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**Member of Conservation Ontario**

February 28, 2019

**via email and mail to [Charles.O'hara@ontario.ca](mailto:Charles.O'hara@ontario.ca)**

Mr. Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
c/o Business Management Division  
Toronto ON M5G 2E5

Dear Mr. O'Hara:

**Subject: Central Lake Ontario Conservation Authority Comments for  
Proposed Amendment No. 1 to the Growth Plan for the Greater Golden  
Horseshoe (2017)  
Environmental Registry of Ontario Notice Number 013-4504  
CLOCA IMS No: PGDP22**

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At their meeting of February 26, 2019 the Central Lake Ontario Conservation Authority (CLOCA) Board of Directors passed the following Resolution:

Res. #26 Moved by I. McDougall  
Seconded by D. Barton

***THAT the Commentary in Staff Report 5628-19 be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA's comments regarding Growth Plan (2017) Amendment No. 1; and,  
THAT Staff Report 5628-19 be circulated to Watershed Members of Provincial Parliament, Municipalities and adjacent Conservation Authorities for their information.  
CARRIED***

***What we do on the land is mirrored in the water***

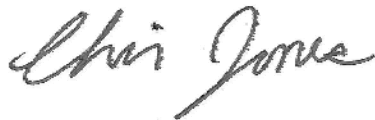


Accordingly, please find the endorsed Staff Report containing the comments of the Central Lake Ontario Conservation Authority enclosed with this letter.

With respect to the proposed amendment:

1. There is need for strong climate change action related to Low-Carbon Communities. The province should use the opportunity of Amendment 1 to recommit to a timely strategy and Growth Plan policy to achieve net-zero community development within the planning horizon of the Growth Plan (by 2041).
2. Lowered Intensification Target and Greenfield Density Targets for Durham should be balanced with the need for continued effective local growth management for environmental and watershed protection. In the context of planned significant growth for Durham Region within the CLOCA watershed, continued effective local growth management for environmental and watershed protection is critical.
3. The “no negative impact” text for Settlement Boundary Expansions should be retained in the Growth Plan for Settlement Area Boundary Expansions.

Yours truly,



Chris Jones, MCIP, RPP

**Director of Planning and Regulation**

CJ/

Encl. CLOCA Staff Report 5628-19

cc: Hon. Rod Phillips, MPP (Ajax), Minister of the Environment, Conservation and Parks  
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*Central Lake Ontario Conservation*

Ministry of Municipal Affairs and Housing, Ontario Growth Secretariat

February 28, 2019

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*What we do on the land is mirrored in the water*



# REPORT

## CENTRAL LAKE ONTARIO CONSERVATION AUTHORITY

**DATE:** February 12, 2019  
**FILE:** PGDP22  
**S.R.:** 5628-19  
**MEMO TO:** Chair and Members, CLOCA Board of Directors  
**FROM:** Chris Jones, Director, Planning and Regulation  
**SUBJECT:** **CLOCA Comments on Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe (2017)**

APPROVED BY C.A.O. 

The purpose of this report is to introduce recently proposed *Amendment No. 1* to the *Growth Plan for the Greater Golden Horseshoe (2017)* (Growth Plan) and to seek Board of Directors' endorsement of draft comments on the amendment in relation to CLOCA's policy and regulatory interests and to make related recommendations.

### ***Background***

On January 15, 2019 the Ministry of Municipal Affairs and Housing released a proposed amendment to the Growth Plan for public comment. The Ministry states that the amendment is proposed to address "policies seen as potential barriers to the development of housing, job creation and business attraction."

The amendment contains new and revised policies within the framework of the existing Growth Plan across the following six general categories:

1. Employment Planning,
2. Settlement Area Boundary Expansions,
3. Rural Settlements,
4. Natural Heritage and Agricultural Systems,
5. Intensification and Density Targets, and
6. Major Transit Station Areas.

In the Environment Registry posting, the Ministry states that the changes are intended to streamline growth management in order to achieve the following outcomes:

- More Streamlined Process (faster municipal implementation of the Plan);
- More Land for Housing (more flexibility for additional Greenfield Development);
- More Housing and Jobs Near Transit (increase the supply of housing and jobs near transit infrastructure);
- Greater Flexibility for Municipal Implementation (municipal implementation to better reflect local context).

### **Environmental Bill of Rights Consultation**

The proposed amendment has been posted to the Environmental Registry for a comment period ending on February 28, 2019. Conservation Ontario is co-ordinating a response on behalf of all 36 conservation authorities in addition to the individual submissions made by individual conservation authorities.

***Analysis: Continued Need for Timely Climate Change Action and Effective Local Growth Management for Environment and Watershed Protection***

Following a detailed review of the proposed amendment, staff have determined that there are no concerns with the majority of the proposed amendment. For example, clarification is provided in the amendment between local natural heritage systems and the provincial-scale Natural Heritage System for the Growth Plan. However, staff have analysis and recommendations regarding the following three policy directions in relation to CLOCA's interests in environmental and watershed protection within the Region of Durham and the CLOCA watershed:

1. Need for Strong Climate Change Action: Low-Carbon Communities

The Growth Plan currently sets out, as a guiding principle, the need to integrate climate change into planning and managing growth in order to build local adaptation to the impacts of a rapidly changing climate. Language in the plan that called for “moving towards low-carbon communities, with the long-term goal of net-zero communities” has been removed and replaced with the general phrase “moving towards the goal of environmentally sustainable communities.”

