

Comment & Response Matrix – Council, Planning Board Members and Staff Comments

#	COMMENT FROM	COMMENT	RESPONSE
1	Clerks Meeting	Subdivisions and Condominiums - Section 4.12.1 Planning Board does not have authority for plans of subdivision and condominiums. As per <i>O. Reg. 501/98</i> , Planning Board has authority only under Section 50 and 53 of the <i>Planning Act, 1990</i> .	Completed. Will update Section 4.12.1 to remove reference to role of Planning Board in plans of subdivision/condo.
2	Clerks Meeting	Definitions - Section 5.1 A more comprehensive definitions section has been requested by the Clerks. Examples brought up during Clerks meeting included potential questions from the public such as ‘what is the difference between mobile and modular?’ (p. 19); and what is the difference between rural commercial and rural residential?’, could be clarified for the public if OP has specific definitions contained within. Other examples brought up include what constitutes a Recreational Vehicle?	Official Plans do not commonly contain a list of definitions. Additional scope would be needed to develop a list of definitions with the Planning Board. Please advise if this is something you wish to pursue.
3	Clerks Meeting	Recreational Vehicles - Section 4.11 As noted above, definitions requested include <i>Recreational Vehicle(s)</i> . General theme from Clerks was that RV section appears too overreaching and the more detailed items could be contained within each municipalities respective Zoning By-laws. Comment that RV’s policy not PPS requirements but local policy. The General consensus from Clerks to make this section simpler and not too detailed. Recreational Vehicle section potentially problematic in the Joint OP given that each municipality has differing goals and objectives.	Policy was carried over from the Johnson Township Official Plan. Section can be removed. Currently revised to state that the local Townships may regulate RV’s in accordance with the Zoning By-law or a licensing by-law under the Municipal Act. Recommend keeping the policies restricting RV’s on lakes at capacity.
4	Clerks Meeting	Mobile and Modular Homes in Rural Designation - Section 2.3.2.2 Consensus to remove reference of Mobile and Modular references in Section 2.3.2.2 and leave the detail to the each respective municipalities zoning by-law(s) as considered to be overreaching. Comments from Johnson Twp request that they do not want mobile homes in the rural designation as per Section 2.3.2.2.	Completed
5	Clerks Meeting	Creation of New Rural Residential Lots - 2.3.2.6 (1) & (2) Rural lot creation requires the original lot to have an area of at least 5 hectares. Questions were asked as to why 5 hectares? Comments detailed that not many lots are at least 5 hectares and that this will severely limit lot creation on existing properties that do not have 5 hectares. A request that the 5 hectares reference be removed from OP. Recommended by Clerks to permit consent if the severed and retained lots meet the minimum lot size as per the zoning by-laws. Rural lot creation under section 2.3.2.6 (2) requires minimum year round road frontage of 60 m and at least 1 hectare. General consensus to remove the references of 60m and 1 hectare and leave to the detail to Zoning by-laws.	Completed the removal of the reference to 5 hectares in (1). The Province requires a minimum lot area of 1 hectare for new lots on private services unless a hydrogeological study demonstrates that a smaller lot area is possible. Have added to (2) to refer to a hydrogeological study allowing a smaller lot size.
6	Clerks Meeting	Consents - 4.12.2 (1) <i>...on a lot that existed prior to the date of July 8, 1986 and it does not necessitate the creation of a new municipal road, or the extension of municipal services. In the Shoreline designation no more than 3 new lots are permitted to created by consent (3 severed and 1 retained).</i> Each municipalities current OP’s state different dates for existing lots. For Echo Bay, this would constitute a backward step in terms of the date of the existing lot (for all land use designations except Rural). Consensus from Clerks that the date be changed from July 8, 1986, the date the Desbarats to Echo Bay Planning Board received authority under <i>O.Reg. 501/98 (September 15th, 1998)</i> .	Completed

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7	Clerks Meeting	Original Lots of Record - 2.3.2.8(5) <i>For the purpose of this policy, an original lot of record is described as a quarter section having a lot area of 64.75 hectares (160 acres).</i> The size of the original lots of records varies within the Planning Board region with some municipalities having both 80 acre and 160 acre existing lots of record. General consensus is to either remove the 160 acre reference or if not taken out, add in 80 acres as well.	Completed
8	Clerks Meeting	Private Services - Potable water - 4.10.5(2) <i>Where development is proposed outside fully serviced areas, the proponent must prove that the soil conditions of the proposed site are suitable for a waste sewage disposal system and that there is a proven source of potable water available.</i> Is this an absolute requirement under Provincial legislation? The general consensus from Clerks that the proponents costs borne from this requirement will greatly hinder development potential. Noted from Clerks that the proof of potable water condition be removed altogether or amend to a case by case basis (based on the dynamics of each consent proposal).	Section 3.6.7 of the PPS states that lot creation is permitted where there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity, which includes treatment capacity for hauled sewage. PPS permits lot creation only where site conditions are suitable for the provision of appropriate sewage and water services, which includes individual on-site sewage and water services. No changes are recommended to this section.
9	Clerks Meeting	Additional Residential Units - 4.1 Additional Residential Units has 12 sections of policy for ARU's based on land use designation, settlement areas, etc., . Concerns from Clerks that the clarity of language and wording could be amended to improve interpretation from members of the public. Understood the recommendation from Clerks is to utilize basic PPS/mandatory requirements for ARU's but still provide flexibility for municipalities to determine whether ARU's will be permitted outside settlement areas.	There are mandatory requirements for ARU's in settlement areas and in the Agricultural designation which should be maintained in order to be consistent with Section 4.3.2 of the PPS. Completed some changes for local flexibility in application.
10	Clerks Meeting	Fish Habitat - 3.8.2.2 A comment from a Clerk regarding the requirement that a proponent shall correspond with Department of Fisheries (DFO) if development is proposed on lands nearby to water prompted a discussion regarding concerns including timelines awaiting approval from DFO, inhibiting development and being perceived as excessive. After discussion, one of the key questions raised was is this a requirement under the PPS/provincial legislation? Secretary-Treasurer question: is it a federal requirement? <i>Secretary-Treasurer reviewed current OP's in place: MMAA OP requires DFO approval within 30m of fish habitat and spawning areas (shoreline)(2.7.3.2.c), Tarbutt OP requires MNR and DFO approval within shoreline areas and EIS, Johnson OP Development and site alteration may be permitted in and adjacent to (adjacent lands) fish habitat on water bodies and their associated tributaries provided it has been demonstrated through the preparation of an Impact Assessment.</i>	The reference relates to the requirement for development impacting fish habitat to be approved by DFO. However, the specific reference can be removed. We recommend the following replacement policy: "Development and site alteration shall not be permitted within 30 metres of fish habitat, except in accordance with relevant provincial and federal requirements. Development that proposes a decrease to the 30 metre setback shall only take place where it has been demonstrated, through a fish habitat assessment, that a net environmental gain of the productive capacity of the area will be achieved. In this assessment, a fish habitat biologist shall be required to provide a detailed impact analysis exploring development design and location options for the purpose of clearly demonstrating avoidance of any predicted harmful impacts."
11	Clerks Meeting	Resource-Based and Resource-Related Uses - 2.3.2.5 <i>Clear cutting shall be prohibited within 500 metres of the shoreline of Lake George or Lake Huron, unless carried out in accordance with sound forest management practices, and maintain appropriate vegetation buffers; and,</i> Noted that there appears to be no enforcement mechanism in place. Concerns that is too prescriptive, hard to enforce if no tools available. Current Tree canopy by-laws has no teeth and currently landowners require no permit for tree removal.	Agreed. Requirement has been removed.

