

November 3, 2015

Grey County
Planning Department
595 9th Avenue East
Owen Sound ON
N4K 3E3

Attention: Sarah Morrison

Dear Ms. Morrison

**Re: Grey County Natural Heritage System Study
Policy Options and Approach**

Natural Resource Solutions Inc. in association with Macaulay Shiomi Howson Ltd. was retained in November 2014 by the Grey County to undertake a Natural Heritage Systems Study to delineate a Natural Heritage System within the County.

Grey County's Official Plan (2013) currently identifies natural features on an individual basis and includes Provincially Significant Wetlands, Areas of Natural and Scientific Interest, significant woodlands, streams/watercourses/waterbodies, and other identified wetlands. Other natural heritage features may be identified and protected incidentally such as habitat of Endangered and Threatened species, significant valleylands, and Significant Wildlife Habitat.

A Natural Heritage System Study is being conducted to take a more holistic and systems-based approach to the natural heritage features in order to ensure that the quality and integrity of natural features are protected for the long-term. The purpose of this letter is to outline the suggested policy approach for moving forward with the implementation of a Natural Heritage System (NHS). The following information is provided for discussion purposes. This letter must be read in conjunction with Maps 3 to 9 which are attached.

PPS Context

The *Provincial Policy Statement* (2014) states that:

"2.1.1 Natural features and areas shall be protected for the long term.

2.1.2 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.

2.1.3 Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.”

A natural heritage system is defined in the Provincial Policy Statement, 2014 as:

“a system made up of natural heritage features and areas, and linkages intended to provide connectivity (at the regional or site level) and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. These systems can include natural heritage features and areas, federal and provincial parks and conservation reserves, other natural heritage features, lands that have been restored or have the potential to be restored to a natural state, areas that support hydrologic functions, and working landscapes that enable ecological functions to continue. The Province has a recommended approach for identifying natural heritage systems, but municipal approaches that achieve or exceed the same objective may also be used.”

The Ministry of Natural Resources and Forestry (MNRF) provides guidance in identification of a Natural Heritage System in their Natural Heritage Reference Manual. Using this approach, the fundamental components of a Natural Heritage System consist of cores and linkages. Core Areas are generally the building blocks of the Natural Heritage System and consist of relatively large natural areas which perform important ecological functions, such as provincially significant wetlands and significant woodlands. Core Areas are identified based on a number of factors including size, integrity, shape, rare species and other significant designations as well as other factors, and in many cases are comprised of clusters of several habitat types. Linkages are components of the Natural Heritage System that allow movement of wildlife and plant species. In addition, the Natural Heritage Systems approach can encourage the consideration of future natural environment conditions including restoration areas and connectivity, thereby including areas that do not currently contain significant natural features or functions, but by association with the Core Area have the potential to provide substantial ecological benefit.

Outline of the Current County Official Plan Policy Approach

- Goals indicate “Respect the natural, cultural and heritage features of the County, including minimizing adverse impacts on the natural environment, protecting significant environmental features, the water quality of various watershed ...”
- Environmental Objectives are provided.
- Natural Environment policies recognize landscape features and processes.
- Schedule A Land Use designates hazards lands and provincially significant wetlands.
- Appendix B maps significant woodlands, other identified wetlands, and provincially significant Earth and Life Science ANSIs in. Policies note that there may be inaccuracies in the mapping. Policies indicate that significant woodlands must be 40 ha in size or larger outside of settlement areas or 4 ha within settlement area boundaries or for overlap with other woodlands, natural heritage features or interior habitat greater than 8 ha
- Appendix A maps special policy areas (Karst).
- Policies note the attempt to maintain natural linkages between features.
- Policies define adjacent lands and identify the width based on the type of feature
- Policies note that nothing is intended to limit the ability of existing agricultural uses to continue

- Policies address Hazard lands.
- Policies address provincially significant wetlands,
- Policies address significant woodlands
- Policies address special policy areas.
- Policies address Natural Function which are significant natural areas in the County for which there is no mapping or mapping is incomplete including threatened and endangered species habitat, valleylands and wildlife habitat.
- Implementation policies identify Environmental Impact Study requirements and indicates none of the natural heritage policies are intended to limit the ability of existing agricultural uses to continue

Natural Heritage System Policy Options

Option 1

Option 1 as shown on Map 3 identifies all of the known (mapped) significant natural heritage features in the County. As is obvious from reviewing the map, using these features with the associated buffers as the basis for creating the Natural Heritage System (NHS) means that an extensive portion of the County would be located within the NHS. While many areas in southern Ontario have very little natural cover, Grey County is blessed with a significant amount.

