

Rescue Lake Simcoe Coalition  
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Dear Sirs,

The Rescue Lake Simcoe Coalition wishes to follow up with some procedural and policy questions that have yet to be answered by staff or Council. They relate to Lake Simcoe Protection Plan policy 4.1-DP; Growth Plan 3.2.6.2 Water and Wastewater Systems; and the PPS.

East Gwillimbury (EG) and BILD are requesting all of EG's whitebelt lands be included in the proposed 2051 urban boundary expansion. This would result in an additional 715 Ha of farmland potentially lost to development. As noted by staff there are servicing constraints that make this risky and development in northern York Region is the most expensive to service on a per capita basis (\$3,000 more compared to the southeast). The development of these lands rely on a Sewage Treatment Plant (STP) that doesn't exist and even if it is built, may never be expanded to accommodate the proposed urban expansion. In the absence of the STP approval, and given the extremely unlikely scenario that Lake Simcoe can accommodate MORE pollution in 20 years, we urge that 25% or less of EG's whitebelt lands be included in the 2051 forecasted land needs and urban boundary expansion (consistent with staff's initial recommendation March, 2018).

We would also like to express concern with Mayor Hackson's continued advocacy to expand the urban boundary and the advanced stage of the East Gwillimbury lower tier Official Plan which appears to be duplicating and possibly undermining forecasted land needs assessments.

### **1. The Lake Simcoe Protection Plan, settlement area expansions**

**Policy 4.1-DP says:** 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.

## **2. Growth Plan: Water and Wastewater Systems**

**Policy 3.2.6.2 says:** Municipal water and wastewater systems and private communal water and wastewater systems will be planned, designed, constructed, or expanded in accordance with the following: ....

c) a comprehensive water or wastewater master plan or equivalent, informed by watershed planning or equivalent has been prepared to: i. demonstrate that the effluent discharges and water takings associated with the system will not negatively impact the quality and quantity of water; ii. identify the preferred option for servicing growth and development, subject to the hierarchy of services provided in policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5 of the PPS, 2020, which must not exceed the assimilative capacity of the effluent receivers and sustainable water supply for servicing, ecological, and other needs; and iii. identify the full life cycle costs of the system and develop options to pay for these costs over the long-term.

## **3. Provincial Policy Statement: Water**

**Policy 2.2.1 says:** 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.....

An example of cumulative effects is included in the Minister's 10 Year Report on Lake Simcoe published March, 2020, which re-enforces a trend observed across Ontario that **chloride concentrations are steadily rising in our groundwater, lakes, rivers and streams** as urbanization expands and intensifies across southern Ontario. The Lake Simcoe Region Conservation Authority documented that levels of chloride are highest in tributaries draining from urban areas. A recent study completed on 4 urban rivers in the Greater Toronto Area documented that chloride levels are elevated even in the summer months due to accumulation of chloride in soils and groundwater at levels that typically exceed the federal chronic level and frequently exceed the acute threshold for aquatic life. This is one of many stresses facing Lake Simcoe that would be amplified by urbanization.

We would appreciate answers to the following questions that relate to the content above:

- a. How will York Region consider the cumulative impacts on source water for the entire region and for Lake Simcoe?
- b. Has York Region identified the increases in rated capacity that would be needed from the expansion?
- c. Has York Region done an environmental assessment of the impacts of that increase in rated capacity?

- d. The LSPA/LSPP is overseen and administered by the Ministry of Environment, Conservation and Parks. Have they been consulted due to the quantum of land proposed for development in the Lake Simcoe Watershed? This has been requested by the Rescue Lake Simcoe Coalition, and we believe it should be requested by both York Region and other Lake Simcoe local governments.
- e. Should the Region of York choose to proceed with expanding the settlement area boundary, will staff reports and the draft official plans document that any proposed settlement expansion must comply with Section 4.1 DP of the LSPP and will be subject to approval by the government of the day?

## **Other Concerns**

### **4. Whitchurch-Stouffville Continued Requests for Urban Expansion in Greenbelt and Oak Ridges Moraine Settlement Areas**

We are concerned by the Mayor of Stouffville's proposed motions and continued requests to expand settlement areas against the recommendations of York Region staff. These requests are forcing both staff and Council to contemplate and support planning that does not conform to provincial plans. It is also advocating for growth that is fiscally irresponsible as it will require water and waste infrastructure where it is most costly for York Region and not capitalize on existing infrastructure. The continued requests, when informed responses on why it is not in the best interests of the Region of York as a whole, is undermining the Municipal Comprehensive Review process, is a poor use of staff time and resource and distracts Council's time and attention away from responsible planning. We are concerned that the persistent and repeated attempts may be influencing and affecting staff's ability to report autonomously and provide recommendations that uphold and conform with provincial plans.

We would appreciate answers to the following questions that relate to the content above:

- a. What additional information could staff bring forward on Mayor Lovitt's proposed motions if they are of the opinion that the requests are not consistent with provincial plans and have already provided their response?
- b. Are staff required to respond to the same question presented in different ways?

### **5. Establishment and Membership of Working and Advisory Groups**

It was noted in BLDG communication that technical and advisory groups were established early in the process. Any answers you can provide about the working and advisory groups would be helpful.

- a. Is the membership of these groups publicly available? If so could a list be provided?
- b. Are there minutes or other information that was presented and shared at these meetings that is publicly documented and available?
- c. Were any other working groups established to help inform the MCR?

## **6. Addressing Climate Change, Preservation of Agricultural Land, Public Health and Complete Communities through Land Use Planning**

How does the draft forecasted land needs satisfy the above policy, goals and objectives to promote the above-mentioned items? The staff report presented to Council December 2020 discussed the public health benefits of complete communities.

### **Summary**

All three water and growth-related policy issues mentioned above, (LSPP, Growth Plan, PPS) have not been adequately addressed in staff reports and/or by discussions held at Council meetings.

We are concerned that the deadline of the province's MCR conformity exercise is leading to procedural problems and a lack of due diligence on some aspects of the MCR, including those presented here that are meant to protect Lake Simcoe, the Oak Ridges Moraine, the Greenbelt, our environment, source water and health. It is clearly leading to impossible review times for the interested public.

We would appreciate it if these constraints were acknowledged, and if these issues were brought to the attention of YR Council decision-makers, by staff. Further we would like to know what the process is for ensuring that these policies are followed in the MCR process.

We would also appreciate a written response to these questions, or a phone call to discuss these questions.

Thank you kindly.

Signed,



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Irene Ford, York Region resident

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CC. Minister Piccini, Minister of Environment, Conservation and Parks