



SOUTH LAKE SIMCOE NATURALISTS

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South Lake Simcoe Naturalists (Ontario Nature Member Organization)

RE: 2015 Co-ordinated Review Policy Submission

Date: 2015-05-28

Land Use Planning Review
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, suite 425
Toronto, Ontario
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Strengthening the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan and Growth Plan for the Greater Golden Horseshoe

The South Lake Simcoe Naturalists (SLSN) are a fully federated organization of Ontario Nature and an original community group which was involved previously to 2005 advocating and commenting Ontario's innovative **Greenbelt, Growth Plan**, and later the Lake Simcoe Protection Plan. Our group brings together many naturalists, environmentalists and local community representatives in the entire South Lake Simcoe Area to ensure the continued protection and expansion of the Greenbelt, and its relation to the **Oak Ridges Moraine** in our area. The quality of our forests, grassland meadows, natural core and corridor areas determine water quality, nature and human health, and our economy. The Greenbelt Plan is a legacy that we must strengthen and grow if we want to have a healthy environment, a robust rural economy and vibrant natural areas that connect and support Ontario's rich biodiversity in perpetuity.

The common attributes of these three conservation plans are critical for protecting the many natural and cultural values of South Lake Simcoe. The three plans affecting our area must integrate conservation plans with the Growth Plan. To do this through these Plans we must strive to protect and restore natural areas and to increase biodiversity, including protecting endangered species habitat and creating a complete connected natural heritage system that does not leave important natural habitat and species isolated and vulnerable. This is particularly important in the future with a changing climate.

It is important that we work to increase the carbon-absorbing forest cover in the Greenbelt and increase the climate resiliency of communities through actions such as greater use of green infrastructure, enactment, monitoring and enforcement of forest bylaws, and natural areas restoration.

The creation of the Greenbelt has served Ontarians well over the past decade. There are important issues and specific geographic area improvements that need to be addressed now to build on the Greenbelt's early success. This is particularly the case for the South Lake Simcoe area (northern York and Durham Regions) where important natural and agricultural resources must be protected for the future, now! Below we have detailed them for you. We have set out our comments in relation to your government's feedback workbook question category 1. Protecting Agricultural Land, water, and natural areas, at the Regional Town Hall Review Meetings for those of most concern to us, as in the short 90-day review our local municipality and region, only in the last few weeks have generated information for comment. Also, we have focused our comments on local area concerns and followed with more general issues later in our document. We are particularly concerned about the real, on the ground measuring of Greenbelt Performance. Consequently we believe much more rigorous research and monitoring should have been done by the Province in the last ten years than is reported for this important Review process, with only four of the nine themes have been reported and those of a skeletal nature and rigour (Wong, 2015). Of the nine identified indicators natural heritage and connectivity, and prime agricultural land and fragmentation we believe are the most important, and in reality drive the success of the others.

Protecting Agricultural Land, water, and natural areas

Our organization has three overriding considerations driving our comments consistent with fundamental comments of the Ontario Nature Organization, as summarized below (Wise, 2015).

Stronger Laws: Address the gaps and close the loopholes in any policies that hamper protection for the region's water, nature and communities (e.g. regulate commercial fill, reduce the

impacts of aggregate extraction and infrastructure projects like 400-series highways)

Stronger Landscape: Enhance the protection of natural heritage and prime agricultural systems, and freeze sprawling urban expansion in the region.

Stronger Legacy: Support the stewardship, monitoring and restoration of the region's important ecological cores and corridors.

GROW THE GREENBELT in SOUTH LAKE SIMCOE

Pefferlaw Secondary Plan Area

The Greenbelt must be expanded in Pefferlaw area of the Town of Georgina in the Region of York where the very large Secondary Plan area of the Georgina Official Plan includes significant parts of three public York Regional Forests (Pefferlaw Tract, Cronsberry and Godfrey Tracts) and on a Provincial Nature Reserve (Duclous Point P.N.R.). We (SLSN) opposed this back in 2005 when the Greenbelt was established (Harpley, 2004, 4). The current Pefferlaw Secondary Plan area (a large square box) bears no relation to the proposed limited development expected here at least to 2031, and also includes high quality farmland and significant woodlands, wetlands and other natural areas that should be in the Greenbelt (**Figure 1**) shows the York Region Forest areas extent in the current Pefferlaw Secondary Plan area, and therefore the Georgina Secondary Plan. Our organization has led a 10 year campaign to right this situation.

