

To:

York Regional Clerk's Office regional.clerk@york.ca

Future York futureyork@york.ca

From: Rescue Lake Simcoe Coalition and signatories

RLSC

120 Primeau Dr.

Aurora ON

L4G 6Z4

rescuelakesimcoecoalition@gmail.com

September 14, 2021

RE: Regional Council Planning and Economic Development, September 16, 2021
Report of the Commissioner of Corporate Services and Chief Planner
Alternate 2051 Forecast and Land Needs Assessment Scenarios in Response to Consultation

Dear members of York Region Council,

The Rescue Lake Simcoe Coalition and signatories wish to comment on the staff report to Council on the September 16th agenda, C.1 Alternate 2051 Forecast and Land Needs Assessment Scenarios in Response to Consultation, and E.1 Region's Municipal Comprehensive Review - East Gwillimbury's Update on Growth Management, Infrastructure and Financial Planning Coordination

We note these documents were released on Thursday Sept 9th for a Council meeting 7 days later. This is not an adequate review period for a decision of this magnitude. It is also not serious public consultation. Where is the consultation?

York Region is planned to grow by almost 600,000 residents by 2041. The Growth Plan 2019 requires the Region to plan for an intensification target of 50 percent. This results in greenfield density that is below the density that will provide viable transit at 15 minute intervals. 50 residents and jobs per hectare in new greenfields cuts off the opportunity to achieve viable transit to its residents, which was identified as the top priority for residents according to your survey[1]. 100 residents and jobs per hectare in new greenfields would be more appropriate. YR is aiming for just a 50 - 55% intensification rate, having analyzed the 60% intensification scenario as well. As you are aware, Council is able to direct staff to analyze alternative intensification targets. **We very strongly support an analysis of 70% & 80% intensification targets.**

The plan presented in agenda item C.1. will more than double the rate at which York Region countryside is being destroyed. While York Region paved over roughly 6400 acres between 2001 and 2019 (that's 357 acres per year) the new plan would see the region burn through a further 25,000 acres by 2051 - over 800 acres per year, **more than double the past rate.** If the protection of agricultural land is a priority, you will need to work harder to achieve it.

To that end we urge you not to support the recommendation to “direct staff to proceed with a phased 50-55% intensification scenario in the updated Regional Official Plan, specifically 50% intensification annually to 2041 and 55% intensification annually from 2041 to 2051”.

The 50 – 55% intensification rate is NOT the best York Region can do to meet its commitments to the environment, and to meet its residents' stated wishes. To be satisfied with a 50 – 55% intensification for the next 30 years, in a climate and Lake Simcoe health crisis is completely unacceptable.

Further, analysis to date does not provide citizens with the information they need to analyse the impact of various options. The RLSC received no response to its suggestion that the intensification scenarios be put into a context that would help residents decide what is best for them.

We urge the Region to first address the affordable housing and elderly housing needs clearly identified by staff in a presentation on July 27th, 2021 and in Shaping the Future: Building Complete Communities in York Region[2] and in York Region's Foundational Housing Analysis, March 2021. **This can be accomplished by addressing the needs of today's York Region residents with a Hard Urban Boundary for the first ten years of the MCR implementation while the region works on intensification, the provision of**

affordable and smaller unit housing, and meeting its GHG reduction targets. In ten years, if it is still the will of Council to pave the maximum amount of York Region allowed by law, consider it then. We suspect that by then the climate crisis and Lake Simcoe's health crisis will be taken seriously and Council would not accept 50 – 55% intensification.

At this point, there is little to no justification for using the lowest intensification rate you could. Choosing the lowest intensification rate allowed by law does virtually nothing for today's residents who need housing they can afford, and it allows for a greater share of single family homes, which acre per acre are the most environmentally damaging way of accommodating new residents.

In addition to paving some of the last unbuilt headwaters of the Rouge and Don rivers, this plan would see a huge number of people and a huge area of pavement forced into the sensitive Lake Simcoe watershed, which simply doesn't have the capacity for more sewage or runoff. The Rescue Lake Simcoe Coalition, Save the Maskinonge, Environmental Defence, Pact-POW and the Simcoe County Greenbelt Coalition have all already made it clear, in their joint letter of January 19th, that **no further settlement expansion** to Upper York Region should occur because there is presently no sustainable way to increase sewage or runoff capacity within the Lake Simcoe watershed.

As an environmental organization we wish to point out how the law is supposed to prevent the destruction of Lake Simcoe via massive growth. As noted in the RLSC letter to York Region Council June 23, 2021:

The Lake Simcoe Protection Plan has a designated policy that deals with settlement area expansions:

LSPP 4.1-DP For a proposed *settlement area* expansion, establishment of a new *settlement area* or a *development* proposal outside of a *settlement area* that requires an increase in the existing *rated capacity* of a *sewage treatment plant* or the establishment of a new *sewage treatment plant*, an environmental assessment of the undertaking shall be completed or approved prior to giving any approvals for the proposal under the Planning Act or the Condominium Act, 1998.

