



Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
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RE: Environmental Registry of Ontario Posting 019-2927 – Proposed Updates to the Regulation of Development for the Protection of People and Property from Natural Hazards in Ontario

From: Steve Ganesh, Commissioner (A), Planning, Building and Growth Management Department, City of Brampton

Michael Won, Commissioner (A), Public Works & Engineering Department, City of Brampton

Whom It May Concern:

Thank you for the opportunity to provide input on the proposed updates to the Regulation of Development for the Protection of People and Property from Natural Hazards in Ontario. The City of Brampton has reviewed the proposed updates outlined through this posting and offer responses to the Discussion Questions below.

For Discussion:

Improved coordination between Conservation Authorities Act regulations and municipal planning approvals

Section 28 of the Conservation Authorities Act, as proposed to be amended by the *More Homes Built Faster Act, 2022*, provides for exemptions for development authorized under the *Planning Act* from the requirement to obtain a permit under the *Conservation Authorities Act*. This exemption would apply in the municipalities set out in regulation and could be subject to certain conditions also set out in regulation. Conservation Authorities would continue to permit other activities not subject to municipal authorization.

The Ministry has not proposed a regulation utilizing this exemption tool as part of this regulatory proposal but is requesting initial feedback on how it may be used in the future to streamline development approvals while still ensuring the protection of people and property from natural hazards. Considerations for the use of this tool include:

- 1. In which municipalities should the exemption apply? How should this be determined?**

All municipalities under the jurisdiction of Conservation Authorities who request exemptions and can demonstrate that they have the necessary expertise to conduct the reviews previously carried out by the Conservation Authorities.

2. Which *Planning Act* authorizations should be required for the exemption to apply?

Site Plan and Draft Plan authorizations should be exempt from Conservation Authority permits, specifically related to stormwater management and discharges in to regulated watercourses, provided that there is no gap in the review of these issues once the Conservation Authority review is eliminated.

3. Should a municipality be subject to any requirements or conditions where this type of exemption is in place?

Yes, municipalities should be required to respect the Conservation Authority's natural hazard policies and requirements for discharging into regulated watercourses. This can be accomplished by requiring municipalities to update their stormwater design standards to reflect Conservation Authority natural hazard policies and requirements.

4. Are there any regulated activities to which this exemption shouldn't apply?

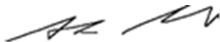
Municipal exemptions should not be provided to "Activities to straighten, change, divert or interfere in any way with the existing channel of a river, creek, stream or watercourse or to change or interfere in any way with a wetland".

The definition of watercourses should exclude roadside and other ditches. This can be accomplished by each municipality maintaining a map of watercourses, municipal drains and ditches in a schedule of an Official Plan, Asset Management Plan and in the system mapping prepared for CLI ECA, in consultation with Conservation Authorities.

Municipalities do not have the resources or expertise to ensure compliance with Conservation Authority policies and requirements associated with watercourses and wetlands.

The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed changes.

Sincerely,



Steve Ganesh, MCIP, RPP
Commissioner (A),
Planning, Building & Growth Management



Michael Won
Commissioner (A),
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