Knowing the planning folly, and the potential great loss of biodiversity in the future to Georgina and the Province to unprotected lands, not in the Greenbelt, when the Toronto Star approached me about the Greenbelt conservation issues in October 2014 they were stunned by this " Ridiculously large" Pefferlaw Secondary Plan Area. With very little growth possible there in the future, and the tremendous natural and farm areas not protected by the Greenbelt everyone involved was dedicated to get this situation out to the people of Ontario.

Consequently, the "Where will the wild things go" article ran in the Toronto Star on Saturday October the 11th, and although the reporter mixed up some growth numbers, the basic planning problem of the Pefferlaw Secondary Plan area was exposed. The positive response we received from professionals and lay people to this article locally and far away was strong and motivating. Word of this situation spread fast amongst conservationists and naturalists and much support was offered to continue this contention of "shrinking the Pefferlaw Secondary Plan" and thereby Growing the Greenbelt.

Recently, at the Town of Georgina Council Meeting (May 13, 2015) the Review meeting of the Town of Georgina Council review of the proposed report "2015 PROVINCIAL CO-ORDINATED LAND USE PLANNING REVIEW- Report No. PB-2015-0026, the Town is recommending that the

Pefferlaw Secondary Plan area be shrunk (Growing the Greenbelt). We concur with this, being our recommendation since 2005. The Georgina Council unanimously supported the Report recommending, stating “The contraction of this (Pefferlaw) Settlement Area boundary would more accurately reflect growth forecasts, more effectively implement the Town’s Official Plan growth management policies, better protect natural heritage/hydrologic features and Prime Agricultural Lands, address an optics issue regarding the physical size of the Pefferlaw Settlement Area and assist the Province in their desire to grow the Greenbelt”. We concur. We expect the Province to act quickly to “Grow the Greenbelt” in Pefferlaw. Indeed, the Region of York Official Plan 2009 Maps a Regional Greenlands System, the details for Pefferlaw and Sutton Secondary Plan areas can be seen clearly in **Figure 2**. It is obvious that changes made in the recent Georgina recommendation for Growing the Greenbelt for natural heritage follow this system delineation. The Detailed Secondary Plan area map of Pefferlaw Secondary Plan area with the Regional Greenlands System is also included in this Figure 2.

At its meeting held on May 21, 2015, the Council of The Regional Municipality of York referred Report No. 1 of the Commissioner of Corporate Services and Chief Planner, as amended by the memorandum from the Chief Planner dated May 21, 2015 (to insert 8 maps to Attachment 3), to the Special Meeting of Regional Council scheduled on May 28, 2015. The Report was regarding the 2015 Coordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe. The Town of Georgina Report PB-2005-0026 is appended as a local municipality Coordinated Provincial Plans Review Report. Detail of this Report shows Pefferlaw Secondary Plan developable area reduction (**Figure 3**) shows the recently revised Pefferlaw Secondary Plan Map recommended. The similarity to the Regional Greenlands System is obvious. And we strongly believe the area of Prime Agricultural Areas with associated natural features should be expanded to the maximum in the second stage Greenbelt Review of final boundaries beyond what the current Georgina Recommendation maps. We have calculated this to be almost a 60% size reduction, resulting in thousands of acres of agricultural fields, and important forests and meadowlands now recommended to be in the Greenbelt. This is a great improvement to the biodiversity, and the long-term sustainability of Southern Ontario. Given the late time of the Town of Georgina recommendation submission to the Region and the Province, we have not had opportunity to rigorously review it, and expect the Province to do this with regard to the new recommended Greenbelt and Secondary Plan area boundaries, and the criteria used to delineate them.

Sutton Secondary Plan

Consistent with the problems of the current Pefferlaw Secondary Plan is the case of the Sutton Secondary Plan. The large square block delineation of the Settlement Area boundary

(developable area envelop) includes of Prime Agricultural Areas with associated natural features that should be expanded into the Greenbelt (Grow the Greenbelt) to the maximum in the second stage of the Provincial Greenbelt Review of final boundaries beyond what the current, as the Town of Georgina has not undertaken this important planning exercise. **Figure 4** details the York Regional Greenlands System for the Sutton Area, which, like for Pefferlaw includes many natural area and agriculture land uses that should be part of the Greenbelt. In our experience the development population projection numbers for Georgina even to the 2031 time during the recent Official Plan Review process have varied and we expect with intensification direction the Sutton Secondary Plan can easily accommodate considerable “shrinking” of geographic area to accommodate the Provincial directive in 2015 of Growing the Greenbelt.

