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Provincial Policy Statement Review
Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay Street, 14th Floor
Toronto, ON M5G 2E5
E-mail: PPSreview@ontario.ca

**Re: EBR Registry number 011-7070
Provincial Policy Statement 5 Year Review**

Dear Sirs:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization with a focus on healthy river ecosystems all across Ontario. ORA members represent numerous organizations such as the French River Delta Association, Vermilion River Stewardship, CPAWS-Ottawa Valley, Friends of Temagami, Paddle Canada, Whitewater Ontario, Mississippi Riverwatchers, along with many other stewardships, associations, and private and First Nations citizens, who have come together to support healthy river ecosystems in Ontario and to ensure that development affecting Ontario rivers is environmentally, ecologically and socially sustainable.

ORA would like to thank you for this opportunity to comment on the five year review of the Provincial Policy Statement 2005 (PPS). ORA commends the Ministry of Municipal Affairs and Housing for the many improvements in this proposed revision to the PPS.

ORA respectfully offer our response to the questions set out in this EBR posting:

1. Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?

This Draft PPS offers many improvements to help meet the needs of the Province in land use planning, however, ORA offers the following additional recommendations regarding the following PPS sections:

1.6.10.1 Energy Supply

This section would effectively tie local planning authorities to promote renewable energy systems even though they have no say into if, where, when or how they should be approved. Many municipalities have been resistant to green energy projects because of this loss of control. Municipalities should not be directed to

promote or provide opportunities for the development of energy supply when Ontario has a surplus of power projected far into the future¹.

Recommendation 1:

Planning authorities should consider opportunities for the development of energy supply including electricity generation facilities, to accommodate current and projected needs, and promote renewable energy systems, when and where necessary.

1.7.1 (j) Long-Term Economic Prosperity

Under the current Green Energy Act and Green Economy Act, municipalities have no say if or where a green energy project is located, so requiring promotion of renewable energy at this time is not recommended.

Recommendation 2:

(j) promoting energy conservation.

1.8.1(f)(2) Energy Conservation, Air Quality and Climate Change

Renewable energy should only be considered in areas where there will be no or minimal negative social or environmental impacts.

Recommendation 3:

2. consider opportunities for the use of renewable energy in areas where there will be no or minimal negative social, ecological or environmental impacts.

2.1 Natural Heritage

ORA strongly supports this section and is very pleased to see its inclusion in the PPS; however we make the following recommendations:

Recommendation 4:

- a) Protection of natural features and areas should include all of Ontario, not just be restricted to certain Ecoregions, or require formal designation as "significant";
- b) Natural Heritage designation should provide higher level protective policies; and
- c) The OMNR Natural Heritage Reference Manual should be cited as reference material for this section.

2.1.5 Wetlands

ORA is pleased to see the recognition of the importance of protecting coastal wetlands in Ecoregions 5E, 6E & 7E; however, wetlands are essential all across Ontario. Wetlands serve the ecosystem by providing clean water, biodiversity, habitat for species at risk, support healthy communities, and help reduce the effects of climate change. It is important that the PPS reflect the valuable ecosystem services that wetlands provide in all parts of Ontario.

Recommendation 5:

Development and site alteration shall not be permitted in or around wetlands unless it has been demonstrated that there will be no negative impacts.

2.1.7 Endangered Species

¹ [Reconnecting Supply and Demand, How Improving Electricity Pricing can Help Integrate a Changing Supply Mix, Increase Efficiency and Empower Customers](#), Report of the Chair of the Electricity Market Forum, George Vegh, December 2011, P-3 and 4.

ORA suggests that maintaining the species at risk prohibitions in the current PPS is critical, and that the draft section 2.17, which refers to *other provincial and federal legislation*, should be changed.

Recommendation 6:

Development and site alteration shall not be permitted in habitat of endangered species and threatened species.

2.2. Water

2.2.1(a) ORA is pleased to see integrated watershed planning included; however, it is important to strengthen this section.

Recommendation 7:

a) Require watershed studies as a condition of development permits. This is key to properly assessing cumulative effects and to make informed decisions.

b) Provide funding to municipalities and conservation authorities to fund watershed studies.

2.2.1(e)(1) Planning authorities must protect both municipal and private drinking water supplies from development impacts.

Recommendation 8:

1. Protect all municipal and private drinking water supplies and designated vulnerable areas; and

2.3.3.2 Agriculture – Permitted Uses

Recommendation 8:

“All types, sizes and intensities of” should be struck. This appears to include factory farming, which can be very detrimental to surface and ground water quality in a watershed and should not be permitted.

6.0 Definitions

Recommendation 9:

Conservation: meaning should also include:

c) the wise and efficient use of electricity.

2. Are there additional land use planning matters that require provincial policy direction and which are not included?

a) Policies should include strong recommendations for Environmental Assessments to be necessary for any development that may have negative impacts on natural resources, the environment, or public health and safety.

b) The United Nation’s Millennium Ecosystem Approach, must be integrated into the PPS, to instruct municipalities to “*assess the consequences of ecosystem change for human well-being and provide the scientific basis for action needed to enhance the conservation and sustainable use of those systems and their contribution to human well-being.*”

3. Do you foresee any implementation challenges with the draft policies?

Since there is no possibility of a no answer from municipalities for green energy projects, there could be a resistance to the PPS instructing the promotion of renewable energy

projects.

4. Is additional support material needed to help implement the Provincial Policy Statement?

Since this is a critical policy document, ORA recommend that once public input has been incorporated into the final draft that it is posted on the EBR for another 30 day comment period.

5. Do you think the legislated Provincial Policy Statement review cycle should be extended from the current 5-year period?

The PPS review cycle should remain at the current 5 year period, as it allows for changes and adjustments to be made to address any increased effects of climate change.

Planning that promotes healthy wetlands, lakes, rivers, and natural resources, ensures sustainability, biodiversity, and results in strong, livable, healthy and resilient communities. Wise planning protects the environment, public health and safety, and facilitates sustainable economic growth.

Please contact the undersigned if you have any questions about this submission.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance

Cc: Gord Miller, ECO – Commissioner@ECO.on.ca
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