

Sent via email to: planningconsultation@ontario.ca



October 21, 2019

To the Provincial Planning Policy Branch, Ministry of Municipal Affairs and Housing
Re: PPS Planning Consultation

Response to the proposed changes to the Provincial Policy Statement ERO 019-0279

FOCA is supportive of the current vision for the PPS (which remains unchanged in the proposal) which is:

The long-term prosperity and social well-being of Ontario depends upon planning for strong, sustainable and resilient communities for people of all ages, a clean and healthy environment, and a strong and competitive economy.

It is unclear, without setting indicators, gathering data and reporting on progress, whether the current PPS policies (let alone any proposed changes) are achieving this vision.

To the contrary, several proposed PPS policies are deeply concerning, as they are likely to move Ontario away from achieving complete, climate resilient communities and water resources that are protected for future generations. Some of our main concerns are outlined below.

We are pleased to see the retention of the following section; “2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development”.

FOCA is concerned that some parallel policy decisions underway within the Province may run contrary to these ambitions under the PPS, including narrowing the scope of authority of the Province’s watershed-based resource managers (Conservation Authorities) who provide significant oversight and expertise in understanding and managing Ontario’s water systems and our natural heritage. Related is the concern about replacing elements of O. Reg. 97/04 regarding Development, Interference with Wetlands and Alterations to Shorelines and Watercourses with a provincial standard.

It also remains unclear whether the forthcoming recommendations or proposed actions from the report of the Province’s Special Advisor on flooding, and the Muskoka Watershed Advisory Group will be consistent with a progressive approach to watershed management as envisioned under 2.2.1.

Although a new policy proposes that municipalities “may choose” to protect non-significant wetlands “in accordance with guidelines developed by the province” (see Policy 2.1.10), many

wetlands currently remain unevaluated. In the absence of a municipality voluntarily undertaking to protect them (and having the resources to do so), FOCA remains concerned that the significance, values and functions of such wetlands may be degraded or impaired if left unevaluated. Given the alarming losses in wetlands over the past several decades, FOCA concludes that the default position in the PPS should be protection for all unevaluated wetlands in areas of the province where the decline has been most dramatic.

We are supportive of the overarching goals under 2.2.1 whereby “Planning authorities shall protect, improve or restore the quality and quantity of water”, however remain unclear about how exactly this will be achieved or measured, specifically:

- How will watershed-based planning be managed and implemented, and what direction will be forthcoming from the Province with respect to measuring and minimizing cumulative impacts under 2.2.1 (a), (b), (c), (d), (f) and (g) and;
- How will lake capacity (2.2.1 (h)) be more effectively considered and codified, beyond the use of phosphorus levels in sensitive trout lakes as the singular measure.

A new policy proposes that “outside of the Greenbelt Area, extraction [of aggregate] may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions” (see Policy 2.5.2.2). Aggregate extraction is a conflicting land use that continues to be given inappropriate priority in the PPS. Extraction activities cause permanent changes to the ecosystem. We recommend that you remove proposed new policy 2.5.2.2 which would allow aggregate extraction to override the protection under the current PPS and would permit aggregate extraction in provincially significant wetlands (except in southern Ontario), provincially significant woodlands, valleylands and wildlife habitat, significant Areas of Natural and Scientific Interest, fish habitat and the habitat of threatened and endangered species. The overarching, preferential treatment of aggregates applies to rural areas across the Province that are of great interest and concern to our members and their communities.

FOCA also suggests that the location and permitting of aggregate operations should consider and be consistent with the direction provided via local land use planning (in terms of zoning industrial operations, setbacks, considerations around compatible uses, etc.).

When discussing “Reserve sewage system capacity” (Page 62) there needs to be language discouraging the continued land application of hauled sewage. This practice is the subject of numerous inter-agency working groups who are considering more reasonable options for managing this material; progress on this front requires the overarching policies that incentivize alternative practices or at a minimum discourage the continuation of land application for hauled sewage.

We are aware of the pressing and cumulative effects of climate change and biodiversity loss on our communities and the natural systems that support them. We look forward to effective policy language and action to move our planning systems forward in a supportive and proactive manner, to achieve the PPS goals of “providing for appropriate development while protecting

resources of provincial interest, public health and safety, and the quality of the natural and built environment.”

We offer these comments for your consideration and look forward to the opportunity to contribute to these important discussions in the months ahead.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Rees". The signature is fluid and cursive, with the first name "Terry" being more prominent than the last name "Rees".

Terry Rees, Executive Director
On behalf of
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cc Minister Steve Clark minister.mah@ontario.ca