



July 31, 2020

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

Via email: growthplanning@ontario.ca

Dear Members of the Ontario Growth Secretariat,

Thank you for the opportunity to comment on ERO 019-1679, the proposed changes to the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) and ERO 019-1680, the Lands Needs Assessment Methodology (“methodology”). Both proposals were placed on the Environment Registry of Ontario on June 16, 2020, with comments due by July 31, 2020.

GDA is a registered charity dedicated to protecting, preserving and enhancing the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, north Pickering and adjacent Greenbelt lands. We support the stewardship of healthy habitats for flora, fauna, wetlands and watersheds, the preservation of agricultural land, the development of trails for passive recreational use, and public access to these trail networks.

Since 1998 we have worked in partnership with municipalities, conservation authorities, private landowners, the aggregate industry and other partners to plan for, acquire and manage trail networks, nature corridors and conservation lands. Over this time we have also supported research about and have commented on policies and decisions affecting land use.

We are a small organization with no paid staff. The short timelines associated with this posting and the complexity of the topic mean that we cannot comment with any depth or specialized expertise. However, we have a long interest in forecasting and land use planning. The roots of our organization lie in the expropriation of thousands of acres of Pickering lands in 1972 by the Federal and Provincial governments for an airport and for the building of a planned community. Some of our members had their land expropriated and ever since have been engaged in monitoring and analyzing aviation forecasts and policies regarding land use planning.

Our members have participated in development of land use frameworks such as the Moraine Plan and the Greenbelt Plan, aimed at environment protection. These were initiated by the Conservative government at the time, and once implemented, we no longer had to spend time and money at OMB hearings but instead focus positively on protecting land and extending opportunities for passive recreation. We also participated in another Conservative government initiative, creating a “smart growth” vision for the Greater Golden Horseshoe region, which became the Places To Grow Act of 2005. Government at the time was increasingly recognizing that urban sprawl not only created environmental problems, it was much more costly than more compact development.

A strong, long-term policy framework is important, so that municipalities may plan, understand the needs of their community, and balance population growth with protection of non-renewable resources such as farmland, natural heritage and ecological features, including hydrologic functions to ensure there is adequate protection of sources of drinking water.

Previous Growth Plan forecasts have over-forecast future population growth in many parts of the GGH. The risk of over-forecasting can lead to over-designation of land for urban residential uses and costly building of unnecessary infrastructure. Ultimately the taxpayer will pay for this over-investment. Over-designation of land for housing also encourages land speculation, thus making farmland unaffordable and affecting our capacity to feed ourselves, and putting pressure on environmentally sensitive lands.

We are concerned by any extension of urban growth boundaries which could be justified by an extension of the population forecast period to 2051. Such forecasts are very problematic and lead inevitably to less compact greenfield development. The further out the projections look, the larger the errors will be. The consequences of such errors will be costly. At a time when a greater percentage of the overall population is attracted to more compact urban areas, we are concerned with Growth Plan changes that reduce previous greenfield density targets.

Interestingly, previous Hemson forecasts over-estimated growth between 2011 and 2016 in Durham and York Regions by 34% and 38% respectively. Hemson forecasts of growth in more compact areas of the GTA like Toronto were much closer to actual population growth, and with rising immigration targets, 90% of those headed for the Toronto Census Metropolitan Area (CMA) are projected to settle in Toronto. Basing forecasts on the most recent Census numbers will improve accuracy, as will re-assessing and revising forecasts over shorter time frames.

We recommend that the Growth Plan forecasts be based on the results of the 2021 Census and the forecast period remain at 2041.

We recommend that the opportunity for municipalities to plan for higher forecasts than what is in the Growth Plan be removed from Section 2.2.1.1.

This will reduce the possibility of land speculation and threats to the agri-food sector and natural heritage features as mentioned above.

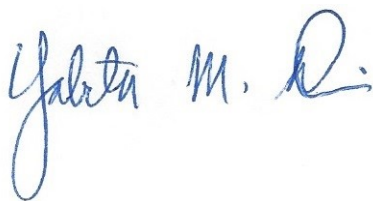
We recommend that density targets, not population forecasts, be used as the guiding force in land use planning. This will encourage logical, sustainable, “smart” growth, a concept associated with previous Conservative governments. It will also reduce the likelihood of unnecessary costs borne over the longer term by the taxpayer.

We recommend that the term “hydrologic function” be retained within the definition of “ecological functions”. This will retain consistency with the Provincial Policy Statement and ensure there is no doubt that the Provincial government is in favour of protecting water sources, watersheds, and clean water.

We recommend that protections for habitat of endangered and threatened species against new aggregate operations be re-instated in Section 4.2.8.2. Aggregate operations can already occur throughout most of the GGH, including the Natural Heritage System. The purpose of the Natural Heritage System is to protect biodiversity. There is no need to also permit extraction to take place in the most sensitive habitats and remove protections for endangered and threatened species.

We recognize the importance of the aggregate industry to infrastructure in southern Ontario. We have worked collaboratively with the many aggregate operators in our area over many years. Aggregates too are a non-renewable resource and we believe that sustainability practices should be encouraged and fostered through incentives and policy reform, not the promotion of ever-more land consumption for extraction.

Thank you for the opportunity to comment on proposed amendments to the Growth Plan.



Elizabeth Calvin
President, Green Durham Association
Email: info@greendurham.ca
Phone: 905 649 1113