

232 Guelph St.
Georgetown, ON L7G 4B1
Tel: 905-877-5191
Fax: 905-873-7452
www.escarpment.org

232, rue Guelph
Georgetown ON L7G 4B1
No de tel. 905-877-5191
Télécopieur 905-873-7452
www.escarpment.org

October 8, 2019

Hon. Steve Clark
Minister
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Dear Mr. Clark:

**RE: Provincial Policy Statement Review – Draft Policies
 Environmental Registry Posting 019-0279**

Further to your letter of July 22, 2019, the Niagara Escarpment Commission (NEC) has reviewed the draft Provincial Policy Statement (PPS) and NEC staff prepared the attached report. This report was considered by the NEC at its meeting on September 19, 2019 and the Commission endorsed the staff recommendation.

In addition, in its discussion on the attached staff report, the Commission had the following additional comments and questions for your consideration with respect to the proposed PPS changes.

- Are the proposed policies encouraging or directing aggregate extraction to locations outside the Greenbelt? As stated in the NEC staff report at page 6, the proposed policy change regarding the opportunity to permit aggregate extraction in natural heritage features on lands outside the Greenbelt implies that the policy encourages aggregate extraction outside the area subject to the Niagara Escarpment Plan. If so, the NEC supports this policy direction.
- With respect to the management of wetlands, the NEC recommends that this term be defined and that there be additional clarity with respect to watershed management and the role of Conservation Authorities in implementing this function.
- What does the term “market ready” mean and what determines if a development is market ready? The NEC recommends that this term be defined in the PPS.
- Are the proposed policy changes laying the ground work for implementation of PPS policy by municipalities rather than by the provincial government and this Commission? If so, how will consistency of interpretation of provincial policy be assured? It is the NEC’s position that the implementation of provincial policy at the provincial scale is an important function that should be maintained.

- Is the province moving toward allowing new rural subdivisions on well and septic systems? While it is important to provide opportunities for new housing development in rural communities, what direction will be given with respect to the incorporation of new technology (tertiary treatment systems) to ensure that existing wells in the community are not negatively impacted by new development on private services and that new development is evaluated on a watershed not site-by-site basis?
- With respect to the proposed policy change that would allow flexibility in meeting the MDS formulae, the NEC recommends that the policy language be strengthened to ensure farming can continue on agricultural lands without conflict with residential land uses.

The NEC appreciates the opportunity to comment on the proposed PPS policies and would welcome an opportunity to discuss its comments with staff in your ministry before the policies are finalized. To that end, staff may contact Nancy Mott, Senior Strategic Advisor, at 905-877-8363 or nancy.mott@ontario.ca.

Yours truly,



David Ayotte
A/Director

cc. Nancy Mott, Senior Strategic Advisor, NEC

Encl.