



North Brantford and Tutela Heights Subwatershed Study

Responses to Questions Received During PIC Period

November 24, 2025

QUESTION

I just wanted to reach out to you both personally as I was unable to submit any comments about the North Brantford & Tutela Heights Subwatershed Study from July 2025. (The pamphlet was found in my mailbox). This was a quite interesting read, a lot of information to unpack and I am still reading it. I just wanted to make sure that I am on future mailing lists. I live on a property immediately adjacent to Jones Creek. (*exact address deleted for confidentiality*), to be exact. We see flooding of that creek every year. Whether it's Springtime or a heavy summer rain, that creek will overflow its banks quite quickly.

ANSWER

Noted. Thank you. It is noticed that property (*as provided in the comment/question- exact address deleted for confidentiality*) is very close to floodplain from 2-year to 100-year but not affected by 2–100-year events. The west side of the property is within the regional floodplain. You can subscribe to updates by clicking "Subscribe to this Page" at the bottom of the following webpage: [North Brantford and Tutela Heights Subwatershed Study Update - City of Brantford](#)

QUESTION

Notwithstanding all the previous work undertaken for the lands, both through the City's Official Plan Review and the Block Plan process, Figure 4.1 in the Subwatershed Study (included below) proposes to designate all the subject lands as 'Core Natural Areas'. The owner objects to this proposed designation. It does not align with either the new City Official Plan or the approved Block Plan. The Block Plan included detailed Environmental analysis and recommended lands for residential and/or mixed-use development. The Subwatershed Study proposes to designate existing residential dwellings and farmed areas as Core Natural Areas.

ANSWER

The work on the SWS is a snapshot of the conditions present at the time (2022) and is based on the biophysical features and processes that are present. The noted features on the subject property were identified as woodlands which met criteria in the City's policies for inclusion in the natural heritage system. That said, the SWS was, by necessity, scoped to address the large study area and the property access permissions that were received. The SWS report acknowledges that site-specific studies such as an EIS may refine or revise the findings of the SWS based on a more detailed analysis of particular properties, and if such a study has been received and approved by the City and/or other applicable reviewing agencies for the indicated property, then it is understood that that study may take precedence. The SWS is not intended to be updated upon receipt of individual property assessments but will remain as a "snapshot" based on the data and analysis completed at the time of study.



QUESTION

I am writing as I am a resident in the North area of Brantford, that received a notice regarding the project status. I went to the city website to see what information was contained in the documents from the study but found the amount of information too onerous and difficult to navigate to find the information I was looking for. Essentially, I would like to know what mitigation and adaptation strategies will be put in place as development occurs as our neighbourhood has been affected in the last number of years with flooding. Our area (Wyndham Hills) is not tied to the city infrastructure related to sewage and surface road runoff. With development occurring on the north side of Powerline, are there plans in place to put in sewer and force residents to tie-in within a certain timeframe? Secondly, there is an area of land that runs between residents on Summerhayes and the commercial business on King George Rd. What is being done to protect this tributary and ensure it does not get affected by the new development?

ANSWER

Thank you for your comment. Subwatershed Studies by nature are complex, multi-disciplinary, science-based undertakings for managing natural heritage and water resources that are based on ecology, engineering, land use planning and resource management. Every effort was made to make the information clear and accessible to all, while also ensuring compliance with standard protocols, process as well as agency and City requirements.

Servicing options for various infrastructure were not part of the subwatershed study and will be determined at the subsequent stages of study and design. Timeframes cannot be determined at this time.

The tributary in question was outside of the study area, representing the headwaters of a feature which proceeded downstream through private property before reaching the Lower Jones Creek upstream of Highway 24 crossing. The downstream feature was identified as having a recommended 30 m Vegetated Protection Zone as a part of the City's Natural Heritage System. Appropriate buffers have been applied to all receiving features to ensure no upstream impacts are realized as a result of future development.

