

September 15th, 2016

Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario L3Y 6Z1
VIA Email: regionalclerk@york.ca

Attention: Denis Kelly, AMCT, Regional Clerk
For Distribution to Committee of the Whole for September 15th, 2016

To Chairman Wayne Emmerson & Members of Regional Council:

RE: ITEM E.2.1 – Status Update – Regional Staff Review and Comments on Draft Provincial Plan Amendments

Malone Given Parsons Ltd. (MGP) acts as land use planning consultant to a number of Landowner Groups throughout York Region. This letter is being written on behalf of these Landowners Groups (our clients) for three reasons:

- To indicate our general support for the Regional Staff Review and Comments on Draft Provincial Plan Amendments Report;
- To request COW's support for a recommendation that the Province clearly define a process, criteria and schedule for requests to refine the Greenbelt Plan boundaries in New Community Areas; and
- To request COW's support for a recommendation that would permit greater flexibility to locate recreational uses in the Greenbelt.

General Support for Staff Report

I commend staff for a strong and clearly expressed analysis of issues created by the Province's proposed amendments to the Provincial Plans. The directions proposed by staff on major issues align closely with MGP's views, as well as those of surrounding area municipalities and the rest of the Greater Toronto Area Councils that have reported to date.

Greenfield Density

With respect to the proposed density and intensification targets in May 2015, Council directed staff to report back on the appropriateness of using 50 people and jobs per hectare (p+j/ha) for Greenfield densities. The Draft Growth Plan now proposes a Designated Greenfield Area density target of 80 people and jobs per hectare (p+j/ha), which far exceeds the density targets endorsed by Council.

As shown in the Figure below, the Ministry of Transportation clearly identify in their Transit-Supportive Guidelines (2012) that a density target of 80 p+j/ha is based on, and intended for, areas with frequent transit service. As clearly stated in the MTO's report, a density target of 80p+j/ha should be adopted **as a guideline** and used only in areas with frequent transit service. The 80p+j/ha should not be applied as a

rule, and would be inappropriate to apply across all Designated Greenfield Areas as a “one size fits all” standard. I therefore, respectfully request that York Region expand their commentary regarding the Designated Greenfield Area density targets (Page #8 of the Sept. 15th Report) to incorporate and adopt a position that recognizes the density target of 80p+j/ha does not fit all and that density targets should instead be determined by various contributing factors, as identified by MTO in their table below.

Figure 1. MTO Suggested Density Thresholds by Transit Service

Transit service type	Suggested minimum density
Basic Transit Service (One bus every 20-30 minutes)	22 units per ha / 50 residents & jobs combined
Frequent Transit Service (One Bus every 10-15 minutes)	37 units per ha / 80 residents & jobs combined
Very Frequent Bus Service (One bus every 5 minutes with potential for LRT or BRT)	45 units per ha / 100 residents & jobs combined
Dedicated Rapid Transit (LRT/BRT)	72 units per ha / 160 residents & jobs combined
Subway	90 units per ha / 200 residents & jobs combined

The table above illustrates suggested *minimum density thresholds* for areas within a 5-10 minute walk of transit capable of supporting different types and levels of transit service. **The thresholds presented are a guide and not to be applied as standards. Other factors such as the design of streets and open spaces, building characteristics, levels of feeder service, travel time, range of densities across the network and mix of uses can also have a significant impact on transit ridership.** *Mobility hubs* and major transit station areas may require higher minimum densities.

Source: Ministry of Transportation – Transit-Supportive Guidelines, 2012.

Intensification

Furthermore, in May 2015 Council directed staff to maintain the 40% intensification target as a minimum. The Draft Growth Plan now proposes an intensification target of 60%, which far exceeds the intensification targets endorsed by Council. In my perspective, these targets are not to be accepted before the implications on parks, schools and upgrades required to roads and servicing networks are known and transit delivery is committed.

I would like to remind Council that in order to achieve an overall intensification rate of 60%, municipalities such as the City of Markham would need to adopt a much higher rate of intensification, that would be both difficult to achieve and premature to ask for. Therefore, I’m requesting the Region continue to support the existing intensification target of 40%.

Greenbelt Plan Boundaries

MGP has made a number of submissions to local municipal Councils requesting that they recommend to the Province the following:

- Clarification on what open and transparent process is being established to review Greenbelt boundaries;
- Clarification on the criteria for boundary refinements;

- Definition of a clear timeframe as to when this process will be established and open for submissions; and, further;
- Permit the precise limit of the Greenbelt boundary in the New Community Areas to be established through the Secondary Plans that will be completed for these areas.

I have attached an excerpt from minutes of the Town of Richmond Hill's Committee of the Whole Meeting of September 6th which describes its intended action on the matter (Attachment #1). I will be following up with other municipalities to urge the same recommendation. Today I am respectfully requesting that York Region adopt a recommendation as expressed above on this matter.

