



Planning Consultation
Provincial Planning Policy Branch
777 Bay Street
13th floor
Toronto, ON
M5G 2E5

October 16, 2019

**Re: Provincial Policy Statement Review – Proposed Policies: Township of Rideau Lakes’
Comments**

To whom it may concern,

The Council of the Corporation of the Township of Rideau Lakes has reviewed the proposed policy changes to the 2014 Provincial Policy Statement and has multiple concerns with the changes, notably:

- **Market Based Needs:** There is a stark dichotomy between the provision of affordable housing and policies which mandate that new development will be based on a market-based need approach. Considering most buyers are looking for single family dwellings in the Township and most rural areas in general, the intent of linking affordable housing with market based needs appears to be a city centric approach without considering rural impacts;
- **Lack of Clarity for Servicing in Rural Settlement Areas:** Policies have been proposed to permit flexibility to permit sewage and water services in rural settlement areas. While this may be a positive change for the Township, the change lacks clarity as there is no confirmation on what tests have to be met for this to be permitted;
- **Solar on Prime Agricultural Lands:** Agricultural policies are proposed to permit the erection of ground-mount solar on prime agricultural lands. There are few prime agricultural lands throughout our province and by allowing solar on these lands it will further reduce agricultural production in the province;

- **Archaeological Resources & Municipal Approaches:** Removal of the ability to use municipal approaches to determine the likelihood of archaeological resources is proposed. This would mean that the Township would be required to use the Provincial criteria which states that any development or site alteration within 300m of a waterbody is required to undertake an archaeological assessment. What this equates to is approximately 90% of the Township being required to undertake an assessment (which includes an approximate 1 year wait for approval) for something as small as a deck. While the Township supports conserving these resources, there must be a balance and by removing the municipal approaches the policy is unreasonable and could effectively stall 90% of development in our Township;
- **Extraction in Wetlands:** Policies are included to permit mineral aggregate operations to extract in areas of natural heritage systems where there are no negative impacts. There is no clarity around how this would be possible, as you cannot strip a wetland and then expect no negative impacts;
- **Fast Tracking Applications:** There are inclusions for identifying and fast tracking development applications that support housing and job related growth and development. There is no consideration for how this would be done to ensure procedural fairness or appropriate public consultation;
- **Companion Policies:** A significant number of policies are proposed to have “companion policies” by the Province, but there is no information about when these would be available or what they would specify;

The Township would appreciate consideration of these comments during the review process. Please continue to keep us informed of any updates to the PPS. Thank-you for the opportunity to review.

Sincerely,

Brittany Mulhern, Manager of Development Services

On behalf of the Council of the Corporation of the Township of Rideau Lakes