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July 28, 2020

Sandra Bickford  
Ontario Growth Secretariat  
777 Bay Street, Suite 2304  
Toronto, ON M7A 2J8

Dear Ms. Bickford:

**Re: City of Kawartha Lakes Comments on Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology**

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On June 16, 2020, your Ministry has released for consultation the Proposed Amendment 1 to A Place to Grow (APTG): Growth Plan for the Greater Golden Horseshoe, 2019 (ERO No. 019-1680) and the Proposed Land Needs Assessment Methodology (LNA) for APTG (ERO No. 019-1679). We offer the following comments to the proposed changes as they pertain to the City of Kawartha Lakes.

### **Schedule 3 Population and Employment Forecasts**

It is the City's understanding that the changes to APTG, Schedule 3 are resulting from feedback and discussions with Advisory and Technical Groups. The City of Kawartha Lakes Planning Staff was selected to be part of the Technical Group and participated in a series of workshops held in February 2020 regarding forecast-related conditions that may influence the Schedule 3 population or employment forecasts. We would like to thank your Ministry for the opportunity to participate and provide the City's perspective.

Furthermore, the City is supportive of proposed changes to Schedule 3. We recognize the importance of updating forecasts ahead of the City undertaking the municipal comprehensive review (MCR), as the Schedule 3 will form key inputs into our Growth Management Strategy exercise.

The City is very supportive of extending the horizon from 2041 to 2051. As a slower growth municipality, we anticipate the extended horizon will better support long-term land use and infrastructure planning.

The Proposed Amendment 1 provides three growth outlooks: Reference Growth Forecast, and High and Low Growth Scenarios. According to the Hemson Consulting Ltd. Technical Report (June 16, 2020), the Reference Forecast represents the most likely future growth outlook. The High and Low Scenarios are devised with deliberately aggressive and conservative assumptions about the future economic and immigration outlook. From the detailed forecast result for the City of Kawartha Lakes (page 71), the Hemson Report appears to have accurately captured the general trends in the City. The variation in assumptions appears to have a negligible impact on the Schedule 3 population and employment distribution in the City across the three growth outlooks; therefore, City Staff do not have concerns with the proposed growth outlooks.

The City is supportive of the Mock A approach that proposes to keep forecasts to 2031 and 2041 (and 2051) to ensure continuity of conformity efforts. The City continues to work through outstanding appeals to City land use documents that are based on our 2011 Growth Management Strategy which relied on 2031 forecasts.

### **Land Needs Assessment**

On October 8, 2019, City Staff participated in a Land Needs Assessment Solutioning Workshop facilitated by the Ministry of Municipal Affairs and Housing. The participants of the Workshop unanimously agreed that a more user-friendly and simplified LNA methodology was needed.

The City acknowledges that the Province has made improvements to the proposed LNA methodology. The LNA document is significantly shorter than the version produced in 2018 and provides suggested data sources, which is appreciated. We also recognize that the LNA empowers municipalities to make different assumptions about growth to the horizon of the Plan.

City Staff find that the content of the proposed LNA is effectively the same as provided in October 2019. In our December 6, 2019 comments to your Ministry, we noted that pre-set formulas and inputs, or other alternatives to textual resources, would be valuable and instructive. Earlier this year, the Growth Policy, Innovation and Partnership Unit at the Ministry interviewed City Staff regarding preferred supporting material from the Province and the method of content delivery. We reiterated our interest in an educational component in the form of a webinar/video, and appreciate the Ministry's interest in collaborating with its partners to help implement the Growth Plan.

City Staff also asked that the Province establish checkpoints throughout the MCR to clarify when municipalities should seek feedback from the Province. We note that the proposed LNA provides that it is intended to be an iterative process between the

municipality, the public and the Province. Operationally, however, we seek clarification of the Provincial expectations.

### **Mineral Aggregate Operations and alignment with PPS, 2020**

The Amendment 1 to APTG proposes to remove the prohibition on new mineral aggregate operations, and wayside pits and quarries from habitats of endangered species and threatened species within the Natural Heritage System for the Growth Plan.

As a Top Aggregate Producing Municipality (TAPMO), the City is supportive of making it easier to establish new mineral aggregate operations closer to market. City Staff are concerned about recent diminution of protection measures of species at risk in legislation and policies through Bill 108, More Homes, More Choice Act, 2019. In lieu of entirely removing the protection of endangered species and threatened species, the language should be better aligned with the policy 2.1.7 in the Provincial Policy Statement, 2020<sup>1</sup>.

The City supports the proposed alignment of Indigenous engagement to the PPS, 2020. City Staff currently notifies Indigenous communities on planning applications in accordance with the Planning Act. Pre-circulating information, providing an extended review opportunity and inviting Indigenous communities to participate in the MCR to identify and discuss issues improves engagement and adds value to the process.

### **Transition to Conformity**

The Amendment 1 to APTG continues to require that all MCR processes be completed by July 1, 2022. As previously communicated, delays due to the COVID-19 Pandemic and the timing of the provincial election in June 2022 add to challenges meeting the conformity date.

In the subject ERO postings, your Ministry provides that municipalities must follow the steps of the LNA methodology as part of the MCR, and that Schedule 3 forecasts are a key input of the process. The core pieces that the City requires to commence its Growth Management Strategy are subject to changes and are not yet in effect. We appreciate that the Province is working quickly to deliver amendments as soon as possible; however, the City strongly recommends that the timeframe be extended to 2025, keeping in step with the Minister's original 5-year implementation schedule. City Staff are, however, very supportive of the phased municipal comprehensive review approach.

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<sup>1</sup> Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.

The City recognizes that the modifications to the new transitional rules are intended to be housekeeping matters only. However, the City did not have occasion to provide input into Ontario Regulation 305/19 (ERO No. 019-0018) that amended the Transitional Matters of Ontario Regulation 311/06, and would like to do so.

The City's Community Secondary Plans for Lindsay, Bobcaygeon, Fenelon Falls, Omemee, and Woodville, as well as the General Amendment (OPA 13), remain subject to appeals before the Local Planning Appeal Tribunal. The OPA 13 was adopted by City Council in June 2017 and coincided with the release of the Growth Plan 2017; in accordance with the Transitional Matters, the OPA 13 is subject to APTG 2019 (as are the Secondary Plans for Lindsay and Bobcaygeon). The intent of the OPA 13 is to implement the Secondary Plans, some of which were adopted earlier, in 2015 (i.e. Fenelon Falls, Woodville and Omemee) and are subject to the Growth Plan 2006. The result is an inconsistent approach to allocating population distribution. To rectify this inconsistency, the City is requesting that all of the Community Secondary Plans, including the OPA 13, be subject to APTG 2019.

In closing, we trust that our comments will be considered and will provide some assistance in finalizing the Proposed Amendment 1 to APTG and the update to the LNA.

Sincerely,  


Richard Holy, MCIP, RPP  
Manager of Planning

Cc: Cordelia Clarke Julien, Assistant Deputy Minister, Ontario Growth Secretariat  
Andy Letham, Mayor  
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