QUESTION

I live in northeast Brantford, and I am very concerned about the preservation of the watershed, forests and other natural areas in the city. I am no expert, but the city should obviously maximize the preservation of all natural. For Enforcement and environmental protection must be stepped up and not just be platitudes. For example, several houses on Gillin Road and Ludlow Cres backing on to Silver Creek. Several of whom have created "private parks" at the rear of their property. The city doesn't manage these lands very well as it is, and I am concerned the city will just allow it again. Please also protect these areas from human encroachment as homeowners often expand their properties into the areas even if owned by the City. habitats as much as possible. These areas are alive with many birds, occasional Great Blue Herons, deer, foxes, skunks and some fish. Public parks and natural habitats should be created and land preserved as much as humanly possible. Once it's gone it's gone!



ANSWER

Regarding the preservation of "all natural", a subwatershed study is intended to; within the confines of the Federal, Provincial and City policies at the time of the completed assessments; identify streams, wetlands, forests, groundwater recharge areas and other natural areas of the subwatershed, including an inventory of plants, animals, birds, and other species in order to protect, maintain and enhance ecological processes and functions and significant natural features of the subwatershed. A subwatershed study promotes an ecosystem approach to environmental planning in the watershed and encourages integration of environmental and ecosystem considerations in the preparation of land use plans while helping the city, agencies, consultants as well as the development industry understand the needs of the watershed. Residents using public lands as their own "rear yard" is a city enforcement matter related to encroachments. This is not something that can be addressed in the SWS.

QUESTION

We request that the City of Brantford and Grand River Conservation Authority (GRCA) reconsider the acceptance of low impact development (LID) measures on private residential lots as a means for achieving water balance criteria.

ANSWER

LIDs on private lots can include soil amendments, downspout disconnection, rain barrels – these are simple ways to implement LIDs on residential lots that we should continue to allow. The Ministry of the Environment, Conservation and Parks (MECP) supports and encourages the use of LIDs for a variety of land uses including – private residential lots. Consideration of acceptable LID measures on private residential lots as a means for achieving water balance criteria should be evaluated on a case-by-case basis in consultation with City staff.

Many municipalities and conservation authorities, such as the City of Markham and the Toronto and Region Conservation Authority (TRCA), have specific guidelines and policies encouraging and requiring LID on both public and private lands to achieve stormwater management goals.

QUESTION

We learned from our neighbours that you requested feedback on your watershed study. We didn't receive any pamphlets regarding your study and were just sent a copy of your lengthy study yesterday. My husband myself (*deleted names and addresses for confidentiality*) have lived at this location for almost 40 years now. We understand that your study is to play a critical role for growth in our area while protecting the environment; however, your study is inaccurate and outdated. We are located along the bird migratory path and each year our yard and the fields and forests behind our property are host to thousands of birds. They depend on this property for food sources, water sources and protection. Your studies are highly inaccurate even for 2022 when they were apparently done. Some species which you have listed as only "flying over" and not nesting such as the Blue Heron have lived, bred, and fed off the Jones Creek. that I have known of for 40 years. Wood ducks' nest in the trees, mallards and Canada geese either nest in our pond or on in the field beside the Jones creek. Barn swallows, Meadowlarks, Peewees are here too. So are the Kestrels, Killdeers that you deemed not applicable. The peepers and tree frogs that your survey stated recorded no calls. Are you



kidding? They are definitely here too. We need to protect our natural environment. Yes, we have also planted flowers and milkweed to help the Monarchs. Your survey stated, "they will go to people's yards", but they are almost extinct. The Canadian Government listed the Monarch as an ENDANGERED SPECIES in 2023. They need more NATURAL HABITAT such as the milkweed that grows out back along their migratory path. Monarchs do have a stopover near Brantford during their fall migration to Mexico. They utilize areas with milkweed to gather energy for their long flight. Your own survey says, 'THIS HABITAT SHOULD NOT BE DISTURBED" and the fields/meadows with the preferred nectar plants and woodland edge providing shelter are requirements. Leave this area alone. This area is protected under the ENDANGERED SPECIES ACT (ESA). This act is a FEDERAL ACT(SARA) This act protects their habitat as well. Both painted turtles and snapping turtles on the SPECIAL CONCERN list need our creek and the sandy shoulders to nest in that area, also out back. These turtles' winter in the same area near our creek that does not freeze. Our snapping turtles have been here for 40 years as well. Your study said neither species was confirmed. Our neighbour (*deleted address for confidentiality*) actually picked one up out front to protect it from traffic. Our other neighbour at (*deleted address for confidentiality*) lost his broom trying to protect another snapping turtle from the traffic. If these turtles lose their natural habitat they will surely go from on the SPECIAL CONCERN LIST to Canada's ENDANGERED LIST. So much for not being confirmed. Your survey says that our deer that rest out back by the creek can thrive in lower density suburban settings. Have you seen them lying at the side of the road dead from the traffic? Is that surviving? We need to protect all our wildlife. Your surveys are not accurate or up to date. We have lived here for 40 years. Yes, we live in a hazard zone, as the Jones Creek has flooded at least once a year, every year for those 40 years.

