

January 31, 2019

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
17th floor 777 Bay Street
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**RE: Proposed Amendment 1 to the Growth Plan
Nobleton Landowner Group Comments
Lands within Nobleton settlement area, Township of King, in the Region of York
ERO No. 013-4504
OUR FILE 1590A**

We appreciate the opportunity to submit comments on the Growth Plan (2017) and proposed Growth Plan Amendment 1 as per the Environmental Bill of Rights Notice.

MHBC represents a landowners group that collectively own approximately 500 acres of land in the settlement area of Nobleton in the Township of King (the "Nobleton Landowners Group" or (NLG)) and submit the following comments on their behalf (see **Figure 1**). On January 18, 2019, we met with Jae Truesdell to discuss the merits of our comments and request and he suggested that we also submit comments through the formal EBR process.

Policy 3.2.6.3, *Policies for Infrastructure to Support Growth*, of the Growth Plan is not proposed to be amended. However, this Policy is stifling the ability for Nobleton to grow as planned into a complete community and it is not in keeping with the Provincial objectives to increase housing supply, reduce the cost of housing and to promote employment opportunities. For these reasons, we urge the Province to consider amending Policy 3.2.6.3 as part of the proposed Growth Plan Amendment 1.

Specifically, Policy 3.2.6.3 of the Growth Plan does not allow a lake based system to be extended to Greenbelt communities, which includes the settlement area of Nobleton in the Township of King.

This policy originated in the 2005 Greenbelt Plan and yet the prohibition is more restrictive than policies in the Oak Ridges Moraine Plan.

In Nobleton, this policy impacts a total of approximately 2,000 acres of land in Nobleton (lands situated between the settlement area boundary and the urban area boundary identified on **Figures**

1, 2 and 3). The NLG collectively own approximately 500 acres of that land (or 25% of the lands in Nobleton impacted by the existing policy).

In order for growth to occur within the settlement area, servicing (water and sewer) expansions are needed.

Two engineering firms have demonstrated that extending the York-Durham lake based servicing system (YDSS) from Kleinburg (3 km away) is the most economic and environmentally preferred servicing solution for Nobleton. Despite this finding and the fact that nearby communities like Bolton, Kleinburg and King City are serviced by lake-based systems, Growth Plan Policy 3.2.6.3 will not allow this servicing option to be considered for Nobleton.

The Region is therefore forced to make incremental expansion to the stand-alone sewage treatment plant which discharges into the Humber River. Expansions to the stand alone system will not provide for full build out of the existing settlement area.

In the last Provincial Plan Review, York Region and the NLG made similar submissions recommending that Provincial Plan policy be revised to at least allow consideration of a more logical servicing solution for Greenbelt settlement areas (e.g. Nobleton), which is consistent with other settlement areas and other current Provincial Plan policies. However, under the former government, the Province did not act on the request and no change was made.

WHAT WILL THIS CHANGE DO?

The proposed policy change to Policy 3.2.6.3 will:

1. Remove an outdated policy that limits servicing options from being explored and is not consistently applied to similar communities
2. Allow the Region to explore other servicing alternatives (i.e. lake-based systems) that are economically and environmentally preferred through the typical and appropriate Municipal Class EA process
3. Allow for more cost-effective servicing alternatives to be considered, reducing overall development costs which can translate to more affordable housing units in Nobleton
4. Allow the Province to capitalize on its investment into the Northwest GTA corridor. This corridor, if approved in the planned alignment, will be ± 1.4 km south of the Nobleton boundary (see attached **Figure 4**)
5. Allow Nobleton to evolve and grow into a complete community by:
 - Increasing the number of potential jobs in Nobleton by $\pm 11,000$
 - Increasing the number of housing units in Nobleton by $\pm 9,000$, accommodating $\pm 25,000$ people
6. Allow Nobleton to evolve like King City has. King City is a good example how growth can be planned / implemented properly by motivated landowners and the public benefits that can come with it to create a complete community

REQUEST TO AMEND POLICY 3.2.6.3 of the GROWTH PLAN

The PPS (Sections 1.1.1, 1.1.3, and 1.6.1) strongly supports servicing options that promote financial viability in the long term along with environmental considerations. The Servicing Options in Section 3.2.6.3 of the Growth Plan should include these considerations.

