



Office of the Chair

May 4, 2018

Resolution Number 2018-318

The Honourable Chris Ballard
Minister of the Environment and Climate Change
11th Floor, Ferguson Block
77 Wellesley Street West
Toronto, Ontario M7A 2T5

The Honourable Bill Mauro
Minister of Municipal Affairs
17th Floor, 777 Bay Street
Toronto, Ontario M5G 2E5

The Honourable Nathalie Des Rosiers
Minister of Natural Resources and Forestry
Suite 6630, 6th Floor, Whitney Block
99 Wellesley Street West
Toronto, Ontario M7A 1W3

Dear Ministers:

Subject: Watershed Planning Guidance for Land Use Planning Authorities

I am writing to advise that Regional Council approved the following resolution at its meeting held on Thursday, April 26, 2018:

Resolution 2018-318:

That the comments outlined in the report of the Commissioner of Public Works, and contained in Appendix I, titled "Watershed Planning Guidance for Land Use Planning Authorities" be endorsed;

And further, that a copy of the subject report be circulated to the Ministry of the Environment and Climate Change, Ministry of Natural Resources and Forestry, Ministry of Municipal Affairs, the Cities of Brampton and Mississauga, the Town of Caledon, Toronto and Region Conservation Authority, Credit Valley Conservation Authority, Conservation Halton, Nottawasaga Valley Conservation Authority and Lake Simcoe Region Conservation Authority.

A copy of the report is provided for your information.

Frank Dale
Regional Chair and Chief Executive Officer

FD:ms

Also sent to:

Carey deGorter, General Manager, Corporate Services/Town Clerk, Town of Caledon
Peter Fay, City Clerk, City of Brampton
Diana Rusnov, City Clerk, City of Mississauga
John Mackenzie, Chief Executive Officer, Toronto and Region Conservation Authority
Deborah Martin-Downs, Chief Administrative Officer, Credit Valley Conservation Authority
Brian Hobbs, Director, Development, Conservation Halton
Doug Hevenor, Chief Administrative Officer, Nottawasaga Valley Conservation Authority
Mike Walters, Chief Administrative Officer, Lake Simcoe Region Conservation Authority

c: Adrian Smith, Acting Director of Integrated Planning, Public Works, Region of Peel

DATE: April 16, 2018

REPORT TITLE: **WATERSHED PLANNING GUIDANCE FOR LAND USE PLANNING AUTHORITIES**

FROM: Janette Smith, Commissioner of Public Works

RECOMMENDATION

That the comments outlined in the report of the Commissioner of Public Works, and contained in Appendix I, titled “Watershed Planning Guidance for Land Use Planning Authorities” be endorsed;

And further, that a copy of the subject report be circulated to the Ministry of the Environment and Climate Change, Ministry of Natural Resources and Forestry, Ministry of Municipal Affairs, the Cities of Brampton and Mississauga, the Town of Caledon, Toronto and Region Conservation Authority, Credit Valley Conservation Authority, Conservation Halton, Nottawasaga Valley Conservation Authority and Lake Simcoe Region Conservation Authority.

REPORT HIGHLIGHTS

- The Ministry of the Environment and Climate Change and the Ministry of Natural Resources and Forestry posted draft Watershed Planning Guidance for land-use planning authorities on the Environmental Registry (EBR) for comments.
- Comments were sought on the Watershed Planning Guidance by April 7, 2018.
- New provincial requirements through the Growth Plan require that growth allocation decisions, settlement boundary expansions, planning for greenfield areas and infrastructure master planning be informed by watershed planning.
- Staff provided comments (attached as Appendix I) to meet the Provincial EBR deadline date.
- The guideline has not sufficiently identified the historical role of conservation authorities in watershed planning nor the relationship between watershed and subwatershed planning.
- Transition provisions are poorly defined and the alignment between watershed planning and infrastructure master planning and the municipal environmental assessment process needs to be clarified.

