

July 18, 2023
(Submitted Electronically to the ERO)

Re: Response to ERO #019-6813 - Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Thank you for the opportunity to submit comments on the Ministry of Municipal Affairs and Housing (MMAH) posting on the Environmental Registry of Ontario (ERO). We understand that, in support of the government's Housing Supply Action Plan, MMAH is consulting on a province-wide Provincial Planning Statement ("new PPS") that would adopt certain policies from A Place to Grow ("Growth Plan") and the Provincial Policy Statement, 2020 ("existing PPS") into a single policy instrument.

The Credit Valley – Toronto and Region – Central Lake Ontario (CTC) Source Protection Region spans more than 10,000 square kilometers and includes thirty-three municipalities within the most densely populated region of the country. The CTC Source Protection Region includes multiple Large and Fast Growing Municipalities as designated under the new PPS. Under the provisions of the *Clean Water Act, 2006* the CTC Source Protection Committee is charged with developing and administering a drinking water Source Protection Plan to protect supplies of drinking water against vulnerabilities now and into the future. The CTC Source Protection Committee passed a resolution on May 3rd, 2023, directing staff to "submit comments regarding implications to protecting sources of municipal drinking water as a result of proposed changes to the provincial planning framework." This letter, along with comments submitted to the Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 97, submitted on May 11, 2023, are in accordance with this resolution.

The protection of sources of drinking water is a crucial component that supports the government's goal of building 1.5 million homes to address the housing crisis. We would like to ensure the proposed changes account for the range of interconnected policies that support the implementation of approved source protection plans. We kindly request the government to ensure that source water protection remains a priority as they contemplate further policy changes to accommodate this important goal.

CTC Source Protection Region responses to Proposed Provincial Planning Statement Consultation Questions:

1. What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?

- We are encouraged by the proposed update to the **Water Policy 4.2.1 e).1.** which addresses a long-standing request for a more comprehensive drinking water supply policy direction. The proposed language revises existing PPS policy by removing the phrase “all municipal”. It is our understanding that the revised policy intends to broaden this key provincial source water protection direction to all sources of drinking water supplies whether they are associated with municipal drinking water systems or not. Given the importance of private drinking water supplies and systems to overall drinking water source protection, we support this policy change. We thank the government for their leadership in effecting this change.
- The Growth Plan requires the identification of **Water Resource Systems (WRS)**, as well as protection of *key hydrologic features* and *key hydrologic areas* and their function. This policy direction is consistent with the Greenbelt Plan and builds on existing plans and policies, including the source protection plans developed under the *Clean Water Act, 2006*. This provides an integrated framework for protecting the quality and quantity of water in the Greater Golden Horseshoe (GGH). Key Hydrologic Areas for example include Significant Groundwater Recharge Areas and Highly Vulnerable Aquifers which are designated through source protection plans and included Municipal Official Plans. As of December 2022, out of 33 municipalities in CTC Source Protection Region, 31 municipalities have completed or are in the process of completing their OP conformity exercise with the *Clean Water Act, 2006*. Furthermore, CTC Source Protection Region includes lands inside and outside of the Greenbelt Plan area.

The removal of the Growth Plan WRS policies could lead to the implementation of less stringent policy protections for water quality and quantity outside the Greenbelt Plan area. This varied policy approach

could erode the supportive policy framework of the CTC Source Protection Plan, which applies across the watershed-based CTC Source Protection Region beyond the Greenbelt Plan area.

We suggest that the new PPS should carry forward the WRS policy direction from the Growth Plan to ensure a consistent and integrated policy approach for protecting water quality and quantity across the geography of the CTC Source Protection Region.

- The Growth Plan requires proposed **Settlement Area Boundary Expansions** to be assessed in terms of feasibility in relation to applicable source protection plan requirements (policy 2.2.8.3 j). The CTC Source Protection Plan contains specific policy direction for settlement area boundary expansions. It is important to note, as demonstrated by the patterns of growth across CTC, these policies do not prevent development. Rather they ensure water quality and quantity are protected as the area is developed. The new PPS Settlement Area Boundary Expansion **Policy 2.3.4** does not contain any water resource related considerations and, specifically, removes the linkage to source protection plans. A loss of provincial planning policy linkage can unintentionally undermine source protection planning requirements. The CTC Source Protection Region includes multiple **Large and Fast Growing Municipalities**, that would benefit from clear policy direction on source protection as they endeavor to meet their housing targets. For example, the Town of Caledon's work on their Official Plan conformity with the *Clean Water Act, 2006*, is in progress and maintaining the policy linkage would ensure CTC source protection policies regarding settlement area expansions are reflected.

Furthermore, drinking water systems across Southern Ontario are reporting increasing trends in sodium and chloride because of the application of winter de-icing materials. Source Protection Authorities and their implementing partners have been undertaking a coordinated effort to complete outstanding Risk Management Plans addressing Significant Drinking Water Threats. Under Clean Water Act, 2006, these increasing trends constitute a drinking water Issue which requires delineation of an Issue Contributing Area. Activities that contribute to these rising trends within an Issue Contributing Area are considered as Significant Drinking Water Threats. It is our understanding the proposed

changes are not intended to exempt any requirements set out in Source Protection Plans. However, without explicit policy direction in the new PPS, boundary expansions can potentially increase the number of Significant Drinking Water Threats.

We suggest that carrying forward Growth Plan policy 2.2.8.3 j into the new PPS would ensure source protection considerations are included in future Settlement Boundary Expansions and enable municipalities to meet their growth targets while protecting quantity and quality of drinking water sources.

- We suggest that **Policy 6.2.1** would benefit from direct reference to source protection authorities.

2. What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?

- The Watershed Planning policy direction at **Policy 4.2.3** and associated defined terms are welcome and supported. We suggest this policy would have better alignment with section 4.2 of the new PPS and existing efforts towards updating the provincial watershed planning guideline, by requiring **Large and Fast Growing Municipalities** to undertake watershed planning.
- Please also see commentary in response to the first question with respect to maintaining policy linkages to ensure proposed Settlement Area Boundary Expansions are assessed in terms of feasibility in relation to applicable source protection plan requirements.

3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?

- Not directly applicable to CTC SPR role and mandate.

4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?

- We support the government's expressed intent to consider alternatives to proposed policy direction that would allow for the creation of up to 3 new residential lots on existing parcels of land in prime agricultural areas. However, this proposed policy could conflict with source protection plan policies, such as those related to new or expanded septic systems and sanitary sewers, recharge reduction and de-icing applications. The potential impacts of this proposed policy to negatively affect drinking water quality and quantity should be thoroughly understood. Should the proposed policy move forward or be modified, it should, at a minimum, be contingent on an assessment to ensure no negative impacts for drinking water source protection.

5. What are your thoughts on the proposed policies regarding planning for employment?

- Not directly applicable to CTC SPR role and mandate.

6. Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?

- Not directly applicable to CTC SPR role and mandate.

We would like to thank you for the opportunity to provide comments on the new PPS and kindly request the government to ensure the continued fulsome implementation of the approved CTC Source Protection Plan. If you have any questions regarding this letter, or the CTC Source Protection Plan, please contact Behnam Doulatyari at Behnam.Doulatyari@cvc.ca.

Sincerely,

Nathan Hyde

Chair, CTC Source Protection Committee



DRINKING WATER
SOURCE PROTECTION
Our Actions Matter

CTC Source
Protection
Region

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