Recommended changes to Growth Plan Policy 3.2.6.3 indicated in red as follows:

3.2.6.3. For settlement areas that are serviced by rivers, inland lakes or groundwater, municipalities will not be permitted to extend water or wastewater services **to or** from a Great Lakes source unless:

- a) the extension is required for reasons of public health and safety, in which case, the capacity of the water or wastewater services provided in these circumstances will be limited to that required to service the affected settlement area, including capacity for planned development within the approved settlement area boundary; **or**
- b) in the case of an upper- or single-tier municipality with an urban growth centre outside of the Greenbelt Area, the need for the extension has been demonstrated and the extension:
 - i. will service only the growth allocated to the settlement area with the urban growth centre; and,
 - ii. has been approved under an environmental assessment; or
- c) the extension had all necessary approvals as of [placeholder for effective date] and is only to service growth within a settlement area boundary that was approved and in effect as of that date, **or**
- d) **the extension is only to service growth within an approved settlement area boundary and is supported by an Environmental Assessment that demonstrates that extension of services to or from a Great Lakes source ensures effective use of infrastructure and public service facilities, minimizes unnecessary public expenditures and is the preferred servicing option from an environmental perspective.**

We trust the enclosed materials are sufficient and to be considered with respect to the proposed Amendment 1 to the Growth Plan currently being undertaken. Should you have any questions or require anything further, please do not hesitate to call me at 905-761-5588 (x216).

Yours truly,

MHBC



Debra Kakaria, MBA, MCIP, RPP

cc. Sandra Malcic, Director of Long Range Planning, York Region
Nobleton Landowners Group



Data Source: First Base Solutions Aerial Flown 2014

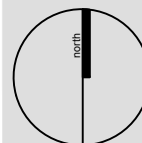
Figure 1
Location Map

LEGEND

- Nobleton Settlement Area
- Nobleton Landowners Group Lands
- - - Nobleton Urban Area Boundary
- Oak Ridges Moraine Boundary