We suggest that EA's on the sewage impacts to Lake Simcoe and conformity to the LSPP should precede the allocation of land to the Lake Simcoe watershed.

Further, YR must outline how this proposal ensures conformity to the following section of the Provincial Policy Statement: 2.2 Water

2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by: a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development..... ;

The RLSC requests a response from the Region as to how they would follow the LSPP's designated policy 4.1 and expand settlement areas, and how YR will conform to PPS policy 2.2.1.

There is little to no sewage capacity for new growth. The Province has as you know made it illegal to approve the Upper York Sewage Solution through Bill 306^[3]. To our knowledge there is no other servicing solution for Upper York until a decision is made to route sewage south via the York Durham pipe to Lake Ontario, and of course, until the thing is actually built and operational. As reflected on pg 2 of in Regional Council Planning and Economic Development, March 18, 2021, Report of the Commissioner of Corporate Services and Chief Planner: Proposed 2051 Forecast and Land Needs Assessment, this constraint is acknowledged by the Region.

On the topic of sewage, we find it highly offensive that the unelected Chair of York Region, Wayne Emmerson, who is also the Chair of the Lake Simcoe Region Conservation Authority, is holding progress on the clean up of Lake Simcoe hostage while demanding that the province approve the Upper York Sewage Solution. New sewage treatment plants are not allowed in the Lake Simcoe watershed because we have more than double the amount of phosphorus going into the lake as is the target load of the Lake Simcoe Protection Plan. To block progress on a phosphorus reclamation plant on the Holland River while advocating for more phosphorus going into the lake through the UYSS is irresponsible and contrary to the role of the head of the Lake Simcoe Region Conservation Authority.

This brings us to East Gwillimbury and item E.1.

Thank you York Region staff for supporting that only 25% of East Gwillimbury's whitebelt should be considered for development, in contrast to EG staff's "all of the whitebelt" request. East Gwillimbury is the most expensive place to service per capita in the region. Also, there is no servicing solution, see above. The UYSS is on hold, and EG's "plans" require an expansion of a plant that doesn't even exist and may not be approved.

In summary, our recommendations and comments are as follows:

1. Where is the consultation and how does this align with the priorities on your website that came from a YR public survey re priorities (ie. transit is at the top of the list)? 1 week notice is inadequate.
2. Do not approve the 50 – 55% intensification target outlined today.
3. Provide analysis of 70 % & 80% intensification targets, and put them in context that is meaningful for residents. Consult.
4. There should be zero settlement area boundary expansions for 10 years. There is lots to infill, this will give YR a chance to do EA's in the Lake Simcoe watershed, make more transit supportive communities and prioritize York's clear need for affordable housing.
5. As noted by staff, YR needs strong phasing policies that will prevent leapfrog sprawl and high cost to taxpayers and the environment. Staff seem to understand that; please support the strongest phasing policies you can.
6. East Gwillimbury's request for developing all of their whitebelt is premature, procedurally confusing and potentially inappropriate. Thank you YR staff for supporting only developing 25% of EG's whitebelt, as compared to EG staff's "all of whitebelt" request. Also, there is no servicing solution. The UYSS is on hold, and EG's "plans" require an expansion of a plant that doesn't even exist and may not be approved.
7. We request a written response to the questions: How will York Region follow designated policy 4.1 of the Lake Simcoe Protection Plan and expand settlement areas? How is it the most reasonable course to plan for settlement area expansions through this MCR, and then deny planning approvals later if they fail an EA? How does this proposal conform to PPS Policy 2.2.1?

Thank you for the opportunity to comment on this significant proposal. Please use caution, consult your constituents, and plan for a sustainable future that supports a healthy Lake Simcoe.

Sincerely,

Claire Malcolmson

Executive Director, Rescue Lake Simcoe Coalition

SIGNATORY ORGANIZATIONS:

Gloria Marsh, Executive Director York Region Environmental Alliance

Debbie Gordon, Save the Maskinonge

Andrew McCammon, Executive Director, Ontario Headwaters Institute

Brandon Stiles, Environmental Dept. Manager, Chippewas of Georgina Island First Nation

Kevin Thompson, SOS Beaverton

[1]

<https://www.york.ca/wps/portal/yorkhome/yorkregion/yr/municipalcomprehensivereview/>

[2]

https://www.york.ca/wps/wcm/connect/yorkpublic/19d4671a-e5a7-402b-beea-4917cba7f9a4/19018_completeCommunitiesStrategy.pdf?MOD=AJPERES&CVID=mOVINog

^[3] <https://www.ola.org/en/legislative-business/bills/parliament-42/session-1/bill-306>