

From: Muller, Joe (NDMNRF) <Joe.Muller@ontario.ca>
Sent: December 3, 2021 8:35 AM
To: Head, Mark <mark.head@peelregion.ca>
Subject: NEC comments on Peel 2051 OP and MCR

Hello Mark:

Please find attached our comment on your draft 2051 OP, and thank-you for your patience. Please let me know if you have any questions or would like to discuss, and take care,

Joe

Joe Muller, RPP, MCIP
Senior Strategic Advisor
Niagara Escarpment Commission



Niagara Escarpment Commission
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In order to ensure a safe and secure environment for staff and clients and in response to recommendations by health professionals, the NEC offices are closed to the public until further notice. The NEC is continuing to provide services via email and telephone. Updates can be found on our website: <https://www.escarpment.org/Commission/COVID19>

Please let me know if you require communication supports or alternate formats.

BY EMAIL

November 30, 2021

Mark Head
Manager, Research and Analysis
Planning and Development Services
Public Works
Region of Peel

**Re: Niagara Escarpment Commission Comments on the Region of Peel's Draft
Official Plan (October 2021)**

Thank you for providing the Niagara Escarpment Commission (NEC) with the opportunity to comment on the proposed Official Plan (OP) for the Region of Peel. The NEC values the Region's commitment to protecting the Niagara Escarpment, and notes that the proposed OP contains robust policies that support the purpose of the Niagara Escarpment Plan, which is "to provide for the maintenance of the Niagara Escarpment and land in its vicinity substantially as a continuous natural environment, and to ensure only such development occurs as is compatible with that natural environment."

NEC staff offer the following comments that may assist in clarifying some Escarpment-related policies in the proposed OP:

Section 2.10 Niagara Escarpment

- NEC staff notes that the preamble of this section describes the permitting authority of the NEP, and includes the following terms in italics: *development*, *cultural heritage resources*, and *scenic resources*. Please note that these terms are defined in the NEP and/or the *Niagara Escarpment Planning and Development Act* (NEPDA). Therefore, it is the NEP definitions that are applicable, and not those found within the proposed OP. NEC staff suggests that this be corrected by removing the italics and including a note that explains that the NEP/NEPDA definitions apply. In addition, as the first paragraph of this section comprises its definition found in the glossary, those comments apply here as well.

Section 2.14.24 Woodlands

- As NEC staff noted previously, it would be helpful to note where NEP policies apply here. While the relation of the NEP to OP policy overall is acknowledged in the preamble to this OP, it would be helpful to note in specific sections of the OP like this where it is known that NEP policies are more restrictive, e.g., significant woodlands.

Section 3.4 Mineral Aggregate Resources

- 3.4.7.b: NEC staff recommend insertion of Escarpment Natural Area here alongside the Escarpment Protection Area. While this prohibition is implicitly incorporated within the definition of "Core Areas of the Greenlands System" in 3.4.7.a, identifying the Escarpment Natural Area explicitly here makes this policy clear with respect to the NEP.

Section 5.10.34 Regional Roads

- NEC staff notes that where expansion is proposed for regional roads through the NEP, such as Winston Churchill Boulevard, King Street, Old Base Line Road, Hurontario Street, Airport Road, Charleston Side Road et cetera, NEP policies may be more restrictive within the NEP Area of Development Control in general. In addition, NEP policies may restrict roadworks where proposed expansion is located in Escarpment Natural Areas, wetlands, key hydrologic features or key natural heritage features. NEC staff recommends that wording be inserted in this section to reflect how NEP policy may affect proposed expansion of regional roads.

Section 7.4.9 Lot Creation and Lot Adjustments

- It would be helpful to note where NEP policies apply here. While the relation of the NEP to OP policy overall is acknowledged in the preamble to this OP, it would be helpful to note in specific sections of the OP like this where it is known that NEP policies are more restrictive with respect to lot creation.

Glossary - Niagara Escarpment

- NEC staff recommend amending wording to incorporate and specifically identify and differentiate between the cultural and natural categories of heritage. Further, with 2017 amendments to the Niagara Escarpment Plan, it would be appropriate to reiterate the Indigenous relationship to the Niagara Escarpment.

Official Plan Schedules

- The NEP mapping provided in new Schedule X8 is using current mapping. NEC staff suggests some cartographic refinement to allow more legibility where roads overlap with NEP designations, and where multiple feature boundaries overlap. These comments have been provided to the Region of Peel by NEC staff in an effort to meet the City's timelines for its OP review. A copy of these comments will be provided at the next Commission meeting to ensure Commissioners are aware, and to provide them with an opportunity to make additional comments. Therefore, the NEC may make an additional submission, if necessary.

For additional information or clarification, please contact Joe Muller, Senior Strategic Advisor, at 905-705-5837 or joe.muller@ontario.ca. Once again, NEC staff appreciates the opportunity to comment on the proposed OP. We look forward to on-going co-operation with the Region of Peel in protecting the Niagara Escarpment.

Sincerely,



Debbie Ramsay, RPP MCIP,
Director
Niagara Escarpment Commission

JM

- c. Niagara Escarpment Commission
Joe Muller, NEC Staff