

Town of
East Gwillimbury

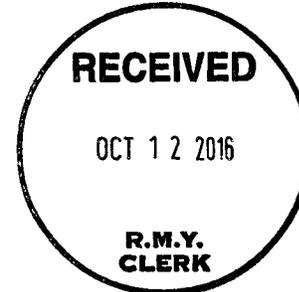
Fernando Lamanna, B.A., Dipl. M. M., CMO

Municipal Clerk
Corporate Services
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P17
PLANNING

October 3, 2016

Denis Kelly
Regional Clerk
The Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario L3Y 6Z1



Dear Denis Kelly:

For your information and records, at its regular meeting held on September 20, 2016 the Council of the Town of East Gwillimbury enacted as follows:

BE IT RESOLVED THAT the addendum letter entitled Town Feedback on Proposed Changes to Provincial Plans through the Coordinated Land Use Planning Review, pertaining to Development Services, Planning Branch Report P2016-74, be received; and

THAT Council endorse the staff comments and the addendum letter as the Town's formal input on the Province's Coordinated Land Use Planning Review; and

THAT a copy of Development Services, Planning Report 2016-74 and the addendum letter be forwarded to the Ministry of Municipal Affairs and Housing, Julia Munro (MPP York Simcoe) and York Region.

If you have any further questions feel free to contact the undersigned.

Yours truly,

Fernando Lamanna, B.A., Dipl. M. M., CMO
Municipal Clerk

Enclosure: Development Services, Planning Report 2016-74 and Addendum letter

CC: Honourable Minister, Ministry of Municipal Affairs and Housing
Julia Munro, MPP

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Town of
East Gwillimbury

DEVELOPMENT SERVICES REPORT P2016-74

To: Committee of the Whole Council
Date: September 7, 2016
Subject: Town of East Gwillimbury Comments on Provincial Coordinated Land Use Planning Review: Proposed Provincial Changes to the Oak Ridges Moraine Conservation Plan, Greenbelt Plan and Growth Plan
Origin: Development Services, Planning Branch

RECOMMENDATIONS

1. **THAT** Development Services, Planning Branch Report P2016-74 dated September 7, 2016, regarding the Town of East Gwillimbury comments on the Provincial Coordinated Land Use Planning Review: Proposed Provincial Changes to the Oak Ridges Moraine Conservation Plan, Greenbelt Plan and Growth Plan, be received;
2. **THAT** Council endorse staff comments as the Town's formal input on the Province's Coordinated Land Use Planning Review; and
3. **THAT** a copy of this Report be forwarded to the Ministry of Municipal Affairs and Housing, Julia Munro (MPP York Simcoe) and York Region.

PURPOSE

This report outlines Town staff's comments on the Province's proposed changes to the Oak Ridges Moraine Conservation Plan, Greenbelt Plan and the Growth Plan. It also seeks Council endorsement of these comments as input in the Province's Coordinated Land Use Planning Review.

BACKGROUND

The Province's Coordinated Land Use Planning Review

In February 2015, the Province formally launched a coordinated review of the Oak Ridges Moraine Conservation Plan ("ORMCP"), the Niagara Escarpment Plan, the Greenbelt Plan, and the Growth Plan. The review of these Plans has been consolidated in recognition of the interconnected nature of the goals and implementation of these Plans, particularly in areas related to managing growth, protecting agricultural lands and the natural environment, reducing greenhouse gas emissions, and supporting economic development. As the boundaries of the Niagara Escarpment Plan fall outside of the Town of East Gwillimbury, it has not been included in the Town staff's review.

The Province's coordinated review includes two phases of consultation. The first phase occurred during the spring of 2015 and requested general feedback on the Plans in an effort to identify subject areas where the Plans have been successful, where improvement needs to be made, and how they can work better together. The Town

provided formal comments to the Province through Development Services Report P2015-021 which was endorsed by Council in May 2015.

