



Corporate Services

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October 4, 2017

Ala Boyd
Manager, Natural Heritage Section
Ministry of Natural Resources and Forestry
Policy Division, Natural Resources Conservation Policy Branch
300 Water Street
Peterborough, ON K9J 8M5

Dear Ms. Boyd,

Re: Criteria, Methods and Mapping of the Proposed Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe (EBR # 013 – 1014)

The following comments are provided by the Region of Peel in response to the Ministry's consultation on the criteria, methods and mapping for the Growth Plan Natural Heritage System (NHS).

General Comments

In principle, Regional Staff is supportive of natural heritage systems planning at different provincial, regional and local scales. The Region understands the importance of including regional NHS planning within the four provincial land use plans, and the interest of the Province to ensure the broader regional system is continuous throughout the various plan areas.

The Region has previously commented to the Province that a provincial identification of NHS boundaries outside the Greenbelt is a duplication and encroachment in municipal planning. Regional staff does not recommend the Ministry expand criteria further to include more local NHS features or areas as local NHS identification and refinement should continue to be established through municipal planning initiatives informed by watershed planning or other appropriate landscape scale natural heritage system planning studies and initiatives.

The key principles for the NHS should be expanded to reflect the principle that the provincial Growth Plan NHS is complementary to municipal natural heritage systems and does not duplicate or replace local NHS planning.

The implementation of the Growth Plan NHS boundaries should permit appropriate refinement of boundaries by municipalities in consultation with the Province.

Although Regional staff has no significant objection to the regional scale criteria proposed by the Province, the application of the criteria in Peel results in the identification of four small NHS areas, which provide relatively little added policy value given the current framework of local, regional and provincial NHS planning requirements in Peel. The addition of another natural heritage policy layer to implement and administer adds further



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complexity to the already complicated framework of provincial policies that apply to the Region.

Detailed Comments

The EBR posting has requested responses to specific questions. Regional comments on draft criteria and mapping are provided below in response to the questions.

1. Generally, do you agree with the principles? Are there other key principles?

In general, the six principles provide a logical basis for the Ministry's identification of a regional NHS. If considering the Ministry's objective is to identify a NHS at a broad landscape scale for the entire GGH, and not identify or connect all natural features and areas that are important at smaller regional or local scales, the key principles should reflect this broad objective and further clarify and support the roles of provincial and municipal NHS identification. This is currently not reflected in the list of principles, but is described in the background discussion supporting the development of criteria and methods.

The key principles that the scale of the regional system should focus on identifying large core areas and broader linkages within a regional landscape is important to retain as it avoids duplication and involvement with local NHS planning.

In addition to this clarification, a further principle that the regional Growth Plan NHS should support and complement municipal natural heritage systems should be added along with the recognition of the importance of local scale NHS identification by municipalities. This latter principle is necessary to ensure NHS identification is comprehensive and fully addresses natural heritage protection, restoration and enhancement from an ecosystem perspective consistent with the Provincial Policy Statement and Growth Plan directions.

2. Do you agree with the criteria for the composition and size of core areas and linkages?

The Region has not undertaken a comprehensive review to recommend specific criteria that may be appropriate for the purpose of identifying a regional NHS for a GGH-wide geography. There are many options and combinations of criteria and thresholds that would be supportable from a science and evidence perspective.

In principle, the Ministry's direction to identify large core areas and large regional linkages is supported, with the provision that there should be flexibility to refine mapped boundaries through municipal official plan conformity exercises and more detailed planning studies. Although the Growth Plan provides mapping refinement policy, it is understood that the policy is to be interpreted to permit only minor refinements to map the provincial NHS with greater precision in municipal official plans. The mapping process should be more flexible to



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enable refinement beyond simply translating provincial data to a local scale and allow for technical corrections and other study inputs.

The Ministry's draft criteria, methods and mapping leaves gaps and does not identify a complete system at a more local scale. Where appropriate, the technical guide should be enhanced to provide implementation support for municipal NHS planning to ensure gaps are addressed at the local scale.

3. Do you agree that there should be consideration of smaller core areas to acknowledge highly fragmented areas with limited natural cover?