Now, since the Ministry has been interfering in our area, we have ENDANGERED SPECIES that you are not recognizing and their habitat not being protected and at risk, amphibians, mammals, generally all wildlife, flora, etc. in peril and our neighbours' homes being flooded after your alterations. We do not support your recommendations or findings as they are inaccurate to say the least.

ANSWER

Due to the large scale of a SWS, field investigations are by necessity scoped and are only able to report on what is observed or can be confirmed through other means. It is acknowledged that there will be locations in the study area that were not able to be studied in detail, and that residents living in an area will have more chances to observe wildlife and local conditions than staff during the limited duration of the project. That said, in mapping out natural heritage features and areas, a conservative approach is taken that assumes species or habitat (particularly for at-risk species) will be present where conditions are suitable, even if staff do not have direct observations.

The Subwatershed study included watercourses, wetlands, woodlands, and other natural heritage features that are defined under the City's policies as areas that are recommended to be protected. This includes a large area of woodland, wetland, and watercourse corridor directly west of (*deleted address for confidentiality*) as well as additional connecting lands to the east along the watercourse corridor. It is also the intention that any future development



areas in proximity to natural heritage features would be subject to a site-specific environmental assessment which would address features and habitat in greater detail than the broader SWS and provide updated information on Species at Risk and applicable habitats.

QUESTION

Natural Resource Solutions Inc. (NRSI) has been retained by several landowners in northeast Brantford to complete environmental studies on their properties (Powerline Rd. East Block Plan Area, and 170, 194 & 218 Powerline Phase 2 and 3 of the North Brantford and Tutela Heights Subwatershed Study appears to overlook 'Official Plan Amendment No. 5, Growth Plan Natural Heritage System Modifications' (OPA 5), which reverted land use designations from Core Natural Areas back to the land use designation that was originally approved by council in March 2021. Rd.). This comment is submitted on their behalf. OPA 5 and associated materials can be found here: <https://prod-environmental-registry.s3.amazonaws.com/2023-06/OP%20Amendment%20No.%205.pdf>

<https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=16727>

<https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=16728>

Areas A – C of OPA 5 are of particular interest to NRSI as they fall within the properties of our clients. Removal of the designation of Core Natural Area for these areas will not impact the remaining Core Natural Areas and a suitable buffer will be maintained to adjacent natural features in all cases. This is supported by the North Brantford and Tutela Heights Comprehensive Environmental Impact Statement prepared by Plan B Natural Heritage consultants and by NRSI's own in independent studies.

NRSI has visited OPA Areas A – C and we agree with these land use designation changes. Our natural heritage studies confirm the areas approved for removal from the Core Natural Area are generally agricultural or residential in nature and should not be included within the Natural Heritage System (NHS). Their removal from the NHS would not be detrimental to the remaining Core Natural Areas as their current land uses do not support species at risk, significant wildlife habitat or other significant natural features. The Powerline East Block Plan Environmental Impact Study (EIS), which details our findings for properties that include Area A (currently agriculture) and Area B (currently agriculture and residential), was submitted to the City of Brantford in June 2024 and our mapping included changes approved in OPA 5. We have also completed a natural heritage overview and mapping for 170, 194 & 218 Powerline Road, which includes Area C (currently agriculture and low-quality meadow/hedgerow). Our findings confirm that the rationale for OPA 5 for Areas A-C is acceptable and we recommend these changes be carried forward to the final Phase 2 and 3 Subwatershed Study.