DATE: January 23, 2019

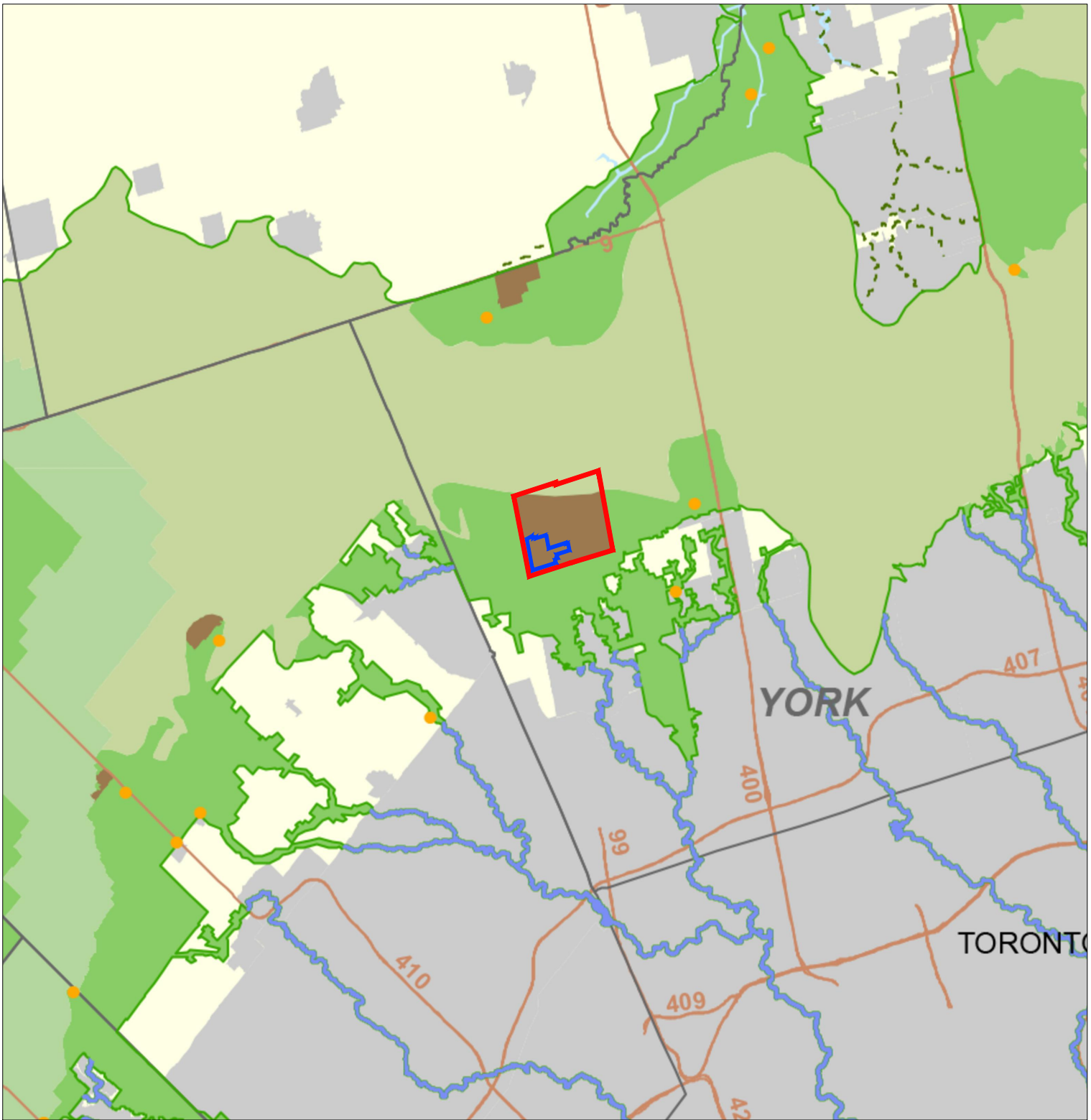
SCALE 1 : 30,000



Nobleton, Ontario

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Data Source: Schedule 1 - Greenbelt Plan Area (2017)

Figure 2
Ontario Greenbelt
Plan (2017)

LEGEND

Nobleton Settlement Area

Nobleton Landowners Group Lands

Greenbelt Area

Protected Countryside

Towns and Villages

Hamlets

Niagara Escarpment Plan Area

Oak Ridges Moraine Area

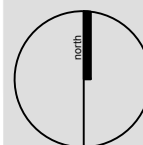
River Valley Connections (Outside the Greenbelt)