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12	Clerks Meeting	Open Spaces - 2.7.4 Several identified open spaces are not mentioned in section 2.7.4. Noted in meeting that Clerks will provide open spaces in each Township and share with Secretary-Treasurer. Also noted that open spaces are missing from Land use schedule. Secretary-Treasurer to submit list to JLR separately and identify open spaces on the land use schedule.	Planning Board staff to provide updated land use schedules with additional open spaces included.
13	Clerks Meeting	References to Urban Preference is to remove all references to <i>Urban</i> in OP as there are no identifiable urban areas within Planning Board region.	Echo Bay and Desbarats are both considered urban settlement areas. Not appropriate to remove all references to urban. Removed most references.
14	Clerks Meeting	Garbage Collection – 4.12.2.3(a & f) Currently no garbage collection in Planning Board area. From Clerks meeting, it is understood that there are no plans for any municipal garbage collection forecast in any municipalities. Recommended that the reference to garbage collection be removed.	Completed
15		Waste Disposal Areas – 3.9 Environmental Compliance Agreements are modified/amended are subject to change from time to time. Section 3.9 provides comprehensive information on each landfill. Questions were asked as to whether the capacity of landfills is relevant to be contained within the Official Plan. Clerks shared concerns that if waste disposal areas have their ECA's amended it may require an OPA amendment. Recommended that minimum detail for waste disposal areas be contained within OP. Waste areas not identified on Land use schedule. Secretary-Treasurer to add to draft land use schedule A1.	Recommend adding a reference that no OPA required should ECAs be updated. The PPS requires development to demonstrate adequate capacity for waste disposal so it is recommended that the references to capacity be kept.
16	Clerks Meeting	Mixed Use - partial services (4.10.3.(1)) <i>In the Township of Johnson and Macdonald, Meredith and Aberdeen Additional, it shall be required, where feasible, that all new development or redevelopment within the settlement areas to be connected to the municipal water and sanitary sewer system. With the exception of minor infilling or rounding out of existing development on partial services located in the Mixed-Use designation provided site conditions are suitable.</i> Mixed use area is specific to Echo Bay. Echo Bay Clerk recommends that the removal of partial services reference within the mixed-use area. Understood that there are no current partial services in mixed-use area.	Please confirm how development in the Echo Bay Mixed Use designation is serviced.
17	Clerks Meeting	EIA Appendix A (separate document shared – not contained within Draft Joint OP) Questions about the EIA appendix included: What is this for? is this supposed to be contained within the OP? Noted along with many other housekeeping issues that the hyperlinks do not work correctly.	Removed references to EIA appendix.
18	Clerks Meeting	Imperial Measurement requested With the public in mind, it was requested that imperial measurements be added in addition to metric measurements, keeping in mind the request to have less prescriptive numbers (frontage, lot size, etc.,) contained within the OP.	Agreed. Will add imperial measurements in addition to metric.
19	Clerks Meeting	Rural and Commercial and Industrial uses – floor area <300m2 - 2.3.2.4 (2) <i>the floor area of the use does not exceed 300 m2 and is compatible with surrounding uses;</i> Noted that under current OP's floor area for commercial and industrial structures are as follows: Echo Bay 2.6.2 (e)i – accessory buildings associated with the light industry shall not exceed 465 m2; Tarbutt and Johnson OP's have no maximum size. All Clerks agreed that the maximum size for industrial uses set at 300 m2 is too low. Questions as to why it is set to 300m2.	We removed the reference and left it up to zoning by-law to regulate.

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20	Clerks Meeting	General Housekeeping Items Many comments were made regarding the general housekeeping of the draft joint OP as presented and its associated documents. These include (but are not limited to): many hyperlinks not directing to correct sections of OP, many sections of OP referenced elsewhere are not contained within the OP; incorrect referencing of Planning Board (rather than municipalities for development, etc.) Questions were asked about whether the Planning Board (and ultimately municipalities) will be charged for remedying basic housekeeping items found that should have been identified and amended prior to the Planning Board receiving the draft OP. Many examples brought up during the Clerks meeting and within notes have been shared already with JLR. The key theme being that the document needs a great deal of revision to identify and remedy basic housekeeping issues and that the costs incurred to address these be borne from JLR. With this said, any future comments in follow up to any revisions of the OP by JLR, may bring up additional items within the OP.	
21	Clerks Comments	1. Governance & Jurisdictional Authority (CRITICAL) Planning Board Authority Misstated Throughout The Draft OP repeatedly assigns authority to the Planning Board that it does not have. Correct authority framework: • Planning Board → consents (severances) only • Province (MMAH) → plans of subdivision & condominium • Council / delegated staff → zoning, site plan, development approvals Concerns: • Multiple sections imply the Planning Board: ◦ approves development, ◦ approves plans of subdivision/condominium, ◦ must be “satisfied” with land use compatibility beyond consents. • This creates: ◦ ultra vires risk, ◦ public confusion about who decides development, ◦ legal and procedural vulnerability. Key sections affected (non-exhaustive): • 3.2 (Brownfields & Contaminated Lands) • 3.4 (Land Use Compatibility) • 3.8.2 (Natural Heritage policies) • 2.5.3 (Shoreline Development) • 4.12.1 (Plans of Subdivision & Condominium) • 4.12.4 (Parkland Dedication)	The Official Plan has been revised throughout to include correct references to the roles and responsibilities that each level of government plays in the land use planning framework.

