

February 8, 2013

Hon. Bob Chiarelli
Office of the Minister
Ferguson Block, 3rd Floor
77 Wellesley St. W.
Toronto, ON
M7A 1Z8

Dear Minister Chiarelli:

Re: Proposed Amendment 2 (2012) to the Growth Plan for the Greater Golden Horseshoe, 2006

Thank you for the opportunity to provide comments in respect of the proposed Growth Plan for the Greater Golden Horseshoe.

CELA writes to provide brief comments with respect to the scope of factors to take into account in arriving at the specific population and employment distribution numbers to be reflected in Schedule 3 to the Growth Plan for the Greater Golden Horseshoe (Amendment 2).

We do not have any comment on specific allocations proposed for Schedule 3.

Rather we would submit that in addition to constraints such as long term water supply and provision of sewer servicing, which we understand has been factored into the proposed Schedule 3 to some extent, the province should take into account the constraint posed by the currently operating nuclear power plants in Durham Region in particular. Those plants, at Pickering, and at Darlington, pose issues with respect to existing and proposed employment and population expansion of the surrounding lands. For example, in a recent Canadian Environmental Assessment Act hearing, the Joint Review Panel in its Report released August 25, 2011, made the recommendation that

`` Recommendation 43

The Panel recommends that the Canadian Nuclear Safety Commission engage appropriate stakeholders, including OPG, Emergency Management Ontario, municipal governments and the Government of Ontario to develop a policy for land use around nuclear generating stations.``

In the official Government of Canada response, the federal Government stated,

`` Response

The Government of Canada accepts this recommendation for the Canadian Nuclear Safety Commission to engage appropriate stakeholders in developing policy for land

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use around nuclear generating stations. `` <http://www.ceaa.gc.ca/052/document-html-eng.cfm?did=55542>

Among the reasons for this concern is that increased population increases the potential consequences of a severe offsite accident, and complicates emergency response.

This is a serious issue which should be thoroughly canvassed by the province and appropriately reflected in the Places to Grow population and employment numbers as set out in the allocations provided in Schedule 3.

We would also suggest that this and other issues be reflected transparently in the Plan or background documents supporting the Plan in terms of how they affect these allocations to ensure that the constraints are appropriately maintained in future iterations of the Growth Plan or analogous provincial policy.

We thank you for the opportunity to submit these comments.

Yours very truly,
CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa McClenaghan
Executive Director & Counsel

cc. Mr. Darryl Soshycki, Manager
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