We strongly believe the area of Prime Agricultural Areas with associated natural features should be expanded to the maximum in the second stage Greenbelt Review of final boundaries beyond what the current Georgina. In this regard the Town of Georgina must undertake a rigorous and open review of the Sutton Secondary Plan immediately in its current Official Plan Review process.

Consequently we expect the contraction of the present Sutton Settlement Area boundary would more accurately reflect growth forecasts, more effectively implement the Town’s Official Plan growth management policies, better protect natural heritage/hydrologic features and Prime Agricultural Lands, address an optics issue regarding the physical size of the Sutton Settlement Area within the Greater Toronto Area and assist the Province in their desire to grow the Greenbelt.

This re-defining of the Sutton Secondary would be a great improvement to the biodiversity, and the long-term sustainability of Southern Ontario. Given the late time of the Town of Georgina recommendation submission to the Region and the Province, we have not had opportunity to rigorously review it, and expect the Province to do this with regard to the new recommended Greenbelt and Secondary Plan area boundaries, and the criteria used to delineate them.

Urban River Valley’s in the Greenbelt – the Case of Georgina

We understand the Province of Ontario is committed to protecting, supporting and Growing the Greenbelt.

It is our understanding that to help meet this commitment, the Minister of Municipal Affairs and Housing is proposing an amendment to the Greenbelt Plan under the Greenbelt Act, 2005 that would:

1. Add provincially owned lands of approximately 630 acres (255 hectares), which are part of the Glenorchy Conservation Area in the Town of Oakville, to the Protected Countryside of the Greenbelt Plan; and,
2. Add a new Urban River Valley designation to the Greenbelt Plan to facilitate adding publicly owned lands in urban river valleys currently outside the Greenbelt into the Greenbelt Plan.

Reference: (Province of Ontario, 2012)

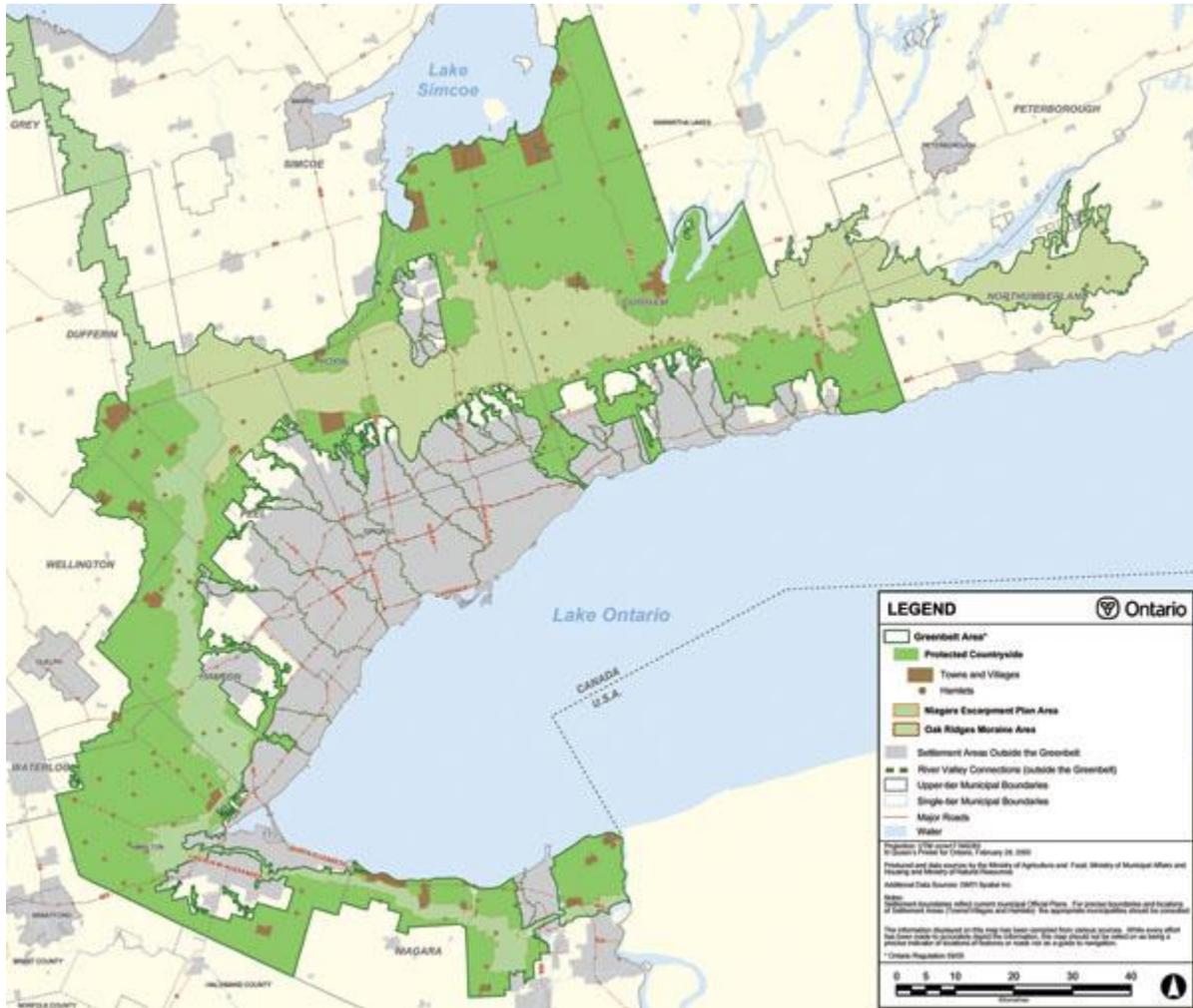
We understand the Province of Ontario is asking for your input on the proposed amendment to the Greenbelt Plan.