Although Map 3 shows all of the natural features in the County that currently have some level of conservation through provincial, county and/or conservation authority policies and regulations, considering further protection of all of these areas does not appear to be consistent with the County's desire to balance natural heritage protection with the on-going agricultural, recreational/tourism and resource uses within the County, does not focus on conservation of cores and linkages as per the PPS, could exceed the requirements under the PPS for natural heritage protection, and may in fact conflict with the PPS which also seeks to protect prime agricultural areas and mineral aggregate resources. Notwithstanding, it is important to note that regardless of further identification of the NHS and development of NHS policies, the areas shown on Map 3 are known natural heritage features that will receive some level of conservation consideration.

Option 2

Map 4 identifies Core Areas for the NHS that are based on large natural areas that provide interior habitat conditions. The approach focuses on identifying large clusters of habitats and excludes narrow and fragmented natural areas that may not be sustainable. The Core Areas are substantially reduced from Map 3, but take into account the current natural vegetative cover of the County and thereby focus on natural habitat clusters that are far greater in area than in any other municipality in southern Ontario. The Core Areas are therefore more appropriate for creating "no-touch" areas that truly protect the natural heritage features given the relatively high natural cover of the County.

The Linkages are assessed based on the location of the Cores. The high natural cover of the County, in conjunction with conservation policies and regulations currently in place, provides for a diversity of connections. However, it is essential that connections between Core Areas are identified and policies are developed that address them. At the same time, it is important to recognize that given the size of the proposed Core Areas and Linkages, crossings of these areas either currently exist or

may be required in the future. Also given the size of the areas under consideration, the potential broad range of issues and pressures must also be considered.

Draft Policy Approach for the Recommended Option

Based on the two options that are outlined above, it is recommended that Option 2 be utilized whereby the Natural Heritage System is comprised of Core Areas and Linkages. The following Official Plan policy approach is suggested in order to implement Option 2.

Goals and Objectives

- Modify Goal 3 to reflect that a Natural Heritage System approach is being used to provide connections between environmental features.
- Modify Environmental objectives to include restoration of the sensitive environmental features in addition to protection, preservation, conservation, maintenance and enhancement.
- Modify Environmental objectives by adding an objective to maintain the functionality and connectivity of the Natural Heritage System of the County.

Natural Environment Policies

- Add policies to identify that the Natural Heritage System is comprised of a connected and integrated system of natural core areas and linkages which provide connectivity and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. In Grey County there are natural heritage features which are located outside of the Natural Heritage System. A Natural Heritage System has a greater ability to sustain itself compared with an approach which only protects individual features as it facilitates biodiversity and resiliency. As the Natural Heritage System provides a range of habitats, it may include areas which are not significant natural features but which are critical to maintaining connectivity.
- Amend Appendix B of the Official Plan Constraint Mapping to identify all known natural heritage features that have been mapped (Map 3 attached to this letter)
- Add policies that recognize that there are many natural heritage features shown on Appendix B that are required to be conserved by the provincial policy statement, as well as County and Conservation Authority policies/ regulations.
- Identify that the County Cores/Linkages are to be provided extra consideration/ protection/ restoration.
- Provide policies indicating that NHS is focused on the rural areas although the identification of natural heritage features on Map 3 does include natural heritage features within the settlement areas. Protection of the Natural Heritage System within settlement areas will be identified through the local Official Plans. Local municipalities will be encouraged to provide for the extension of Core Areas and Linkages into the settlement areas where significant natural heritage features (particularly significant valleylands) are contiguous with the County Natural Heritage System. .

Core Areas

- Core Areas are to be designated on a new Schedule C in the Official Plan identified as Natural Heritage System which is based on Map 4 attached to this letter and will act as an overlay to Schedule A Land Use Designations.

- Provide a definition of Cores Areas which identifies that they are large, sustainable habitat clusters; the building blocks of Natural Heritage Systems. Core areas are capable of providing and sustaining ecological functions and may be comprised of a mix of ecosystem types.
- Provide policy that requires Core areas to be identified in the local Official Plan. The boundaries of Core Areas may be refined in the local Official Plan based on criteria for identifying the Core Area boundaries at a site specific level and the area of Core can be expanded but cannot be reduced. Gaps within the Core Area would be preferred sites for restoration and inclusion into the Core if current, non-natural uses discontinue.
- Provide policy that development and site alteration are prohibited in Core Areas except for:
 - conservation and flood control projects,
 - forest, fish and wildlife management,
 - essential infrastructure,
 - passive recreation,
 - sustainable forestry,
 - legally existing uses, buildings and structures,
 - development on existing lots of record subject to a scoped EIS, and
 - accessory uses, buildings and structures.
- Minor expansion of legally existing uses, buildings, or structures may be permitted outside of provincially significant wetlands, if an EIS can demonstrate no significant incremental or cumulative impacts on the land forms, features, or ecological function of the Core Area.
- The intent of the Core Area is to protect the very large natural areas in the County while recognizing continued private use and encouraging landowners to continue to protect and manage these lands.
- Cores should have a 120 m adjacent land zone with policies that reflect the PPS definition of adjacent lands. Development proposed within the 120 adjacent land zone will be required to undertake an EIS which will recognize the need to assess the natural features that fall inside the adjacent lands and/or extend beyond the adjacent lands and in some cases, these adjacent land zones would include existing land uses and may cutoff portions of existing natural features.

