. Suggestions were provided to improve the organization of the document, clarify certain sections and simplify language. The feedback received will help provide more flow and clarity in the document, where possible.

We received suggestions to identify additional staff in the regulations. As drafted, the regulations only explicitly mention the Parks Canada President & CEO and Superintendents. These are roles that are defined in the *Canada National Parks Act*. It is not a best practice in regulatory drafting to reference those not specified in the Act. Instead, the responsibilities outlined in the regulations would be delegated to the employee or teams responsible in accordance with internal administrative procedures. Nothing in the regulations prevents this.

We also heard a number of suggestions that specific policies, plans or other documents be explicitly referenced in the regulations. The *Land Use Planning Regulations*, as drafted, only explicitly mention management plans and community plans. These are documents that are already defined through the *Canada National Parks Act*. This approach was deliberately taken in developing our framework of what should and should not be included in regulations. Other plans and policies remain incredibly important in defining what is in the interest of the Parks Canada place for the purposes of permit review, but they cannot be directly referenced. Doing so would result in using a regulatory drafting tool referred to as “incorporation by reference”. Parks Canada’s land use plans and policies do not meet the strict criteria for use of this tool. Instead, the Interpretive Guidelines include references to these types of documents critical in permit review; as a living document that can be amended, this provides significant flexibility as new considerations come forward and new land use policies are developed.

Respondents and stakeholders also told us that the need for clear communication extends beyond our documents to encompass the way that Parks Canada does business and interacts with applicants, the public, and partners. Through implementation, participants reiterated the need for improvements to how the permit process is administered. Various measures in the NPPP have been designed to improve service delivery. This effectiveness of these improvements was a question in the survey; the majority of survey respondents felt the Interpretive Guidelines met that goal and adequately laid out the steps in the permit review process.

Just as with other stakeholders, Indigenous partners noted the challenges faced with an opaque, inconsistent process. This lack of clarity presents a barrier to their thorough engagement with the process and puts strain on existing and developing relationships. Partners supported the inclusion of Indigenous consultation requirements in the *Land Use Planning Regulations* and that engagement should begin prior to the start of the formal permit process and continue throughout.

## Theme 2: Leading Locally

The second key theme that emerged was focused around the roles of staff at the local field unit and National Office. We heard again how decision making needs to remain rooted at the local level, aligning with the 2018-2019

consultations. Stakeholders have strong relationships with field unit staff and reinforced that local staff were best placed to make decisions on planning and construction files. While we heard strong support for a more consistent national process, stakeholders were quick to affirm that the local authority issuing permits must remain the Superintendent, as identified in the draft regulations. There was support for the reduction of the number of area-specific requirements in regulations and instead the bolstering of local land use policies.

---

Local admin in the parks need the flexibility to make decisions on what is reasonable and practical for their jurisdictions.

- Survey Participant

---

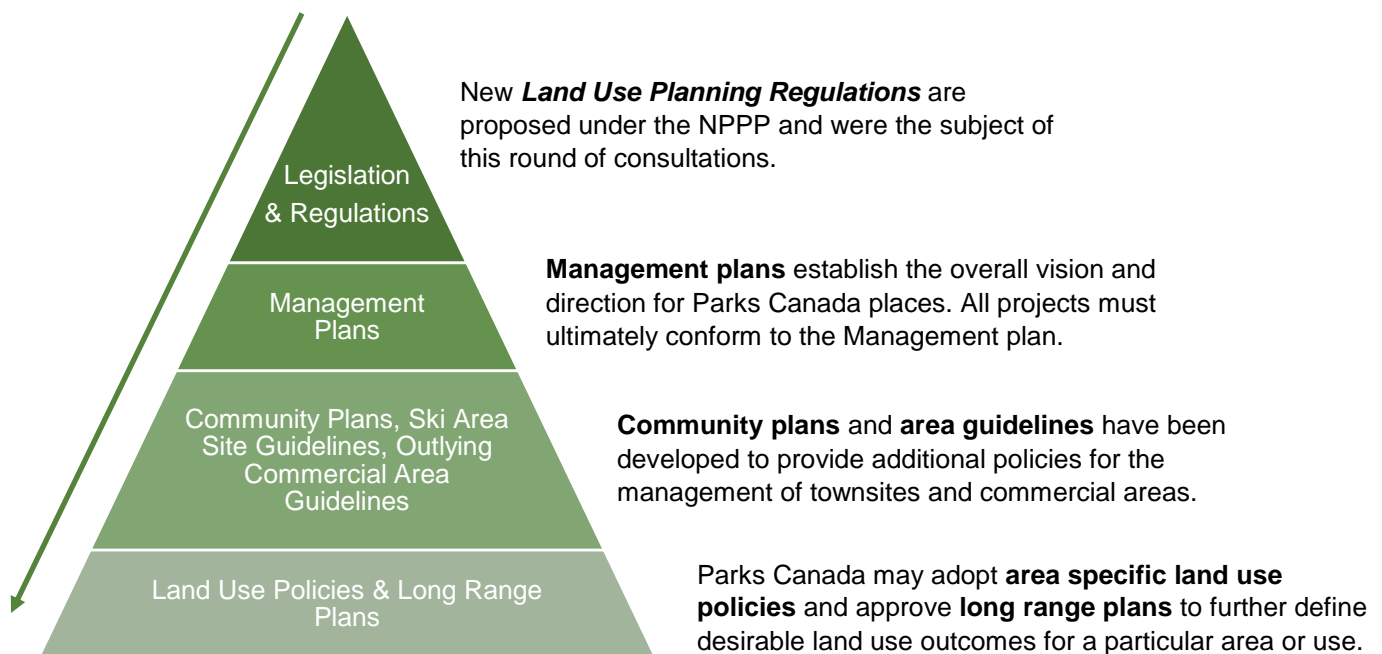
This need for flexibility, one of the key principles, was echoed in the feedback received. Stakeholders confirmed that they wanted decision making to remain at the Superintendent level, as they are most familiar with local issues. While they hope that capacity might be expanded with additional support and tools, they maintained that decision making should remain at the field unit level, rather than at National

