



## Severn Sound Environmental Association

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January 17<sup>th</sup>, 2019

Ken Petersen, Manager  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay Street – 13<sup>th</sup> floor  
Toronto, ON M5G 2E5

Dear Mr. Petersen;

**RE: Proposed Open-for-Business Planning Tool, ERO number 013-4125,  
As Part of Bill 66 *Restoring Ontario's Competitiveness Act, 2018***

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The Severn Sound Environmental Association (SSEA) appreciates the opportunity to comment on the proposed open-for-business tool under Bill 66 *Restoring Ontario's Competitiveness Act, 2018*.

The SSEA is committed to ensuring exceptional environmental quality and exemplary stewardship of the Severn Sound area through sound science, collaboration and partnerships. The SSEA is a Joint Service Board under the *Municipal Act*, working closely with eight lower tier municipalities and two upper tier municipalities in the Severn Sound area, as well as provincial and federal government, agencies and non-government organizations. The SSEA collects environmental data and provides expertise to member municipalities, works to keep water clean so it supports healthy terrestrial and aquatic ecosystems, as well as in identifying and documenting natural heritage features for several member municipalities for use in their Official Plan updates. The SSEA is the local Source Protection Authority in the area and has been delegated Part IV powers (enforcement of the act) under the *Clean Water Act* for all but one of our member municipalities.

The SSEA is proud of the work our municipalities do to ensure a thriving local economy while protecting and restoring water quality and natural heritage. It is the SSEAs understanding the proposed open-for-business (OFB) planning by-law would be used on a site specific basis to allow what would have otherwise been a non-permitted use based on various regulations (i.e. Provincial Policy Statement, Planning Act, Clean Water Act, and municipal specific Official Plans) to go ahead if various employment thresholds are

met. The SSEA offers the following comments on the proposed open-for-business tool under Bill 66 *Restoring Ontario's Competitiveness Act, 2018*.

Numerous established planning requirements and land use restrictions, plans, policies, regulations and legal requirements (e.g., Clean Water Act, Provincial Policy Statement (PPS), Growth Plan for the Greater Golden Horseshoe, municipal Official Plans, etc.) were established based on years of science and research. Municipalities who are not in Conservation Authority regulated areas need support to uphold environmental standards such as Great Lakes Remedial Action Plan commitments and Clean Water Act. The Province should ensure that the OFB tool/by-law does not undermine the very things that a healthy economy and health community are based on, clean water, natural heritage features which are often critical green/natural infrastructure (ie. Wetlands), farmland and human health

The Province is commended on looking for efficiencies for Ontario businesses, municipalities and residents. The Ministry is encouraged to consider the potential impacts of site or municipal specific by-laws on groundwater and natural heritage systems and corridors that extend beyond site and municipal boundaries. Natural heritage systems often double as natural green infrastructure and clean water is critical to the health of all Ontario's, both underpin the health of our local and Provincial economy.

The SSEA is proud of the work our municipalities do to ensure a thriving local economy while protecting and restoring water quality and natural heritage. We look forward to working with our municipalities and the Province of Ontario to ensure clean water and natural heritage are protected as the underpinning of our healthy economy. If you have any questions or comments please feel free to contact myself or Melissa Carruthers (Risk Management Officer [mcarruthers@severnsound.ca](mailto:mcarruthers@severnsound.ca)) at the SSEA office.

Yours Truly,



Julie Cayley, Executive Director  
Severn Sound Environmental Association

cc: SSEA Board of Directors