WATERSHED PLANNING GUIDANCE FOR LAND USE PLANNING AUTHORITIES

DISCUSSION

1. Introduction

On February 6, 2018, the province posted the draft *Watershed Planning in Ontario: Guidance for land use planning authorities* (the “Guidelines”) to the Environmental Registry for comments.

The draft Guidelines are intended to support municipalities in fulfilling new provincial land use planning requirements related to watershed planning in the four provincial land use plans – the Growth Plan (2017), the Greenbelt Plan (2017), the Oak Ridges Moraine Conservation Plan (2017), and the Niagara Escarpment Plan (2017), and the Provincial Policy Statement (2014). Provincial land use planning policy specifies new requirements for municipalities to undertake watershed and subwatershed planning to inform key land use planning and infrastructure decisions.

The Province has provided a 60-day commenting period until April 7, 2018 for the public to provide comments on the draft guidelines.

This report provides an overview of the recently released Guidelines and requests endorsement of Regional staff response comments to the Province attached as Appendix I. The comments were sent prior to Regional Council’s receipt of this report in order to meet the Province’s commenting deadline. The Province has been advised that further comments or changes to the recommendations that may be made by Regional Council will be provided as further input to the EBR posting.

Regional staff has consulted local municipal and conservation authority staff in the preparation of the report and comments.

2. Background

The history of watershed planning in the Province goes back more than 80 years and was seen as being important to address changes in land use, including deforestation and urban development which were associated with flooding, soil erosion, silting of streams, degraded water quality and loss of habitat.

In 2001, the *Oak Ridges Moraine Conservation Act* required upper-tier municipalities to prepare watershed plans for every stream that originated on the Moraine in the municipality’s jurisdiction. Watershed plans in Peel were prepared for the Moraine in accordance with technical guidance issued by the Province at that time.

Further provincial focus was placed on watershed planning through the Walkerton Enquiry of the early 2000s, where the multi-barrier approach to protection of drinking water was emphasised and resulted in the *Clean Water Act, 2006* and the approval of source water protection plans to protect drinking water sources.

Over the years the conservation authorities (primarily Credit Valley Conservation Authority and the Toronto and Region Conservation Authority) with jurisdiction within Peel have produced watershed and subwatershed plans that have been used to guide land use decisions with respect to protecting, improving and restoring water quantity and quality, and avoiding development in sensitive habitat and floodplains. Subwatershed scale planning

WATERSHED PLANNING GUIDANCE FOR LAND USE PLANNING AUTHORITIES

studies have also been led by local municipalities for land use planning in new growth areas collaboratively with the Region and conservation authorities.

a) New Watershed Planning Guidance for Land Use Planning

The proposed Guidelines will update the existing watershed planning guidelines that were initially released by the Province in 1993. The new and updated policies in the Provincial Policy Statement and provincial land use plans extend requirements for watershed planning throughout the Greater Golden Horseshoe and provide greater direction that watershed planning be undertaken to inform decisions on planning for growth and infrastructure.

The Provincial land use plans that are applicable in the Greater Golden Horseshoe area now provide more specific direction for municipalities to ensure that watershed planning is undertaken to inform decisions on allocating growth, determining the location and feasibility of settlement boundary expansions, planning for designated greenfield areas, and development of water, wastewater and stormwater master plans.

3. Assessment of Watershed Planning Guidance

The Guidelines provide information on how to undertake watershed planning and how the recommendations generated from watershed plans can be effectively implemented.

The role of upper and single-tier municipalities in future watershed planning is emphasized as coordination of watershed planning may be required across jurisdictional boundaries. However, while the draft guidelines appropriately highlight the role of upper and single-tier municipalities in watershed planning, they do not sufficiently acknowledge the important role of Conservation Authorities in watershed and subwatershed planning and their anticipated future involvement in similar studies in collaboration with local municipalities.