Regional staff does not support expanding criteria to capture smaller core areas or more linkages unless there is a commitment and ability to refine the NHS in accordance with municipal NHS policy and implementation processes. Although the need for stronger NHS identification is supported, the predetermination of NHS boundaries at a provincial scale that include smaller areas and local systems precludes the ability to integrate natural heritage system planning and land use planning when designing complete communities. The inclusion of local system features and linkages in a rigid provincial designation has the potential to impose unwarranted costs and precludes the ability to adjust boundaries for equal or better natural heritage system outcomes.

4. Do you agree with the automated approach to consistently apply the criteria across the landscape?

Yes, in general, systematic application of criteria and mapping methods using GIS tools is supportable. The technical report on the criteria, methods and mapping should also include additional implementation guidance to assist with refinement of the NHS boundary as noted above.

5. Do you have any other suggestions for the Ministry of Natural Resources and Forestry to consider?

The new Growth Plan NHS areas in Peel should be reviewed to ensure they are identified based on the consistent application of regional scale criteria or be deleted entirely given their limited coverage and overlap with local scale NHS planning.

In the event that the Ministry retains the current draft criteria to identify NHS designations, each of the areas recommended for designation in the Region of Peel as shown on the attached map should be reviewed to confirm that appropriate criteria for designation are satisfied in each instance and that boundaries are based on best available data and/or are field checked where feasible.



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In particular, Ministry staff is requested to review and verify the following proposed NHS areas in Peel:

Proposed Mayfield West Linkage (Vicinity of Old School Road and Kennedy Road)

The basis for identifying a large linkage at Mayfield West, which connects the West Humber and Etobicoke Creek watersheds, has merit ecologically; however, it appears that the linkage identified by the Ministry does not completely extend from the West Humber watershed to connect with the Etobicoke Creek NHS designation in the Greenbelt Plan. This linkage is bisected by Highway 10 and stops short of the small valley systems extending north from the Etobicoke Creek Valley. The Ministry is requested to review the recommended NHS designation and confirm whether it satisfies the criteria for designation.

Small NHS Area North of Bolton

Regional staff recommends the Ministry delete the small area of proposed NHS north of Bolton. It is understood the NHS boundary in the Growth Plan at this location is part of a larger core area within the Greenbelt Plan. The portion extending outside the Greenbelt Plan is currently farmland and has no natural heritage features.

Conclusion

The Province should continue to engage municipalities on the criteria, methods and mapping to identify a regional NHS for the Growth Plan.