The second phase of consultation began in May 2016 with the release of draft amendments to each of the Provincial Plans. The amended plans are available on the Province's website (www.ontario.ca/landuseplanningreview). Staff provided Council with an overview of some of the major amendments in the June 2016 Development Services Memorandum. The Province is soliciting feedback on the proposed changes to the Provincial Plans by mail, email, through their consultation webpage and postings on the Ontario Environmental Registry. Additionally, 12 Public Open Houses were scheduled in May, June and July across the Greater Golden Horseshoe so the public could speak directly with staff from a variety of Provincial Ministries and offer their input. The Province originally requested that all comments be submitted by September 30, 2016, but has since extended this deadline to October 31, 2016.

DISCUSSION AND ANALYSIS

Town Input

Town staff have reviewed the proposed changes to the ORMCP, Greenbelt Plan and Growth Plan. Additionally, staff attended one of the Provincial Public Open Houses and two technical workshops led by the Province for municipal staff. Staff are generally supportive of many of the proposed amendments to the Plans; particularly the introduction of climate change policies, recognition of the Agricultural economy and flexibility for agricultural uses. Staff's detailed comments are attached to this report as Appendix 1. These comments focus on the following themes:

- Dedicated Financial Support and Infrastructure
- Implementation Support, Tools and Education
- Additional Guidance for Implementation Challenges
- Closing Transitioned Applications
- Intensification and Density Targets
- Protection of Employment Lands
- Clarity for Settlement Area Expansion
- Expanding the Urban River Valley Designation

Regional Input

York Region invited staff from all nine local municipalities to participate in Regional level discussions on these Plans. This included opportunities to discuss the proposed Provincial Plan changes directly with Provincial staff. The expected outcome of these discussions is a submission to the Province from York Region that includes coordinated comments from the Region and local municipalities. Town staff will continue to participate in these discussions and relay any formal Town comments. Staff recommend that in addition to Regional collaboration, the Town also submit its individual comments to the Province.

NEED FOR PUBLIC CONSULTATION

The Province's work plan for the Coordinated Land Use Planning Review includes two phases of public consultation. Phase 1 occurred in the spring of 2015 and included extensive opportunities for the public to provide input, including Town Hall Meetings and digital submissions. The Province requested general feedback on the Plans in an effort to identify subject areas where the Plans have been successful, where improvement needs to be made, and how the Plans can work better together.

In the current phase (Phase 2), the Province is seeking detailed feedback on the proposed changes to the Provincial Plans that were released in May 2016. The public is able to participate through a variety of methods, including by mail, email, the Province's consultation webpage, a posting on the Ontario Environmental Registry, or by attending one of the Public Open Houses occurring across the Greater Golden Horseshoe. Staff encourage all interested parties to participate in the Province's consultation process, as additional consultation at the local level is not scheduled at this time. The Town's input to the Province throughout the Coordinated Review is available to the public through the agendas, reports and minutes posted on the Town's website.

FINANCIAL IMPLICATIONS

Implementing the policies of Provincial Plans has a direct impact on the budget and financial planning of the Town. The Town will need to continue to invest significant dollars to build the infrastructure required to meet the growth forecasts of the Growth Plan, and will require better support from the Province to achieve its goals. In addition, there may be financial implications related to updates to policy documents (like Official Plan conformity exercises) and master plan updates.

ALIGNMENT TO STRATEGIC PLAN

The recommendations of this report align with the following Strategic Pillar:

- #2 Building a complete community that provides healthy places to live, work, play and learn

ATTACHMENTS

Appendix 1 – Town Input for the Provincial Plan Review

Prepared by:

Original signed by

Trish Elliott, MCIP, RPP
Senior Planner

Reviewed and Recommended by:

Original signed by

Carolyn A. Kellington, MCIP, RPP
General Manager, Development Services

Reviewed and Recommended by:

Original signed by

Nick Pileggi, MCIP, RPP
Director of Planning

Approved for Submission by:

Original signed by

Thomas R. Webster
Chief Administrative Officer

APPENDIX 1 – TOWN INPUT FOR THE PROVINCIAL PLAN REVIEW

Staff are generally supportive of many of the proposed amendments to the Oak Ridges Moraine Conservation Plan, the Greenbelt Plan and the Growth Plan. This particularly includes the introduction of climate change policies, and the recognition of the Agricultural economy and flexibility for agricultural uses. Additional amendments or consideration should be provided for the following:

Dedicated Financial Support and Infrastructure

- Dedicated financial support is still required for municipalities to implement the policies and targets of the Provincial Plans. There are large financial implications for municipalities, particularly small municipalities, to complete conformity exercises, address appeals, etc.
- It is important that there is certainty behind the funding/timing of infrastructure delivery to achieve the growth forecasts and complete community goals of these plans. For example, a highway link between Highway 400 and Highway 404 is needed to provide an effective east-west transportation route.
- Certainty, funding and timing for the Upper York Servicing Solution (UYSS) is also of utmost importance to the Town, in order to appropriately plan and manage forecasted growth, and ensure a fiscally responsible municipal government.

