Toronto Ornithological Club

Planning consultation
Provincial Planning Policy Branch
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October 21, 2019

Ladies and gentlemen,

Re: ERO # 019-0279 Provincial Policy Statement Review

Thank you for the opportunity to comment on the proposed changes to the Provincial Policy Statement (PPS). We, the Toronto Ornithological Club, believe that contrary to the government's stated intent many of the proposed changes to the PPS will diminish protections for the natural environment and farmland across Ontario. Overall, the proposed changes do not present a balanced approach to land use planning and they unduly favour aggregates extraction and development over other provincial interests, in particular natural heritage and agriculture.

The TOC is one of the oldest birding clubs in Canada established in 1934 and we are committed to the ongoing conservation initiatives of migratory birds in Toronto and the surrounding areas, with a sound basis in contributions to scientific projects and studies.

Achieving the provincial goal of enhancing the quality of life for all Ontarians (PPS Preamble, p.1) requires policy direction that will protect and restore the lands and waters that sustain us and that will direct development to suitable areas. With that goal in mind, we outline below our concerns and recommendations.

1. **Aggregrates extraction should not override protections for significant natural heritage and prime agricultural land.**
    - **Recommendation 1:** Remove proposed new policy 2.5.2.2 which would allow aggregates extraction to override the protection of the significant and at-risk natural heritage features.
    - **Recommendation 2:** Remove current policy 2.4.4.1 which allows aggregates extraction to override protections for prime agricultural land on the faulty premise of future rehabilitation.
2. **Current requirements for compact development, efficient use of infrastructure, integrated land use planning and achieving intensification and redevelopment targets should be retained.**
    - **Recommendation 3:** Retain the requirements in policies 1.1.3.3, 1.1.3.6, 1.1.3.7, 1.1.3.8, 1.6.7.2 and 1.6.7.5 that support compact development, the achievement of intensification and redevelopment targets, the efficient use of existing and planned infrastructure and integrated land use planning.
    - **Recommendation 4:** Proceed with the inclusion of the new policy 1.6.8.5, but make it a clear directive by changing "should" to "shall" so that it reads: "The co-location of linear infrastructure shall be promoted, where appropriate."
3. **Settlement area boundary adjustments should only be permitted as part of a Municipal Comprehensive Review.**
    - **Recommendation 5:** Remove proposed policy 1.1.3.9 which would allow settlement boundary adjustments outside the Municipal Comprehensive Review.
    - **Recommendation 6:** Remove proposed policy 1.3.2.5 which would allow the conversion of employment lands to a designation that permits non-employment uses outside the Municipal Comprehensive Review.
4. **Protections for wetlands must be retained or enhanced.**

    - **Recommendation 7:** Either remove proposed policy 2.1.10 or clearly state that the purpose is to maintain, restore and where possible enhance wetlands, and include clear requirements to: Achieve net gain in wetland area, quality and function; set clear limits to offsetting, taking into account the type, location, vulnerability and irreplaceability of wetlands as well as their cultural significance to Indigenous peoples; Implement the mitigation sequence, which positions offsetting as a last resort after first avoiding and then minimizing negative impacts.

    - **Recommendation 8:** Either remove proposed policy 2.1.10 or clearly state that in the absence of an evaluation of significance, all unevaluated wetlands will be deemed to be significant and therefore off limits to development and offsetting.

5. **Address implementation of proposed climate change directives.**
    - **Recommendation 9:** Proceed with amendments to the Vision and proposed policies 1.1.1 i), 1.6.1, 1.6.6.1 b) and c), 2.2.1 c) and 3.1.3 which acknowledge the urgency of and direct municipalities to prepare for the impacts of climate change.

- **Recommendation 10:** Recognizing the critical role of natural features and systems in attenuating the impacts of climate change, amend policies 2.1.2, 2.1.4 and 2.1.5 to enhance the protection of wetlands, woodlands and natural heritage systems as follows: Protect all coastal wetlands and all provincially significant wetlands province-wide by amending section 2.1.5 a) and f) to include all significant wetlands and coastal wetlands. Protect all provincially significant woodlands in Ecoregions 6E and 7E by adding them to the list of features in section 2.1.4 which strictly prohibits development and site alteration. Require municipalities to maintain, restore or improve the diversity, connectivity and ecological function of natural features and systems by replacing the word "should" with "shall" in section 2.1.2.
- **Recommendation 11:** Either remove policy 4.7 or revise it so that it reads: 4.7 Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for development projects not situated on hazardous lands which meet floodproofing standards and support achievement of greenhouse gas emissions targets by: identifying and fast-tracking priority applications which support housing and job-related growth and development; and reduce the time needed to process residential and priority applications to the extent practical.
- **Recommendation 12:** Add the following statement (underlined) to paragraph 2, Part III, How to Read the Provincial Policy Statement, so that it reads: The Provincial Policy Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together. The language of each policy, including the Implementation and Interpretation policies, will assist decision-makers in understanding how the policies are to be implemented. In situations where there is a conflict with respect to a matter relating to the natural environment or human health, the policy that provides more protection to the natural environment and/or human health prevails.

6. Retain key sections guiding implementation and interpretation in Section 4.

- **Recommendation 13:** Retain current policies 4.9 – 4.13 in Section 4, where they are clearly understood to provide direction on implementation and key municipal duties.
- **Recommendation 14:** Remove this statement in its entirety from policy 2.5.2.1 : "Demonstration of need for mineral aggregate resources, including any type of supply/demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere." Instead, require that a demand/supply analysis be undertaken to provide satisfactory evidence that there is a demonstrable public need for the proposed extraction.

Concluding remarks

All amendments to the PPS must be evaluated in light of the urgent need to respond effectively to climate change and the ongoing and accelerating loss of biodiversity[9] here and around the world. As noted in the PPS Vision statement (Part IV), the long-term prosperity and well-being of Ontarians requires planning for sustainability and resilience. Impact studies and policies which protect the natural areas and farmland upon which we all depend are integral to achieving the Vision.

Thank you for attention. We trust that our comments and recommendations will be carefully considered in finalizing amendments to the PPS.

Yours sincerely,

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Conservation Councilor

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President