The following recommendations to improve the guidelines have been proposed to the Province as outlined in more detail in Appendix I:

- The historical and potential future role of Conservation Authorities in watershed and subwatershed planning needs to be identified in the Guidelines.
- The Guidelines need to provide clearer distinction between planning at the watershed and subwatershed scales and the outputs that are expected at these scales to inform land use and infrastructure planning decisions.
- Transition provisions should be expanded and clarified to provide reasonable flexibility and recognize that an appropriate transition period will be needed, especially as it relates to the updating of broader scale watershed plans.
- The alignment between watershed planning and infrastructure master planning and the municipal environmental assessment process needs to be clarified with flexibility for municipal infrastructure master plans to proceed as integrated components of watershed planning studies or separately as infrastructure master plan studies informed by watershed planning.

WATERSHED PLANNING GUIDANCE FOR LAND USE PLANNING AUTHORITIES**FINANCIAL IMPLICATIONS**

The existing broader scale watershed plans and studies that have been prepared for the Region's watersheds are approximately 10 years old and are scheduled for updating. The Ministry of the Environment and Climate Change guidance among other requirements will help scope what is needed for the next generation of watershed plans.

No new provincial funding has been committed to undertaking new watershed and subwatershed plans. Work program requirements for the updating of watershed scale plans will be funded through the annual conservation authority and Regional budgeting approvals process.

Regional staff will be confirming in conjunction with the Conservation Authorities, the extent to which existing watershed plans and their equivalent studies satisfy requirements for watershed planning needed to support the Growth Management components of the five-year review of the Regional Official Plan, and related water, wastewater and stormwater master plans.

If gaps are identified, Regional staff, in consultation with the Conservation Authorities, will identify the additional work and budget needed to ensure requirements are completed.

NEXT STEPS

Regional staff will be addressing the new watershed planning policy guidance and direction under the Growth Plan through the five-year review of the Regional Official Plan (Peel 2041) and coordinating work through the Growth Management Strategy and through updates to the water and wastewater master plans and Regional stormwater management initiatives.

In addition, Regional staff will also be working with Conservation Authority staff in consultation with local municipal staff to update future watershed plans.

Regional staff will continue to update Council on this guidance document as it unfolds through the EBR process and on the implementation of watershed planning initiatives as needed.



Janette Smith, Commissioner of Public Works

Approved for Submission:

D. Szwarc, Chief Administrative Officer

WATERSHED PLANNING GUIDANCE FOR LAND USE PLANNING AUTHORITIES

APPENDICES

Appendix I - Letter to Province providing comments on draft Watershed Planning in Ontario Guidance for land use planning authorities.

For further information regarding this report, please contact Arvin Prasad Director RPP, MCIP Integrated Planning Division ext. 4251 arvin.prasad@peelregion.ca.

Authored By: Learie Miller RPP, MCIP

Reviewed in workflow by:
Financial Support Unit

**Public Works**

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April 3, 2018

Nisha Shirali
Senior Policy Analyst
Ministry of the Environment and Climate Change
Policy and Program Division
Environmental Policy Branch
40 St Clair Avenue West, Floor 10
Toronto, ON
M4V 1M2

Dear Ms. Shirali,

Re: Watershed Planning in Ontario: Guidance for land use planning authorities
(EBR 013-1817)

Thank you for the opportunity to comment on the draft watershed planning guidance for municipalities. The Region of Peel has a long history of supporting watershed planning to protect, restore and improve the Region's natural systems and recognizes the importance of integrating watershed planning with land use and infrastructure planning and decision making. The comments provided below identify areas of need and opportunities for improvement in the draft guidelines based on the Region's experience in these areas.

Please note that the comments provided in this letter will be considered by Regional Council and any further comments or changes to the recommendations that may be made by Regional Council will be provided as further input to the EBR posting.

