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Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, Ontario
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Subject: **Comments on the Environmental Registry of Ontario Posting No. 019-6813: Review of Proposed Policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.**

Thank you for the opportunity to comment on the “*Review of Proposed Policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.*” Please find attached, comments approved by the RVCA’s Board of Directors on July 27, 2023.

The Rideau Valley Conservation Authority (RVCA) supports the Province’s objective to have streamlined, comprehensive and integrated land use planning policies in place that further the achievement of goals for timely and affordable housing supply, a robust economy, livable communities and a healthy, sustainable environment that benefits all Ontarians.

The RVCA has a collaborative partnership with eighteen lower tier municipalities and three counties for which we have provided plan input and review services for over twenty years as defined in formal memorandums of understanding. We provide this service to assist our municipalities in meeting our collective obligations to ensure that recommendations and decisions on planning matters are consistent with the Provincial Policy Statement (2020) and local official plan policies. We also strive to ensure that planning decisions are aligned and coordinated with requirements under our *Conservation Authorities Act* Section 28 regulation to achieve efficient and timely approvals.

Ontario’s policy led planning system, as set forth in the PPS (2020), has achieved an effective balance between multiple equally important interests including:

**Proudly working in partnership
with our 18 watershed municipalities**

Athens, Augusta, Beckwith, Central Frontenac, Clarence-Rockland,
Drummond/North Elmsley, Elizabethtown-Kitley, Merrickville-Wolford, Montague,
North Dundas, North Grenville, Ottawa, Perth, Rideau Lakes, Smiths Falls, South Frontenac, Tay Valley, Westport

- Growth management, economic development and housing;
- Efficient and cost-effective infrastructure for sewage, water and stormwater management services, transportation, transit, energy supply and corridor protection;
- Protection and management of resources, including prime agricultural areas, aggregates, natural heritage, surface water, groundwater and cultural heritage;
- Protection of public health and safety from natural and human-made hazards;
- Building resiliency and adaptation for climate change.

The proposed provincial planning instrument brings many of these good policies forward and the document continues to recognize that all relevant policies must be applied to each situation to achieve an integrated policy driven approach to land use planning and development. Current natural hazards policies in the PPS have been retained, which reflects the Province's commitment to high standards for the protection of public health and safety. However, other effective policy that supports the objectives of comprehensive and integrated land use planning and development, together with the desired outcomes of livable communities, economic development, housing and environmental protections, have been diminished.

Table 1 (attached) provides our comments and recommendations for each identified policy section that corresponds to the numbering in the proposed provincial planning statement. The recommendations are to bring forward components of existing policies that will provide a high degree of integration and coordination across all policies interests to achieve the Province's objectives for timely planning and development approvals, housing supply, economic growth, public health and safety and environmental protections. The Province has consistently demonstrated commitment to these environmental protections in the *"More Homes, More Choice: Ontario's Housing Supply Action Plan"* (May 2019) and the *"Report of the Ontario Housing Affordability Task Force"* (February 8, 2022).

Thank you for the opportunity to comment on the proposed provincial planning statement. The Province, municipalities and conservation authorities have worked collaboratively and effectively to implement successive PPS and Growth Plan policies, which has resulted in a well-balanced approach to land use planning and development. This approach has and continues to achieve our collective objectives for economic development, housing, the management of natural hazards, protection of public health and safety and the environmental protections that are valued by Ontarians.

Yours truly,



Glen McDonald, MCIP RPP
Director of Planning and Science

Attached: Table 1

Table 1. Comments and Recommendations on the Proposed Provincial Planning Statement

Policy Section	Policy	Comment / Recommendation
Vision		<p>The vision statement in the current PPS emphasizes a preventative approach that directs development away from natural hazards, with a view to minimizing financial risk to the Province and municipalities, protection of public health and safety and preventing social disruption. The vision is founded on the principle of avoiding the need for costly remedial actions to correct problems. Avoidance has been the Province’s longstanding approach to the management of natural hazards. This direction has, and continues to serve Ontarians well, as it is a prudent approach to development that effectively manages risk.</p> <ul style="list-style-type: none"> • The recommendation is to reinstate this principle in the proposed planning statement, which currently emphasizes mitigation over avoidance.
2.3	Settlement Areas and Settlement Area Boundary Expansion	<p>The physical characteristics of a site are significant considerations that influence the feasibility of development. These characteristics also define how a site functions within its broader watershed setting, including development impacts both on and off site.</p> <ul style="list-style-type: none"> • The recommendation is to bring forward existing policy in the Place to Grow document that requires municipalities to determine feasibility of development by avoiding, minimizing and mitigating potential negative impacts on watershed conditions, the water resource system including the quantity and quality of water.
2.9	Energy Conservation, Air Quality and Climate Change	<p>The proposed policy requires planning authorities to promote green infrastructure. This policy would be strengthened by the inclusion of wording from the existing policy that provides for the establishment or maintaining natural vegetative cover on the landscape. This recognizes the significant function of natural vegetation to support the objectives of energy conservation, air quality improvement and climate change mitigation.</p> <ul style="list-style-type: none"> • The recommendation is to bring forward policy 1.8.1 (g) in the current PPS that requires planning authorities to “<i>maximize vegetation cover within settlement areas where feasible.</i>”
3.6	Sewage, Water and Stormwater	<p>Climate change has a direct and observable impact on sewage, water and stormwater services. Combined sewage overflows, pluvial and fluvial flooding, erosion, washouts and slope failures with concurrent damage to private property and municipal infrastructure are frequently observed</p>

