



SOUTH LAKE SIMCOE NATURALISTS

SLSN is a Not-for-profit Member of Ontario Nature.

Post Office Box 1044 Sutton West, Ontario, L0E 1R0

Telephone 905-722-8021

www.slsnc.ca

Mayor Margaret Quirk and Council,
Town of Georgina
26557 Civic Centre Road, RR#2
Keswick, ON., L4P 3G1

2019-01-11

Re: Bill 66 – Ontario Provincial Government Proposed legislation

Recommendation: That the Mayor and Council of the Town of Georgina request that the Province of Ontario immediately abandon this legislation. And, implore that the Town of Georgina not use this Bill 66, should it be passed by the Ontario legislature.

Mayor and Council of the Town of Georgina:

The South Lake Simcoe Naturalists believe the Town of Georgina should be very concerned about Bill 66 proposed by the current Ontario Government that would give municipalities the a tool to override existing important natural and cultural heritage, environmental and health and safety existing legislation. The current Ontario government wrongly sees the current land-use planning process as impeding economic development, in support of jobs through a purported “open for business planning bylaw”.

From our review most of the Bill 66 proposed will roll back important aspects of existing legislation such as the Clean Water Act (adopted after the Walkerton tragedy), The Greenbelt Act, the Lake Simcoe Protection Act, Oak Ridges Moraine Act, Places to Grow Act (Growth Plan), etc. and is ill-conceived. The wide-ranging Omnibus nature of this legislation is truly concerning and obviously lacks balance and a full

understanding of real on the ground land-use planning implications. A central concern is that this proposed Bill would allow municipalities to pass a by-law to place employment uses and secondary uses such as residential and commercial anywhere in Ontario without conforming to these important Acts, and indeed contravene their recent existing Official and Secondary Plans arrived at through extensive local community consultation and good planning process. We would obviously strongly disagree with this. Many other commentators, legal advisers and media and academics have detailed these serious flaws in this policy move and proposed Bill 66 including concerning municipal Zoning change implications. Also, there is lots of additional information and analysis easily available on the internet, including the detailed Bill 66 itself, which anyone can search. We implore Council members personally undertake their own review of this legislation and legal and academic review that are also available in the public domain (legal review - Aird & Berlis LLP, Stikeman Elliott LLP, C.E.L.A. etc.)

It is noted that no public notice or hearing is required prior to the passing of the open-for-business planning by-law proposed. From our inquiries, the provincial government is now advising that the fundamental powers and responsibilities regarding decisions approving development projects is with the Minister of Municipal Affairs and Housing. This was historically the case, and from experience, will ultimately result in some cases further high-level legal fighting, and municipality representatives facing angry residents at the front line of controversial, scientifically and socially indefensible developments at their local neighbourhood level, by a municipality who would support this tool. Despite the Province calling it a planning tool to empower municipalities, it will force local public community members to act against their municipalities more than is presently the case. Ultimately, it is difficult to see how this local purported community-based decision making, further top-down directive driven is helpful. It is not, and a slippery slope "prescribed" based process, which none of us need.

The Greenbelt and Oak Ridges Moraine Acts and Plans are established integral components of land use planning in Ontario that complement the Growth Plan to encourage smart planning in York Region. We want and need all our local municipalities (consistently across the Region (and the entire Southern Ontario landscape) to champion the priorities within the existing land-use planning process resulting in the reduction of sprawl, protection of natural and hydrological features and agricultural lands, and conservation of wildlife through the developing confirmed landscape ecology principles of existing policy and legislation at the local and provincial level.

Indeed, with this Bill 66 it would seem apparent employment uses could be built anywhere in the province without following our well-established public planning process in Ontario. This is poor planning! **Our members research, and our own knowledge of our local area and municipalities confirm that there is an excess of economic development land here, and in cities across the Greater Golden Horseshoe, that have been identified for that use. There is no need for this legislation, the appropriate lands are already identified as we have previously advised, in existing approved municipal Official and Secondary Plans, including in Georgina.**

In our Region the Greenbelt, Oak Ridges Moraine Act and Plan, the Lake Simcoe Protection Act and Plan, and Clean Water Act existing complete provisions, critical to the health of all our communities, and the wildlife we share with them, must not be undermined.

Regarding the Greenbelt in Ontario, it has protected 1.8 million acres of farmland, local food supplies, the headwaters of our rivers and important forests and wildlife habitat for over 12 years. We are advised that it generates 9.1 billion dollars in revenue each year, creating 161,000 local jobs across 28 municipalities. It ensures our food security by providing us with local food, encouraging young farmers to step in. Its continued clearly defined and defensible boundaries must not be tampered with, for clarity for developers and all the people, wildlife and natural and cultural landscapes of Ontario.

We broadly ask that municipalities, upon review especially of Schedule 10 of Bill 66, to stand with us and many others opposing this proposed Bill 66. We are advised that other municipalities are already doing this, Guelph, Burlington and Halton Hill among others. As many other individuals and organizations have noted our communities are not “red tape”. Similarly, our wildlife, rivers and streams, local food security and the future health and well-being of our children is also not simply red tape. The provisions of existing Ontario Land-use planning and zoning are there for good reason.

Many of our SLSN members are small business people themselves, professionals and others, and are involved in community organizations, and active in social, cultural and natural heritage organizations in our municipalities. **At the end of the day, it is up to the local municipality representatives to speak up for their citizens for good, rigorous and open planning process. We thereby request the Mayor and Council of the Town of Georgina act decisively now to request the Province of Ontario immediately abandon this proposed legislation. And, we implore that you not use this proposed provincial Bill 66 in the Town of Georgina, should it be passed in the Ontario legislature. We request formal notification of any actions taken by Council regarding the proposed Bill 66.**

Paul Harpley BSc. (Hons.) M.A.

President, South Lake Simcoe Naturalists (Ontario Nature)

Director, The Zephyr Society of Lake Simcoe Research Organization

c.c. John Espinosa, Clerk, Town of Georgina
Ontario Nature
Canadian Environmental Law Association
Environmental Defence
Ontario Greenbelt Alliance
Lake Simcoe Watch
Rescue Lake Simcoe Coalition
Other Conservation Partners

About the South Lake Simcoe Naturalists

The South Lake Simcoe Naturalists (SLSN) is a fully federated member organization of Ontario Nature. Ontario Nature protects and restores natural habitats through research, education and conservation, connecting thousands of individuals and communities to nature. Ontario Nature is a charitable organization representing 25,000 members and supporters and over 140-member groups across Ontario. The South Lake Simcoe Naturalists represent individuals and families in Georgina and the greater South Lake Simcoe Region. Our membership includes

a wide range of people from diverse backgrounds and experience, professional to amateur. Members are interested in nature, wildlife, natural and cultural landscape conservation, good planning and support of local and broader environmental issues. The SLSN have been involved in the community for over 25 years. Our organization has made many past submissions including, but not limited to, the Town of Georgina Official Plans and Sutton/Jackson's Point and Pefferlaw Secondary Plan reviews, since the 1990's. Also, SLSN has in the past, and recently commented on previous and recent development proposals in the Georgina area, among other Regional and Provincial scale initiatives such as the Lake Simcoe Act and Plan, Ontario Greenbelt Act, Ontario Growth Plan and the Oak Ridges Moraine Act.