Net-zero communities are envisioned as communities where carbon dioxide emissions from the main sources of carbon pollution in a community: buildings, vehicles and industry are reduced over time to the point where net emissions are zero factoring in any offsets such as renewable energy production generated from the community. Actions needed to transition to a net-zero community would include: expanding and restoring natural heritage systems (i.e more woodlands and wetlands) to provide carbon sinks, provincial changes to the Building Code with energy efficiency targets for new net-zero carbon emission small buildings; development of zero emission transportation options including electric vehicles and electrified rapid transit (i.e. GO Regional Express Rail) and compact development forms that facilitate the use of walking, cycling and transit.

The current Growth Plan does not contain any direct policies for achieving net-zero communities beyond noting an aspirational long-term goal. Given the imperatives of our rapidly changing climate, **it is recommended that the province use this opportunity to recommit to a timely strategy and Growth Plan policy to achieve net-zero community development** within the planning horizon of the Growth Plan (by 2041) as part of growth planning for the Greater Golden Horseshoe and the government's *Environment Plan*.

2. Lowered Intensification Target and Greenfield Density Targets for Durham Should be Balanced With the Need for Continued Effective Local Growth Management for Environmental and Watershed Protection

In order to make efficient use of land, conserve agricultural lands and natural areas and to maximise existing public infrastructure, the Growth Plan provides for 50% of all residential development occurring annually within the Region of Durham to take place within areas already developed. Under the current Plan, this intensification target of 50% is set to rise to 60% beginning in 2031. The proposed changes would remove the planned 2031 increase and keep the existing annual intensification target at 50% for Durham Region.

New development on land not currently urbanized is referred to as Greenfield Development. In the CLOCA watershed, Greenfield Development almost always takes place by converting prime agricultural lands. In order to prioritize re-use of lands in already urbanized areas, to slow down the rate of prime agricultural land loss, and to ensure that agricultural lands converted are developed efficiently, the Growth Plan establishes urban density targets for “Designated Greenfield Areas” and provides rules for when urban boundaries may be expanded—a process referred to as “Settlement Boundary Expansions.”

Under the current Plan, a minimum density target of 80 residents and jobs combined per hectare of land is to be gradually achieved in new Greenfield Development by 2041, which would be an increase from the status quo density of 50 residents and jobs combined per hectare. The proposed amendment would reduce the density target for Greenfield Development for Durham Region by over one third by maintaining the status quo density of 50 residents and jobs combined per hectare.

The lowered intensification target and greenfield density targets are minimum targets that could be exceeded based on local planning decisions by the Region of Durham and local municipalities within the CLOCA watershed. Over the next few years, a significant amount of agricultural lands are planned for urbanization as a result of growth planning undertaken to implement the 2006 Growth Plan. This includes significant new Greenfield Development in Brooklin in Whitby, Kedron and Columbus in Oshawa and Courtice and Bowmanville in Clarington. In total, these lands are well over 2,000 gross hectares in new urbanization in the current Regional and local Official Plans within the CLOCA watershed.

While the intensification target (re-use of land) and the greenfield density targets (efficient use of newly urbanized land) are proposed to be lowered for Durham Region, the planned population and employment targets to 2041 for Durham Region are continued: a planned population of 1,190,000 persons (up from the 2016 population of 673,000) and 430,000 jobs. Without careful, balanced planning, the pace of agricultural and environmental land conversion could accelerate further given the planned population and employment forecasts allocated to the region. In this context, **continued effective local growth management for environmental and watershed protection is critical.**

The Durham Region Municipal Comprehensive Review of the Regional Official Plan (Envision Durham) will be the process to determine how the Growth Plan is implemented. CLOCA staff understand that this process will be collaborative and will continue to include conservation authority input and analysis, especially watershed planning knowledge, into the process. It will be critical for the Envision Durham process to recognize the links between intensification rates, greenfield densities and our future environmental health in the context of the additional flexibility proposed in the proposed Growth Plan amendment.

### 3. “No Negative Impact” Environmental Test for Settlement Expansions Should be Retained

Currently the Growth Plan requires that feasibility of any future Settlement Area Boundary Expansions be tested against the following environmental standard:

“Watershed Planning or equivalent has demonstrated that the proposed expansion, including the associated servicing, would *not negatively impact* the water resource system, including the quality and quantity of water...”

The Growth Plan amendment proposes the following instead:

“The proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to *avoid, or if avoidance is not possible, minimize and mitigate* any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water.”

Moving from an avoidance test to a mitigation approach lowers the environmental standards that future Settlement Area Boundary Expansions will need to meet. Given the significant scale of settlement expansions and the risk and degree of potential negative environmental impacts to terrestrial and aquatic ecosystems, including natural hazards and quality and quantity of water, there does not appear to be an environmental justification for the removal of the no negative impact test. **It is recommended that the no negative impact test be retained in the Growth Plan for Settlement Area Boundary Expansions.**

### **RECOMMENDATIONS:**

***THAT the Commentary in Staff Report 5628-19 be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA’s comments regarding Growth Plan (2017) Amendment No. 1; and, THAT Staff Report 5628-19 be circulated to Watershed Members of Provincial Parliament, Municipalities and adjacent Conservation Authorities for their information.***