



## Delegation to City of Hamilton Planning Committee – August 18<sup>th</sup>, 2020

### RE: Amendment No 1 – A Place To Grow – Growth Plan for the Greater Golden Horseshoe

Thank you Chairperson Farr and members of the Planning Committee for the opportunity to provide Environment Hamilton's comments regarding Amendment No 1 to ***A Place to Grow – Growth Plan for the Greater Golden Horseshoe*** and the proposed Land Needs Assessment Methodology.

I want to start by saying that, much as was the case when I was before this committee in February of 2019 commenting on the last round of Ford Government changes to the Growth Plan for the Greater Golden Horseshoe, Environment Hamilton concurs with the majority of the comments and recommendations made by city planning staff. And, again, we are very appreciative of the detailed responses being prepared by staff to the on-going onslaught of planning policy changes from this provincial government.

There is **one critically important element of the proposed provincial changes that IS NOT addressed in the report from planning staff that I urge you to incorporate into the City of Hamilton's response to the Ford Government's amendment to the Greater Golden Horseshoe Growth Plan.** Amendment No 1 includes a change that would allow aggregate pits and quarries to be located in the habitat of threatened and endangered species throughout the Growth Plan area's Natural Heritage System. Right now aggregate extraction is prohibited in these crucial habitats. Given that the purpose of the Natural Heritage System is to protect biodiversity, it is not unreasonable to **prohibit aggregate extraction within the habitats of our most vulnerable plants and animals. Please send a strong message to the province that protecting the habitat of threatened and endangered species is the bare minimum that must be required!**

I also wanted to take this opportunity to speak to what has now become blatantly obvious – the Ford Government is actively dismantling the planning policies that we urgently need right now to support an intensification first approach to growth management in the Greater Golden Horseshoe. This is pushing us back into the realm of what we know are extremely problematic approaches to growth that DO NOT prioritize efficient land use, create compact, complete communities, protect our precious agricultural land and natural areas, or come anywhere near to helping us to build a climate resilient future! The approach has been described by a former senior planner with Ontario's Ministry of Municipal Affairs and Housing – who played a central role in growth management planning during his time with the province - as a '**systematic dismantling of the Growth Plan**'. To make matters worse, the approach is now being promoted as part of the Ford Government's post-pandemic economic recovery strategy.

I want to share a brief recap of what we have seen from the Ford Government so far.

#### **The 2019 Growth Plan Amendments brought the following changes:**

-Private land owners can now pursue urban boundary expansions of up to 40ha and, as you are all very aware, efforts are already underway on this front by private landowners here in Hamilton.

-The Province decreased the minimum greenfield density targets that apply in Hamilton from 80 to 50 jobs & people per hectare (jph) , and the minimum intensification target in the built up area from 60% to 50% of all new residential units. I will add, though, that these are MINIMUMS and municipalities can commit to HIGHER TARGETS as Planning Committee and, ultimately, Hamilton City Council did last year with a stated commitment to the 80 jph target for greenfield areas in Hamilton.

**Bill 197 – the COVID 19 Economic Recovery Act – which received royal assent on July 21<sup>st</sup> changed the provincial *Planning Act* in problematic ways:**

According to the Canadian Environmental Law Association:

Bill 197 includes changes to the *Planning Act* that ‘enhance provisions that already give the Minister unilateral power to issue zoning orders. The revised order-making power would allow the Minister to reach deeply into the planning process at the level of the details of a specific project and site, thereby overruling decisions by municipal council and planning staff.’

CELA goes on to state that ‘(A)lthough the proposal (now law) states that the new power will be exercised in relation to “site plan control and inclusionary zoning”, the last few months have seen a dramatic increase in the use of Minister’s zoning orders IN FAVOUR OF THE DEVELOPMENT INDUSTRY’ (emphasis added).

And this use of ministerial zoning orders (MZOs) now continues at breakneck speed. We have the recent ‘brow lands’ MZO decision here in Hamilton along with a list of 8+ more MZOs issued to add to the list of 8 already issued this year. Most MZOs have been issued in the GGH area – and several will promote more problematic urban sprawl like the Carruthers Creek MZO which will destroy prime agricultural land and natural areas.

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And finally – the focus of the staff report today - the proposed changes to A Place to Grow set out in Amendment No 1 *which include:*

- a) More flexibility for siting of aggregate extraction operations, including allowing aggregate extraction within the Natural Heritage System of the GGH, putting the habitat of threatened and endangered species at risk.
- b) Increasing the Growth Plan’s ‘planning horizon’ out from 2041 to 2051, making it easier to justify more urban expansion, or forcing municipalities in that direction in order to accommodate projected growth over a longer timeframe.
- c) Modifications to population and employment forecasts and the factors considered to establish these forecasts that will only serve to justify larger urban land needs, including modifications that would empower municipalities to exceed population & employment forecasts when undertaking land needs assessments.

And there are also the associated proposed, but still vague, changes to the provincial Land Needs Assessment Methodology that could take the GGH Growth Plan away from target based towards market demand based land needs assessments.

All of this is so incredibly disheartening! We can’t afford to let this happen – there are severe costs from an economic, a social, and from an environmental point of view. Again – Environment Hamilton urges you to remain committed to doing everything that the municipality can do to push back against these regressive provincial planning policy changes and to push forward with progressive, ‘intensification first’ approaches to

accommodating growth in our community. This is the best way to plan for post-COVID recovery. We need to prepare for the tsunami that is the CLIMATE EMERGENCY by building a city that is sustainable, climate resilient and inclusive!

Thank you!

Lynda Lukasik, PhD  
Executive Director  
Environment Hamilton  
[llukasik@environmenthamilton.org](mailto:llukasik@environmenthamilton.org)