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22	Clerks Comments	2. Zoning-By-Law Detail Included in the Official Plan The Draft OP contains prescriptive, site-specific regulations that should be addressed through municipal zoning by-laws, not a joint OP. Examples include: • Section 4.11 – Recreational Vehicles (entire section) • Mobile/modular homes as single detached dwellings (2.3.2.2) • Floor area limits (2.3.2.4, 2.4.4.2, others) • Guest cabins (2.5.3) • Trailers, temporary uses, building form permissions Concern: • Removes Council flexibility • Forces OP amendments for future zoning changes • Not required by the PPS - at least with that amount of prescriptive detail • Particularly problematic in a joint OP where we all have different goals & objectives (therefore should be addressed through Zoning).	The Official Plan has been revised to reduce its prescriptiveness and instead provide direction to the implementing Zoning Bylaw.
23	Clerks Comments	3. Rural Development Policies – Overly Restrictive Key Issues • 5-hectare minimum severance requirement (2.3.2.6): ◦ This is just simply far too large (I'd be interested to see how many properties in my municipality that are even this big that aren't designated AG. ◦ Eliminates many reasonable rural infill opportunities ◦ Inconsistent with existing lot patterns and servicing • Increased road frontage (60 m vs 50 m) (2.3.2.6 #2): ◦ No justification provided – why does it need to be bigger? Our current size for frontage seems to work just fine. • Confusion between rural severances and “new infilling lots”: ◦ Cross-references appear incorrect or contradictory • Original Lot of Record (2.3.2.8): ◦ Unclear how this is determined ◦ Difficult for municipalities to verify – 160 acres vs. 80 acres. All of our original were 80 acres here.	The Official Plan has been revised to exclude minimum lot area requirements specific to backlot creation, with direction for the implementing zoning by-law to prescribe larger lot area/frontage requirements. References to minimum frontage for lot creation have been removed from the Official Plan. Cross references have been updated regarding rural residential lot creation and new infilling lots. The Official Plan specifies that original Township lots of record are laid out in the original survey. Policy has been revised to indicate that some original Township lots may have 80 acres.

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24	Clerks Comments	4. Shoreline Development Policies – High Impact & Unworkable Major Concerns • 30 m no-development zone (2.5.3 #3): ◦ Would render most waterfront lots legal non-conforming ◦ Severely limits reasonable redevelopment – garages, sheds, bunkies, saunas, etc. • No clear distinction between: ◦ new shoreline development, and ◦ redevelopment of existing legal lots • Guest cabins not clearly distinguished from ARUs or dwellings – not defined at all. Broad consultation triggers (e.g., DFO) applied to “adjacent lands” – I highly doubt we will be getting feedback and/or approval from the DFO for development – again, what about smaller items like garages, sheds, bunkies,etc. – if they fit within the zoning (% of lot coverage), can meet the setbacks, and have sufficient approvals from APH if anything is septic related then why do we need DFO weigh-in?	Policy regarding the 30m “no development” buffer is best practice based on provincial guidance for protecting water quality in shoreline areas. This applies to new development and site alteration moving forward. See subsection d) which speaks to reconstruction, replacement, and minor additions to existing lawful buildings within the vegetative buffer. A definition has been added to clarify the distinction between guest cabins and ARUs. The PPS requires that development/site alteration in fish habitat is subject to provincial and federal requirements. Policy regarding development on adjacent lands has been revised to note that development may be subject to the requirements of the local Townships, Province, and DFO.
25	Clerks Comments	5. Environmental Policies – Overreach & Implementation Issues Concerns Identified • 120 m adjacency buffers (3.8.1, 3.8.2): ◦ Effectively apply everywhere in rural areas • Forestry / clear-cutting policies (2.3.2.5): ◦ No distinction between commercial forestry and private landowners ◦ No enforcement mechanism – municipalities have their own tree canopy by-laws. If this needs to be mentioned in the OP perhaps just the minimum? My worry is about being too prescriptive on items that we can’t enforce, and are therefore being neglectful in. As of right now we do not require someone to have a permit or get permission to clear their land if they wish. • Lake Management Plans (2.5.5): ◦ Funding assumed ◦ No clarity if funding is unavailable – again, my worry here is about committing ourselves to something, but only if funding is available? Available to who? Each municipality? The Board? The applicants? • ANSI policies: ◦ Unclear who determines ANSI designation ◦ Confusion between life science vs earth science ANSIs ◦ If it’s not clear where these are in existence, its difficult to know if they will be negatively affected by consent, development, etc.	The width of adjacent lands to protected natural heritage features/areas is based on provincial guidance in the <i>Natural Heritage Reference Manual</i> and is standard practice across Ontario. Development in adjacent lands may be permitted subject to the completion of an EIS and implementation of any recommended mitigation measures which demonstrate that development can occur without negatively impacting the feature or its ecological function. Reference to clearcutting has been removed in the resource-based/resource-related use policies. Language has been softened in the policy regarding lake management plans to instead encourage their preparation, but not require it if funding cannot be obtained. This would likely be a joint effort between local Townships, the planning board, and interested stakeholders, lead by the planning board with funding from the province. The location of ANSIs is based on available data from the MNR / MECP. The distinction between life science and earth science ANSIs impacts upon the buffers / width of adjacent lands where an EIS could be triggered. Where ANSIs are located, these will be mapped and included on a schedule with other natural heritage features/areas to be protected by the plan’s policy framework. Additional ANSIs may be identified by an EIS studying other features and mapping can be updated on an as-needed basis where such features are identified during the development process.

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26	Clerks Comments	Mixed Use – Clarification Still Required (Mapping Concern Removed) Mixed Use reference to partial services – all properties in this area either have full services or no services, there are no partial. The only area that has partial services is in the Defazio subdivision where some parts of Hurley and Margaret have water services only and not sewer.	
27	Clerks Comments	7. Schedule & Mapping Inconsistencies (Systemic) Schedule A - Open Space designation referenced but not shown - Waste disposal areas referenced but not shown - Attenuation area not identified (future expansion concern) Schedule B - Waterfowl staging areas referenced but not shown in legend Schedule D - Mine hazards referenced but not shown - Mineral aggregate resource areas referenced but not shown Concern: Policies rely on schedules that do not depict the referenced features.	
28	Clerks Comments	8. Cross-Reference & Section Errors (Widespread) Non-existent or incorrect sections referenced 1.5.1 (does not exist) 3.6.1 (should be 3.6.2) 3.6.8 (does not exist) 4.1.5 (does not exist) 5.5.1 (does not exist) Confirmed reference breakdowns - Section 3.8.2 #1 → refers to 3.6.8 (non-existent) - Section 3.8.2.5 (EIS requirements) → refers to “Appendix 1” (should be Appendix A) - Section 5.5 → circular and broken references between 5.5, 5.5.1, and 5.5.2 Critical finding: These errors became apparent when the document was used as intended, by following references.	These cross references have been updated throughout the plan.