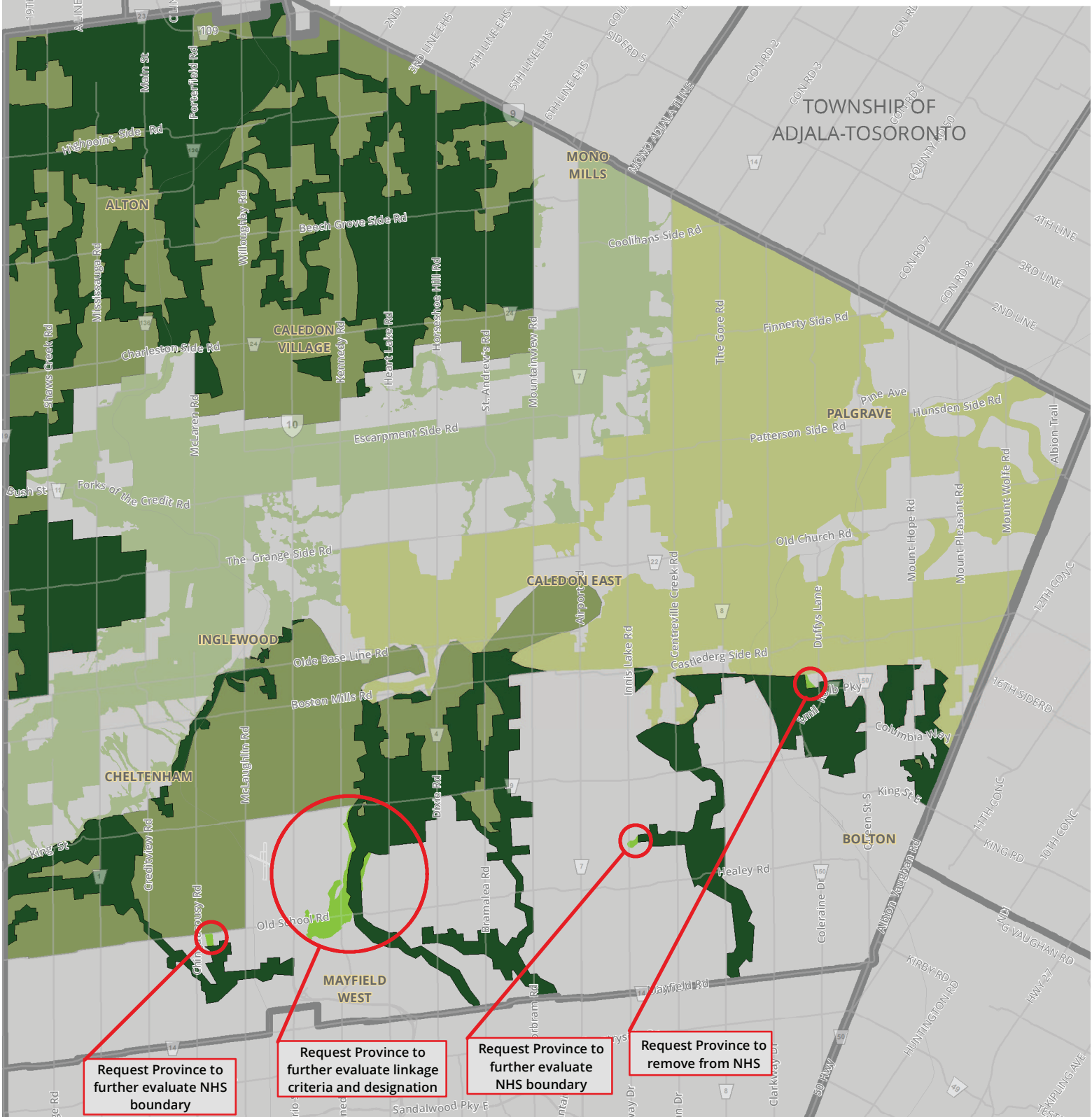
Staff from the Region of Peel thank you for providing the opportunity to comment on this important mapping initiative. We trust that our comments will be considered in finalizing changes to the NHS criteria, methods and mapping.

Yours Sincerely,

Arvin Prasad, MPA, MCIP, RPP
Director, Integrated Planning Division

cc: Jason Travers, Director Natural Resources Conservation Policy Branch
Ministry of Natural Resources and Forestry

Proposed Growth Plan Regional Natural Heritage System in Peel



Natural Heritage System

- Proposed Growth Plan Regional Natural Heritage System
- Greenbelt Plan Natural Heritage System
- Greenbelt Plan - Protected Countryside
- Niagara Escarpment Plan - Escarpment Natural and Escarpment Protection Areas
- Oak Ridges Moraine Conservation Plan - Natural Core and Linkage Areas

The information displayed on this map has been compiled from various sources. While every effort has been made to accurately depict the information, this map should not be relied on as being a precise indicator of locations.

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October 4, 2017

Helma Geerts
Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph, ON N1G 4Y2

Dear Ms. Geerts,

Re: Draft Agricultural System and Implementation Procedures (EBR # 013-0968)

The following comments are provided by the Region of Peel in response to the Ministry's consultation on the draft Provincial Agricultural System, including the proposed Implementation Procedures, draft Agricultural Land Base map and draft agri-food network portal.

General Comments

In principle, Regional Staff is supportive of agricultural systems planning at different provincial, regional and local scales. The Region understands the importance of including agricultural systems planning within the four provincial land use plans, and the interest of the Province to ensure the broader regional system is continuous throughout the various plan areas.

Detailed Comments

Provide Flexibility and Permit the Use of Local LEAR Studies to Refine Provincial Agricultural Land Base Mapping

Peel Region has an established agricultural sector that it is part of a larger agricultural system in the Greater Golden Horseshoe (GGH). However, there are local differences across each of the GGH agricultural communities. The proposed Provincial Implementation Procedures should be clarified to permit greater flexibility for municipalities to identify land use designations for the agricultural land base, based on local factors and needs. The proposed Provincial Implementation Procedures should support refinement of the proposed Provincial Agricultural Land Base map using local LEAR studies, with greater weight given to local LEAR studies, as these studies provide a more accurate assessment of local agricultural capability. For the Province's reference, a map depicting the joint Region of Peel-Town of Caledon LEAR recommended Prime Agricultural Area is attached to this letter.

