



July 5, 2023

Submitted via email: growthplanning@ontario.ca

Ministry of Municipal Affairs and Housing (MMAH)

Re: Comments on the “Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument” (ERO#019-6813)

Thank you for the opportunity to comment on the above consultation document. Mississippi Valley Conservation Authority (MVCA) is pleased to work with the Province and our municipal partners to achieve livable communities, a thriving economy, and a clean and healthy environment. MVCA supports the need for comprehensive and integrated policy direction on land use planning matters related to growth management, infrastructure planning, protection and management of resources, and protection of public health and safety.

ABOUT US

MVCA is located in Eastern Ontario and manages water resources over 4,100 km² including some of the fastest growing communities in the province such as Kanata-Stittsville, Almonte, and Carleton Place. For over 20 years, MVCA has collaborated with member municipalities and local counties to provide technical and planning policy review services to guide development and ensure consistency with the *Provincial Policy Statement (PPS, 2020)* and local official plan policies. We also work to ensure that planning decisions are coordinated with permit requirements under the *Conservation Authorities Act* Section 28 regulation to achieve efficient and timely approvals.

CONTEXT

MVCA’s work covers a range of landscapes, from managing sustainable growth within the rapid urban expansion, to balancing resource management within our rural and waterfront development areas. It is our experience that our municipal partners and watershed residents place enormous value on the natural features and water resources within their communities, and hold a strong desire to see growth managed in a sustainable manner that ensures the long-term protection of our natural heritage. There is growing recognition of the immeasurable and irreplaceable value of the services provided by those natural assets including: flood and drought mitigation, clean drinking water, and the economic and social benefits provided from products, jobs and recreational opportunities.

COMMENTS

On June 27, 2023, Conservation Ontario submitted its comments to the Province on behalf of all 36 local conservation authorities. MVCA endorses those comments and provides the following additional comments on specific matters under the PPS (2020):

Natural Hazards (Section 5.2):

The PPS (2020) is a cornerstone document for local land use planning and has been an essential tool in enabling the Province, municipalities and conservation authorities to identify and sustain those values. Specifically, PPS polices for Natural Hazards provide the foundation for the sound management of development within flood and erosion hazard areas in order to mitigate risk and protect the safety of people and property. MVCA strongly supports the Province's continued commitment to the protection of public health and safety by carrying forward current Natural Hazard policies into the new PPS.

Natural Heritage (Section 4.1):

PPS Natural Heritage policies have been instrumental in providing municipalities with sound and comprehensive guidance in mitigating impacts to natural heritage features and systems. At the local level, the PPS (2020) provided the impetus and framework for some excellent planning initiatives that have helped to inform Official Plan policy and implementation including, the City of Ottawa's Natural Heritage System Mapping and Natural Landscape Linkage Analysis, and the County of Frontenac Natural Heritage Study (2012). Municipal councils and staff rely greatly on those PPS (2020) policies for support and guidance in striking the balance between providing for much needed growth and while maintaining a healthy natural environment over the long term. MVCA strongly supports the Province's commitment to sustaining the wellbeing of our natural features and systems by maintaining current Natural Heritage policies in the new PPS.

Vision (Chapter 1):

The current "Vision" section of PPS 2020 emphasizes a preventative approach that directs development away from Natural Hazards. This approach is extremely effective in minimizing financial risk to the Province and municipalities by avoiding costly remediation following a flood or erosion event. The proposed new text emphasizes a mitigation approach to managing development within natural hazard risk areas. Mitigation is difficult to effectively implement and comes with the risk of failure and the exacerbation of localized problems. MVCA recommends that the Province reinstate the principle of avoidance over mitigation as a more prudent and cost-effective means of protecting people and property.

Sewage Water and Stormwater (Section 3.6):

The growing frequency of extreme weather events makes municipalities and their residents increasingly vulnerable to flash flooding, sewage overflows, erosion and washouts, slope failures, etc. It is essential that the planning, design and operation of sewage and stormwater systems allow for the growing impacts of climate change. MVCA recommends that the following policy from the existing PPS (2020) be carried forward into the new document: Policy

1.6.6.1 b) 2. "Ensure that these systems are provided in a manner that: prepares for the impacts of a changing climate".

