



July 30, 2020

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

Re: Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO 019-1680) and Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO 019-1679)

Please accept this letter in response to the Environmental Registry of Ontario – ERO 019-1680 and ERO 019-1679. The Town of Caledon is pleased to provide initial comments on the above ERO postings. Please note that additional or modified comments may be forthcoming upon receipt of this letter by Town Council in August.

Staff are generally supportive of maintaining the existing 2031 and 2041 forecasts, allowing municipalities to continue with the conformity work that has already been completed. The release indicates the Reference Forecast represents the most likely future growth outlook. Staff are supportive of including this Forecast in the final amendment, which still allows municipalities the flexibility to plan for additional growth beyond the forecast based on local conditions. If the forecasts will be treated as minimums, staff recommend that further policies be provided to guide this ability.

Staff note that mineral aggregate resources are important for the development of communities. Caledon has a significant amount of aggregate resources, and a significant amount of environmentally protected land. Staff are not supportive of the proposed policy change to 4.2.8.2 that would allow for new aggregate pits, wayside pits and quarries within the Natural Heritage System of the Growth Plan. Staff is concerned about the adverse impacts of this policy if the prohibition on new operations within habitats of endangered and threatened species is removed. It would be inappropriate to open lands for habitat species for aggregate operations and staff encourage the province to prioritize these species.

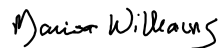
The Town is pleased to note that the Province will continue to develop PSEZ policies. It is critical that municipalities have clear policy guidance for these areas, and any tools to assist post-COVID economy recovery will help municipalities and local economies to become more sustainable. We look forward to future consultation with the province on these matters.

Town staff is concerned about the level of detail in the proposed methodology. Unlike the previous document which was lengthy and detailed, the proposed methodology is too high level and would allow for inconsistent application across the Greater Golden Horseshoe. Staff recommends that the proposed methodology should provide more details and clarity regarding the balance of economic and market interests with other goals in *A Place to Grow*.

As municipalities are working diligently to meet the conformity dates set out in *A Place to Grow*, it is important to stress the need for the timely implementation of the amendment. Further, to achieve the 2051 forecasts delivery of key infrastructure such as the GTA West Transportation Corridor, will be required to support the planning of complete communities.

If you have any comments or require clarification, please do not hesitate to contact the undersigned.

Sincerely,



for Sylvia Kirkwood
Chief Planner, Town of Caledon

c. Mayor and Members of Council
Carey Herd, CAO, Town of Caledon