



February 28, 2019

Ontario Growth Secretariat, Ministry of Municipal Affairs
777 Bay Street
c/o Business Management Division, 17th floor
Toronto ON M5G 2E5
Canada

Attn: Charles O'Hara

RE: Environmental Registry of Ontario
Comments Regarding Proposed Changes to Growth Plan Related Policy and Regulations

Dear Mr. O'Hara:

The Township of Cramahe recognizes, and very much appreciates, the changes being proposed by the Minister of Municipal Affairs with respect to the 2017 Growth Plan for the Greater Golden Horseshoe. The Municipality also very much appreciates the willingness of the Minister and his staff to listen to the concerns of smaller, rural municipalities in this regard. The 2017 Growth Plan has had a negative impact on the opportunities for economic development and sustainability of rural Ontario beyond the GTA. Whereas growth in the GTA (Inner Ring) is characterized by pressures on resources, continued urban sprawl and increased traffic congestion, this is not the reality for communities outside the GTA (Outer Ring). The Township of Cramahe, which is located east of Cobourg in the County of Northumberland, is similar in geography, economy and challenges to other communities which lie within the eastern Outer Ring. These municipalities include the City of Kawartha lakes, the County of Peterborough, the City of Peterborough and other Townships within the County of Northumberland.

The Council for the Township of Cramahe supports changes to **Intensification and Density Targets** which are intended to take into account local realities, including market demand for housing. The Township also supports the proposed changes to the **Settlement Area Boundary Expansions**, which are intended to enables local municipal decisions on reasonable changes to settlement area boundaries. It is the hope of Council that these changes will provided for additional residential and commercial development and support more jobs and housing in our communities.

In terms of **Employment Planning**, the Township of Cramahe is hopeful that there will be an opportunity for the lands located at the intersection of the 401 and County Road 25, in the vicinity of the Big Apple, and the Township's Industrial Park to develop in a comprehensive manner. Similar to the Employment node designations being given to larger employment areas within the GTA, these lands would benefit from recognition of their role as contributors to economic development of the Township of Cramahe and to the sustainability of the eastern extent of the Greater Golden Horseshoe. These lands are in need of improved municipal servicing, including upgrades to the sewage treatment system. The



Township has had preliminary discussions with MTO regarding their planned changes to the 401 corridor in the vicinity of the Township of Cramahe. The anticipated changes to the intersection will improve connectivity and opportunities for businesses and ensure that these designated employment lands are available for employment in the future.

The Township is supportive of proposed changes to the **Natural Heritage System and Agricultural System** because, in our opinion, the mapping contains serious errors and overgeneralizations. The policies which implement this mapping would have resulted in serious economic hardships to the Township and its fellow rural municipalities without the proposed changes.

Several issues with the policies intended to implement the Natural Heritage System remain problematic, however. Most problematic is that Key Hydrologic Features are distinct from the Natural Heritage System, in the current policy. The policy currently reads “Key Natural Heritage Features within the Natural Heritage Systems or in Key Hydrologic Features...”. The policy should read “Key Natural Heritage Features and Key Hydrologic Features within the Natural Heritage System”.

Secondly, the definition of Key Hydrologic Features currently includes every intermittent swale, ditch and pocket wetland within the Growth Plan area. In the northern and eastern parts of the Growth Plan, the assumption that each and every feature of this type is of significance is unreasonable. What is more problematic is that there is no opportunity to determine which features and areas are in fact of ‘key’ importance. The geography, topography and land use patterns in this area are distinct from those of the Greenbelt and Inner Ring landscape. We request that the Ministry revisit this definition and its impact on municipalities within the geographic area loosely associated with eastern Outer Ring.

Insofar as the Transition Regulations are concerned, the Township of Cramahe requests that applications for development filed prior to July 1, 2017 be subject to the Clergy Principle. It is important that these active applications be evaluated based on the policies in effect at the time they were filed. To impose a new and extremely restrictive policy regime on these applications is to cause those who had prepared and submitted these applications extreme financial hardship, through the immediate loss of significant investment in time and resources. At the same time, it places municipalities in the unenviable position of having to recant comments regarding the appropriateness of proposed developments in order to ensure consistency with the new policies.

Finally, we have some concerns with the intent of the proposed changes to the Regulation involving Official Plan amendments for the Natural Heritage and Agricultural Systems mapping. It appears that there is less flexibility in the Regulation in terms of the extent to which municipalities can adjust and improve the Provincial mapping to better reflect ‘on the ground’ information.

We encourage the Minister to continue to consider municipalities in the Outer Ring (including Cramahe) experiencing limited growth or decline as having separate challenges from those where growth pressures are an issue. It is important that the Minister and his staff understand the difference between concerns being raised about the proposed legislative changes by growth-based municipalities and



stakeholders (including planners) and comments brought forward by smaller rural municipalities like Cramahe in the 'de facto "Outer Ring".

We look forward to further discussions with our provincial colleagues

Mayor Mandy Martin and Members of Council
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