Upper-tier Municipal Boundaries

Single-tier Municipal Boundaries

DATE: January 23, 2019

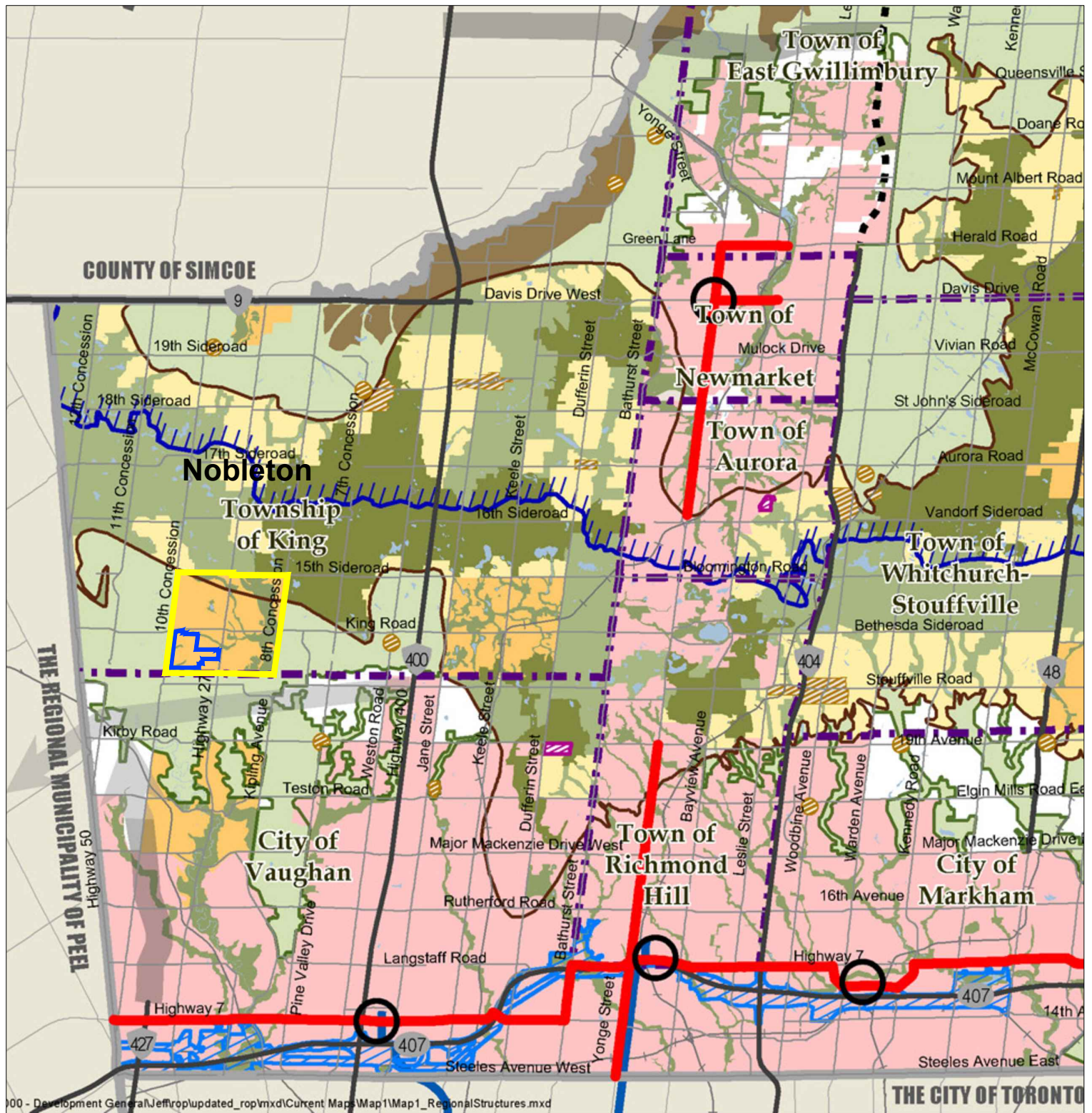
SCALE 1 : 250,000



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Data Source: York Region Official Plan (2016)

Figure 3
York Region
Official Plan
Map 1:
Regional Structure

LEGEND

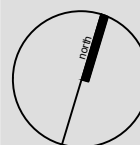
- Nobleton Settlement Area
- Nobleton Landowners Group Lands
- Regional Centre
- Regional Corridor
- Urban Areas

- Towns and Villages
- Regional Greenlands System
- Natural Core Area Designation
- Natural Linkage Area
- Countryside Area Designation/Hamlet
- Holland Marsh Specialty Crop Area
- Minister's Decision on ORMCP Designation Deferred

- Oak Ridges Moraine Boundary
- Greenbelt Plan Area Boundary
- Countryside Area Designation/Hamlet
- Holland Marsh Specialty Crop Area
- Area Subject to the Lake Simcoe Protection Plan
- Parkway Belt West Plan
- Existing Provincial Highway
- Controlled Access Highway-Under Construction
- Municipal Boundary
- Regional Boundary