General Comments

As currently drafted, the guidelines do not sufficiently clarify the relationship between watershed and sub-watershed planning and the types of information and level of detail that is needed at each stage to inform the various levels of land use and infrastructure planning implemented by municipalities. This gap could result in inconsistent interpretation and overly onerous requirements by future users of the guidance or the wrong level of watershed planning detail in early land use and infrastructure planning stages. Inconsistent and inappropriate implementation could have significant consequences for timely delivery of land use decisions and needed infrastructure that are critical for community and economic development with no improvement in outcomes. Watershed planning outcomes can be achieved with improved clarity and better alignment of watershed planning information to corresponding stages in the planning and development process.



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Although there is recognition of differences in the different scales at which watershed planning is undertaken, the guidance document mixes references to watershed and sub-watershed planning together in a number of sections throughout the report making interpretation of requirements difficult, and does not provide sufficient differentiation of how larger scale watershed planning is undertaken and then refined and implemented in subsequent, more detailed levels of planning at the sub-watershed and catchment scales. The document does not clearly indicate the intended outputs that these various scales of watershed planning are to provide as intended inputs for growth planning, land use planning, settlement expansion, and water, wastewater and stormwater master planning.

The guidance document should be clarified to better indicate the relationship between watershed planning at both the watershed and sub-watershed scales and the roles that the different levels of watershed planning serve to inform official plan policy development, decisions on allocating growth, in determining the feasibility and location of settlement expansions, planning for greenfield areas, and in undertaking water, wastewater and stormwater master planning.

While the guidance document should not prescribe requirements, it should generally indicate the types of goals, objectives, criteria, targets or recommendations that are expected to be provided at the different watershed planning scales and the general outputs that are to be delivered to inform official plans, growth allocation, settlement expansion and infrastructure planning. For example, Section 5 Setting the Vision, Goals, Objectives and Targets provides a very cursory introduction of the topic and provides no indication of the types of outputs that are needed for official plan policy, growth planning, land use planning and infrastructure planning.

Although the expectation is better integration of watershed planning with land use planning and infrastructure planning, the guidance should allow flexibility to undertake different planning activities concurrently or sequentially as it can be unrealistic to undertake and fully coordinate all of the planning activities comprehensively within a single watershed or sub-watershed planning process.

Municipal infrastructure planning is subject to separate legislative requirements and municipalities must have the flexibility to undertake infrastructure master planning as separate but integrated planning tasks.

Recommendations

The watershed planning guidance should be reviewed and clarified or re-structured throughout the document to better indicate the relationship between watershed planning at various scales and the roles that the different levels of watershed



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planning serve to inform official plan policy development, decisions on allocating growth, in determining the feasibility and location of settlement expansions, planning for greenfield areas, and in undertaking water, wastewater and stormwater master planning.

Ministry staff should undertake additional consultation with municipal public works water, wastewater and stormwater planning staff to ensure that expectations regarding infrastructure master planning in the guidance are clear and achievable.

The watershed planning guidance should more clearly indicate the expected alignments with municipal infrastructure master planning and infrastructure project approvals under the Environmental Assessment Act and Municipal Class EA process.

If there is insufficient time to fully address the clarification needed within the guidance document, the Ministry should consider Issuing the document as an initial version for interim use by municipalities with the intention that the document would be refined in subsequent versions.

Jurisdictions Subject to Multiple Provincial Plans and Policies

The Region of Peel is subject to the Growth Plan, Oak Ridges Moraine Conservation Plan, Greenbelt Plan, Niagara Escarpment Plan, Lake Simcoe Protection Plan, Provincial Policy Statement and a number of source water protection plans approved under the Clean Water Act. Section 2.6 and Appendix A provides checklists of requirements summarized from the policy direction in the different plans and policies. The planning direction for watershed planning is very confusing in jurisdictions like Peel that are subject to multiple provincial planning documents especially as the documents are not providing planning direction, initiatives and requirements that are consistent across watershed and/or planning boundaries.

Recommendation

The guidance document needs to improve the summary of policy requirements so that municipalities with multiple provincial plans within their jurisdiction can scope and combine requirements into consolidated and simplified watershed planning exercises to meet multiple requirements. The implementation guidance should help simplify and not overly complicate requirements.



