



COUNTY OF SIMCOE
MUNICIPAL COMPREHENSIVE REVIEW

MEMORANDUM

FROM: County of Simcoe Planning Department
TO: MCR Project Circulation List
DATE: February 8, 2022
SUBJECT: Municipal Comprehensive Review Supplemental information pertaining to the Provincial Natural Heritage System Mapping Refinement and Implementation

This Memorandum has been prepared to provide a general response to the comments and questions received on the first draft of the Provincial Natural Heritage System Refinement mapping, which was posted to the County's MCR webpage on October 27, 2021 for review and comment.

The Provincial Natural Heritage System (NHS) mapping refinement is a technical exercise to be completed as part of the Municipal Comprehensive Review (MCR), in accordance with a provincially prescribed methodology, "[The Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe, Technical Report on Criteria, Rationale and Methods](#)". The NHS has been mapped by the Province to support a comprehensive, integrated, and long-term approach to planning for the protection of the region's natural heritage and biodiversity. The NHS does not apply to lands within settlement area boundaries. Therefore, the implementation of the NHS mapping will have no direct impact on the municipalities of Collingwood, Wasaga Beach, Midland, and Penetanguishene.

The NHS mapping will be incorporated by the County as an overlay in its updated Official Plan. This overlay is not a land use designation, but rather an additional layer of policy, which serves to protect natural heritage systems. The Official Plan will also include appropriate policies to maintain, restore, or enhance the diversity and connectivity of the NHS and the long-term ecological or hydrologic functions of the features and areas. The NHS overlay does not replace or impact any of the current County and local municipal natural heritage system land use designations that already exist in Official Plans.

The County Official Plan Greenlands land use designation is not being assessed through the MCR exercise and will remain as is. Local municipal natural heritage systems will also not be affected by the MCR. Local municipalities will continue to map natural heritage lands within settlement areas in their own Official Plans, as they always have.

In addition, natural features and areas remain subject to natural heritage policies of the Provincial Policy Statement, Lake Simcoe Protection Plan, Greenbelt Plan, Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan, municipal official plans, and Conservation Authority policies and

regulations. The policies of the Growth Plan also restrict development in key hydrologic features, outside of settlement areas.

The Province developed their mapping of the Growth Plan NHS by connecting (via “linkages”) large “core areas” consisting primarily of “natural features”. The identification of core areas did not account for the ecological significance or a designation of the natural features. Furthermore, core areas are not entirely comprised of natural cover, but include undeveloped land (i.e. rural / farm land) that is considered a permeable component of the rural landscape. The County’s Consultants’ review has followed the guiding principles developed by the Province to create the Growth Plan NHS and the criteria and approach for refinements to the NHS. While the focus on mapping revisions consisted of reviewing the natural features underlying the Growth Plan NHS, the mapping of High Quality Natural Cover in the Lake Simcoe Watershed was reviewed, and it was determined that this mapping would not add any additional “natural features” to the Growth Plan NHS.

The proposed refinements are intended to clean up the mapping where there are discrepancies related to projection errors, built areas, settlement areas, and to ensure the NHS remains a connected system of core areas and linkages as defined by the Growth Plan NHS Technical Report.

Definitive Approach to the NHS Refinement:

The County’s Consultants are currently working on an updated report, which will take into consideration public comments received to date.

In the current draft mapping of the proposed refinements, the Consultants are recommending removals or additions to the Provincial NHS based on guidance that the Growth Plan offers in the Growth Plan NHS Technical Report. This guidance and the approach being undertaken to recommend revisions to the Growth Plan NHS has been verified with the Province. As such, any refinements to the Provincial NHS are based on the following criteria:

1. Minor, technical adjustments;
2. Addition of natural features continuous with the boundary of the provincially mapped NHS;
3. Removal of small portions of the Provincial NHS where there is built-up development or infrastructure;
4. Removal of small, isolated portions of the NHS that protrude from the Greenbelt Plan boundary or settlement areas provided these areas have no natural features and are not connected to the larger Provincial NHS.

Refinements to the Provincial NHS may also occur if linkages to core areas are no longer connecting core areas or natural features.

In addition to the above criteria, the County is proposing to remove rural registered plans of subdivision (M-Plans), located outside of settlement areas, from the Provincial NHS. In reviewing the methodology and final product of the Province’s NHS mapping, it was evident that the Province removed many built-up areas within core areas as well as excluded built-up areas on the perimeter of the Growth Plan NHS. When comparing the available mapping of these rural registered plans of subdivisions with the Province’s NHS mapping, some of these registered plans of subdivisions were removed in areas throughout the County, however, this was completed inconsistently.

The County has taken the position to remove registered plans of subdivisions (M-Plans) outside of settlement areas from the Provincial NHS, throughout the County. The County is able to undertake this exercise with the plans of subdivision at a level of accuracy that would not be practical by the Province. Instead, the Province is relying on the County to refine the mapping as part of the implementation of this provincial level system through the MCR. The County ultimately must present all refinements to the Province for consideration since they will make the decision as the approval authority.

Subdivision Plans, also known as 'M-Plans' or 'Registered Plans' are a form of orderly division of larger pieces of land into lots, blocks and roads. These M-Plans encompass development permissions based on the plan of subdivision approval requirements of the Planning Act dating back to the 1970's. This, combined with the natural heritage policies contained within the policy statements and provincial plans issued under the Planning Act, has resulted in a more structured subdivision approval process, in which the natural features within these registered plans of subdivision remain protected at the regional level (County Greenlands designation) and at the local level through Environmental Protection designations and zoning.

The County's approach to the Provincial NHS refinement mapping where linkages and features are bisected by a Settlement Area or Road are as follows:

- Where Natural Feature linkages are bisected by a Settlement Area, if there are natural features within the Settlement Area that maintain a functional linkage and where the linkage could be modified to go around the Settlement Area, these linkages are maintained within the Provincial NHS.
- Where Natural Features are bisected by a Road and within 30 m of the Growth Plan NHS, they are being added to the Growth Plan NHS if they; contain a watercourse or wetland, are identified as part of the County's Greenland System, and/or are woodlands greater than 15 ha in size.

As clarification, approximately 7,000 small (<1 ha) patches abutting the Growth Plan NHS are not being added to the Growth Plan NHS. As part of the review exercise, a natural feature cover dataset was created to compare this dataset with the Provincial NHS. Upon a review of a small sample of these areas it was determined that many were a result of minor distortions in mapping, and many did not contain natural features. In addition, there are municipal policies protecting these natural heritage features. Therefore, it was decided to not add these areas into the Provincial NHS.

The existence of the Provincial NHS adjacent to a Settlement Area that has been identified for expansion will not prevent the expansion from occurring, however, expansions into the NHS should be avoided where possible.

Government roles in any planning process is to find proper balance between addressing sustainable growth and community needs, while also protecting the environment. Given the County's strong commitment to the environment, preserving natural heritage features and functions remains a key piece of our Planning Vision throughout the collaborative MCR process.