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SCALE 1 : 200,000



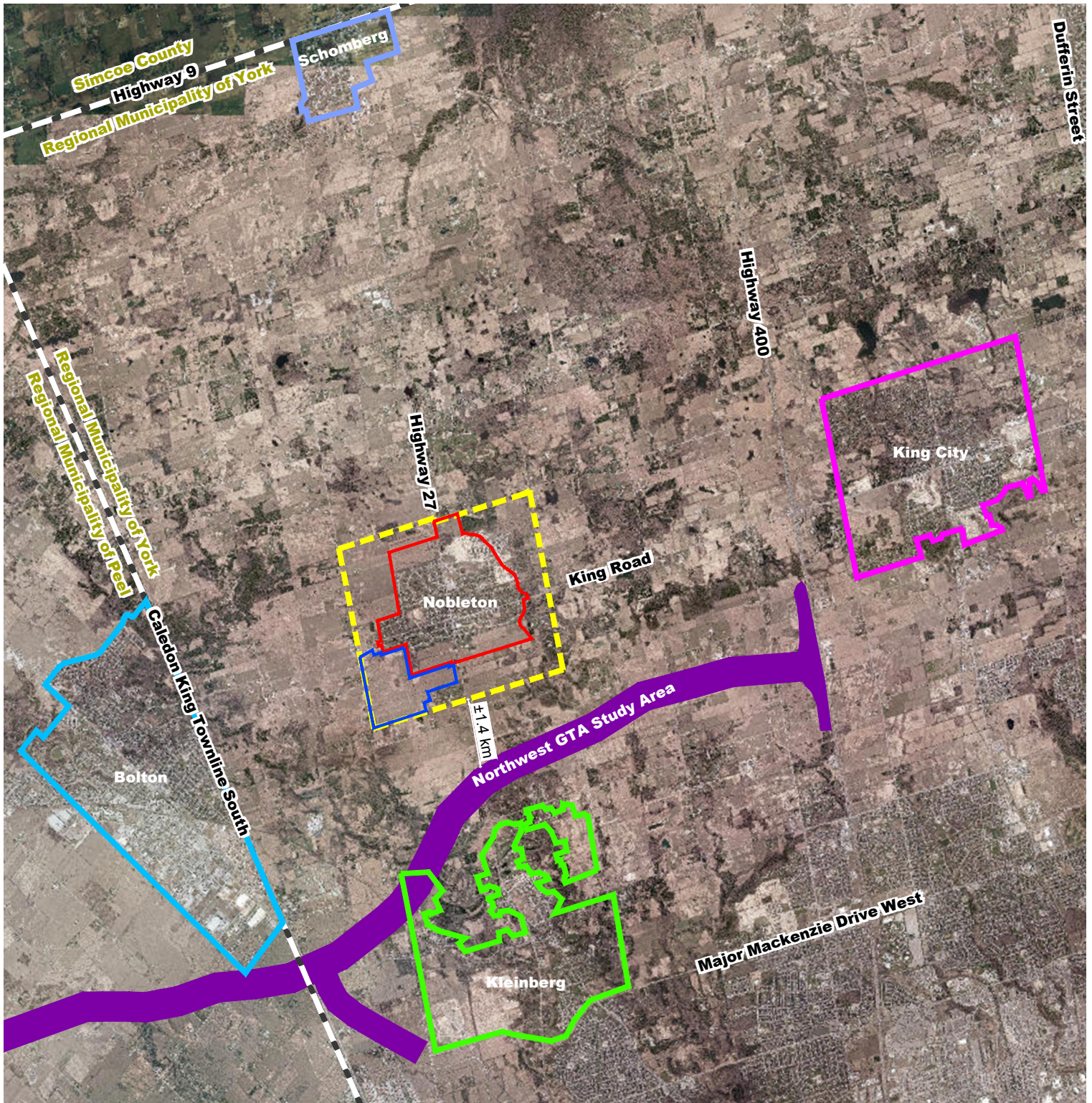
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Data Source: First Base Solutions Aerial Flown 2017

Figure 4

Northwest GTA Corridor Study Area

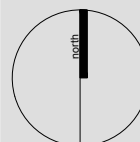
LEGEND

- Nobleton Settlement Area
- Nobleton Landowners Group Lands
- Nobleton Urban Area Boundary
- Northwest GTA Study Area

- Bolton Settlement Area
- Kleinburg Settlement Area
- King City Settlement Area
- Schomberg Settlement Area

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SCALE 1:110,000



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