



November 18, 2022

Kate Manson-Smith  
Deputy Minister  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
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**RE: York Region Response – ERO 019-6216, Proposed Amendments to the Greenbelt Plan, ERO 019-6217 Proposed Amendments to the Greenbelt Area boundary regulation, and ERO 019-6218 Redesignation of land under the Oak Ridges Moraine Conservation Plan**

On November 4, 2022, the Province of Ontario released the above-noted environmental registry postings proposing amendments to the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan.

This letter provides preliminary comments to the above noted registry postings. The short consultation period, coupled with the recent municipal election prevented timely Council endorsed comments and recommendations before the submission deadline of December 4, 2022. York Region Council will consider these comments on December 8, 2022 and additional Council comments will be submitted to the Province.

**The Province is proposing to redesignate or remove 330 hectares of the Greenbelt lands in York Region for urban development**

The Province is proposing redesignations or removals for 15 areas of land in the Greenbelt in support of the Province's goal to have 1.5 million homes built in the next 10 years. If approved, these areas are estimated to include 50,000 homes toward the target.

Five of the proposed areas are in York Region within the Township of King, City of Vaughan, Town of Whitchurch-Stouffville and City of Markham totaling 53 hectares of redesignation and 277 hectares of removal from the Greenbelt Plan. The purpose of redesignating or removing these lands is to build housing with construction beginning no later than 2025, with significant progress on approvals by the end of 2023, and

landowners funding the necessary infrastructure. If these conditions are not met, the lands would be returned to the Greenbelt.

### **York Region has an adequate supply of housing through both intensification and approved urban boundary expansions, without the need for the proposed amendments**

York Region Council's adopted Regional Official Plan provides adequate urban land and planned servicing to accommodate the Province's housing objectives. Provincial approval of the Regional Official Plan (ROP) in November 2022 included the following modifications which will provide additional opportunities for housing:

- An additional 364 hectares of urban expansion in Whitchurch-Stouffville, King and Markham
- Four site specific 'special provisions' areas that increase maximum building heights and density in Aurora, Markham and Vaughan
- Two employment conversions in Vaughan
- Other modifications that signal further urban use designations in the Oak Ridges Moraine Plan in Vaughan and Richmond Hill to be approved by the Minister

The proposed Greenbelt and Oak Ridges Moraine Plan amendments would represent additional potential urban lands along with the ROP modifications. It is unclear why these additional removals from the Greenbelt and Oak Ridges Moraine Conservation Plan Area are being contemplated at this time, given the extensive MCR exercise to determine how to manage growth, including delivery of critical infrastructure to 2051.

### **While York Region supports expansion of Southlake Regional Health Centre, existing urban land should be explored first**

One of the proposed areas in the Township of King represents the largest land area proposed to be redesignated and removed from the Oak Ridges Moraine Conservation Plan and Greenbelt Plan. This area is one option for expansion of the Southlake Regional Health Centre in Newmarket. The Township of King has passed a Council resolution to support the redesignation and removal of these lands to fast track the approvals for construction of a hospital satellite building.

While York Region supports expansion of the hospital, we encourage consideration of existing urban lands prior to Greenbelt removals. The 2022 York Region Official Plan added significant new urban lands north of the Newmarket boundary and in close

proximity to planned rapid transit and existing GO station, which should be considered when choosing a location for expansion.

### **Locating residential development close to high traffic corridors such as a 400 series highway is not optimal and may compromise planned adjacent employment areas**

Greenbelt removals in Richmond Hill are proposed between Highway 404 and land designated for employment uses. Housing in this location may not be appropriate from a land use compatibility perspective, compromising delivery of the planned adjacent employment lands. Additionally, there is strong evidence to support adverse health impacts of traffic related air pollutants for people residing near highways and roadways.

### **Proposed Greenbelt land removals in Markham intrude on the continuous 600m wide wildlife and ecological Little Rouge Corridor connection from the ORM to the Rouge National Urban Park**

Following significant work undertaken through the Rouge North Management Plan, the Greenbelt Plan protected a 600 m wide corridor for the Little Rouge River as the main connectivity corridor between Lake Ontario and the Oak Ridges Moraine via the Rouge Park. This serves as a vital corridor for ecological and wildlife connectivity allowing species sensitive to urban uses to move and migrate freely. Removal of the proposed lands will create a narrow pinch point of less than 300 metres just west of the Rouge Park that will adversely affect survival of species by fragmentating and degrading the integrity of the corridor.

The Province should not be contemplating removal of Greenbelt lands in this vital north/south ecological corridor.

### **Impact of all removals should be assessed from a transportation and wastewater infrastructure perspective**

Servicing capacity in central and northern York Region is constrained until the servicing solution proposed through the *Supporting Growth and Housing in York and Durham Regions Act, 2022* is in place. Development in the proposed Greenbelt Plan removal areas within York (Map 1) and Durham Regions (Map 6 and 7) have not been considered for servicing that will directly impact the Duffin Creek Water Pollution Control Plant. Proposed Greenbelt land designation changes will increase required capacity for the proposed wastewater servicing solution and landowner servicing must be coordinated with the Regional sewer and water system.

The cumulative impact of developing the proposed sites along with growth approved through the Regional Official Plan needs to be considered to identify infrastructure needed to accommodate provincially planned growth. Presently, these areas have not been contemplated for servicing in Water and Wastewater Master Plans but would require servicing in the near future. Additional housing to achieve the Province's goal is better suited to areas with existing or planned services than outlying areas better suited for protection by the Greenbelt Plan.

**York Region urges the Province to extend the consultation period and meaningfully engage with municipalities and stakeholders**

As part of the Municipal Comprehensive Review, York Region engaged with First Nations and Indigenous communities to inform growth management and infrastructure master plans. Through these consultations, First Nations and Indigenous communities expressed the importance of protecting land and water for all living beings, protection of the environment and landscape connectivity. They reiterated the importance of protecting the Greenbelt and Oak Ridges Moraine given threats to headwaters, wetlands and watercourses in Ontario. This sentiment was echoed by residents and other stakeholders.

York Region requests the Government of Ontario extend the commenting period on proposed amendments to the Greenbelt and Oak Ridges Moraine Conservation Plan Areas to allow for collaboration with municipalities about opportunities for development within existing approved urban areas, and solutions to accelerate housing development without compromising the integrity of these Plans.

If you have questions regarding this response or would like to discuss these recommendations, please contact Paul Freeman, Chief Planner, Planning and Economic Development Branch at [Paul.Freeman@york.ca](mailto:Paul.Freeman@york.ca).

Sincerely,



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