



Planning Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON M5G 2E5

October 21, 2019

Re: ERO 019-0279: Provincial Policy Statement Review – Proposed Policies

The North Pigeon Lake Association (NPLA) represents members in the Municipality of Trent Lakes and the City of Kawartha Lakes. NPLA supports actions that preserve and promote the welfare of the shoreline and the waters of north Pigeon Lake, its catchment area, and more broadly across Ontario. We also promote good government, including sound environmental stewardship.

Thank-you for the opportunity to comment on the proposed changes to the Provincial Policy Statement (PPS). Firstly, we would like to suggest that future proposal notices of this nature include a marked up copy of changes (additions/deletions/edits) to facilitate effective review of the proposal.

We are pleased that the proposed revisions include a recognition of the role Indigenous communities have in land use planning and that the Province encourages planning authorities *“to build constructive, cooperative relationships through meaningful engagement with Indigenous communities.”*

Likewise, we are pleased that section 2.1 (**Natural Heritage**) is largely unchanged and that section 2.2 (**Water**) adds subsection 2.2.1 c) *evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;*

We are, however, deeply concerned that the policies in sections 2.1 and 2.2 will be undermined by the proposed changes to section 2.5 (**Mineral Aggregate Resources**). Specifically, we are extremely concerned about the proposed addition to subsection 2.5.2.2:

“Outside of the Greenbelt Area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions.”

This subsection should be removed, as it allows aggregate extraction to override protections for significant wetlands, woodlands, valleylands, fish habitat, and wildlife habitat (including habitat for species at risk). *“Long-term rehabilitation”* is unlikely to be effective in protecting species at risk whose remaining populations are already fragmented across the landscape.

The PPS proposal notice poses a series of questions for consideration. The second question is: *Do the proposed policies strike the right balance?* Our answer: **No**. The proposed amendments to section 2.5 tip the balance too far in favour of aggregate extraction and away from environmental protection of our natural heritage and water resources. These proposed changes will lead to further loss of Ontario’s rich biodiversity.

Yours,

NPLA Board of Directors