Linkages

- Linkages are to be shown on a new Schedule C in the Official Plan identified as Natural Heritage System which is based on Map 4 attached to this letter will act as an overlay to Schedule A Land Use Designations.
- The establishment of Linkages are based on several factors including:
 - Shortest distance between Core Areas
 - Area of greatest natural cover (terrestrial and/or aquatic; areas of deep interior habitat considered)
- Provide a definition of Linkages that they are components of Natural Heritage Systems and are designed to provide movement corridors for both plants and animals between Core Areas to provide and protect biodiversity and the long-term viability of ecological systems. Linkages are ecologically functional, with a width of at least 200 m in Grey County. Linkages are delineated within the NHS as the closest distance between Cores, while providing the most habitat (i.e. natural heritage features).
- The boundaries of Linkages can be refined in the local Official Plan but must meet the definition/ criteria.

- Provide policy that development and site alteration are prohibited in Linkages except for:
 - conservation and flood control projects,
 - forest, fish and wildlife management,
 - essential infrastructure,
 - passive recreation,
 - sustainable forestry,
 - agricultural uses including new buildings and structures,
 - legally existing uses, buildings and structures,
 - development on existing lots of record subject to a scoped EIS, and
 - accessory uses, buildings and structures.
- Expansion of legally existing uses, buildings, or structures may be permitted outside of provincially significant wetlands, if an EIS can demonstrate no significant incremental or cumulative impacts on the land forms, features, or ecological function of the Linkage area.
- Development proposed within the Linkage will be required to undertake an EIS.
- The intent of Linkages is to provide for connectivity within the NHS while recognizing continued private use and encouraging landowners to continue to protect and manage these lands.
- Crossing of Linkages (e.g. for roads, utilities) should be minimized and context sensitive design as well as eco-passages need to be considered.

Natural Heritage Features

- Existing Hazard Land designations are to remain on Schedule A Land Use
- Provincially Significant Wetland designations are to remain on Schedule A Land Use. Some Provincially Significant Wetlands may also be a component of the Core Areas on Schedule C.
- Modify the existing Natural Function policies to be called Natural Heritage Features.
- Modify Natural Function policy (1) to indicate there is insufficient information available and the scale of the study too broad, to definitively establish the boundaries of the natural heritage features as shown on Appendix B. Therefore, the policies of the Plan require that where development is proposed within (except for Provincially Significant Wetlands) or adjacent to a natural heritage feature, the ultimate boundary will be determined through more detailed studies based on a range of criteria including the provision of appropriate buffers. For a site specific application, the boundary will be determined through submission of an Environmental Impact Study (EIS) where the site is located within 120 metres of any part of the natural heritage feature.
- Provide policy that indicates the local municipality may also carry out a more detailed municipal wide or area specific natural heritage study and refine the boundaries of the natural heritage features. Local mapping may be more restrictive but not less so.
- Buffer widths are recommended as 30 m from all natural heritage features that are within the NHS unless an EIS identifies a larger buffer is required.
- New single detached dwelling should be permitted on an existing lot of record in the Core Area, except where already prohibited by the PPS and/or zoning (e.g. a lot entirely within a Provincially Significant Wetland) subject to an EIS to determine the most appropriate location for the dwelling.

Implementation

- It is recommended that the zoning for lands within the Core Areas be an NHS Core zone with a Holding provision. That would allow for the permitted uses listed above including existing

- uses and would permit a single detached dwelling on an existing lot of record. The Holding provision would be lifted when an EIS has been undertaken to the satisfaction of the municipality in consultation with the relevant Conservation Authority.
- If conditional zoning becomes available, it is recommended that conditional zoning be utilized instead of a Holding provision. The challenge with using a Holding provision is that once the Hold is lifted, it does not require an EIS to be undertaken prior to subsequent development occurring on that site. The conditional zoning could require an EIS to be carried out prior to any development being allowed to proceed.

We look forward to your input and feedback on the proposed approach. Thank you

Yours truly,

Macaulay Shiomi Howson Ltd



Lorelei Jones, MCIP, RPP
Principal