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November 24, 2022

**BY E-MAIL ONLY** ([MSOC.Admin@ontario.ca](mailto:MSOC.Admin@ontario.ca))

**Re: Response to Request for Comments  
Proposed Revocation of the Central Pickering Development Plan (ERO #019-6174)**

Thank you for the opportunity to comment on this posting on the Environmental Registry of Ontario (ERO) by the Ministry of Municipal Affairs and Housing (MMAH) which proposes to revoke the Central Pickering Development Plan (CPDP), under the *Ontario Planning and Development Act, 1994*. As the ERO states, this proposal intends to help support the government's commitment to streamline, reduce and eliminate burdens and to potentially increase housing supply.

Toronto and Region Conservation Authority (TRCA) has an ongoing interest in the proposed changes given our roles as:

- A regulator under Section 28 of the *Conservation Authorities Act* (CA Act);
- A public commenting body under the *Planning Act* and the *Environmental Assessment Act*;
- A delegated commenting body to represent the Provincial interest in natural hazards;
- A service provider to our municipal partners;
- A resource management agency operating on a local watershed basis; and
- One of the largest landowners in the Greater Toronto region owning and directly managing lands and conducting programs and projects in collaboration with the province, municipalities, stakeholders, and indigenous communities within the confines of the CPDP area.

In these roles, and as stated in the *Made-in-Ontario Environment Plan*, CAs work in collaboration with municipalities and stakeholders to protect people and property from flooding and other natural hazards, and to conserve natural resources.

## COMMENTS

TRCA appreciates the Province's important goal of addressing the housing crisis through expediting development approvals and has taken streamlining actions that help support this objective. We do not believe, however, that resolving the housing crisis needs to come at the expense of the environment. To this end, we provide the following comments to ensure that well planned sustainable development can happen safely while maintaining nature's beauty and diversity.

Revocation of the CPDP would remove an area-specific policy framework focused on the permanent protection, maintenance and enhancement of natural features, functions and systems. Revocation of the CPDP combined with recent legislation will also remove protection of areas that previous governments and stakeholders intended to be preserved for agricultural and conservation uses. Careful consideration of the CPDP and its objectives were shaped by previous provincially led EA and planning processes that



potential impacts on infrastructure and downstream communities subject to flood risk. Thus, **TRCA strongly recommends that clear direction be provided to affected municipalities to ensure that municipal OPs and by-laws uphold the ecological systems established through the CPDP and consistent with the Duffins Creek Watershed Plan prior to revocation. We also strongly recommend that the CPDP stay in place until a watershed and subwatershed plan for Petticoat Creek is completed, until related and linked legislative processes are complete, and details of proposed infrastructure improvements to the York Durham Sewer System in Bill 23 are better known.**

**Finally, TRCA recommends that the Province pause the proposed revocation of the CPDP and convene a special panel to include the City of Pickering, City of Markham, City of Toronto, York and Durham Regions, Rouge Park/Parks Canada and TRCA which could include the Province (Infrastructure Ontario) and other landowners to identify shared interests, potential impacts of this decision, mitigative policies and a path forward that would protect and restore natural systems and address natural hazard risks in this area and in downstream areas.**

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca).

Sincerely,

< Original Signed By >

John MacKenzie, M.Sc.(PI), MCIP, RPP  
Chief Executive Officer

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