ANSWER

The SWS is a 'snapshot' of the conditions present at the time of study (2022) and is based on the biophysical features and processes that are present. The SWS was, by necessity, scoped to address the large study area and the property access permissions that were received, and it is acknowledged in the SWS report that site-specific studies such as an EIS may refine or revise the findings of the SWS based on a more detailed analysis of particular properties. If such a study has been received and approved by the City and/or other applicable reviewing agencies for the indicated properties, then it is understood that that study may take precedence. The SWS is not



intended to be updated upon receipt of individual property assessments but will remain as a "snapshot" based on our data and analysis completed at the time of study.

QUESTION

- a) It is unclear what hydrology flows were used to produce the floodlines in Appendix C, and what hydrology flows were used in the hydraulic modeling files
- b) Section 6.4 noted that: It is Aquafor's understanding that GRCA will not consider SWM facilities to be in place when assessing the regional storm. As such, GRCA has accepted the future uncontrolled regional flows as the Regulatory flows within the study area. Further to comment a) we would like to clarify – if there are decreases/increases to Future Uncontrolled Flows through model refinements at the Block Servicing Study stage, that are different than the flows reported in Table 6.5 that the Future Uncontrolled Flows being used as the Regulatory Flows can these be revisited We understand the purpose of the Regulatory flows, and that these flows have been accepted by GRCA based on a proposed uncontrolled condition; however, if there are refinements to drainage boundaries, or imperviousness assumptions, that alter these flows can these flows be refined through the Block Servicing Study process subject to appropriate impact analysis?
- c) Have the SWM Ponds (100-year quantity control ponds) been accounted for during the regional event Uncontrolled Future Flows Scenario?
- d) Section 7.1.1 Notes: In addition, these ponds must be designed to ensure that the post-development flow rates at key flow nodes (Figure 6-1) are controlled to the pre-development flow rates. To clarify, this is for 100-year events and lesser events that must control post- to pre-, and not the regional event (as noted in Section 6.4, GRCA has accepted no regional controls)?
- e) Section 8.4.1 recommends that runoff from the 29 mm storm event be processed through the hierarchy approach, and if not achievable a minimum 5 mm shall be retained in site. It is not clear if this recommendation is based on catchment or property. Some properties are easier to achieve retention/infiltration than others, and flexibility to achieve this based on a catchment basis vs individual property basis is reasonable given water balances are typically performed/calculated on a catchment-by-catchment basis. Locating LIDs in neighbourhood parks (City owned) may be preferred for maintenance / access over private lots – but not all individual property owners have a park on their lands – making it more difficult to achieve the LID requirements. Again, flexibility to achieve the water balance targets on a catchment basis rather than an individual property basis.

ANSWER

- a) Please note that Appendix C does not contain floodline mapping, as such it is unclear what Appendix this comment is referring to. The hydrology flows used in hydraulic models to produce existing 100-year and Regional floodlines are Phase 1 existing condition flow results; Phase 2 Uncontrolled hydrologic model is used for Uncontrolled condition hydraulic results; and Phase 2 Controlled hydrologic model is used for Controlled condition hydraulic results.
- b) Refinements to hydrologic modelling and refinement of the future uncontrolled regional flows (Regulatory flows) are the jurisdiction of the GRCA. Proponents are encouraged to



conduct pre-consultations with the GRCA regarding submission requirements, modelling needs and approvals requirements.

- c) Only current existing SWM Ponds were accounted for in Uncontrolled condition. The SWM Ponds for 100-year quantity control (Controlled Conditions) were not accounted for during regional event Uncontrolled Future Flows Scenario.
- d) Yes. The SWM facilities must ensure that post-development flows at key locations are equal to or less than pre-development in 2–100-year storm events. Regional event control is not required by GRCA.
- e) The City's Stormwater CLI-ECA issued by the MECP requires that Appendix A criteria for Stormwater Management Criteria (including water balance) applies to the criteria listed under Table A1 of the Appendix and applies to all drainage areas greater than 0.1 ha. The Appendix A criteria is applied on an entire site basis. Where the opportunity exists on a project site or the same subwatershed, reallocation of development elements may be optimal for management as described in footnotes of the CLI-ECA.