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29	Clerks Comments	9. Terminology, Accuracy & Applicability Issues “Urban development” terminology used where no urban areas exist “Old Highway 17” should be Highway 17B - Township name inconsistently spelled (“MacDonald” vs Macdonald) - Island Development policies included without stating which municipalities they apply to. I think they are referencing a specific issue and/or problem in a municipality that I am not aware of? For the user of the document it should be clear what this specifically refers. - Garbage collection referenced where no municipal service exists	Terminology has been updated throughout the plan as per your suggestions. The preamble to the “Island Development” section clarifies where islands are present throughout the planning area.
30	Clerks Comments	10. Provincial vs Local Policy Translation - Council understands that there is a lot of PPS direction that we will ultimately have no say over. - PPS does not require: - zoning-level regulation in an OP, - misstatement of local authority, - unworkable implementation mechanisms Concern: Provincial policy intent has been poorly translated into a locally implementable document.	Noted. See above responses where these issues have been addressed.
31	Clerks Comments	Overall Conclusion - The issues identified are systemic, not isolated. - Concerns relate to: - authority, - technical accuracy, - implementability, - public clarity. - The Draft OP is not technically ready for adoption and requires a comprehensive revision and quality-control review. - A thorough proof-read and correction of Section References need to be addressed so this document can be read in entirety. - Anything zoning specific we would like to keep out of the OP and address through zoning.	Noted. See above responses where these issues have been addressed.

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32	Mayor of Laird Township	As Mayor of Laird Township, I provide my response to the Draft Official Plan for the Desbarats to Echo Bay Planning Area document prepared by JL Richards. I believe Laird Township should reject this current iteration of the Official Plan draft in its entirety. It seems to have entirely missed the mark and is simply a repackaging of the previous plan. This document unfortunately duplicates many of the same problematic issues that caused us enough concern previously to remove the original planner, JLR were tasked with providing us with a proper official plan that was to be more appropriate and applicable to the needs of our Township(s) and this document has not achieved this goal.	
		Growth and development The current draft plan requires that Laird Township approve a plan that includes the statement that “<i>the goal of this plan is to direct the majority of growth and development in the planning area to the Echo Bay and Desbarats settlement areas</i>”. Laird Township should categorically reject any Official Plan which suggests that <u>all</u> growth and development should be focussed in areas which are outside of Laird Township. While we wish our neighbours much goodwill in attracting growth and development, we will certainly not subscribe to a document which restricts our ability to do the same. There have been some discussions with the previous planner that Laird did not have any “settlement areas”. For clarity, I have attached the provincial planning definition of a settlement area. - An “<i>area of settlement</i>” means an area of land designated in an official plan for urban uses including urban areas, urban policy areas, towns, <u>villages, hamlets, rural clusters, rural settlement areas, urban systems, rural service centres or future urban use areas, or as otherwise prescribed by regulation</u>” (Ontario Planning Act R.S.O. 1990, Chapter P.13) Clearly Laird Township has areas that satisfy the criteria above. The same applies to the “Village” and “Mixed-use” descriptions, Laird will require that the Village of Bar River, the end of Bar River Road (Hwy 17 E) and Laird Hill be included in these descriptions with-in the document. These areas have community centres and previously have had, gas stations, stores and other commercial enterprises. For growth and development, these areas make sense for Laird Township to select as part of our growth plan. Also, the PPS encourages redevelopment of brownfield sites (see Ontario PPS 2024 2.5.1-b) which is also applicable for all three of these areas. The PPS requires that we provide “<i>opportunities for a diversified economic base, maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses.</i>” Again, these are the areas that make sense for non-Ag development. The PPS references Strategic Growth Areas which may also be applicable to Bar River and Laird Hill, but I see no reference in the draft plan to any Strategic Growth Areas. This should be clarified. In summary of the above, Laird needs to be absolutely certain that the Official Plan we approve has not limited the possibility of <u>any</u> development outside of the prime ag. areas. We need to be assured that Laird has not been written out of these opportunities by way of this document.	The policy encourages that the majority of growth and development will be directed to the Echo Bay and Desbarats settlement areas, but does not restrict development and growth in other parts of the planning area. A proposal for additional scope has been prepared to consider identifying a new settlement area in Laird Township based on the relevant PPS criteria. See Section 3.2 for policies regarding brownfield sites, which apply throughout the planning area. The PPS defines strategic growth areas to include nodes, corridors, and other areas <u>within settlement areas</u> that have been identified by municipalities to be the focus for accommodating intensification and higher density mixed uses in a more compact built form. In our professional opinion, there are no areas within Laird Township that appropriately fit this definition and therefore no strategic growth areas have been identified.

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		Lot Sizes The draft plan includes many references to lots sizes which are conflicting and inaccurate. The suggested lot sizes in the Draft Plan also vary significantly from the calculations in the <i>JLR Draft Policy Direction Report</i> which uses an average lot size based on the Zoning By-laws, which have minimum frontages of 45m and are .2 hectares. A question for JLR would be whether the number of lots available for severance has been based on the By-law average size or the lot sizes in the draft plan? (as the draft plan lot sizes are significantly larger) Also does the JLR calculation for potential lots include the potential for infill lots? While the above lot size data is relevant for the future lot support calculations, I believe that all specific references to minimum lot sizes, severed lot sizes, retained lot sizes and frontage requirements should be removed from the official plan, and should be characterized in our individual zoning by-law(s) as indicted by the <i>Ontario Municipal Councillors Guide – 11. Land Use Planning</i> . (attached)	Provincial guidelines for lot creation on private water/sewage services require a minimum lot area of 1 hectare, unless a hydrogeological study can demonstrate that a lesser lot area is appropriate. This is the basis for this policy in the Official Plan. In our experience, the Province has consistently required a minimum lot size of 1 hectare be identified in Official Plans across Ontario, in order to be consistent with Section 2.6.1 of the PPS regarding ensuring lot creation is only permitted where site conditions are suitable for the provision of appropriate sewage and water services.
		Affordable Housing One of the primary objectives of the PPS is to encourage the planning that supports affordable housing. To comply with this directive, and to support growth in the Township, we must have the option to approve small lot creation to combine with small cost-effective home construction or possibly “tiny homes” (see Ontario PPS 2024 pg. 24 & page 14 of the Draft Official Plan). “Affordable housing” for Laird equates to affordable land first, so, it is imperative that this document does restrict our ability to create the affordable lots that will support affordable housing.	See above response. Smaller lots may be supported, provided that site conditions are demonstrated to be appropriate for private servicing over the long term with no negative impacts. This policy is to ensure consistency with the PPS policies regarding the protection of public health/safety and the natural environment.
		Planning Board This draft plan prescribes duties to our Planning Board for which it has not been authorized. This should be clarified. - Draft Plan 1.6.4 – <u>The Planning board</u> may identify and promote the redevelopment of designated vacant and/or underutilized sites..... - Draft Plan 4.9 – Economic Development – all references to the “Planning Board” should be removed. - Draft Plan 4.10.7.3 – References to “Planning Board” should be removed. - Draft Plan 4.10.7.3.2 – References to the Planning Board should be removed. - Draft Plan 4.12.1 m – References to the Planning Board should be removed.	References throughout the plan have been updated based on the appropriate authority in the land use planning framework.
		Miscellaneous PPS and Draft Official Plan Comments In general, I believe the Official plan should respond to the Province’s PPS requirements only, we should endeavour to keep this document as simple and clean as possible, documenting only those items which are specifically required to achieve compliance and ensure we do not include any items which unduly hinder or restrict any future councils abilities to achieve growth objectives where desired.	Noted.

