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December 20, 2013

Mr. Jim Dymont
MHBC Planning
113 Collier Street
Barrie, Ontario
L4M 1H2

and

Ms. Andrea Furniss
Town of Georgina
Keswick, Ontario
L4P 3G1

Dear Mr. Dymont and Ms. Furniss:

Re: Official Plan Review - North Gwillimbury Forest

Now that I've attended the November 14 workshop and December 11 public meeting, and reviewed more materials on the Official Plan review process, I would like to raise some additional issues and questions on behalf of my client, the North Gwillimbury Forest Alliance (NGFA), which I hope you will respond to in the upcoming policy development phase of the review.

My November 8, 2013 letter focused on protecting wetlands and significant woodlands in the North Gwillimbury Forest and throughout the Town. This letter will address two other, related issues.

Maple Lake Estates

As the Town knows, since 2011 NGFA has been seeking constructive solutions that would terminate the existing development approvals for the Maple Lake Estates property. As described in a staff report of June 19, 2013, the ultimate owner, Metrus Developments Inc., has indicated it is willing to explore one option, whereby the existing approvals would be replaced by equivalent approvals on lands that Metrus owns between Deer Park Drive, Woodbine Avenue, Boyer's Sideroad, and Varney Road (see map attached to staff report).

NGFA is prepared to discuss any option that will ensure that neither the Maple Lake Estates property nor other wetlands or significant woodlands are developed. However, as NGFA said in a media release on June 21, 2013, reiterated by Jack Gibbons in a deputation to Council on June 24:

"there must be full community input into the location and design of Metrus' proposed [alternative] new residential development to ensure that it will be a high-quality, liveable urban community that is appropriately integrated into its surroundings."

In my view, this should include consideration of alternative locations. The lands identified by Metrus may not be the best feasible alternative. Other possible alternatives - without making any judgement as to their feasibility at this time - would include a location abutting Keswick (which the Metrus alternative lands do not), or a location within Keswick.

While in theory, consideration of alternatives could be extended to other locations inside Georgina but away from Keswick, or outside Georgina, such alternatives present sufficient problems that they should probably only be considered as a last resort. The existing Maple Lake Estates approvals are already factored into the capacity of the Keswick sewage system and the Region's population allocations for Georgina. As well, both the York Region and Georgina Official Plans make clear that Keswick is to continue to be the Town's principal growth centre.

As a result, the Official Plan review area includes:

- Maple Lake Estates, whose development approvals would hopefully be terminated,
- all the priority candidates for hosting equivalent approvals, except for lands in Keswick.

Therefore, both the exchange itself, and the alternative development locations, are relevant to the review.

Policy 1.1.3.9 of the Provincial Policy Statement says:

"A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:

- "a) sufficient opportunities for growth are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;
- "b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term and protect public health and safety;
- "c) in prime agricultural areas:
 1. the lands do not comprise specialty crop areas;
 2. there are no reasonable alternatives which avoid prime agricultural areas; and
 3. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas; and
- "d) impacts from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area are mitigated to the extent feasible.

"In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of [Provincial Policy Statement] Section 2: Wise Use and Management of Resources [dealing with natural heritage, water, agriculture, etc.] and Section 3: Protecting Public Health and Safety [dealing with natural and human-made hazards]."

The proposed exchange would constitute identification of a new, or expansion of an existing, settlement area, unless the alternative lands are in Keswick. The Official Plan review meets the definition of a comprehensive review, and provides an excellent opportunity for conducting the

process.

In my opinion, Policy 1.1.3.9 requires that the alternative development locations be examined against these criteria, and that the ultimately-preferred location be shown to meet those criteria at least as effectively as any other option. Similarly, the criteria in Policy 2.2.8 of the Greater Golden Horseshoe Growth Plan, and Policy 5.1.12 of the York Region Official Plan, need to be considered.

These criteria suggest that all other things being equal, and again without judging feasibility at this time, the most attractive exchange option would be for equivalent approvals on lands within Keswick, as this would promote intensification and avoid any expansion of the existing urban designation into the Greenbelt. A less attractive option would be lands abutting Keswick, which would at least avoid leapfrog development. The least attractive option would be for lands not abutting Keswick.

I recognize, of course, that any exchange would also involve a variety of other considerations deriving from the Provincial Policy Statement, the Growth Plan, and the Regional Plan, as well as the Greenbelt Plan. However, given the willingness of the various agencies (as indicated in the staff report) to enter into discussions about an exchange, this should not keep the Town from considering it as part of the Official Plan review.

In any case, I note that Maple Lake Estates has been identified as a growth and settlement issue, most recently at the December 11, 2013 public meeting, and that the prospective exchange is briefly described in the minutes of the Official Plan review Technical Advisory Committee meeting of July 17, 2013.

Questions:

1. How do the Town and MHBC propose to address the prospective Maple Lake Estates exchange within the Official Plan review?
2. What steps will you take to ensure that within the review, the consideration of alternative locations is not limited to the lands identified by Metrus, and also includes other options in or abutting Keswick?

Population Allocations Within Georgina

The Town is obliged to accommodate the population targets allocated to it by the Region, as presented at the November 14 workshop.

As you are well aware, the parent Official Plan, which is the subject of this review, includes outdated targets for the Town as a whole and does not include any allocation among population centres.

The secondary plans provide population projections, but all for different dates: Keswick, 38,700 in 2021; Sutton/Jackson's Point, 15,150 in 2031; and Pefferlaw, 3,000 in 2011. There is an assumed population of 2,200 for Maple Lake Estates specified in the Official Plan.

So far as I am aware, there are no population targets or allocations for:

- the Serviced Lakeshore Residential Area designation,

- the six designated hamlets, or
- the rural and unserviced-lakeshore-residential remainder of the Town.

The population projections for the secondary plan areas suggest there could be challenges accommodating the Regional population allocation, by the end of the projection period in 2031. So do the ultimate capacities of the sewage systems (49,000 for Keswick, Maple Lake Estates, and the Serviced Lakeshore Residential Area designation, according to York Region; 13,500 for the serviced portion of Sutton/Jackson's Point according to that area's secondary plan).

In addition to being of assistance to the public generally, information on the current and projected populations of each population centre or area, and whether/how the Regional projections can be accommodated, is of particular interest to NGFA for two reasons:

- ensuring that growth can be accommodated without adversely affecting the Town's wetlands and significant woodlands,
- its obvious relevance to any discussion of the prospective Maple Lake Estates exchange.

In my view, this information should be provided early on, so the public can consider it during the policy development stage - not just as an accomplished fact within the draft new Official Plan.

Question:

3. Within the Official Plan review, when and how do the Town and MHBC propose to inform the public about the current populations of, and updated population allocations among, the various population centres and areas?

* * *

Thank you for your consideration of these points. Please let me know if you need any further information or clarification.

Yours sincerely,

[original signed by]

Anthony Usher, MCIP, RPP