



Sent via e-mail: [charles.o'hara@ontario.ca](mailto:charles.o'hara@ontario.ca)

February 28, 2019

**Charles O'Hara**

**Director**

Ministry of Municipal Affairs and Housing

Ontario Growth Secretariat

777 Bay Street

C/O Business Management Division, 17<sup>th</sup> Floor

Toronto, ON M5G 2E5

Dear Mr. O'Hara

**RE: Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017  
(EBR# 013-4504)**

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This letter constitutes the Lake Simcoe Region Conservation Authority's comments pertaining to the Environmental Registry notice 013-4504 which addresses the proposed amendment to the Growth Plan for the Greater Golden Horseshoe, 2017. It is understood that the proposed amendment seeks to address implementation challenges that have been identified by municipal and development sectors as well as other stakeholders. The proposed changes aim to provide greater flexibility and address the identified barriers to building homes and job creation among others while ensuring the continued protection of the environment. This notice was posted on the Environmental Registry on January 15, 2019 with the comment period ending on February 28, 2019. It is our understanding the Ministry of Municipal Affairs and Housing is seeking input on this proposal.

## Context

The Lake Simcoe Region Conservation Authority (LSRCA) is one of 36 conservation authorities (CA) in Ontario that provides watershed-based services. We are a provincially and municipally mandated regional agency who delivers programs and services to our member municipalities within the watershed jurisdiction. It is the objective of the LSRCA to protect Lake Simcoe and its watershed basin in partnership with government, the agricultural sector, development industry, Non-Governmental Organizations (NGO), stakeholder groups, and landowners. From a planning perspective, the LSRCA provides plan review services under the *Planning Act* to our member municipalities in the context of the natural heritage and natural hazard policies contained in the provincial, regional and local land use planning documents, including the Lake Simcoe Protection Plan, as well as in the context of Ontario Regulation 179/06 under the *Conservation Authorities Act*.

## Discussion and Comments

The proposed changes to the Growth Plan can be summarized into the following 6 topic areas.

- Intensification and Density Targets
- Major Transit Station Areas
- Agricultural and Natural Heritage Systems
- Settlement Area Boundary Adjustments
- Rural Settlements
- Employment Planning

On the basis of our understanding of the proposed amendment, we are generally supportive of the proposed changes and the intent to remove obstacles in the planning process which have proven challenging to our municipal and development sector partners. For your consideration, please see the following comments:

### ***Agricultural and Natural Heritage Systems***

We are pleased that the current Natural Heritage System policies will remain unchanged and are supportive of the ability to apply these policies to current municipal mapping during the interim period before the provincial mapping is implemented into upper, lower and single tier municipal plans (4.2.2.4 and 4.2.6.8).

To assist the Ministry with the large scale Natural Heritage System mapping exercise, we recommend that the Ministry consult with Conservation Authorities to obtain updated natural heritage system mapping data. The LSRCA has recently completed the Natural Heritage System and Restoration Strategy for the watershed. This has provided us with updated mapping data which we have been able to share with our municipal partners to inform their planning documents, as well as our neighbouring conservation authorities to ensure that our systems align at our shared boundaries. We would be happy to work with the Ministry to assist in the updating and improvement of the provincial mapping to ensure that it better reflects local knowledge and the large amount of work that has already been completed. For reference, the LSRCA Natural Heritage System and Restoration Strategy can be found here: <https://www.lsrca.on.ca/Shared%20Documents/reports/Natural-Heritage-Systems-Restoration-Strategy.pdf>

### ***Settlement Area Boundary Adjustments***

We are supportive of the changes to policy 2.2.8.3 which provides clarification to focus on outcomes rather than specifying the types of studies to justify feasibility and location of settlement area boundary expansions provided that agencies are offered the opportunity to provide comment with respect to the study requirements that would be required in support of the proposed boundary expansion. The decision to expand a settlement area boundary should be informed by technical information concerning source water protection, natural heritage preservation as well as stormwater management, to ensure that the system can support and sustain the growth in the area.

***Intensification and Density Targets / Major Transit Station Areas /  
Rural Settlements /Employment Planning***

We are supportive of the proposed changes concerning these topic areas and will not be providing further comment.

Thank you for the opportunity to comment on the proposed amendment to the Growth Plan, 2017. As noted above, we would be happy to provide any assistance to the Province with the Natural Heritage System mapping update. If you have any questions concerning the comments above, please contact the undersigned or Melinda Bessey, MSc, MCIP, RPP.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Baldwin', with a long horizontal line extending to the right.

Rob Baldwin  
General Manager  
Planning and Development

Copy: Conservation Ontario, Nicholas Fischer  
LSRCA, Mike Walters