Transition

The strengthening of watershed planning policy in the PPS and provincial land use plans represents a significant clarification of environmental planning requirements in land use and infrastructure planning. These changes will require a review of existing watershed planning approaches, plans, and studies and eventual renewal of existing watershed planning studies to fully address new requirements.

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Although municipalities like the Region of Peel have undertaken watershed planning to inform municipal planning, the updating of broader scale watershed planning will require resources and potentially multi-year planning studies to update existing watershed plans, and coordination with conservation authorities, local municipalities, adjacent watershed municipalities and Indigenous communities.

Transition provisions are described in Section 2.8 *Equivalency and Transition* and Section 7.2 *Informing Land Use Planning and Integrated Planning for Water, Wastewater and Stormwater* (p. 119) and recognize the ability to utilize existing, enhanced or new assessments, studies and plans as equivalent studies to address requirements. These provisions should be expanded and clarified to provide reasonable flexibility and recognize that an appropriate transition period will be needed, especially as it relates to the updating of broader scale watershed plans. It would not be realistic or necessary, for example, to require entirely new or updated watershed plans and sub-watershed plans for every watershed or sub-watershed in a municipality prior to the completion of the current municipal official plan conformity exercises, nor would this be needed for every development approval, or immediately needed for site specific approvals proceeding within existing planned areas that already have environmental planning guidance in place.

Improved transition guidance for municipalities subject to the Growth Plan, 2017 should clarify specific requirements for watershed planning for the different components of municipal comprehensive review that municipalities are required to meet before 2022 and provide a clearer indication that local needs can be assessed and that appropriate phasing of updates and new studies are allowed to enable a reasonable transition and evolution of current watershed planning practices to the new requirements.

The requirements for undertaking sub-watershed scale studies for new growth areas is less of a concern as these types of studies have typically been undertaken and sequenced to inform and support land use planning decisions.

Recommendation

Transition provisions should be expanded and clarified to provide reasonable flexibility and recognize that an appropriate transition period will be needed, especially as it relates to the updating of broader scale watershed plans.



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Improved transition guidance for municipalities subject to the Growth Plan, 2017 should clarify the specific requirements for watershed planning for the different components of municipal comprehensive review that municipalities are required to meet before 2022 and provide a clearer indication that local needs can be assessed and appropriate phasing of updates and new studies allowed to enable a reasonable transition and updating of current watershed planning practices to the new requirements.

Scoping and Timing of Watershed Planning Requirements for Allocating Growth, Master Planning and Settlement Boundary Expansion

Regional upper-tier municipalities have taken different approaches to satisfy municipal comprehensive review requirements for growth allocation and settlement boundary expansion. The Ministry should continue to permit the option of different approaches that achieve similar or better outcomes and allow settlement expansion studies to proceed in a concurrent, sequential or phased approach following the allocation of growth to local municipalities. The guidance should be clarified to indicate that either broad watershed planning information or more detailed sub-watershed planning information would be appropriate for determining the location and feasibility of settlement boundary expansions.

The reference that higher-level watershed planning will typically inform water, wastewater and stormwater masters plans as well as settlement boundary expansions and decisions on allocating growth is an important clarification (under “Why is it important?” on p. 118 in Section 7.2). This distinction is not carried forward and is less clear later in the guidance under “How to do it?” on pages 117-120, where it indicates “the timing and sequencing of growth allocation and settlement boundary expansion decisions should be aligned with watershed and sub-watershed planning” and then “where development and secondary planning are proposed for a designated greenfield area, sub-watershed planning will need to be undertaken”.

The guidance should revise these statements and provide flexibility to undertake appropriately scoped watershed planning studies to inform growth allocation and settlement boundary expansion, which may utilize either watershed plans or initial stages of sub-watershed planning to determine growth allocation and settlement expansion areas with requirements for sub-watershed plans to be completed to inform land use planning and stormwater planning at the secondary plan stage when planning greenfield areas.