The three river valleys of the Maskinonge, Black and Pefferlaw Rivers in Keswick, Sutton and Pefferlaw should be significantly naturalized and be formally incorporated as urban river valley focus areas of the Greenbelt. This SLSN recommendation is in support of the Province of Ontario focus of designation of as Greenbelt lands, the urban river valley lands where the Municipal Council has adopted a resolution to include lands in the Greenbelt including the City of Mississauga, the Town of Oakville, the City of Guelph, the City of Toronto. The Municipality of the Town of Georgina should immediately pass a resolution of the urban portions of the three rivers listed above. We ask the Region of York and the Province of Ontario for our support in having the Town of Georgina enact this course of action in the second stage of the Greenbelt Reviews.

In addition to important natural heritage values, river valleys in urban municipalities within, and adjacent to, the Greenbelt may contain tourist, recreational and cultural amenities that contribute to the diversity of benefits the Greenbelt offers in an urban setting.

The proposed amendment would introduce a new Urban River Valley designation to the Greenbelt Plan. This new designation would help to facilitate adding publicly owned lands in urban river valleys currently outside the Greenbelt into the Greenbelt Plan. Should a municipality be interested in the future in having the Urban River Valley designation (if approved) apply to public lands within their jurisdiction, the municipality would submit a request to the Ministry based on Growing the Greenbelt criteria, developed in 2008. The potential inclusion of any of these lands would assist in connecting the Greenbelt to inland lakes and the Great Lakes through these river valley corridors.

The proposed designation would rely on municipal official plan policies which have regard for Greenbelt Plan objectives and any other applicable criteria. The Protected Countryside policies of the Greenbelt Plan would not apply. Many of the key external river valley connections are shown on the Figure below.



This urban river valley delineation would also support the goals, objectives and recommendations of the Lake Simcoe Act. Our organization (SLSN) originally advocated for the inclusion of these three rivers in South Lake Simcoe in the Greenbelt in 2005 (Harpley, 2004). This new urban river valley designation could be harnessed to support biodiversity and natural area restoration and important connectivity of forest and wildlife habitat from the terrestrial Regional Greenlands System from the Oak Ridges Moraine to Lake Simcoe.

Maple Leaf Estates Issue related to the Greenbelt

It is recognized that DG Group bought the land on the shores of Lake Simcoe in the 1980s after it had already received planning approval for a 1,073-unit mobile-home park. The plan sat dormant for decades as the land around and under it was progressively protected. The area was designated a provincially significant wetland in 2004 and incorporated into the Greenbelt in 2005. Though there are many conflicting legal and planning issues related to this important Provincially Significant Wetland (PSW) area our executive and membership are of the opinion that this issue must be resolved with the highest order of good planning. Many of our members have been engaged and concerned about this local Keswick area issue.

