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By Email: growthplanning@ontario.ca
Provincial Land Use Plans Branch
13th Floor, 777 Bay St
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RE: ERO Posting 019-6813

Thank you for providing the opportunity for the County of Bruce to comment on ERO Posting 019-6813 on the proposed 2023 Provincial Planning Statement through the Environmental Registry.

Bruce County and our eight local municipalities are committed to supporting the province's goals to increase housing supply, bring more affordable housing to market and streamline the development process to get more homes built faster. Bruce County delivers planning services to our eight partner municipalities and delivers a range of housing services, including the construction of County owned/operated housing.

Throughout the recent changes to the Planning System, Bruce County and its partner municipalities have been advancing initiatives to increase the supply of affordable housing by updating planning documents and preparing a new County Official Plan. An Official Plan Amendment implementing Growth Management policies and new population projections into the Bruce County Official Plan was adopted in October 2022 and is before the Minister of Municipal Affairs for approval.

Bruce County delivers planning services to our eight partner municipalities and delivers a range of housing services, including the construction of County owned/operated housing.

This letter is in relation to the updated information posted to the registry on June 16, 2023.

Natural Heritage:

Bruce County appreciates the general consistency between the natural heritage policies of the currently in-effect Provincial Policy Statement (2020) and the proposed Provincial Planning Statement (2023). The County, consultants, and stakeholders have been working diligently to identify a natural heritage system for implementation through the new Bruce County Official Plan. Maintaining alignment will support the work to date and the

completion of the project to support the management of natural resources for future generations.

Two changes to the proposed Provincial Planning Statement are highlighted below:

1. The definition of “Natural Features and Areas” no longer includes “habitat of endangered species and threatened species.”

“Natural Features and Areas” are directed to be protected *for the long term* however other provincial legislation applies to protect the habitats of these species, and includes permitting processes where impact to habitat may be permitted subject to conditions. As such, requiring that habitat of endangered species and threatened species be protected for the long term under the Provincial Planning Statement creates a potential conflict with the other legislation.

“Natural Heritage Features and Areas” are also listed as a component of natural heritage systems, which Bruce County and local Municipalities are required to identify. The Plan the Bruce: Natural Legacy project which is setting out to identify natural heritage system for the County has identified endangered and threatened species mapping as a category that could not be effectively mapped, given species may be included/removed from the list, permits may be obtained to permit habitat removal, and habitat may include things like old bank barns.

Habitats that occur in natural areas may derive policy protections as significant wetlands, significant coastal wetlands, other coastal wetlands, fish habitat, significant woodlands and significant valleylands, significant wildlife habitat, and significant areas of natural and scientific interest, which are important for their environmental and social values as a legacy of the natural landscapes of an area.

Overall the revised definition of natural heritage features and areas enables the natural heritage system to be more fully mapped in accordance with provincial direction, and habitat of endangered and threatened species will continue to be addressed through provincial legislation, with referral of proponents to the province when such habitats are identified through the planning process.

2. The definition of ‘significant’ is revised, in relation to *wetlands, coastal wetlands, and areas of natural and scientific interest*, to remove reference to the role of the Ontario Ministry of Natural Resources and Forestry (MNRF) in determining significance.

The revised definition includes these as an area identified as provincially significant using evaluation criteria and procedures established by the Province, as amended from time to time. This change reflects a decision by the province in December 2022 to change the Ontario Wetland Evaluation System Manual to remove a ministry role in the identification and approval of wetland boundaries (see [ERO Posting 019-6160](#)) and sets up the possibility

for revisions to the process and responsibility for identifying and delineating areas of natural and scientific interest.

Bruce County submitted comments with respect to the ERO posting 019-6160 that identified concerns with the removal of the provincial Ministry's role in the determination of provincially significant resources.

Those changes remove MNRF from the administrative function, without indicating a clear replacement to support municipalities. It appears that the intent is for municipalities to assume this role. Bruce County and its local Municipalities do not have the resources or capacity to assume this role. Further, distributing this role across 400+ municipalities will be neither efficient nor yield consistent stewardship of provincially-significant wetlands, let alone areas of natural and scientific interest.

Bruce County recommends that the province consider the impacts to features and the capacity for administration of any further changes to natural heritage policies.

Agriculture:

The original ERO posting indicated a policy to require municipalities to permit 3 lots to be severed from any farm lot existing as of January 1, 2023, provided MDS was maintained. At the time the posting was extended, the province indicated that the intent of this policy was to facilitate housing for next-generation farmers and for farm workers, and that the government would not be moving forward with this policy and was extending the comment period to hear other ideas.

The updated Planning Statement posted on June 16th continues to include the originally proposed agricultural consent policies.

Bruce County recommends that the province consider the feedback and engage on revised policies before putting them into effect in a new Provincial Planning Statement.

Summary

Bruce County Council and staff appreciate the opportunity to provide input on the government's efforts to address the need for housing in Ontario through the proposed 2023 Provincial Planning Statement. We appreciate the overall alignment on natural heritage policy between the current Provincial Policy Statement in the updated Provincial Planning Statement posted June 16, 2023.

We encourage the province to work with groups such as AMO and the Warden's Caucuses, as well as rural and small urban communities to engage in meaningful dialogue on the proposed changes and their implications for municipalities across Ontario.

Please contact the undersigned should you have any further questions.

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