



July 31, 2020

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, 23rd Floor, Suite 2304
Toronto, ON M7A 2J3

Re: **Conservation Ontario's Comments on the "Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe" (EBR #019-1680) and the "Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe" (EBR #019-1679)**

Ontario Growth Secretariat:

Thank you for the opportunity to provide comments on the "Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe" and the "Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe". Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). These comments are not intended to limit consideration of comments shared individually by CAs through the consultation process.

Conservation authorities are involved in the land use planning process in a variety of ways, including: as a regulatory body under Section 28 of the *Conservation Authorities Act*; as source protection authorities under the *Clean Water Act* supporting policy implementation; as a body with delegated authority in plan review to represent the provincial interest for natural hazards; as the province's second largest landowners, who may become involved in the planning and development process, either as an adjacent landowner or a proponent; and through service agreements with our municipal partners to offer planning advice. In these roles, CAs endeavour to provide the best technical guidance to their municipal partners regarding how to balance multiple provincial, municipal and watershed priorities in a timely and cost-effective manner.

Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe

It is understood that Proposed Amendment 1 would generally: update the Distribution of Population and Employment for the GGH through revised forecasts; extend the Plan horizon from 2041 to 2051; allow new aggregate operations, wayside pits, and quarries within the Natural Heritage System; allow the conversions of employment areas to non-employment uses within a provincially significant employment zone that is located within a Major Transit Station Area; and align the Growth Plan with the 2020 Provincial Policy Statement (PPS). Conservation Ontario offers the following comments.

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Conservation Ontario acknowledges that many of the background assumptions associated with the three growth outlooks are articulated in the Technical Report Prepared by Hemson Consulting LTD, “Greater Golden Horseshoe: Growth Forecasts to 2051”. It is noted however that the Province has not conducted a feasibility analysis of the projections with an environmental perspective. The only environmental constraint noted within the Hemson Report was in the County of Dufferin where it was acknowledged that there is limited ability to provide long-term water and wastewater services to accommodate growth. The same acknowledgment is not extended to Waterloo Region. It is recommended that as part of any updated forecasts, the Province should undertake a watershed/basin-scale analysis to understand the environmental constraints from a drinking water and waste water perspective. This analysis should be subject to further public consultation prior to the adoption of the revised growth forecasts.

Conservation Ontario is supportive of the proposal to extend the Plan horizon from 2041 to 2051, as it aligns with the planning horizon of other provincial plans. Conservation Ontario has concerns with the proposal to change the policies of the plan to remove the prohibition on new mineral aggregate operations, wayside pits and quarries from habitats of endangered species and threatened species within the Natural Heritage System. The proposed amendment does not appear to be consistent with the overall intent of the Natural Heritage Policies of the Growth Plan. Moreover, the proposed amendment also appears to be inconsistent with the direction provided in other Provincial or Federal legislation, regulations or policies (for example, the *Endangered Species Act* and the Provincial Policy Statement). At a minimum, consistency with relevant legislation, regulations or policies should be reinforced through the Growth Plan. Conservation Ontario therefore recommends that the text should be amended to use similar language found within the Provincial Policy Statement, Section 2.1.7. This would also ensure that the proposed changes are in line with existing municipal natural heritage policies.

Finally, Conservation Ontario has no objection to the proposal to change the text of the Growth Plan to permit municipalities to undertake employment area conversions outside of the municipal comprehensive review for lands that are identified as provincially significant employment zones and within major transit station areas. Conservation authorities are supportive of the changes to align the text of the Growth Plan with the Provincial Policy Statement, 2020 including specifying that planning authorities shall engage with Indigenous Communities.

Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The land needs assessment methodology is the process that municipalities must follow to ascertain the amount of land required to accommodate the amount and type of additional housing units and jobs required to meet market demands as well as whether there is a need for a settlement area boundary expansion to do so. It is understood that the proposal recommends using an outcome-based approach to land needs assessment, with the overall goal to streamline land budgeting activities. Conservation Ontario offers the following comments.

The proposed methodology appears to remove the transparency associated with one common method for land needs analysis and replaces it with a high-level outline of land needs assessment concepts. It is recommended that the Province retain a more transparent land needs assessment process that seeks to achieve the objectives of effective growth management including reducing agricultural, rural and natural area land consumption associated with the new, extended 2051 population and employment forecasts.

Natural hazards, natural heritage systems and water resource systems should be considered as part of any land needs assessment since in many cases these features/systems preclude development from taking place. Currently, hazard lands often become “take-outs” when identified and confirmed during later stages of the planning process, which can impact the developable area, proposed build and/or density targets. The COVID-19 pandemic has demonstrated to Ontarians the value of natural/greenspace for physical and mental health, as well as its ability to retain water on the landscape. Therefore, parkland/greenspaces should also be considered as part of the land needs assessment since these areas are essential to the health and well-being of the public and also serve as municipal natural assets.

Thank you for the opportunity to provide comments on the “Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe” and the “Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe”. Should you have any questions regarding this submission, please contact me at lrich@conservationontario.ca or 705-716-6174.

Sincerely,



Leslie Rich, RPP
Policy and Planning Liaison

c.c. CA Growth Plan CAOs/GMs