Office. Concerns were raised that staff capacity is already limited. We heard that additional National Office services to support field unit decision making is needed for successful implementation and continued modernization of permit delivery.

### Clarity in Policies

We heard that the proposed NPPP does not clearly explain the relationship between the proposed permit process, long range plans (such as those developed with ski areas), and other Parks Canada policies. We heard that more work is needed to better define the links between long-term planning processes at Parks Canada and the permit process. These processes each have important roles in the overall land use management of a place. Clarity in the link between these processes are further defined in the Interpretive Guidelines.

We heard from stakeholders that flexibility is needed in the permit review process; strong support was received for the addition of the new variance process in the NPPP. Due to the nature of management and community plans, there are few opportunities for amendments to those policies. Participants provided strong direction for the addition of the new variance process to the NPPP and reflected that no one policy will fit all situations.



**Figure 3.** Hierarchy of planning legislation, regulations, plans, and policies.

### Theme 3: Compliance & Enforcement

The third theme that emerged was compliance and enforcement. Compliance is focused on ensuring that leaseholders and permit holders are following the conditions of their leases and permits. Enforcement is focused on the actions that Parks Canada can take to ensure this.

In this round of consultation, a frequent comment was that, for the NPPP to be successful, compliance and enforcement must be improved.

Stakeholders understand and support that leaseholders need permits for activities in a protected place and that applicants should be held to account on permit conditions. However, participants asserted this must be done in a consistent and equitable way.

We heard that enforcement of existing policies is lacking. For example, concerns were expressed around short-term rentals, such as those listed on Airbnb or VRBO, occurring in some park communities, despite these not being permitted by either local policies or leases. In both virtual meetings and through the survey, we heard support for stronger enforcement mechanisms. There was support for the new enforcement tools in the *LUPR*, including new orders available to the Superintendent, including Stop Work Orders, Restore Orders and others.

### Theme 4: Parks Canada Capacity

Lastly, we heard a number of comments focused around Parks Canada's capacity. Capacity here included both the human resources to do the necessary work and the tools available to them to do the work efficiently. Of note, Parks Canada's ongoing analysis on program costing as part of a fee and service standard proposal confirms these findings.

Over and over again, we heard participants say how much they appreciated the work of Parks Canada staff and the strong relationships that have been built at a local level. This is a testament to the great work of planning and development staff in field units across the county.

New permit classes are one tool to help improve capacity by streamlining low-impact projects without compromising review standards.

However, coupled with the praise of Parks Canada's relationship building was the recognition that field units often do not have the capacity to manage the volume of work in an effective and timely manner. As we move to implementing the National Planning Permit Program, the Land Use Planning Service Unit is exploring ways to address capacity issues and improve service delivery. Parks Canada is exploring a variety of novel solutions including Lean methodologies, developing digital tools, and increasing resources. These will be further explored as we finalize the draft regulations and prepare for implementation.

#### New Compliance & Enforcement Tools

- ✓ Superintendent's Orders
- ✓ Powers of Inspection
- ✓ Administrative Monetary Penalties for violations of the regulations or permit conditions

## Site Specific Comments

Some comments received through the course of the consultations were important for further consideration/discussion but were not directly related to the planning permit process.

