

From: Kevin Powers
Sent: Wednesday, July 22, 2020 10:00 AM
To: Regional Clerk
Subject: York Region Council consideration of Proposed Changes to the Growth Plan Released by the Province -- Submission

Good morning,

Please consider the following submission from the Nobleton Landowners Group (NLG) calling for a small change to the Growth Plan that would allow York and other Municipalities to better align their infrastructure with growth objectives.

The NLG represents several landholders in Nobleton comprising several hundred acres within the town's settlement area.

Summary

- **We are seeking an amendment to the Growth Plan that would allow municipalities like York Region the option to consider all municipal water and sewage servicing options, in line with the Provincial Policy Statement.**
- **While all water and sewage servicing options must be evaluated through a detailed municipal Class EA, Growth Plan Policy 3.2.6.3 prevents municipalities from even considering lake-based municipal servicing – even if it is a potentially more viable and environmentally sound servicing option.**
- **In order to comprehensively support forecasted growth and intensification, the Province needs to provide municipalities the tools needed to support these objectives by providing appropriate municipal servicing solutions.**
- **A small change to 3.2.6.3 would allow municipalities like York Region to review all municipal servicing options, including lake-based servicing where it may be most appropriate from an economic and environmental perspective**

Servicing Solutions Are Limited In York Region

Nobleton is serviced by a municipal stand-alone wastewater treatment facility, while surrounding communities are serviced by lake-based systems.

The current wastewater treatment facility discharges phosphorous into the Humber River. It is costly to maintain, and hinders already approved growth within the settlement area.

A long-term, sustainable and environmentally sound water and sewage treatment solution is needed.

Lake-Based Servicing Should Be An Option For York Region

Lake-based servicing may not be appropriate for all settlement areas. However, municipalities should be permitted to consider all municipal servicing options through a Class EA review.

Nobleton is one example where extending the municipal lake-based servicing system is a viable servicing option. In the long term, a municipal lake-based alternative would be a more economical, and environmentally sustainable solution that removes phosphorous loading into the Humber River.

Current Legislation Prevents The Most Environmentally Sound Option

We are seeking to resolve a contradiction between the Provincial Policy Statement and the evolution of Provincial Plan policy. This contradiction flows from a time when growth was controlled by limitations on water and sewage treatment in the Greenbelt Plan versus the more modernized growth management approach of the Growth Plan. The Growth Plan controls boundary expansions through stringent criteria and by requiring density targets and intensification.

The Provincial Policy Statement directs municipalities and Regions to make the most efficient use of servicing and enables municipalities to plan infrastructure beyond the normal 30-year growth horizon.

Yet Policy 3.2.6.3 of the Growth Plan for the Greater Golden Horseshoe remains – restricting a municipality from considering all viable municipal servicing options as part of a municipal Class EA.

York Region Has Requested This Change Before

York Region has asked the Province twice to revise this section of the Growth Plan.

“Recommendation # 20. The Province revisit policies regarding servicing communities in the Greenbelt and ORMCP, in consultation with municipalities and stakeholders” (May 2015)

“Recommendation # 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)” (September 2016)

- York Region Staff Report (May 2015) provides the following rationale for making the recommended change:

“Extending lake-based municipal servicing into Greenbelt communities (example Community of Nobleton in King Township) is prohibited by the Greenbelt Plan.

The same prohibition, however, does not seem to apply to communities within the Oak Ridges Moraine (example Village of Gormley in Whitchurch-Stouffville). Clarification is required in relation to these different standards, with apparently less restrictions on the Moraine. *Further, within York Region there are communities on private sewage systems or standalone wastewater systems that are in close proximity of existing lake-based water and wastewater systems and a lake-based connection may potentially be a more preferable option (financially and environmentally) to service those communities. Regional staff is of the opinion that the Plans should allow for exploration of these alternatives”.*

A Simple Solution

The Provincial Government is consulting on changes to the Growth Plan. In order to comprehensively support forecasted growth and intensification, the Province needs to provide municipalities the tools they require to support these objectives including consideration of appropriate long-term municipal servicing solutions.

A small change to 3.2.6.3 would allow municipalities to review all servicing options, including lake-based municipal servicing where it may be most appropriate from an economic and environmental perspective.

This change does not compromise strong environmental protections currently in the Greenbelt, and would avoid the unintended consequence of unsustainable growth.

A change would also be in line with Provincial Policy Statement, and in line with provincial direction to increase housing supply, create jobs, attract business investment and better align with long term infrastructure planning.

Recommended Policy Change

Proposed Change to 3.2.6.3 – by adding the **highlighted** words and removing words with ~~strikethrough~~

- b. in the case of an ~~upper- or single-tier~~ **inner ring** municipality: ~~with an urban growth centre outside of the Greenbelt Area;~~
 - i. the need for the extension has been demonstrated;
 - ii. the increased servicing capacity will only be allocated to existing ~~settlement areas with urban growth centres~~; and
 - iii. the municipality has completed the applicable environmental assessment process in accordance with the Ontario Environmental Assessment Act; or

Kevin Powers
Principal
Campbell Strategies