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		- Draft Plan 1.6.1.4 – States that we will “ <i>prevent changes to water quality through assessment of hydrological and hydrogeological impacts upon watercourses, lakes, aquifers and wetlands caused by land use</i> ”. While we may agree that it may be “Strategic Objective” to prevent changes to water quality we should be careful about potentially committing ourselves to having to complete these assessments for baseline data collection. At the very least this statement should include the caveat of “where deemed prudent by council” to ensure this is only a potential obligation.	Language has been softened to indicate that assessment is one of many measures available to the planning board and local townships to protect water quality.
		- Draft Plan 2.1.2.2 – This section includes wording that restricts new development to areas “ <i>with-in and adjacent to existing built-up areas</i> ” Why would we say this? Although this may be the case in some circumstances it may not apply to all, so why use restrictive wording?	This policy applies to the Village designation – i.e., existing settlement areas of Desbarats and Echo Bay and is intended to limit “sprawl” or fringe development that does not make efficient use of land and resources. See Section 2.1.2 3) for phasing policies that consider expansion onto vacant, undeveloped lands.
		- Draft Plan 4.6.1 – Cultural Heritage Resources – I am unaware of any Cultural Heritage Resources within our official plan area. If there are any, they should be identified and listed in the document, if not, this section should be removed.	The identification and protection of cultural heritage resources is a matter of provincial interest as per the Planning Act and therefore policies to this effect are required in the Official Plan.
		- Draft Plan 4.7.1 – Growth Management Strategy – The second last paragraph of this section states that “ <i>population growth will be 0.85% over the planning horizon (2021-2051)</i> .” I presume that the is an annual increase? If so, the data in Table 2 of the Draft Policy Direction Report seems to differ, unless I’m reading it incorrectly.	The Official Plan has been revised to clarify that annual population growth of 0.5% is anticipated over the plan’s horizon. Projected population estimates by local Township have also been included for reference purposes.
		- Draft Plan 4.10.5.2 & .8 – Private services – States that a development proponent must prove that there is “ <i>a proven source of potable water</i> ” source of potable water. I believe that this should be the developer’s risk not something they should have to provide prior to us allowing potential development. How would a purchaser of yet unsevered lot, drill a well and prove the source of potable water? Should .8 be added to .2?	The Official Plan policies related to private services are intended to ensure that new development only proceeds where it can be supported by safe, sustainable servicing, consistent with Provincial policy. The requirement to demonstrate a “proven source of potable water” is not intended to require the physical installation of a well prior to severance or development approval. Rather, it requires sufficient evidence, such as hydrogeological studies or other supporting documentation, at the appropriate stage to confirm that an adequate potable water supply can reasonably be achieved. This approach helps ensure that new lots or developments are viable and protects future purchasers and the local Township from potential servicing constraints that may render a property unsuitable for development. Detailed well installation and testing would typically occur at the building permit stage and remain the responsibility and risk of the property owner or developer.

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#	COMMENT FROM	COMMENT	RESPONSE
		- Draft Plan 4.10.7.3 States that the Township Councils “<i>will encourage the creation of a transportation system that is safe, energy efficient and appropriate to projected need, and which supports the use of zero-emissions vehicles</i>” This seems to be a clause more applicable other areas of Ontario and should be removed.	Policy 4.10.7.3 is consistent with the Provincial Planning Statement, 2024, which directs planning authorities to promote transportation systems that are safe, energy efficient, and that support reduced greenhouse gas emissions and climate change mitigation. Encouraging infrastructure that supports zero-emissions vehicles is presented as an aspirational, long-term policy direction and does not impose immediate requirements or obligations on development. The policy applies broadly across Ontario, including rural and northern communities, and is intended to provide flexibility to respond to evolving transportation needs and technologies over time. As such, we recommend that the policy is appropriate to retain in the Official Plan.
		- Draft Plan 4.10.7.4 – Township, seasonal and private roads – Should these sections be included in an official plan? If so, it should include a section on “Unassumed Roads”.	Official Plans commonly include policy direction related to Township, seasonal, and private roads, as these roads form a significant part of the transportation network in rural and northern communities and are critical to land access, emergency response, and development review. Including these policies provides clarity regarding municipal responsibility, access expectations, and limitations related to road maintenance and assumption. The comment regarding unassumed roads is noted. The Official Plan has been revised to explicitly address unassumed roads, clarifying that while development will generally be restricted on unassumed roads and providing criteria for consideration of requests for local Townships to assume unassumed roads.
		- Draft Plan 4.11 – Recreational Vehicles – RVs on vacant lots seem completely irrelevant to the needs of an Official plan and would be more suited to the Zoning By-law. Suggest we remove this entirely.	The inclusion of policy direction related to recreational vehicles (RVs) in the Official Plan is intended to provide high-level guidance on land use compatibility and to address recurring land use issues in rural and seasonal communities. The policy is intended to carry forward Johnson Township’s approach to regulating RV’s, and is not intended to require other municipalities to regulate RV’s if they choose not to. While zoning by-laws implement detailed regulations, the Official Plan establishes the broad policy framework that guides zoning standards and enforcement. That said, the comment regarding overlap with the Zoning By-law is noted. The Official Plan has been refined to ensure that Official Plan policies related to RVs remain high-level and focused on land use planning considerations, with detailed permissions and regulations addressed through the Zoning By-law.