## Cottage Sizes

Particularly in the visitor center of Waskesiu, there was a desire to increase maximum cottage sizes proposed in the *Land Use Planning Regulations*. The maximum cottage sizes included in the proposed regulations currently come directly from the *Cottage Regulations*. Changes of this nature will require a detailed analysis on the impacts.

## Land Use Planning and Development in the Town of Jasper

During consultations, we continued to receive comments on why Parks Canada, versus the Municipality of Jasper, is responsible for delivering land use planning services within the town boundaries. This arrangement is set out in the *Canada National Parks Act* and the Agreement for the Establishment of Local Government in the Town of Jasper (2001). The intent of the NPPP is to improve planning services across Parks Canada, including within the Town of Jasper, through increased transparency and improved governance. Throughout all consultation processes since 2018, participants stated that the biggest concern was ensuring these services were effectively delivered, regardless of who does it. Parks Canada recognizes that there may be other, more appropriate, service delivery models that are unique to this park community. The Jasper Community Sustainability Plan (2011) contained an action item to review the Establishment Agreement and, where in agreement, look to increase the role of the Municipality respecting land use planning and development.

In Winter 2023, Parks Canada will hold consultations to seek targeted feedback on whether a new operating model should be developed where both the Municipality of Jasper and Parks Canada work together in land use planning in the Town of Jasper. In accordance with the *Canada National Parks Act* and the Establishment Agreement, these events will provide opportunities for participation at the national, regional, and local levels, including participation from Indigenous partners.

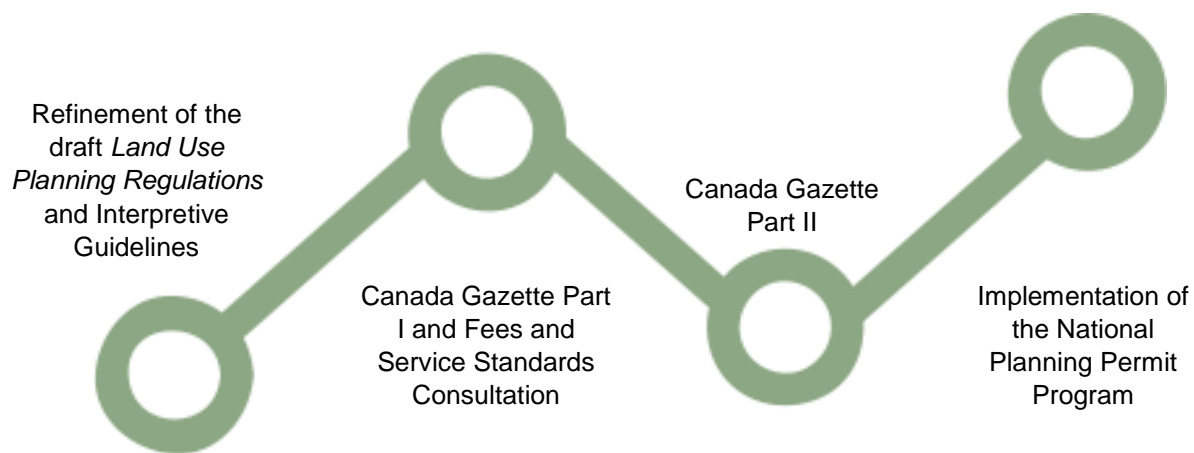
## Local Policy Issues

Through the consultation period, a number of local policy issues were raised by stakeholders that were outside of the scope of these consultations. Comments received include the re-designation of residential lands to support new commercial development, and site specific setbacks. Policy initiatives are generally subject to their own public consultation based on the scope and scale of the proposed initiative. That is the more appropriate venue for addressing those concerns.

## What Comes Next

The National Planning Permit Program is larger than the *Land Use Planning Regulations* and the Interpretive Guidelines. While these documents form an important foundation, the NPPP is about rethinking how Parks Canada approaches land use planning and permit delivery as a whole. There are other important and interrelated elements to this proposal, including an updated fee structure, new tools to support the process and future analysis of local land use policies.

Parks Canada is eager to maintain momentum and continue to advance key priorities as we move towards implementation of the NPPP. We are revising the *Land Use Planning Regulations* and the Interpretive Guidelines based on the feedback received. We would also note that the Interpretive Guidelines are intended to be a living document – they will continue to be updated and evolve as the NPPP advances and is implemented.



**Figure 4.** Next steps for the National Planning Permit Program.

## Land Use Planning Regulations

The next major piece will be the Treasury Board submission of the regulations. Regulations developed by Parks Canada are subject to the federal regulatory process, including the [Cabinet Directive on Regulations](#). The Land Use Planning Services Unit has been refining the Treasury Board submission based on the feedback received throughout these consultations. Once accepted, the draft regulations will be pre-published in the [Canada Gazette, Part I, for a 30-day comment period](#).