The allocation of growth within municipal boundaries may result in one or more settlement expansions of varying sizes and in different locations within one or more watershed or sub-watershed. The ability to appropriately scope sub-watershed



study requirements to different planning needs should be retained provided that each planning study addresses a watershed planning approach.

The guidance allowing appropriate scoping of studies should also be reflected in Section 4.1 on delineation of watersheds and sub-watersheds for situations when smaller sub-watershed or catchment boundaries would be appropriate when considering growth expansion options involving smaller areas.

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Recommendations

The guidance should provide flexibility to undertake appropriately scoped watershed planning studies to inform growth allocation and the feasibility and location of settlement boundary expansions, which may utilize either watershed plans or initial stages of sub-watershed planning.

Sub-watershed study requirements should be clarified for planning greenfield areas as a requirement of secondary planning and allow appropriate scoping to sub-watershed or catchment boundaries in cases where growth expansion options involve smaller areas.

Clarification of Alignment with Infrastructure Planning under the Environmental Assessment Act and Municipal Class EA

The limited information in the guidelines on alignment to the Municipal Class Environmental Assessment process is a significant concern. This gap could result in uncertainty in interpreting the level of watershed planning detail required at early infrastructure master plan stages and the more detailed work that would normally be provided at the individual project EA stages. Inappropriate implementation could have significant consequences in delivering timely infrastructure master planning, providing co-ordinated input to land use planning, providing financing for infrastructure and unnecessarily delaying key projects.

Section 7.2 *Informing Land Use Planning and Integrated Planning for Water, Wastewater and Stormwater* provides a simplified diagram indicating the different levels of watershed planning (watershed and sub-watershed scales) and where they connect to inform municipal land use planning. Step 2 in the guidance discusses alignment with environmental assessment approaches for infrastructure planning. Additional guidance and clarification is recommended in this section and throughout the document to clarify the relationship between watershed planning and municipal infrastructure master planning and infrastructure project approvals under the Environmental Assessment Act and Municipal Class EA process.

The guidance currently discusses harmonization of watershed planning and EA planning for infrastructure, and indicates that the choice to integrate infrastructure



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EA planning steps within a watershed planning study is optional, but does not clearly illustrate where watershed/sub-watershed planning aligns with the infrastructure EA planning process if this option is not undertaken. Direction and options for infrastructure planning within the Municipal Class EA should be reviewed and reflected in the guidance document so this relationship is clearer.

The diagram in Section 7.2 should be more detailed and indicate the various alignments to municipal land use planning (MCR components, Regional OPs, Local OPs, Secondary Plans, Block Plans, Plans of Subdivision, Site Plan) and clarify alignments to the different Municipal Class EA processes and approaches municipalities may implement for infrastructure. The diagram and supporting guidance should clarify and provide flexibility for undertaking infrastructure master planning as an integrated, separate parallel or sequential process.

Recommendations

Further consultation with municipal public works water, wastewater and stormwater staff is recommended to clarify how the guidance should be improved to provide appropriate direction for infrastructure planning through the Municipal Class EA processes. The recommendation also applies to the guidance referring to climate change planning for Infrastructure in Section 6.4.

Detailed Comments

- Section 2.7 Roles and Coordination pgs. 21-23

While the Municipal role was highlighted, no specific role for the Conservation Authorities (CAs) was identified. However, historically the CAs played a major role in delivering watershed or sub-watershed study processes and are expected to continue in that capacity in collaboration with municipalities. Recognizing the delegated role (representing the provincial interests as it relates to natural hazards) and expertise CAs provide, further efforts should be made to appropriately outline the partnership framework between CAs and upper-tier municipalities to avoid duplication of efforts, streamline efficiencies and ensure responsible use of resources.

