Official Plan Changes - 2021 - Provincially Significant Wetlands

- 1. Communications have already been provided expressing concern with the deletion of mapped areas, particularly shown on the existing Schedule "C" of your Official Plan, in relation to Provincially Significant Wetlands. The 1981 Official Plan has clearly delineated specific Provincially Significant Wetlands on Schedule "C", and the foregoing include the following:
 - a) Airport Wetland Complex in the southern boundary of the City;
 - b) Harper Road Provincially Significant Wetland, which has been the subject of recent evaluation;
 - c) Downer's Corners Wetland which is generally to the west of Television Road.
- 2. Throughout the years, various projects and proposed developments have led to the recognition, identification, and delineation of further Provincially Significant Wetlands. The following is just a brief characterization of such wetlands:
 - a) Harper Road has been recently evaluated, and the boundaries delineated as it would relate the Provincially Significant Wetland classification for this area;
 - b) Loggerhead Marsh;
 - c) The Trent University area, at least in part, in reference to their wetland complex.

The proposed Official Plan Amendment seeks to delete the specific delineation of such Provincially Significant Wetlands. In essence, the City is not showing the PSWs in an appropriate fashion, which is a subset of the natural areas situate within the Municipality.

This approach is contrary to long established Provincial Policy. Provincially Significant Wetlands have a clear meaning and criteria associated with the foregoing pursuant to the Province's Policy. The criteria associated with what would qualify as Provincially Significant is an important component of the assessment process in the identification and classification of Provincially Significant Wetlands.

The Provincial Policy also outlines the degree of protection that is identified for this Provincially Significant feature. No development nor site disturbance is allowed within a Provincially Significant Wetland. This is different than other areas which have different features constituting a Natural Area. The degree of protection, afforded to those features, can vary depending upon the subject circumstances and evaluation. However, for Provincially Significant Wetlands the degree of protection is clearly delineated in Provincial Policy.

Furthermore, the definition and criteria of adjacent lands in relation to a Provincially Significant Wetland is also well established and recognized in terms of Provincial Policy. The starting point in delineating the subject adjacent lands starts with an identified boundary of a Provincially Significant Wetland.

Various approaches, methodology, and criteria have evolved in reference to the prescription of the boundary and area associated with such Provincially Significant Wetlands.

Not all wetlands are Provincially Significant, and one cannot arbitrarily attribute that all wetlands are a Provincially Significant Wetland pursuant to applicable policy. It would be arbitrary, and completely improper, to diminish the status of Provincially Significant Wetlands, and also elevate the status of other wetlands to a Provincially Significant Wetland, when the foregoing cannot fulfill compliance with Provincial criteria.

The policy context is consequently clear. The City is proceeding improperly within the context of not mapping the Provincially Significant Wetlands located within the Municipality. The City is deviating substantially from the prescribed Provincial Policy, Planning regime, and the policy context proposed in the new Official Plan is inappropriate.

<u>Recommendation</u>: The Provincially Significant Wetlands as identified throughout the last four decades, be appropriately mapped, delineated, and shown as a Provincially Significant Wetland within the context of the Natural Areas of the City. This should be recognized as a subset to the Natural Areas Classification.