Consequently, we believe that the best solution is to support a land swap with lands identified by the North Gwillimbury Forest Alliance (NGFA) and their consultants, not the land swap proposed that would use Greenbelt lands. As the NGFA has pointed out, both pieces of land involved in the current swap supported by the Town Council of Georgina, the Region of York and the Lake Simcoe Region Conservation Authority (LSRCA) are part of the Greenbelt and shouldn't be developed at all. The NGFA wants to see the conservation authority let the trailer park development lapse under new rules, recently passed by instead of helping the developer trade for another piece of protected land to build on. These proposed Greenbelt lands are prime farmland, much of the area is important groundwater recharge area, and it is important grassland related habitat for prairie associated breeding birds, some of which are our most at risk avian species in Ontario. The area is rural and not a place to develop a satellite, leapfrog-like development. Although, no one can force the DG Group to consider a swap of lands within the Keswick Secondary Plan Area, we believe there is much more cooperative conversation needed at the political and planning level before any decision should be made.

Restoration Headwater Protection

We advocate the Province take a broad perspective, establishing a stronger and more active framework to ensure protection of the ecological integrity of Southern Ontario. The terrestrial and hydrologic base of the ecosystems of the Greater Toronto Area must be protected through legislation like the Greenbelt and the Oak Ridges Moraine Plan, to ensure healthy biodiverse environments for future nature and human generations for forests, air quality, soil, climate and water. This biodiversity and restoration can best be enacted by a large, connected core and corridor natural habitat areas with sustainable agricultural areas. This is why we feel Growing the Greenbelt in Georgina at Pefferlaw and Sutton now, makes so much sense. Unsustainable and risky land use activities must be stopped and phased out throughout the Greenbelt like fill

operations, biosolid application in un-buffered river systems (1-3 order streams) (Harpley and Milne, 2015) turf farms and peat extraction operations.

On a broader regional scale in South Lake Simcoe natural forest and grassland meadow wildlife habitat conservation and restoration must be more strongly incorporated in a new enhancement of the protection of natural heritage and prime agricultural systems, and freeze sprawling urban expansion in the region. We are aware of areas in the Town of Georgina and the Town of East Gwillimbury where this is needed now. An overall approach to natural area planning and landscape ecology is urgently needed at the local and regional scale in the Greenbelt and Oak Ridges Moraine, focusing on wildlife species diversity, distribution, monitoring informing planning on the ground in the future (Harpley and Milne, 1992-2014). More resources to municipalities, non-government organizations and naturalists is needed.

(original signed by author below)