While the proposed Implementation Procedures do allow for local refinement of the proposed Provincial Agricultural Land Base, the Province does not provide clear detail on how local refinements may occur utilizing local LEAR studies. The proposed Implementation



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Procedures indicate that refinement should be based on systematic LEAR criteria but provides no examples or further detail on these criteria. The Implementation Procedures should not be prescriptive but enable municipalities to work with provincial staff to develop appropriate criteria through the local refinement process.

To enable municipalities to undertake their refinement, the Province should release its LEAR datasets used to identify the proposed Provincial Agricultural Land Base.

Recognizing Prior Approved Non-Farm Designations

As provincial mapping is broad scale and not refined, it inadvertently extends into existing settlement boundaries and other approved, non-agricultural designations that may not be appropriate candidates for PAA or Rural Land designations. There are also areas that are not identified as PAA in the Provincial mapping that are currently designated as PAA in the Region of Peel and Town of Caledon Official Plan. The proposed Provincial Implementation Procedures should discuss these inaccuracies, correct the draft agricultural land base mapping and acknowledge that data correction may also be part of the municipal conformity process.

In the Region, land designated in both the Regional Official Plan and Town of Caledon Official Plan as 'Palgrave Estates Residential Community' has been identified as candidate lands for the agricultural land base. While agricultural uses are permitted, this area has received prior planning approval to be excluded from Prime Agricultural Area or Rural Lands designations. This is a significant discrepancy in the draft Provincial Agricultural Land Base map and the identification of this area as candidate lands should be removed.

Regional staff is able to provide OMAFRA with the Region's settlement boundaries in a GIS shapefile so that discrepancies in the draft Provincial Agricultural Land Base map can be corrected prior to the Province releasing the final interim mapping.

Flexibility to Work with Adjoining Municipalities to Resolve Boundary Issues

As the proposed contiguous Provincial Agricultural Land Base crosses municipal jurisdictions, Regional staff recognizes the need to work with adjoining municipalities to refine and align agricultural land use designations at municipal borders. However, as municipalities may refine the draft Provincial Agricultural Land Base based on local LEAR studies and local land use designation preferences, the Province should provide corresponding flexibility when making decisions on how agricultural designations align at boundaries.

As the proposed Provincial agri-food network also crosses municipal jurisdictions, how municipalities are to consider the agri-food network when preparing Agricultural Impact Assessments (AIA), needs to be clearer. The Province should develop evidence-based



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guidance for municipalities, with mitigation recommendations for the agri-good network, especially where the network in another jurisdiction could be influenced. This detailed guidance should clarify expectations relating to avoiding, minimizing and mitigating impacts to the agri-good network.

Designation of Prime Agricultural Areas and Rural Lands by an Upper-Tier Municipality

As an upper-tier municipality, the Region of Peel has delegated local land use planning authority to its Local Municipalities. The draft Provincial Implementation Procedures should make clear that upper-tier municipalities have the option to either designate or identify agricultural land use designations in upper-tier plans or can direct, through text policy, that Local Municipalities designate as appropriate in accordance with upper-tier Official Plan mapping.

Agri-Food Network Portal

The draft agri-food network portal could be revised to be more user-friendly. The layers could be grouped using NAICS codes and land use designations. Information in the portal should be available for download and use by municipalities in their GIS software. The portal should also clarify the last modification or date of each data layer and how often the portal is updated. An option for municipalities, businesses and agricultural commodity groups to provide information for upload to the portal would be beneficial.