While the draft regulations were already released on the consultation website, this period is another opportunity for any interested party to view changes that have been made since then and submit other suggestions. Members of the public, Indigenous partners, and stakeholders who participated in previous consultations will be notified when the regulations are posted. Following Canada Gazette, Part I, the Land Use Planning Services Unit will make any additional changes necessary to the proposed regulations. Once finalized, regulations are published in Canada Gazette, Part II, which will include the coming-into-force date. The timing of final publication in Canada Gazette, Part II will depend on the feedback received in Part I.

## Fees and Service Standards

Parks Canada charges many fees for services it renders; permits and other approvals are no exception. This is standard practice across permit agencies and bodies, whether municipal, provincial, or federal. Parks Canada's land use planning permit fees are currently fixed in regulation, and have not been updated since the 1990s. Some even date back to the 1960s when the regulations first came into force. Fees are far below average market rates and do not achieve cost-recovery.

Service standards are for material fees pursuant to the *Service Fees Act*. The proposed land use planning service standards would be based on the period of time that Parks Canada would have to make a decision on a permit application. Establishing appropriate service standards is a key piece of the NPPP's implementation and was supported in the previous phases of engagement.

No fees or service standards were included in the proposed *Land Use Planning Regulations*. Instead, it is proposed that permit and service fees would be added to the Parks Canada Master List of Fees. Fees in the Master List of Fees are subject to the Consumer Price Index (CPI) and will therefore be adjusted every second year. All fees will be subject to requirements of the *Parks Canada Agency Act* and the *Service Fees Act*.

Fees and service standards associated with the NPPP require separate approvals from the proposed regulations. Once the costing analysis is finalized, proposed new fees and service standards will be subject to a public consultation period. This engagement will occur concurrently with pre-publication of the regulations in Canada Gazette, Part I. Previous participants will be notified when this proposal is open for comment.

## Improving our Services

Parks Canada recognizes that we have an obligation to improve the level of service we offer. In order to support a successful implementation of the National Planning Permit Program, Parks Canada is undertaking a comprehensive review of the permit process and working to develop new approaches that benefit both applicants and Parks Canada.

In line with the Government of Canada's Digital Standard, we are exploring digital permit review and management systems. The end goal is that the entirety of the NPPP will be able to be administered digitally, both from an external and internal perspective. The intent is to reduce operational demand on Parks Canada staff, while improving service delivery for applicants and those involved in consultations. We are working closely with colleagues in the Office of the Chief Information Officer and others within Parks Canada to explore digital options.

In conjunction with the development of digital tools, we are also exploring how the permit process can be optimized and streamlined. We are undertaking Business Process Mapping exercises with the support of an outside expert. The NPPP uses the techniques and tools of Lean to help Parks Canada develop more efficient ways to administer the process. Lean is a continuous improvement ideology that seeks to remove "wastes" or non-value added elements of a process, while maximizing time spent on value added steps, such as technical review. This work will inform service standards and fees, and help inform where additional resources may be required.



## Rolling out to all Parks Canada Administered Places

The National Planning Permit Program is a national level, holistic approach to land use planning within Parks Canada. From its inception, the intent of the National Planning Permit Program has been to build a system that can be adopted in all Parks Canada administered places. The first phase of implementation of the NPPP will be focused on National Parks but, with time, Parks Canada is committed to rolling out the NPPP to other Parks Canada places including National Historic Sites, National Marine Conservation Areas, and National Urban Parks. Internal discussions are ongoing to determine strategic approaches to implementing the NPPP across Parks Canada.

## Conclusion

Parks Canada is committed to building a transparent, consistent and effective permit process to manage the administration of land use planning and construction permits across the Agency. The planning permit process is how the long-term vision for Parks Canada administered places, set through strategic management, community, and long-term plans, is implemented. The feedback received through these consultations and summarized in this report will contribute greatly to these efforts.

As we continue to refine the *Land Use Planning Regulations* and the Interpretive Guidelines, we will pay particular attention to the themes raised through these consultations, including a need for simplicity, leading locally, compliance & enforcement and Parks Canada capacity. These contributions will guide us as we move towards the implementation of the NPPP.

The National Planning Permit Program is focused on meeting the needs of Parks Canada in regards to staff capacity, revenue generation, and operational efficiency while also meeting the expectations of stakeholders and applicants. We will continue to work with Indigenous partners, stakeholders and the public as this modernization effort advances and appreciate all the input that has been received to date.



## Contact

**Megan Rueckwald**

Senior Planner, Land Use Planning Services

[permis-permits@pc.gc.ca](mailto:permis-permits@pc.gc.ca)