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	Objectives To be clear, Laird Township’s primary objectives for the official plan are the following. 1) To identify growth and development areas with-in <u>Laird Township</u> for focussed housing development, available roadside building lots and commercial/industrial activity. (Supported with mapping details) 2) To protect Prime Agricultural land as per the Province’s mandate while ensuring undesirable lands adjacent to Prime Ag. are not restricted from development. We are not Southern Ontario, we do not have thousands of acres of Prime Ag. to protect. Where we do have Prime Ag. it is interspersed with non-Prime Ag. and/or rocky Canadian Shield lands. These interspersed areas should not be caught up in an inaccurate prime Ag. designation simply to satisfy the arbitrary wishes of the Province to have “large and contiguous” Prime Ag. areas in the plan, as these conditions simply don’t exist here. (Identify these areas with mapping) 3) To keep current farms intact, even in non-Prime ag. areas. If these farms include areas of non-ag. lands, development of roadside lots would remain consistent with #2 & #5. (Identify these areas with mapping) 4) To ensure that we have the ability to sever small building lots. This is critical for Laird to support the Province’s mandate for more affordable housing. Small affordable properties are required to be compatible with small affordable homes and tiny-homes. 5) To allow <u>all</u> roadsides in non-agricultural areas to be available for development. (Also ensure available housing lot calculations are based on small lot sizes, and identified with mapping) 6) To ensure sub-division development (more than 5 lots), can be accomplished though our planning board. 7) To ensure that development of “unassumed roads” is included in the roads portion, for roads that may be considered for assumption in the future. Lake George Road, Isbester Road, Cemetery Road, Reilly Road, Reid’s Road East, Porchuck Road, Lakeview Road, Rydal Mill Road, Reids Road East of Hwy #17, Reids Road East of MacLennan Road, etc. (Unassumed Roads being those roads/trails created by Statute Labour and Township road crews in the early years of the Township, but which are now unmaintained). 8) Review mainland parking details, requirements and locations for island properties. This clause may need to be removed or have a grandfather clause. It should be understood that growth and development within Laird Township is not dependent on municipal water, wastewater or garbage pickup as these services are not provided in Laird. <u>All</u> growth and development in Laird is to be stand-alone as far as site services are concerned.	A proposal for additional scope has been prepared to consider identifying a new settlement area in Laird Township based on the relevant PPS criteria. A LEAR study was completed to support the identification and protection of prime agricultural lands through the Agricultural designation. A range of uses are permitted in the Rural designation outside of prime agricultural lands, as well as in the Village, Mixed Use, and Shoreline designations. Agricultural uses are permitted in the Rural designation outside of prime agricultural areas. The severance of lots as small as 1 ha is permitted as-of-right in the Official Plan, and smaller lots may be severed outside of prime agricultural areas, provided a hydrogeological study is completed which demonstrates that site conditions are appropriate for the long-term provision of private services without negative impacts. Development is permitted throughout the Planning Area on lots with frontage on a public road maintained year round or an existing private road. Approval of plans of subdivision remains the authority of the Ministry. The Official Plan has been revised to include policy to address unassumed roads, including criteria for local Townships to consider when deciding to assume an unassumed road. Mainland parking requirements for island development pertain only to lot creation. Noted. The Official Plan framework permits and facilitates development on rural lands and in rural areas that is appropriate to available rural service levels.
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Comment & Response Matrix – Council, Planning Board Members and Staff Comments

#	COMMENT FROM	COMMENT	RESPONSE
	MMAH	Please ensure references to provincial ministries are current.	References to specific ministries have been replaced with generic references to the Province to remain up to date as ministry names change.
		The Draft OP provides an anticipated population increase number, but not the population target. The target population provided in the Policy Directions Report should be inserted into the updated OP for better clarity.	Included table with population projections to 2051 by local Township and for the Planning Area as a whole.
		The draft background study provides population projections and a land supply analysis and concludes that there will be sufficient land supply over the planning horizon per PPS 2.1.3. This is largely based on an estimated current vacant residential land supply of 1047 vacant lots compared to anticipated need for 418 lots. The ministry would like to better understand recent vacant land absorption, and requests that the planning board please provide some recent data from MPAC’s Municipal Connects portal (which member municipalities should be able to access for free): Year over year total numbers for each vacant residential property code (e.g. 100, 101, 110), from 2021 to 2025 Any corroborating residential building permit data that might help inform uptake of vacant lands. Should this prove onerous given the higher numbers and multiple municipalities involved, the ministry would appreciate if this information could be gathered for at least the settlement areas. For clarity, this information does not need to be incorporated into the draft official plan but rather shared separately with the ministry.	
		Remove reference to "unceded territory" as the Desbarats to Echo Bay planning area lies within the Robinson-Huron treaty.	Revised per comment.
		Replace "Historic Métis Council" with the "Historic Sault Ste. Marie Métis Council" for accuracy.	Revised per comment.
		PPS 2024, Section 2.2 requires that planning authorities support a range and mix of housing options and improve housing affordability. To better demonstrate consistency with Section 2.2, the official plan should include a clear definition of what is “affordable” to low- and moderate-income households within the planning area. To help achieve the 20% affordability target, and to enhance the development of affordable housing and meet the community’s housing needs, the OP should also incorporate specific measures aligned with PPS 2024, such as fee reductions, parking flexibility, incentives through Community Improvement Plans, and identifying surplus municipal lands that may be used for affordable housing purposes.	See Section 5.2.6 for the plan’s framework for CIPs, which includes incentives to promote the development of affordable housing.
		Clause (3)(a) of this section speaks to new hunt camps on patent or Crown lands. As the MNR is not currently considering applications to occupy Crown land for the purpose of establishing new private hunt/recreational camps, please remove this language from this section.	Revised per comment.

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#	COMMENT FROM	COMMENT	RESPONSE
		For consistency with PPS Policy 4.3.5.2. the OP should clarify that impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance. The current policy refers only to impacts where non-agricultural uses “encroach into the Agricultural Area,” which is narrower than the PPS requirement.	Revised per comment.
		For better clarity, the Planning Board should ensure consistent use of the term “agricultural-related.” Revise this policy to use terminology that aligns with the permitted uses identified in the “Guideline on Permitted Uses in Ontario’s Prime Agricultural Area”.	Revised per comment.
		The MECP recommended minimum setback or non-development zone from waterbodies is 30 m from the “high-water mark” on the Precambrian Shield irrespective of lake capacity status, due to typically thin and fractured bedrock as per the Lakeshore Capacity Assessment Handbook (2010) and subsequent updates. Revise as follows: 3) No new development or site alteration, with the exception of shoreline structures, shall be permitted within 30 metres of the shoreline high-water mark of surface water features.	Revised per comment.
		Revise Policy 7) to indicate that proposed development on non-municipally serviced lots less than 1.0 hectares in size requires a detailed hydrogeological assessment by a qualified professional that demonstrates that site conditions are suitable for the long-term provision of such services with no negative impacts.	Revised per comment.
		PPS Policy 3.6.7 states that planning authorities may allow lot creation where there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity. Add a policy to address these requirements.	Revised per comment.
		Recommend integrating the Province-wide Cycling Network (PWCN) through the Planning Area to protect it from fragmentation.	
		This section refers to the recommended minimum separation distances outlined in MECP D-Series Guideline D-6 but uses a wrong number (maybe a typo). Revise as follows: 6) With the support of technical studies, prepared under Provincial Guideline D-6, the following minimum separation distances in accordance with Provincial guidelines shall apply between industrial uses and residential or other sensitive land uses: a) Class I Industries: 20 metres; b) Class II Industries: 70 metres; and c) Class III	Revised per comment.