Implementation Support, Tools and Education

- Funding, tools and programs (e.g. education) are needed to help the Town both communicate and meet the targets of the Provincial Plans while balancing the needs of municipal Councils and existing residents.

Additional Guidance for Implementation Challenges

- The Province has identified that 20+ guidance documents are currently being prepared in relation to the Provincial Plans. It is important that consultation occur on these documents, as municipalities can offer on-the-ground insight as to what requires clarification and what may be difficult to implement without further guidance.
- The Provincial Plans need to provide better guidance on the appropriate locations for cemeteries within the context of agricultural and environmental land protection, and density requirements within settlement areas. This is an implementation challenge for municipalities.
- Additional guidance is required to illustrate the intention for “community hubs”; particularly the expectations and differences between those in settlement areas and those within the rural area or hamlets.
- Conflicting Provincial Plan policies regarding the Holland Marsh Specialty Crop area have not been addressed (i.e. balancing the agricultural viability of the land and protection of natural heritage resources/provincially significant wetland).
- Prohibiting or limiting peat extraction within the Greenbelt and Oak Ridges Moraine has not be addressed through the Provincial Plans.

Closing Transitioned Applications

- The transition policies within the Greenbelt Plan and ORMCP should be amended to close these files. Consideration can be made for files that have been active throughout this time (e.g. a Draft Plan of Subdivision waiting for municipal servicing, but continuing work to prepare the site during this time), however, other files should be officially closed. Municipalities are receiving requests regarding applications that have not been active for quite some time and do not reflect the provisions of the Provincial Plans.

Intensification and Density Targets

- The Town will not be able to provide a significant amount of intensification units (on the Regional scale) due to the limited size of its built boundary. It may be helpful to recognize the infill/intensification potential of Greenfield Area development that was approved prior to the introduction of the Growth Plan, as the pre-Growth Plan densities in these communities may facilitate future redevelopment. The Provincial Plans could explicitly identify these lands and provide a density/intensification threshold to support built boundary intensification.
- The Town is supportive of density requirements around express rail GO Transit network. However, the Province needs to design these stations with the density and pedestrian friendly objectives of these Plans, i.e. no expansions to ground-level surface parking, inclusion of landscaping and pedestrian connectivity, proper grade separations for pedestrian and vehicular safety, ensuring development is on full municipal servicing, etc.

Protection of Employment Lands

- Lands east of Highway 404, west of Woodbine Avenue, between Green Lane and Davis Drive are currently located within the Greenbelt Plan. The Town continues to promote the notion that these lands should be identified and protected for employment uses in the long-term, when said lands are needed to achieve forecasted growth in the Town.
- Major retail should be explicitly prohibited within employment areas and prime employment areas.
- Growth Plan policy 2.2.5 restricts prime employment areas to settlement areas. There may be instances where it is desirable to consider existing/historical employment areas that are located outside of the settlement area, but are strategically located near goods movement networks (e.g. 400 series highway), as prime employment areas.

Clarity for Settlement Area Expansion

- The coordination of settlement area expansion policies between the Provincial Plans is helpful, however the proposed revisions provide uncertainty regarding the protection of lands. The coordinated provisions allow for Towns/Villages within the Greenbelt Plan to expand subject to a list of criteria, which could be used as justification to promote an expansion in communities where this may not be

intended. For example, subclauses 2.2.8.a and 2.2.8.m appear to create an opportunity to use the expansion of servicing capacity (e.g. larger treatment facility) within a Town/Village to accommodate existing underdeveloped land as justification to expand the boundary of the settlement area. Alternatively, the desire to expand the boundary of the settlement area may be used as justification to plan to expand servicing infrastructure/capacity.