In line with the MECP Draft LID Stormwater Management Guidance Manual, should pre-design investigation (case specific analysis) undertaken by the proponent or consultation by the proponent with the subject municipality, conservation authority, or as part of the environmental approval pre-consultation and/or pre-design investigation identify that volume targets are not achievable; the proponent should consider and present to the responsible authority the merits of relocating project elements to address varying soil conditions and other constraints. Also, runoff volume control to the maximum extent possible (MEP) should be planned and implemented.

QUESTION

In this regard, we wish to identify our concerns with the recommendations on the proposed land use boundaries, as they have significant implications for the future development potential of our clients' lands. Our clients' lands have now been identified with new constraints with the proposed inclusion of addental lands to the Core Natural Areas as shown in Figure 4.1 Proposed Land Use. It is also most concerning that Figure 7.3 (3 of 4) entitled Restoration Enhancement Opportunities identifies a significant portion of our client's lands as being within a Vegetation Protection Zone, or Enhancement/ Restoration Area and within the "Growth Plan Natural Heritage Area". It is of particular concern that our client's lands are referenced as being within the Growth Plan Natural Heritage Area as the "Growth Plan" no longer exists and has not existed since October 2024. This should have no bearing on the subject lands.

In addition, our client's lands have also been identified as having severe constraints for a stable slope on Figure 7.4 Development Constraints, Stable Slope Offsets and Meander Belt Requirements. These lands have been carried forward as "Environmental Protection Area" or similar designation in the land use plans. The map also indicates that private property access was not granted for the majority of the lands, therefore we question how the analysis was conducted? We object to the recommended land use designations, as well as the restoration and enhancement opportunities and the high constraint areas shown on the attached maps, as this has significant implications for our clients' ability to develop these lands. In addition, the use of the "Growth Plan Natural Heritage Area" should be removed entirely. If the Growth Plan was



used as the basis for the recommendations of this study, the study should be revisited and based on current legislation, as well as sound field assessment to be refined in the Block Plan stage.

ANSWER

The SWS is a 'snapshot' of the conditions present at the time of study (2022) and is based on the biophysical features and processes that are present. The SWS was, by necessity, scoped to address the large study area and the property access permissions that were received, and it is acknowledged in the SWS report that site-specific studies such as an EIS may refine or revise the findings of the SWS based on a more detailed analysis of particular properties. If such a study has been received and approved by the City and/or other applicable reviewing agencies for the indicated properties, then it is understood that that study may take precedence. The SWS is not intended to be updated upon receipt of individual property assessments but will remain as a "snapshot" based on our data and analysis completed at the time of study.

It should be noted that the Phase 1 and Phase 2/3 reports were originally written and submitted in 2023 and we re-dated upon final acceptance by the agencies and City in November 2024 and July 2025 respectively. As such, the field studies and Phase 1 reports were authored when the old PPS was still in effect, and the Growth Plan was still relevant. We understand the concern, but revisiting completed studies like the Phase 1 Characterization Report is not within the current scope. Policy considerations and future changes will be addressed as relevant on a site-by-site or application-by-application basis.

As is noted in the report(s), where property access was not permitted to conduct field investigations, conditions were evaluated through available mapping, air photos, roadside review, etc. and conservative assumptions were made.

A subwatershed study is intended to; within the confines of the Federal, Provincial and City policies at the time of the completed assessments; identify streams, wetlands, forests, groundwater recharge areas and other natural areas of the subwatershed, including an inventory of plants, animals, birds, and other species in order to protect, maintain and enhance ecological processes and functions and significant natural features of the subwatershed. A subwatershed study promotes an ecosystem approach to environmental planning in the watershed and encourages integration of environmental and ecosystem considerations in the preparation of land use plans while helping the City, agencies, consultants as well as the development industry understand the needs of the watershed. The 'developability of the land' is not the focus of a subwatershed study, although development opportunities and environmental constraints are outputs that do inform developability. The focus of a subwatershed is to evaluate the existing biophysical conditions and apply the labels of NHS under the City's policies.