Permission for Recreational Uses in the Greenbelt

As matters stand today, the Greenbelt Plan is interpreted to preclude municipal recreational uses (e.g., active parkland, playing fields and golf courses). This restriction is illogical and forces an inefficient use of a constrained land supply.

We support your recommendation from May 2015 (identified as recommendation #2 to be carried forward to the Province in Attachment 2 of the September 15th, 2016 York Region Status Update Report –Attachment #2), suggesting a process to consider compatible additions to land use permissions within the Greenbelt Plan and ORMCP. The same recommendation was made by the City of Markham DSC on September 6th and the City of Vaughan COW on September 7th.

I respectfully request that York Region adopt a recommendation to the Province that it permit a wider range of recreational uses in Greenbelt lands in or proximal to current and new community areas.

If you would like to discuss any aspect of this letter or if you have any further questions regarding my submission please feel free to contact me at 905.513.0170 ext. 109.

Yours very truly,

MALONE GIVEN PARSONS LTD.



Don Given, MCIP, RPP
President
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attachments

cc: Bruce Macgregor, Chief Administrative Officer, The Regional Municipality of York
Valerie Shuttleworth, Chief Planner, Planning & Economic Development, The Regional Municipality of York
Lina Bigioni, Chief of Staff, Office of the Chairman and CEO, The Regional Municipality of York

11. Comments on the Proposed Amendments to the Growth Plan, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan – (SRPRS.16.143)

Moved by: Mayor Barrow

- Rec. 15**
- a) **That a copy of SRPRS.16.143, a copy of the Council resolution and all comments of Council be forwarded by the Town Clerk to the Minister of Municipal Affairs and the Province of Ontario EBR Postings #012-7194, #12-7195, and #012-7197 for consideration in the proposed amendments to the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan.**
 - b) **That the above documents also be provided to York Region for its consideration when preparing comments to the Province on behalf of all of the Region's municipalities;**
 - c) **That the Ministry of Municipal Affairs be requested to provide the following:**
 - 1. Clarification on what open and transparent process will be established to review Greenbelt boundaries;**
 - 2. Clarification on the criteria for any boundary adjustments;**
 - 3. Outline a clear timeframe.**

Carried Unanimously

14. Respect in the Workplace Policy and Procedures Update – (SRCAO.16.026)

Moved by: Regional and Local Councillor Hogg

That consideration of staff report SRCAO.16.026 regarding Respect in the Workplace Policy and Procedures Update be referred to the September 12, 2016 Council meeting.

Carried Unanimously

Recommendations Carried Forward and Adapted from May 2015

The Province:

1. Develop a process to review boundaries associated with the Greenbelt Plan and ORMCP in response to individual landowner requests (Adapted from 2015 Recommendation No. 25).
2. Develop a process to consider compatible additions to land use permissions within the Greenbelt Plan and ORMCP in response to individual landowner requests (2015 Recommendation No. 37).
3. Develop a process to allow municipalities to access strategically located employment lands, currently protected by the Greenbelt Plan or ORMCP, if deemed necessary through a municipal comprehensive review (Adapted from 2015 Recommendation No. 9).
4. Consider amending the Greenbelt Plan to permit compatible community uses (2015 Recommendation No. 14).
5. Revise the Plans to consider the extension of lake-based municipal servicing as a viable option to service existing communities within the Greenbelt and Oak Ridges Moraine Plan areas (Adapted from 2015 Recommendation No. 20).
6. Consider growing the Greenbelt northwards into south Simcoe County in order to prevent continuing 'leap-frog' development in communities which may not have the appropriate infrastructure to manage such growth in a sustainable manner which is consistent with delivering complete communities as is the intent of the Plans (2015 Recommendation No. 27).
7. Recognize the importance of significant woodlands and urban forest canopy cover as integral to delivering complete communities, and take a net gain approach to managing tree and forest cover in the Greenbelt Plan, ORMCP and Growth Plan areas (Adapted from 2015 Recommendation No. 3).
8. Amend Section 42 of the Oak Ridges Moraine Conservation Plan and Section 3.2.3 of the Greenbelt Plan as necessary to identify and resolve mapping and policy conflicts and terminology inconsistencies, to bring them into closer alignment with the *Clean Water Act* (Adapted from 2015 Recommendation No. 28).
9. Provide enforcement assistance and guidance to local municipalities to address the issue of inappropriate outdoor storage on rural and agricultural lands within the Plan areas (Adapted from 2015 Recommendation No. 35).
10. Consider removing the requirement in the ORMCP that cemeteries be "small scale" (Adapted from 2015 Recommendation No. 16).
11. Review and resolve the conflict between the Holland Marsh Specialty Crop Area in the Greenbelt Plan and the Provincially Significant Wetland (2015 Recommendation No. 5).