

# *The Couchiching Conservancy*



The Couchiching Conservancy  
Box 704  
Orillia, On,  
L3V 6K7

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Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St., 13th Floor  
Toronto, ON  
M5G 2E5

## **RE: ERO Registry # 019-0279 for input on Provincial Policy Statement Review – Proposed Policies**

Thank you for the opportunity to submit feedback on the proposed amendments to the Provincial Policy Statement (PPS). The Couchiching Conservancy has the following comments:

- 1. Wetland Protection Clarification:** It is unknown what wetland guidelines are being referred to in 2.1.10. Municipalities should be given the authority to protect locally significant wetlands according to their own Official Plans or a stronger, more protective PPS.
- 2. Relationship with Provincial Plans:** On Page 5, the following should be added: “Where there is a conflict between the PPS and other Provincial Plans policies regarding the natural environment or human health, the direction that provides more protection to the natural environment or human health prevails.” This would replace the phrase “more specific policies” in the revised 2019 edition with “the Plan that affords more protection to the natural environment or human health” in the “Relationship with Provincial Plans” Section.
- 3. Settlement Area Boundary Expansions:** The current proposal to allow settlement area boundary expansions outside of a comprehensive review process threatens to revert to an ad hoc approach to planning whereby municipalities respond to development proposals rather than planning in advance and needlessly places our natural areas and farmland at risk. It is imperative that boundary adjustments respond to a demonstrated need for growth and are data-driven. Furthermore, we recommend that an Environmental and Agricultural Impact Assessments be mandatory for any minor settlement boundary adjustments that could impact components of the

Natural Heritage or Agricultural System. These measures will help to achieve sustained or enhanced Natural Heritage and Agricultural System viability.

4. **Climate Change Crisis:** There are no policies in the PPS that stress the importance of taking measures now to prevent or avoid climate change. The fight against climate change is a race against time and actions need to be taken immediately to prevent irreversible impacts from climate change. These actions should be policy-driven and described in any new PPS. Deleted sections from the 2014 PPS that promoted “renewable energy systems and alternate energy systems” should be re-inserted in Section 1.6.11.1 and 1.7.1 and 1.8.1.
5. **Damaging Communal Sewage Systems:** The proposed PPS recognizes private communal sewage and wastewater services as a viable and preferred alternative to municipally owned water and wastewater infrastructure. Private communal systems, in the absence of a responsible public authority to ensure proper operation and maintenance have a greater likelihood to malfunction as a result of poor management practices. If they fail, the operator and residents do not typically have sufficient funds to remedy the problem. Past experience indicates that the malfunction of sewage and water services is a public health and environmental threat that requires immediate action, sometimes by the municipality using taxpayer dollars. This continued promotion of private communal services as a preferred servicing arrangement for multi-lot/unit development may not adequately protect our lakes, rivers, wetlands, community good will or human health.
6. **Destructive Aggregate Resource Policies:** The proposed PPS now includes the ability to consider aggregate extraction in Provincially Significant natural heritage features, provided that long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions. Once you dig a pit or quarry in a Provincially Significant wetland or a forest or a geological ANSI, twenty years later, after all the aggregates are gone, you can not come out with what you started with. The proposed policy permitting aggregate extraction in significant natural heritage features should be deleted. The Province should provide for comprehensive planning process, such as a regional aggregate strategy, official plan, policy and zoning provisions to protect the broader public interest and existing landowners. When considering the recent amendments to the Environmental Assessment Act, Endangered Species Act through Bill 108, the potential for cumulative impacts on the environment resulting from a combination of policy and legislative changes is very troubling especially in the current climate crisis. We should be protecting and restoring, not destroying.
7. **Destructive Prime Agricultural Area Policy 2.3.6.1:** Extraction of minerals, petroleum resources, mineral aggregates or “identified needs” (housing?) should not be permitted in our prime agricultural areas.
8. **The Source Water Protection Plan** should be referenced as a guiding document in Sec 2.2.
9. **PPS Policies are Minimum Standards and Municipalities should have Ability to Impose Higher Standards:** Under Section 4.0, the province should re-insert the 2014 policy permitting municipalities to establish higher standards than dictated by the PPS. “The policies of this PPS represent minimum standards. This PPS does not prevent planning authorities and decision makers from going beyond these minimum standards”. To omit this policy, as has been done in the current proposed PPS, may suggest that proposed growth and development need only meet the lowest PPS standard as opposed to appropriately responding to municipal priorities and objectives.

- 10. Destructive Mineral and Petroleum Policy 2.4:** Development of mineral mining operations, aggregates, petroleum resources and significant areas of mineral potential should be subject to normal municipal planning procedures, subject to zoning, municipal by-laws, Official Plans and meaningful public consultation. (Sec 2.4 and 2.5).
- 11. No Permits or Planning Changes Necessary for Pits, Quarries, Asphalt or Concrete Plants:** Wayside pits and quarries, portable asphalt plants and portable concrete plants should NOT be permitted without the need for an Official Plan Amendment, Rezoning, meaningful public consultation or development permit. Section 2.5.5.1. should be deleted.
- 12. Natural Hazards:** The wording “development shall generally be directed to areas outside of...” should be reworded “Development shall not occur within...”
- 13. Natural Heritage Protection Line in Figure 1:** With the climate crisis upon us, all unevaluated wetlands should be evaluated and all Provincially Significant Wetlands below the **upper** line should be fully protected with sufficient buffers to sustain the form and function of each wetland. All accompanying wording (page 29): “unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions” should be deleted. That way, all Provincially Significant lands below the upper line will be protected. In addition, a wetland protection strategy for wetlands above the upper protection line should be developed.

Thank you for this opportunity to share our comments on the Provincial Policy Statement Review Proposed Policies.

Most Sincerely,



Mark Bisset  
The Couchiching Conservancy