



Submission on the proposed policies adapted from *A Place to Grow* and the *Provincial Policy Statement* to form a new *Provincial Planning Statement*

Environmental Registry of Ontario, ERO #019-6813

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The Environment Council for Clear, Stoney and White Lakes (EC) and its partner, the Shoreline Conservation Initiative for Peterborough County (SCI), have carefully reviewed the natural heritage and water conservation policies and related definitions in the proposed *Provincial Planning Statement (PPS)*. We are concerned that these policies are lacking sufficient detail to guide land use planning that will preserve our natural heritage.

The EC is a volunteer, not-for-profit, multi-stakeholder organization, created in 2008, and dedicated to protecting the health of our lakes and the surrounding natural heritage in the Kawartha Lakes region of the County of Peterborough. SCI is a group of volunteers brought together by the EC in 2021 to promote the preservation and enhancement of natural shorelines across Peterborough County. Both the EC and SCI look to the Province to expand affordable housing supply while sustaining Ontario's natural heritage.

We strongly urge the environmental protection referenced in the natural heritage and water conservation goals laid out in the *PPS*, such as in Section 4.1.2 below.

"The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features."
(proposed *PPS*, p.19)

However, the usefulness of these *PPS* objectives is constrained by their vague and very general presentation. The absence of specific targets and implementation details weakens the planning and oversight needed to safeguard our natural heritage as development pressures intensify. The paucity of technical information, for example, restricts discussion on protecting provincially recognized natural heritage features.

Natural heritage features not identified, per se, as "*significant*" features, such as shorelines, trees and natural vegetation, receive scant attention in the *PPS* despite their importance. These features, themselves protectors of the environment mitigating climate change damage and water degradation, also require their own protection. Evidence abounds of natural shorelines' ecological importance, including: safeguarding surface and ground water quality; slowing the

growth of aquatic 'weeds' and algae; providing fish and wildlife habitat; and reducing atmospheric carbon dioxide and erosion.

We agree that protecting the connectivity of natural features is vital. Connectivity data and mapping will enable this objective. An excellent reference is the Kawarthas Naturally Connected Natural Heritage System mapping and related Baseline Connectivity data and mapping, prepared and implemented with the assistance of the Ministry of Natural Resources and Forestry*.

The proposed *PPS* offers municipalities increased independence to customize their own environmental regulation. But a detailed, comprehensive provincial framework is still required to serve as a minimum standard. Our worry that the *PPS* protection of Ontario's natural heritage and water resources may not achieve the *Statement's* vision of environmental sustainability is heightened by the policy changes in *Bill 23* and other recent provincial legislation that have weakened the environmental conservation framework developed over decades.

Thank you for providing the opportunity to comment on the proposed *Provincial Planning Statement*.

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* www.kawarthasnaturally.ca.