Comment & Response Matrix – Council, Planning Board Members and Staff Comments

#	COMMENT FROM	COMMENT	RESPONSE
		Section 3.4 (Land Use Compatibility): Inaccurate schedule referenced. Revise as follows: 16) Development adjacent to Abandoned Mine Information System (AMIS) sites shown on Schedule ‘DC_1’ shall be in accordance with the policies of Section 3.6.2.	Revised per comment.
		Section 3.5 (Mineral Aggregate Resources): Inaccurate schedule referenced. Revise as follows: Paragraph 2) ..."For this reason, Schedule ‘DC_1’ identifies areas of potential mineral aggregate resources, including the location of Primary Aggregate Resources and Nipissing Diabase in the Planning Area".	Revised per comment.
		Please specify whether "areas of mineral aggregate potential" refers to Primary and/or Secondary Aggregate Resources as shown on Schedule 'C', or to Metallic Mineral Potential above a certain threshold as shown on Schedule 'D'.	Revised to reference Schedule C – Primary/Secondary Aggregate Resources.
		Please update "Ministry of Energy, Northern Development and Mines" to "Ministry of Natural Resources".	References to specific ministries have been replaced with generic references to the Province to remain up to date as ministry names change.
		The OP should clarify that permit applications on Crown land are regulated under the <i>Aggregate Resources Act</i> and do not require a Zoning By-Law Amendment.	Revised per comment.
		Wording suggestion for Policy 3 e). Update the term “mining” to “ aggregate extraction ” as the word mining can become confused with mining activities regulated under the <i>Mining Act</i> .	Revised per comment.
		Policy 4 of this section speaks to minimum influence areas for aggregate operations. Revise the OP to include policies for minimum influence areas that align with one of the following technical guidance resources, as applicable: MNR’s Non-Renewable Resources Training Manual (1997) recommends that, where an application for development occurs within 500 m of a bedrock quarry operation or 300 m of an aggregate pit operation, the applicant should be required to assess the impact of the proposed development on the mineral aggregate resource and mineral aggregate operation. In the absence of site-specific studies, the Ministry of the Environment Conservation and Parks’ (MECP) Guideline D-6 - Compatibility between Industrial Facilities and Sensitive Land Uses applies to pits and quarries where sensitive land uses (including residential uses) are proposed near an existing pit and/or quarry. Guideline D-6 advises that sensitive land uses (like homes) near pits and queries should follow these guidelines: - Assess potential impacts within 1000 m of an existing pit or quarry before approving new developments. - Maintain a minimum separation distance of 300 m between existing pits/quarries and new sensitive land uses.	Revised per comment.

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#	COMMENT FROM	COMMENT	RESPONSE
		The high-mineral potential area isn’t referred to in the text and schedule properly. Revise as follows: ... Areas having high potential for the discovery of mineral resources are shown as a constraint on Schedule ‘DC_1’ to this Plan, which is highlighted by the trace of the Nipissing Diabase. Ontario Mineral Inventory (OMI) points, appearing on Schedule C-1, are also indicators of mineral potential.	Revised per comment.
		The Mineral Deposit Inventory (MDI) term has changed to the Ontario Mineral Inventory (OMI). Revise the text where needed.	Revised per comment.
		Section 3.6 (Abandoned Mine Sites): Inaccurate reference to the name of the ministry, schedule, and who to consult with the Province. Revise as follows: Paragraph 2) “The location of mine hazards are shown on Schedule “DCC_1. When development is proposed within 1,000 metres of a mine hazard there is potential for impact on a proposed development. The local Township and proponent shall consult with the Ministry of Energy and Mines, <i>through the Northeast Regional Land Use Geologist</i>, in order...”	Revised per comment.
		The OP should include the provincial recommendation that all lands within 300m of an inland lake trout lake (at capacity) on the Canadian Shield are considered adjacent lands for PPS Policy 4.1.6.	Revised per comment.
		The OP defines fish habitat as “spawning grounds and nursery, rearing, food supply and migration areas on which fish depend directly or indirectly in order to carry out their life processes”. This definition does not quite reflect the definition provided in the PPS and should be updated.	Revised to reference PPS definition for fish habitat.

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#	COMMENT FROM	COMMENT	RESPONSE
		The planning area is within Ecoregion 5E. PPS Policy 4.1.5 f) directs that development and site alteration shall not be permitted in coastal wetlands in Ecoregions 5E, 6E and 7E unless it’s demonstrated that the proposal will have no negative impacts on the wetland or its function. The OP does not include non-significant coastal wetlands in the development and site alteration restriction outlined in OP Policy section 3.8.2.4, Policy 2. MNR can confirm there are several coastal wetlands in the planning area. Prior to any development or site alteration, the applicant should be required to hire a qualified professional to demonstrate that the proposal will have no negative impact on the wetland or its function. As of January 1, 2023, MNR no longer reviews or confirms wetland evaluations. Instead, a qualified wetland evaluator, who has completed the necessary training and is certified under OWES, must be retained. Data on the location of coastal wetlands is available through the Natural Heritage Make a Map tool and the Wetland database on Ontario GeoHub.	Revised to include policy that requires screening of significant wildlife habitat per the NHRM guidelines.
		The OP does not include a policy to screen for the presence of significant wildlife habitat (SWH) prior to new development or site alteration. Not all significant wildlife habitats are known/mapped. The OP should include a trigger for when additional evaluation for the presence of SWH should be required, described in Natural Heritage Reference Manual (NHRM). In addition to the NHRM, several resources are available to help planning authorities and professionals with this task: The Significant Wildlife Habitat Technical Guide Significant Wildlife Habitat Mitigation Support Tool Significant Wildlife Habitat Criteria Schedule for Ecoregion 5E These resources provide valuable information for scoping site assessments, identifying significant wildlife habitats and identifying how to mitigate impacts to significant wildlife habitats. The OP should consider habitats of species of Special Concern and other sensitive species as significant wildlife habitats. These species are listed in the Ministry of the Environment, Conservation, and Parks (MECP) Species at Risk in Ontario (SARO) list, available on e-laws and the Ontario Species at Risk webpage.	

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#	COMMENT FROM	COMMENT	RESPONSE
		The Draft Official Plan permits one Additional Residential Unit (ARU) as-of-right within the principal dwelling in the Shoreline designation. Given the sensitivity of shoreline environments, reliance on private wells and septic systems, MECP D-5-4 and D-5-5 requirements for demonstrating sewage and water compatibility, and the updated provincial direction exempting environmentally sensitive and servicing-constrained areas from mandatory as-of-right ARUs, it is recommended that all ARUs within the Shoreline designation require a site-specific Zoning By-law Amendment demonstrating: (1) sewage system compatibility, (2) no negative groundwater or lake impact, and (3) conformity with the Lakeshore Capacity Assessment framework and the 30-m non-development buffer.	Policy has been revised to reflect that ARUs in the Shoreline designation are subject to ZBLA per the criteria noted in the comment.
		For consistency with PPS policies 2.6.1 and 4.3.2, the OP needs to clearly differentiate between Permitted Uses for Rural Areas and for Agricultural Areas.	Refer to Section 2.3.1 for the permitted uses in the Rural designation and Section 2.4.1 for the permitted uses in the Agricultural designation.
		Detailed hydrogeological assessments may be required for development proposals with individual on-site sewage systems and individual well water. The Plan references D-5-5 (drinking water), but it does not reference D-5-4 (sewage). It should refer to these procedures as the acceptable procedures for determining adequate site conditions for individual water and sewage system development on lands with private services.	Revised per comment.
		The terms Indigenous, First Nation and Métis are used in an inconsistent and sometimes duplicative manner throughout the section.	Revised per comment.
		Municipal Heritage Registers are a key land use planning tool, and they directly support policies 4.6.1 and 4.6.4.a), so it is important that the Planning Board consults such Registers when reviewing development applications. For example, a Register helps fulfill PPS Policy 4.6.1 by identifying properties with built heritage resources and/or cultural heritage landscapes, providing a basis for evaluating cultural heritage value or interest under Ontario Regulation 9/06 and informing decisions by planning authorities, property owners, consultants and others during the development review process. The local Townships within the Planning Board are required to maintain a Municipal Heritage Register. Newly listed properties must meet the criteria for determining cultural heritage value or interest found in O. Reg. 9/06 under the <i>Ontario Heritage Act (OHA)</i>. The municipalities shall make their register available on a publicly accessible website. The register shall be updated regularly to ensure effective conservation. Check Appendix A for suggested wordings.	Revised per comment.

