

July 25, 2023

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3

## Public Works

10 Peel Centre Dr.  
Suite A  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

### **Updated 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 provide input on the proposed Provincial Planning Statement (PPS) natural heritage policies and definitions. Please note that on June 9, 2023, the Region of Peel provided a separate response to the original Environmental Registry of Ontario (ERO) 019-6813. This response provides new Peel staff comments on the updated posting. If additional comments are provided through a Council resolution, they will be forwarded to the Ministry of Municipal Affairs and Housing for consideration.

Key recommendations address the need to:

- continue an appropriate level of protection of natural heritage and water resource systems, especially in large and fast-growing municipalities; and,
- have up-to-date Provincial implementation guidance documents for identifying and protecting natural heritage and water resource systems.

### **General Comments**

Peel staff appreciates the Province's efforts to increase housing supply, improve affordability and provide comprehensive policy direction on land use planning matters. The proposed PPS, while combining elements of the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow), 2019, represents a significant streamlining of policy direction and fundamental change to the policy-led planning framework in Ontario. While Peel supports streamlining to increase housing supply, it is important that provincial directions carefully balance policy direction for multiple planning objectives including protecting Provincial resources, agriculture, water, and natural systems.

## Specific Comments

### **Large and Fast-Growing Municipalities and Natural Heritage Planning**

Peel staff strongly supports the Province's proposed policies for natural heritage which retain the key direction and protection standards in the current PPS. The Province should consider, however, strengthening policy direction specifically for large and fast-growing municipalities. The revoking of A Place to Grow Section 4.2.2, removes important policy direction to municipalities in the Growth Plan Area to undertake a natural heritage system planning approach, a direction that remains relevant to large and fast-growing municipalities. Retaining A Place to Grow's protection standards for key features outside settlement areas, connectivity policies that are more specific than the Provincial Policy Statement, and policies addressing removal of other features is relevant for natural heritage system planning in large and fast-growing municipalities, and with appropriate modifications, should be brought into the proposed PPS.

### **Vision Statement**

The proposed PPS 'Vision Statement' provides an important foundation and context for the interpretation of the PPS policies and should reflect all key provincial interests. The Vision Statement should recognize that the Province's natural heritage resources, water resources, agricultural resources, mineral resources, cultural heritage and archaeological resources provide important environmental, economic and social benefits as currently expressed in the Provincial Policy Statement.

The current direction in the Provincial Policy Statement, that resources should be managed in a sustainable way to conserve biodiversity, protect essential ecological processes, protect public health and safety, minimize environmental and social impacts and provide for the production of food and fibre should also be retained in the proposed PPS. The wise management of resources and the protection, restoration and enhancement of natural systems are essential for the long-term economic, social and environmental well-being of Ontario's communities.

### **Watershed Planning**

Natural heritage and water resource systems are inextricably linked and are highly sensitive to the cumulative impacts of growth and development, especially in large and fast-growing municipalities. These systems require comprehensive and integrated watershed planning to be undertaken at an ecologically appropriate scale. The watershed scale is appropriate for developing a scientific understanding of natural systems and their interrelationships and how development can occur while maintaining or enhancing those systems. Provincial policy should continue to require that land use decision making, infrastructure planning and large-scale development be informed and supported by watershed and sub-watershed planning

information with direction to avoid, minimize or mitigate impacts and address the risks associated with the impacts of climate change.

As was provided in Peel's June 9, 2023, submission, the proposed PPS policies in Sections 4.1 and 4.2 need to go beyond policies for just managing sewer and stormwater infrastructure, and retain the existing A Place to Grow's watershed scale planning policies to inform development, infrastructure and growth management to address the unique needs in large and fast-growing municipalities. The potential impact of planning for large and fast-growing municipalities on the environment requires that watershed planning be undertaken to inform decisions on planning for growth and development, avoid, minimize or mitigate risks to public health and safety, including risks associated with climate change, and support a comprehensive, integrated and long-term approach to the protection, restoration and enhancement of natural heritage and water resource systems, features and areas.

### **Wetlands**

The level of protection for non-Provincially significant wetlands (PSW), in the current A Place to Grow should also be retained. Additional Provincial guidance that protects non-PSWs that are key features within and outside of settlement areas should be included in the proposed PPS.

### **Implementation Guidance**

Revisions to the definition of '*Significant*' now references that the evaluation of significance will be set out in guidance, criteria and procedures established by the Province. The Province needs to provide comprehensive, up-to-date implementation guidance for the proposed PPS (e.g., Natural Hazard Technical Guidelines, Watershed and Subwatershed Planning Guides, and the Natural Heritage Reference Manual) to increase the consistency of applying Provincial policy and support decision-making. The protection of significant natural heritage features to a "no negative impacts" protection standard is a key policy direction in the PPS. Further clarification in the guidelines of how "negative impacts" to features and their ecological functions is to be interpreted in the implementation of the natural heritage policies should be addressed through updated guidance. Providing examples of what could be considered a negative impact in the context of the policy would be helpful.

Peel looks forward to continuing to work with the Province, local municipalities, and other stakeholders to meet Ontario's housing needs. I would be pleased to provide any clarifications or additional comments on these matters.

Yours Respectfully,

A handwritten signature in black ink that reads "Tara Buonpensiero". The signature is written in a cursive, slightly slanted style.

Tara Buonpensiero, MCIP, RPP  
Acting Chief Planner and Director of Planning & Development Services  
[Tara.Buonpensiero@peelregion.ca](mailto:Tara.Buonpensiero@peelregion.ca)  
437-218-7724

Cc:  
Andrew Whitemore, Commissioner, Planning & Building, City of Mississauga  
Steve Ganesh, Commissioner of Planning, Building and Growth Management, City of Brampton  
Antonietta Minichillo, Director of Planning and Chief Planner, Town of Caledon