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Figure 1

Town of Georgina Official Plan, Schedule A1, Municipal Structure, Draft, 2015-05

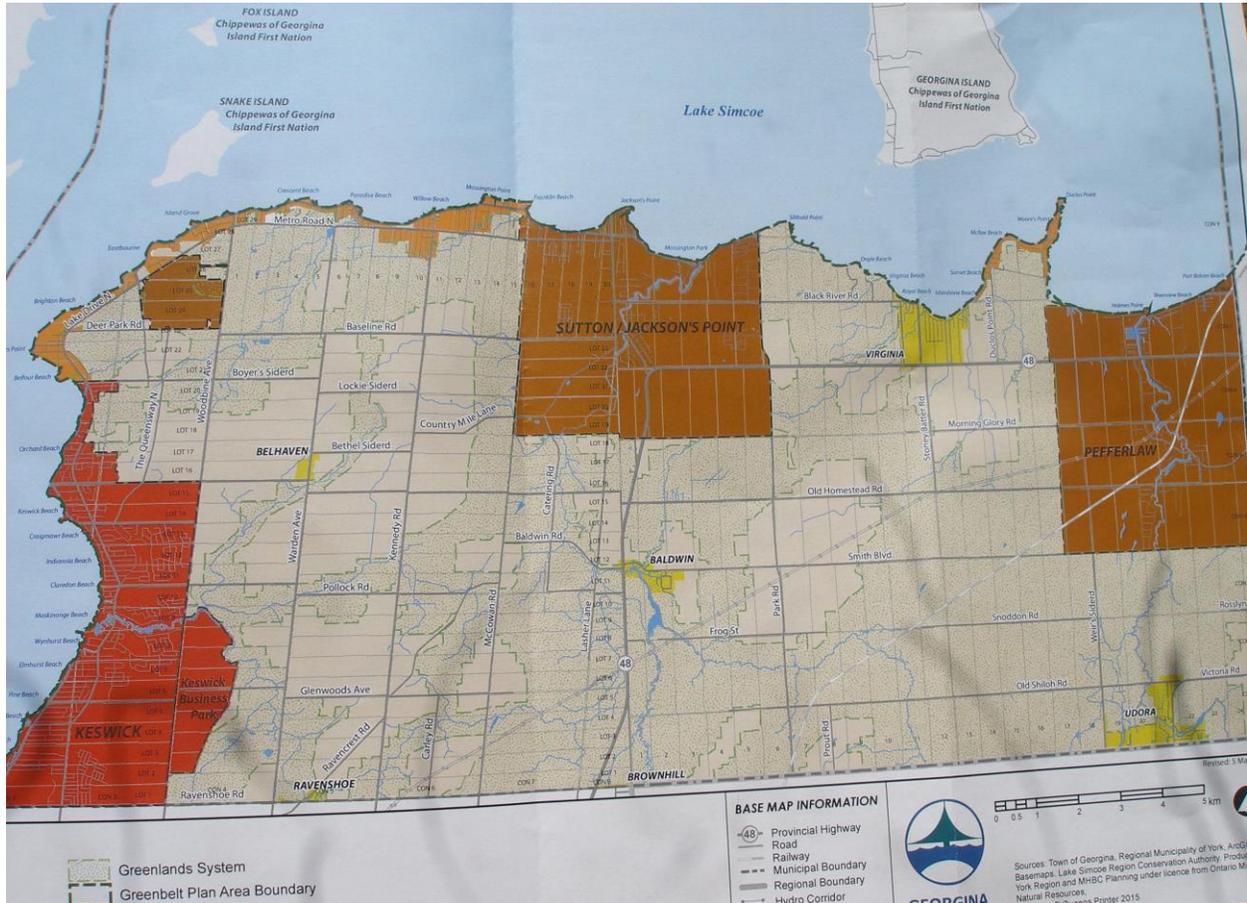
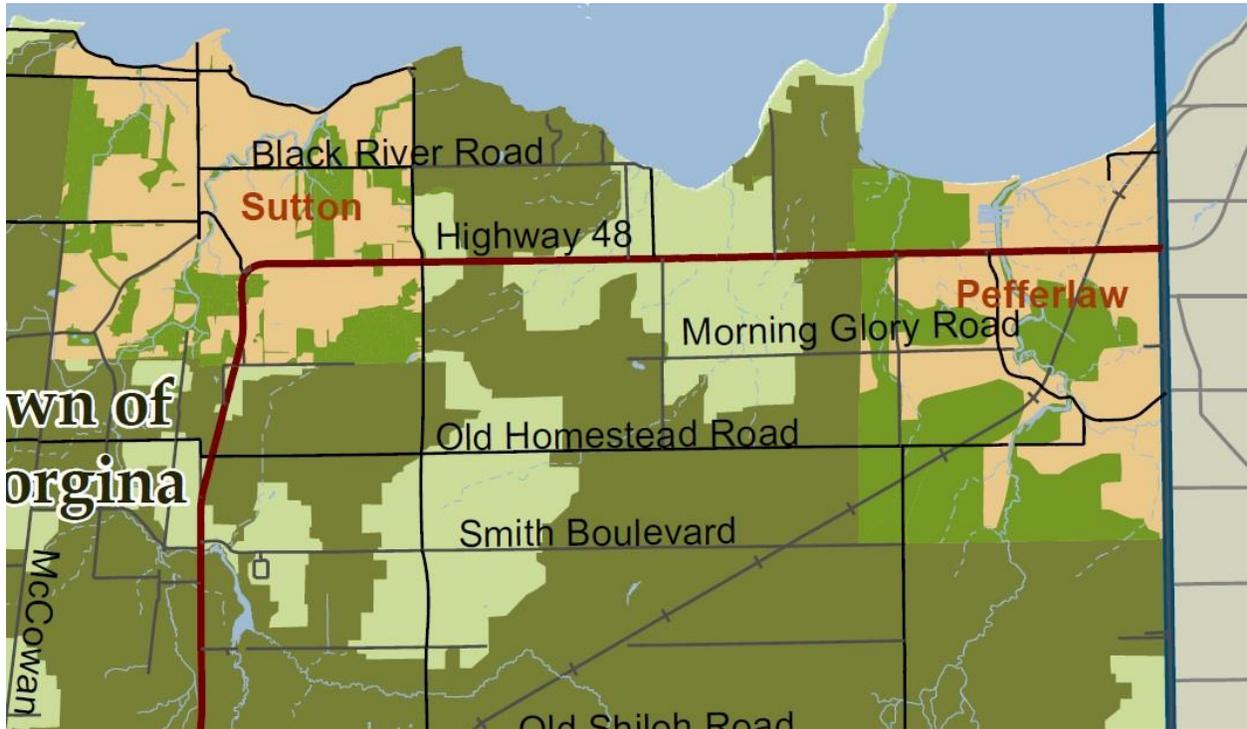