QUESTION

The study mapping of the Core Natural Areas Designation has not been updated to reflect OPA 5 (By-law 97-2023, approved May 23, 2023), which reduced the limits of the Designation and corresponding Adjacent Land Overlay in some areas, both in the north and in Tutela Heights. The status of the Growth Plan for the Greater Golden Horseshoe (including Growth Plan NHS)/Provincial Policy Statement 2020 as now merged in the Provincial Planning Statement 2024 should be acknowledged. The expansion lands are at various stages of the Block Plan process, with the Tutela Heights West Block Plan complete (Approval Fall 2023 - <https://we.tl/t->



ppq8SuHrorr (link expires in 3 days)). The study and staff report (2025-400) do not refer to the Block Plans but rather a subwatershed plan requirement prior to secondary plan. "Secondary planning for the annexed lands" has taken the form of the Block Plan process set out in Section 5.1.f) of the Official Plan. The Block Plan Terms of Reference (Appendix B to the Official Plan) references supporting studies in the block plan process including EIS work that will contain field studies to address gaps or updates in subwatershed level information for the applicable catchment areas of the Block Plan; or that will integrate the existing management goals and recommendations of applicable subwatershed studies. This was to recognize that the subwatershed study was ongoing when the OP was adopted by Council back in 2020. There is a need to reconcile the recommendations in the subwatershed study with the ongoing development and review of the block plans and supporting studies, both of which have had input from the GRCA. In particular, the extent of any changes to the current floodplain limits needs to be understood before they are finalized by the GRCA.

The "Proposed Core Natural Areas" on the mapping (e.g. Figure 4-1) includes areas that were identified in the 2014 Natural Heritage Study that was completed as part of the Official Plan Review but ultimately were not included in the final Core Natural Areas Designation. The extent of the proposed new areas includes these lands, but some have now been approved for development (i.e. Tutela Heights West Block Plan). This mapping will therefore create confusion regarding what is to be protected and/or assessed. The mapping should be revised at least with the limits of this approved Block Plan.

ANSWER

Per the Meeting with City Staff on 2025-08-13, the "City is accepting Aquafor Beech's recommendation to issue an appended document to the Phase 2/3 report outlining the changes" to capture the status of approved development and/ or previous approvals that occurred prior to or subsequent to the field work being completed in 2022 and the Phase 1 and Phase 2/3 reports authored and submitted in 2023.

The SWS is a 'snapshot' of the conditions present at the time of study (2022) and is based on the biophysical features and processes that are present. The SWS was, by necessity, scoped to address the large study area and the property access permissions that were received, and it is acknowledged in the SWS report that site-specific studies such as an EIS may refine or revise the findings of the SWS based on a more detailed analysis of particular properties. If such a study has been received and approved by the City and/or other applicable reviewing agencies for the indicated properties, then it is understood that that study may take precedence. The SWS is not intended to be updated upon receipt of individual property assessments but will remain as a "snapshot" based on our data and analysis completed at the time of study.

It should be noted that the Phase 1 and Phase 2/3 reports were originally written and submitted in 2023 and we re-dated upon final acceptance by the agencies and City in November 2024 and July 2025 respectively. As such, the field studies and Phase 1 reports were completed under the policy framework in place at the time, when the previous PPS was still in effect and the Growth Plan was applicable. We understand the concern, but revisiting completed studies like the Phase 1 Characterization Report is not within the current scope. Policy considerations and future changes will be addressed as relevant on a site-by-site or application-by-application basis.



SWS work is an independent entity/ study and should not be required to undertake edits of the findings to "reconcile" with other studies, which may or may not have been completed at the same level of study or following the same protocols and/or approaches. Updates to the reporting in regard to the status of approved development and/ or previous approvals that occurred prior to or subsequent to the field work being completed in 2022 and the Phase 1 and Phase 2/3 reports authored and submitted in 2023, unfortunately, is not realistic or financially viable for the City and its consultants.

QUESTION

The hydrology and hydraulic models are an important component of the SWS as they establish stormwater management recommendations that must be implemented in the catchments that pertain to the Central Block and West Block plan areas. Receiving the models with less than 2 weeks to review is insufficient time to complete a comprehensive review of the models. As such, additional comments may be provided on hydrology and hydraulic models.

ANSWER

The hydrology and hydraulic models have now been approved by the GRCA Board and endorsed by the Council. As such, we will not be accepting any further comments or revisions to these models.