- Section 4.2 Identification of Water Resource System pgs. 34-38

This section should be expanded to acknowledge the current range of practices in water resource system delineation. The guidance should explain how water resource systems are generally identified at a watershed scale, and then refined through subsequent subwatershed studies and then confirmed through land use approvals with final determination through various processes including secondary planning, block planning, zoning, plans of subdivision and site plan approvals. The expectation that system delineation will be completed at a broad watershed scale is unrealistic.



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- Section 4.3 Characterization of Existing Conditions pgs. 39 – 45

Watershed characterization is recommending considering some indicators associated with hydrologic function, such as the minimum base flow, depth to water table, oxygen levels, aquifer pressure, etc., consistent with indicators identified in the Provincial Policy Statement on quality and quantity of water. However, regional groundwater aquifer system boundaries do not necessarily align with watershed boundaries and therefore further clarification is required on how characterization of water resources system is to be achieved through watershed planning studies.

- Section 4.3 Characterization under “Sources of Available Baseline Data” pgs. 46-47

Although the draft Guidance document contains many references to various CAs studies and reports (Resources section 9), it is somewhat surprising that there is no specific reference to available data from the CAs in this section of the report, especially since available datasets should be considered in advance of implementing a “boots on the ground” monitoring plan.

- Section 6.1 Water Quantity, Water Budget and Water Conservation Plans pgs. 54- 62

The Water Budget and Water Quantity Risk Assessment Guidance Module is described as studies done as part of the Source Protection program and it targets policies to manage water uses to protect sources of municipal drinking water. These studies are done based on local groundwater and aquifer conditions. Regional groundwater aquifer system boundaries do not necessarily align with watershed boundaries. Further guidance on recommended practices for characterization of groundwater and surface water features, areas and functions in a watershed planning study is recommended.

- Section 6.3 Natural Hazards in Watershed Planning & Subwatershed Plans pgs. 73-79

It would be beneficial if some text was added outlining the CAs role in providing technical support and representing the provincial interest in identifying and protecting natural hazards through the land use and watershed planning process. For example it could identify CAs (where they exist) as being the lead for providing input on defining the characteristics of natural hazards (flood hazards, erosion hazards and hazards associated with Great Lakes) and regulating development through the land use planning process.

- Section 6.4 Climate Change & Watershed Management pgs. 83-84

Step 2 should also consider mentioning the influence of extreme storm events on frequency of wastewater treatment plant by-pass and spills – which may be more frequent stressors on water resource systems in the future if not properly mitigated.



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- Section 7.2 Informing Land Use Planning and Integrated Planning for Water, Wastewater and Stormwater pg. 120-121

There are several statements in the sections regarding allocating growth, planning for designated settlement areas and proposals for large-scale development that indicate “growth should be directed to areas outside of water resource systems and key hydrologic areas”. These statements are inconsistent with the Growth Plan, 2017 policies. It is not possible to entirely avoid “water resource systems”, or “key hydrologic areas”, as currently defined by the Growth Plan, 2017, when allocating growth, planning designated greenfield areas or considering large scale development. These sections and all references to similar policy in the guidance document should be carefully reviewed and revised to correctly reference the corresponding provincial plan policies. Growth Plan Sections 2.2.8, 4.2.1, 4.2.2 and 4.2.3 should be reviewed for the correct policy interpretation.

If you have any questions, please contact Mark Head, Manager, Research and Analysis (Mark.Head@peelregion.ca), or 905-791-7800 ext. 4354).

Respectfully,

Arvin Prasad, MPA, RPP, MCIP
Director of Integrated Planning
Public Works

- cc. Ed Sajecki, Commissioner, Planning and Building, City of Mississauga
Rob Elliot, Commissioner of Planning and Development Services, City of Brampton
Peggy Tollett, General Manager of Community Services, Town of Caledon
Chris Lompart, Manager, Land Use Policy Section, Environmental Policy Branch, Ministry of the Environment and Climate Change
Jennifer Keyes, Manager, Water Resources Section, Natural Resources Conservation Policy Branch, Ministry of Natural Resources and Forestry