Figure 2

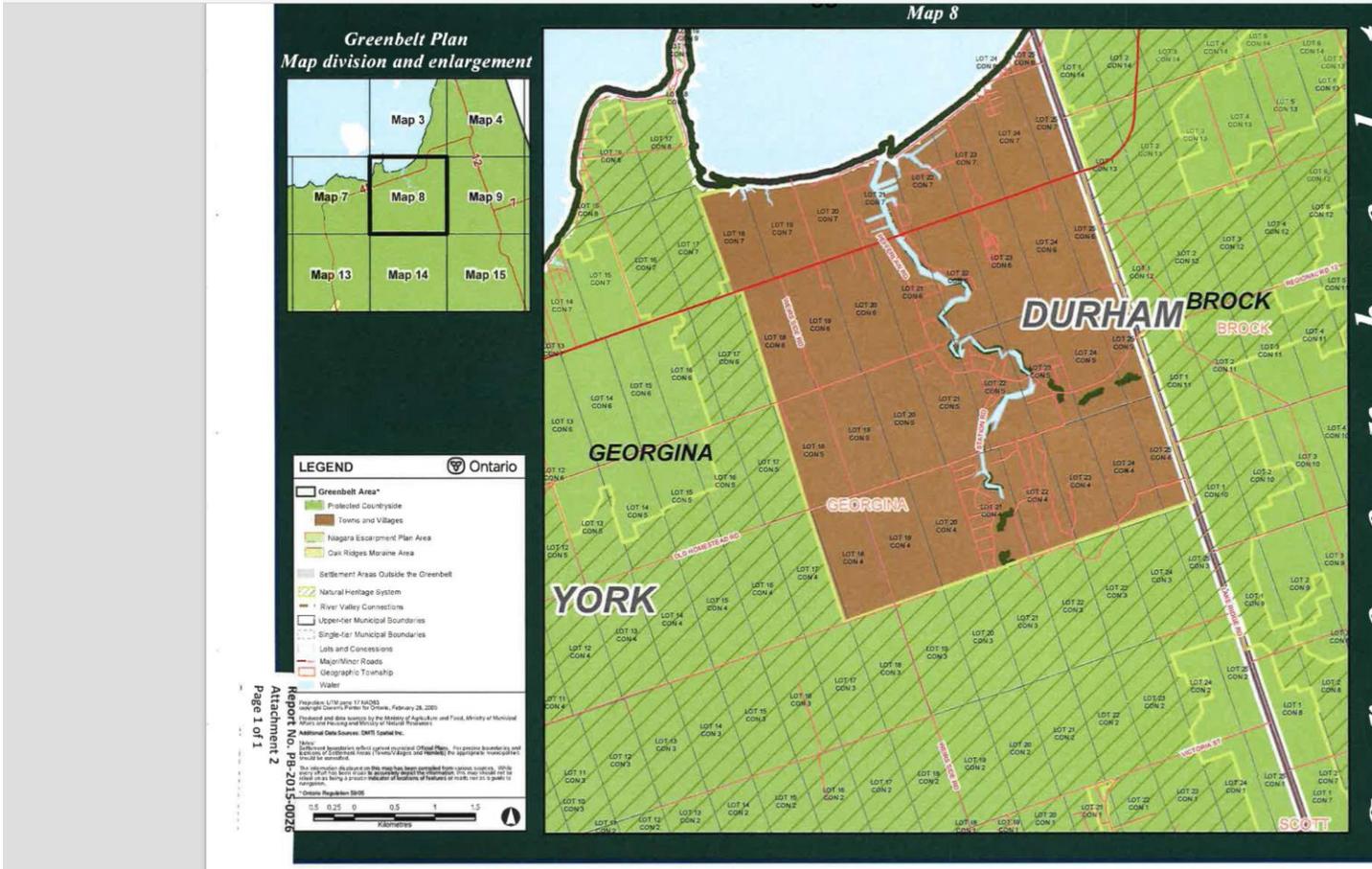
The Regional Official Plan of York, Map 2 Regional Greenlands System, including Map 5 Significant Woodland, 2009. Showing Pefferlaw and Sutton Secondary Plan areas in pink.