Comment & Response Matrix – Council, Planning Board Members and Staff Comments

#	COMMENT FROM	COMMENT	RESPONSE
		This policy about adjacent lands should be revised for consistency with PPS Policy 4.6.3. Technical requirements for HIAs should not be embedded directly in the OP as it is subject to change over time. Information about Heritage Impact Assessment should be deleted. It would be appropriate to prepare a Terms of Reference or refer to MCM's guidance on the Planning Board's website. Check Appendix A for suggested wordings.	Revised per comment.
		This policy should be revised for consistency with PPS 2024 and the <i>OHA</i>. Terminology should reflect that in the PPS, 2024 and the <i>OHA</i> and should be used consistently throughout the document. Check Appendix A for suggested wordings.	Revised per comment.
		This introductory paragraph about archaeological resources and determining archaeological potential should be revised for consistency with PPS policy 4.6.2. A policy should be added to the OP about consulting existing registers and maps of archaeological resources and areas of archaeological potential. Maps of areas of archaeological potential can be accessed through a data sharing agreement with MCM. This policy should be revised to acknowledge that archaeological resources include both terrestrial and marine resources as per the definition of 'archaeological resources' in the PPS 2024. Check Appendix A for suggested wordings.	Revised per comment.
		This policy about cemeteries and burials should be revised for consistency with PPS Policy 4.6.2 and the <i>OHA</i>. Terminology should reflect that in the PPS 2024 and the <i>OHA</i> and should be used consistently throughout the document.	Revised per comment.
		Archeological resources should be assessed, documented, and conserved before development and site alteration is located on lands containing archaeological resources, not after the fact. This policy should be revised for clarity and consistency with PPS Policy 4.6.2 and the <i>OHA</i>. Check Appendix A for suggested wordings.	Revised per comment.

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#	COMMENT FROM	COMMENT	RESPONSE
		The <i>Ontario Heritage Act</i> (OHA) provides municipalities with tools to implement PPS 2024 policies related to cultural heritage and archaeology (Section 4.6). Terminology should align with the PPS 2024 and the OHA and be used consistently throughout the document. While the PPS 2024 does not define “cultural heritage resources,” the term is used in other provincial documents to collectively refer to archaeological resources, built heritage resources, and cultural heritage landscapes. Please use the specific terms when referring to each individually, and “cultural heritage resources” when referring to all three. The draft OP definitions for “built heritage resources” and “cultural heritage landscapes” are not consistent with the PPS 2024. In addition, the term “conserved” is defined broadly in the PPS 2024, and its use in the draft OP should be revised to reflect this full scope. The PPS definitions do not need to be repeated in the OP, which helps avoid future revisions if the PPS is updated. Check Appendix A for suggested wordings.	Revised per comment.
		A marine archaeological assessment is required when a marine archaeological resource is identified. This policy should be revised for consistency with PPS Policy 4.6.2. Terminology should reflect that in the PPS 2024 and the OHA and should be used consistently throughout the document.	Revised per comment.
		This policy should be clear about the archaeological assessment requirements for a plan of subdivision. Add the following: 1) As part of the Draft Plan approval, the following provisions apply: o) The Planning Board shall require archaeological assessments to be carried out by consultant archaeologists licensed under the Ontario Heritage Act, as a condition of any plan of subdivision proposal affecting areas containing an archaeological resource or considered to have archaeological potential.	Revised per comment.
		The <i>Planning Act</i> now requires discounted parkland dedication rates for affordable and non-profit housing developments. The OP should be updated to reflect these changes to ensure clarity and compliance.	Revised per comment.
		The OP designates all areas of every Township in the Planning Board and emphasises that all uses may fall under Site Plan Control. Bill 23 exempted residential developments with 10 or fewer units from site plan control, with certain exceptions. Please revise the OP to reflect the exemption under <i>Planning Act</i> Sub-Section 41(1.2) and O.Reg 254/23	Revised per comment.
		The <i>Building Faster and Smarter Act</i>, 2025 (Bill 17), removed the ability for municipalities to require new complete application studies/reports beyond what is identified in their official plan. Please revise the policy as follows: Studies That May Be Required to Accompany a Planning Application Further to Section 5.5.1, the following are the types of studies that may be required to accompany a Planning Act Application, however this list is not exhaustive.	Revised per comment.

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#	COMMENT FROM	COMMENT	RESPONSE
		It was mentioned in Section 3.9 of the OP that Waste Disposal Areas are identified on Schedule ‘A’ of this official plan. Waste Disposal sites have not been identified in Schedule A1, A2, or A3. Please revise the schedules to identify waste sites. If applicable, identify waste sites as operating vs non-operating or open vs closed landfills on Schedule A. Schedule A Should also delineate Province-wide Cycling Network segments and municipal active transportation corridors.	
		Numerous natural heritage features are not included in this schedule, including but not limited to: Fish habitat features A documented northern pike spawning area in Echo Bay marsh 2 bald eagle nesting sites along the north side of Echo Bay marsh A waterfowl staging area and black tern breeding area in Echo Bay Marsh Schedule B should be updated to include all known natural heritage features to support the implementation of section 4.1 of the PPS. Detailed data is available through the following GeoHub datasets: Aquatic resource area polygon segment Aquatic resource area line segment MNR’s Inland Ontario Lakes Designated for Lake Trout Management (2015) Fish activity area Ontario GeoHub Wildlife Values Area Ontario GeoHub Wildlife Values Site Ontario GeoHub	
		Add the Ontario Mineral Inventory (OMI) points layer available on Geology Ontario, OGS Earth. The same map could be used to show mineral potential as the potential is governed by the presence of the Nipissing Diabase as evidenced by the MMPET map with few exceptions.	
		The Metal Mineral Potential Evaluation Tool (MMPET) map should be used to create a high-mineral potential zone map. Delete the MMPET map from the schedule. It shouldn’t appear in the official plan, nor its mention.	