Expanding the Urban River Valley Designation

- The Greenbelt Plan identifies River Valley Connections located outside of the Greenbelt within the Town. However, the Urban River Valley designation has only been applied to those connections that are located between the Greenbelt Plan Area and Lake Ontario. The Province should consider all of the connections identified in the Plans.
- The Urban River Valley designation should be applied to all lands along these corridors, not just public lands.



Town of
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Corporate Services
Tel: 905-478-3821 Fax: 905-478-2808
flamanna@eastgwillimbury.ca

September 21, 2016

[VIA EMAIL]

Land Use Planning Review
Ministry of Municipal Affairs
Ontario Growth Secretariat
777 Bay Street, Suite 425 (4th Floor)
Toronto, ON, M5G 2E5
landuseplanningreview@ontario.ca

**RE: Town Feedback on Proposed Changes to Provincial Plans through
the Coordinated Land Use Planning Review**

Thank you for the opportunity to provide feedback on the Proposed Changes to the Growth Plan, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, as released May 2016. The following comments were endorsed by East Gwillimbury Council on September 20, 2016.

The Town supports some of the proposed amendments to the Oak Ridges Moraine Conservation Plan, the Greenbelt Plan and the Growth Plan. This particularly includes the introduction of climate change policies, and the recognition of the Agricultural economy and flexibility for agricultural uses. However, there are a number of key issues that are either missing or have not been properly addressed. In particular, these include:

- Lands within the Holland Marsh have been identified as “specialty crop area” within the Greenbelt Plan due to provincial muck soil analyses and high agricultural production rates. However, much of the specialty crop area is also identified as a provincial significant wetland, which places restrictions on farming activities. The Town and York Region have identified these conflicting goals and policies to the Province on many occasions, yet the draft Provincial Plans continues to ignore the issue. This needs to be addressed through the Coordinated Review.
- Two of the key goals of the Greenbelt Plan and Oak Ridges Moraine Conservation Plan are agricultural protection and environmental protection. However, these Plans are silent on restrictions and/or prohibitions on both peat extraction and commercial fill operations, which causes implementation challenges specifically for local municipalities. These operations do not support the goals of the Provincial Plans and should be explicitly restricted or prohibited within the Plan boundaries.

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- The Town has been challenged to meet its targets for employment growth due to a lack of municipally serviced employment lands. The Town's Highway 404 Employment Secondary Plan Area is required to meet the Province's job forecast to 2031, yet there have been funding issues and delays in the infrastructure needed to service these lands. The Town cannot appropriately accommodate employment growth without adequate funding for, and certainty on the timing of, the major infrastructure needed to service such growth. The Town recognizes and acknowledges the importance of achieving balanced growth. The lack of necessary infrastructure (water, sewer, roads, transit) significantly hampers our ability to achieve this balance.
- The Province needs to provide adequate funding and certainty regarding necessary infrastructure to support the connectivity of new growth areas and transit stations. The Green Lane GO Station is an invaluable transit hub for East Gwillimbury and will become even more important as the surrounding areas continue to develop. The rail line currently crosses Green Lane at-grade, which creates both traffic congestion and safety concerns, and require infrastructure such as rail flyovers to address these issues.

Additionally, the Town of East Gwillimbury recommends that the Province should further review the Provincial Plans and provide additional amendments or consideration for the following:

Dedicated Financial Support and Infrastructure

- Dedicated financial support is still required for municipalities to implement the policies and targets of the Provincial Plans. There are large financial implications for municipalities, particularly small municipalities, to complete conformity exercises, address appeals, etc.
- It is important that there is certainty behind the funding/timing of infrastructure delivery to achieve the growth forecasts and complete community goals of these plans. For example, a highway link between Highway 400 and Highway 404 is needed to provide an effective east-west transportation route.
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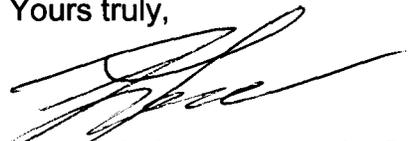
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Should you have any questions or require clarification on any of the above feedback, please contact the undersigned at the Town offices.

Yours truly,



Fernando Lamanna, B.A., Dipl. M. M., CMO
Municipal Clerk