MVCA supports the requirement for stormwater planning "to align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale" per policy 3.6.8(g).

MVCA disagrees with the proposed elimination of the existing policy 3.6.8. (b) that requires planning authorities to protect, improve or restore the quality and quantity of water by "ensuring stormwater management practices minimize stormwater volume and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces". MVCA recommends that minimizing stormwater volume should remain a priority policy for the provincial government to ensure planning authorities account for increased stormwater volumes which may contribute to pluvial and fluvial flooding and erosion within and downstream of developed areas.

Water (Section 4.2):

MVCA is pleased that the policy requiring municipalities to identify water resource systems has been retained and that a definition has been added.

MVCA disagrees with the proposed elimination of the existing PPS 2020 policy 2.2.1 (c) that requires planning authorities to evaluate and prepare for the impacts of a changing climate to water resource systems at the watershed level. This significantly diminishes the Province's existing standard of requiring watershed planning to be the basis for infrastructure, stormwater, water resource and comprehensive planning for large and fast-growing municipalities. MVCA recommends that proposed policy 4.2.3 be improved by:

- requiring "large and fast-growing municipalities" to undertake watershed planning, while continuing to encourage all other municipalities to do so;
- retaining PPS 2020 policy 2.2.1 (c) to ensure planning authorities protect, improve or restore water quality and quantity by evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;
- reference that the purposes of watershed planning is to prepare for the impacts of a changing climate, and to inform planning for sewage and water services and stormwater management, and to protect, improve or restore of the quality and quantity of water and,
- reference partnerships with CAs to undertake watershed planning.

Ont. Reg. 686/21 (Conservation Authorities Act, Mandatory Programs and Services) includes low water or drought as a natural hazard risk. The proposed planning statement is silent on this hazard. MVCA recommends that policy 4.2 1 f) be amended to read "planning for efficient and sustainable use of water resources, through practices for water conservation, sustaining water quality and low water and drought management".

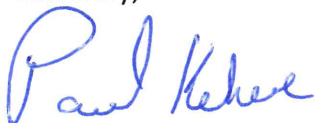
Additional recommendations:

MVCA would also like to reiterate and emphasize the following recommendations from Conservation Ontario dated June 27, 2023:

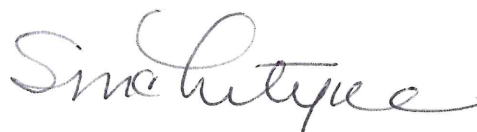
- The PPS requires greater focus on preparing for the impacts of a changing climate (e.g. as a purpose for watershed planning).
- Comprehensive, up-to-date implementation guidance is required for the proposed PPS (natural Hazard Technical Guidelines, Watershed/Subwatershed Planning Guides, and the Natural Heritage Reference Manual).
- Large and fast-growing municipalities should be required to undertake watershed planning to allow for comprehensive and coordinated consideration of interjurisdictional matters.
- Language in the PPS is needed that encourages all other municipalities to undertake watershed planning to ensure climate resiliency.
- Existing PPS 2020 policies should be retained that emphasize the importance of green infrastructure and stormwater management including maximizing vegetation within settlement areas and minimizing stormwater volumes to protect, improve or restore water quality and quantity.

Thank you for the opportunity to provide comments.

Sincerely,



Paul Kehoe, Chair
Board Chair



Sally McIntyre
General Manager

/AS

cc. MVCA member municipalities
Counties of Frontenac, Renfrew, and Lanark
Local MPPs: J. Jordan, R. Bresee, G. Ghamari, J. Yakabuski, C. Pasma
Mississippi River Watershed Plan Public Advisory Committee
Mississippi Valley Conservation Foundation
Conservation Ontario and CA partners
Post to website