

February 28, 2019

## via upload to Environmental Registry of Ontario website

Mr. Charles O'Hara
Director, Growth Policy, Planning and Analysis
Ministry of Municipal Affairs and Housing
777 Bay Street,
23<sup>rd</sup> Floor, Suite 2304
Toronto, Ontario
M5G 2F5

Dear Mr. O'Hara

Re: ERO Registry No. 013-4504 – Proposed Amendment to the Growth Plan, 2017

Hamlet of Newtonville, Municipality of Clarington Part of Lot 8, Concession 1, Former Township of Clarke

CM Planning Inc. is the planning consultant for 2408406 Ontario Inc., 2408426 Ontario Inc. and 2408428 Ontario Inc., the owners of land located within the Hamlet of Newtonville in the Municipality of Clarington. For the reasons detailed below, we request that a policy be added to the proposed amendment to the Growth Plan 2017 to allow for the refinement of Natural Heritage System mapping as permitted by policy 5.4.2 of the Greenbelt Plan in order to 'ensure provincial agricultural and natural heritage systems maps reflect local realities'. Alternatively, we request that an exemption be provided for land that was zoned for development prior to the effective date of the Growth Plan.

Our comments herein pertain to the proposed amendment to the Growth Plan related to making "growth planning easier for rural communities" and ensuring the "provincial agricultural and natural heritage system mapping reflect local realities" as quoted from the Ministry of Municipal Affairs and Housing (MMAH) News bulletin issued on January 15, 2019.

As stated in the ERO Policy Notice No. 013-4504, the overall goal of the proposed changes to the Growth Plan is to "streamline growth management planning in the Greater Golden Horseshoe to achieve", among other outcomes, "More Land for Housing" by respecting "the ability of local governments to make decisions about when and where to add new land for housing, to ensure that there is enough housing supply to meet demand" and "Greater Local Autonomy and Flexibility for Municipalities" by ensuring "municipalities will have the ability to implement the Plan in a manner that better reflects their local context while protecting the Greenbelt".

## Mapping – Ensuring Natural Heritage System Mapping Reflects Local Realities

As stated in the ERO Policy Notice No. 013-4504, the Natural Heritage System mapping is meant to be "factual and reflect the local mapping realities, while providing for the appropriate level of protections for our natural resources".

The proposed amendments to Growth Plan policies 4.2.2.4 and 4.2.2.5 regarding the Natural Heritage System mapping provide for refinement to the provincial mapping in upper- and single-tier municipal official plans, but not in local municipal official plans, through site specific studies



at the time of development applications, or via a municipal zoning by-law update <u>as provided for in policy 5.4.2 of the Greenbelt Plan (2017)</u>.

The subject property is within the hamlet boundaries and is zoned for hamlet residential development. Development applications are soon to be filed with the Municipality with a site specific Environmental Impact Study completed in support of the refinement of the natural heritage features on the property.

We therefore request that, for clarity, a policy be added to the Proposed Amendment to the Growth Plan to allow for the refinement of Natural Heritage System mapping by lower-tier municipalities as permitted by policy 5.4.2 of the Greenbelt Plan (2017) in order to "ensure provincial agricultural and natural heritage systems maps reflect local realities" as stated in the Ministry of Municipal Affairs and Housing News bulletin. Alternatively, we request that an exemption be provided for land that was zoned for development prior to the effective date of the Growth Plan.

Thank you for the opportunity to provide comments on the Proposed Amendment to the Growth Plan and for your consideration of this important matter. We believe the changes requested herein will help to achieve the overall goal of the proposed changes to the Growth Plan of streamlining growth management planning in the Greater Golden Horseshoe.

Yours truly CM PLANNING INC.

Carolyn Molinari

cc Templeman LLP Clarington client