Pefferlaw Detail - The Regional Official Plan of York, Map 2 Regional Greenlands System, including Map 5 Significant Woodland, 2009. Showing Pefferlaw Secondary Plan areas in pink.



Figure 3
Original Pefferlaw Secondary Plan Area (2005)



Aerial View of Reduced (shrunk) Pefferlaw Secondary Plan Area (proposed 2015-05)

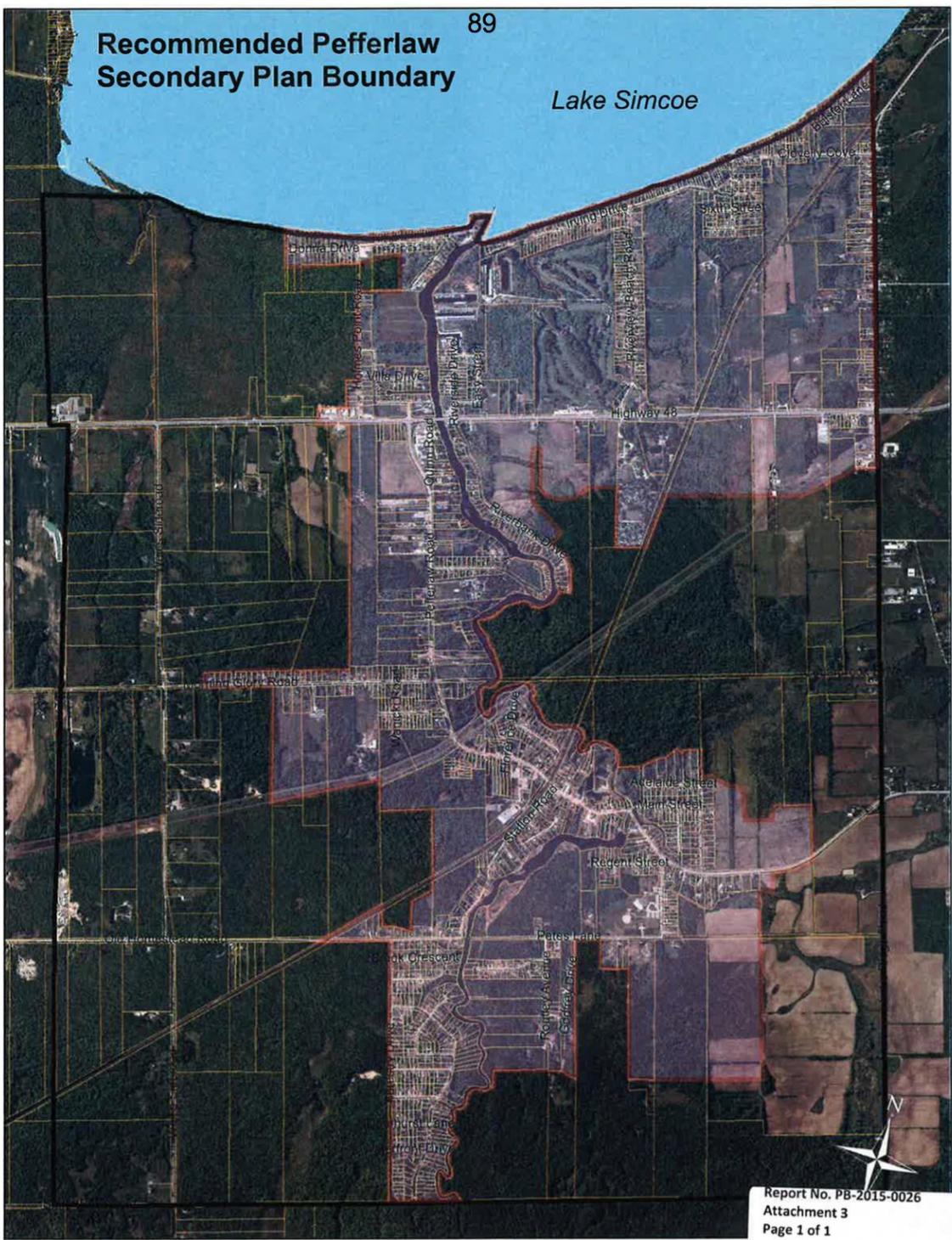


Figure 4

Sutton Detail - The Regional Official Plan of York, Map 2 Regional Greenlands System, including Map 5 Significant Woodland, 2009. Showing Sutton Secondary Plan areas in pink.



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