



# Eastern District Planning Commission

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Bruce Morrison

Chair

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December 1, 2022

Honourable Tim Halman, Minister  
Department of Environment and Climate Change  
1903 Barrington St., PO Box 442  
Halifax, NS, B3J 2P8

**By Email: [coastal@novascotia.ca](mailto:coastal@novascotia.ca)**

Dear Minister Halman,

**Reference: Coastal Protection Act Consultation.**

Thank-you Minister for your letter of November 8, 2022 to our Director which was reviewed by our Board yesterday. As you know the Commission represents six municipal units and there was unanimous disappointment with this correspondence. With all due respect, we feel you did not make the case that integrating your regulations into the municipal permitting process is compelling. Fundamentally the suggestion that we would issue a permit prior to someone getting a provincial approval for compliance with the *Coastal Protection Act* regulations is untenable. The two hypothetical situations you propose would indeed cause an applicant frustration, because neither is a realistic application of the regulations. We see a CPA approval to be similar to an on-site sewage disposal system approval issued under the *Environment Act*; or a "Minister's Consent for Building and Access to Property" issued under the *Public Highways Act*. Effectively the province is already the logical first check, when someone is building.

If the province insists, once again, on downloading provincial responsibilities on municipalities, we will continue to protest this expanded expectation of municipal responsibility as an unnecessary and inefficient means of administering provincial regulations. As rural municipalities, we have neither the human resource capacity/time, nor the expertise/financial resources to provide this service and would expect the province to at a minimum address this lack of municipal resources.

Again, it is our hope that all of these concerns will be addressed by the province in that the administration of Provincial Regulations needs to be a Provincial, as opposed to a Municipal, responsibility.

Sincerely,

FOR  
Bruce Morrison  
Chair

cc. Board EDCP  
Federation of Nova Scotia Municipalities  
Honourable Allan MacMaster, Deputy Premier  
Honourable Keith Bain  
Honourable Trevor Boudreau  
Honourable Greg Morrow  
Honourable Michelle Thompson