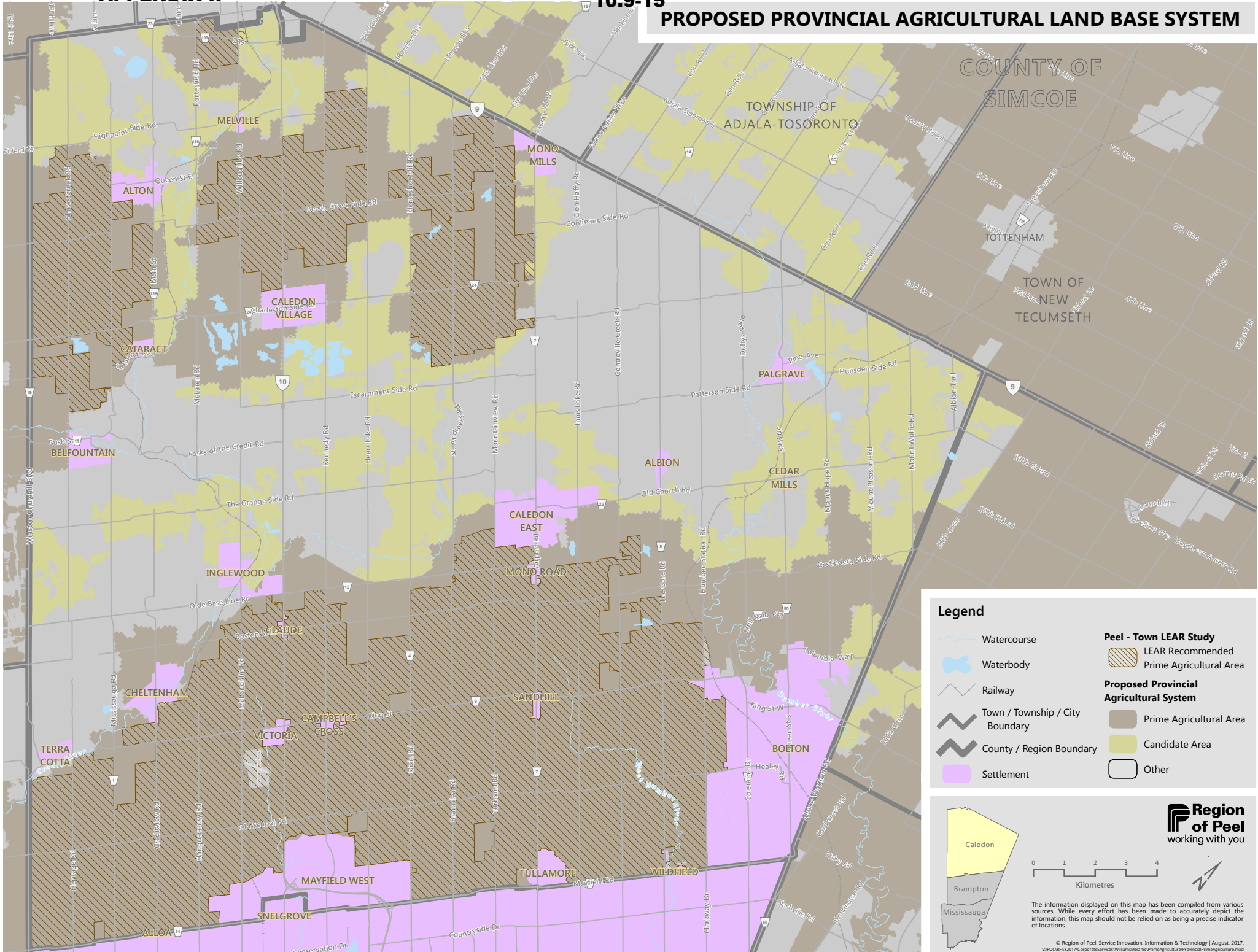
Conclusion

The Province should continue to engage municipalities on the criteria, methods and mapping to identify a Provincial Agricultural System for the Greater Golden Horseshoe.

Staff from the Region of Peel thank you for providing the opportunity to comment on this important initiative. We trust that our comments will be considered in finalizing changes to the Provincial Agricultural System, the proposed Implementation Procedures, agri-food network portal and draft Agricultural Land Base mapping.

Yours Sincerely,

Arvin Prasad, MPA, MCIP, RPP
Director, Integrated Planning Division



COUNTY OF SIMCOE

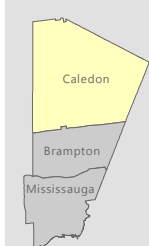
TOWNSHIP OF ADJALA-TOSORONTO

TOWN OF TOTTENHAM

TOWN OF NEW TECUMSETH

Legend

- Watercourse
- Waterbody
- Railway
- Town / Township / City Boundary
- County / Region Boundary
- Settlement
- Peel - Town LEAR Study
LEAR Recommended Prime Agricultural Area
- Prime Agricultural Area
- Candidate Area
- Other



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