		<p>during extreme precipitation events. It is in the public interest to ensure that water, sewage and stormwater infrastructure are provided in a manner that is resilient to climate change impacts.</p> <ul style="list-style-type: none"> • The recommendation is to restore current PPS 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.” This would be consistent with and reinforces the policies of section 2.9 Energy Conservation, Air Quality and Climate Change. <p>Proposed policy 3.6.8 (g) would require planning for stormwater management to “align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale”. However, policy 3.6.8 (b) in the current PPS which 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” has not been included.</p> <ul style="list-style-type: none"> • 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. <p>Current Growth plan policies 3.2.6 (Water and Wastewater Systems) and 3.2.7 (Stormwater Management) <u>require</u> that watershed planning be undertaken to inform municipal water, wastewater and stormwater masterplans. Proposed policy 4.2.3 <u>encourages</u> municipalities to undertake watershed planning in large and fast-growing municipalities. This shift in language is not consistent with the Province’s objective for a streamlined, comprehensive and coordinated approach to infrastructure planning and diminishes the concept of the watershed as the ecologically meaningful scale for integrated long-term planning.</p> <ul style="list-style-type: none"> • The recommendation is to restore the commitment to watershed planning in large and fast-growing municipalities and to strongly encourage it for all other municipalities.
4.1	Natural Heritage	<p>The RVCA supports the Province’s policy approach to the protection of natural features and natural areas. The current natural heritage policies in section 2.1 of the PPS (2020) have not been changed, which demonstrates the Province’s commitment to protect natural heritage systems and the collective features, functions and linkages that comprise</p>

		these systems. The policy continues to recognize the critical linkages and interdependencies between natural heritage features and areas, surface water features and groundwater features.
4.2	Water	<p>RVCA is pleased that the policy requiring municipalities to identify water resource systems has been retained and that a definition has been included.</p> <p>The Province is proposing to remove the requirement for planning authorities to evaluate and prepare for the impacts of a changing climate to water resource systems at the watershed level (PPS 2020 policy 2.2.1 (c)). This 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.</p> <p>The recommendation is that the watershed planning policy direction in proposed policy 4.2.3 be improved by:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <ul style="list-style-type: none"> • The recommendation is to amend policy 4.2.1 f) to read <i>planning for efficient and sustainable use of water resources, through practices for water conservation, sustaining water quality and low water and drought management.</i>
5.2	Natural Hazards	Current natural hazards policies in the PPS have been retained, which reflects the Province’s commitment to high standards for the protection of public health and safety. A new policy is proposed which states that

		<p>“planning authorities shall identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance” (5.2.1). and associated regulations.</p> <ul style="list-style-type: none"> • The recommendation is that the policy be modified to include collaboration with conservation authorities. <p>Such an amendment would be consistent with recommendation #3 from the “Independent Review of the 2019 Flood Events in Ontario” Report, O. Reg. 686/21 which identifies natural hazards as a conservation authority mandatory program and service, and with the vision as described in the proposed planning statement that mitigation of natural and human made hazards <i>“will require the Province, planning authorities and conservation authorities to work together.”</i></p>
6.2.1	Coordination	<p>Policy 1.2.1 from the PPS 2020 (now proposed policy 6.2.1) states a “coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities...”, including coordination of water, ecosystem, shoreline, watershed and Great Lakes related issues, as well as natural and human-made hazards.</p> <ul style="list-style-type: none"> • The recommendation is that Conservation Authorities be included in the list of agencies involved in this coordinated approach given our leadership role in the implementation of provincial natural hazard policies and our regulatory role under Section 28 of the Conservation Authorities Act. <p>As specified in the Act, Conservation Authorities provide coordinated services to municipalities on a watershed basis.</p>
Definitions	Water Resource Systems	<p>RVCA is pleased to see that a definition has been added for “water resource system”.</p>
General	Technical Support and Guidance	<ul style="list-style-type: none"> • Recommend that technical support and implementation guidance from the Province be provided to assist with accelerating development and construction approvals. <p>The provision of comprehensive and up-to-date implementation guidance would support a predictable, consistent, and streamlined process. This technical guidance would recognize advancement in science and technology used to undertake supporting studies which inform land use planning decisions.</p>