

May 26, 2015

Mr. David Crombie and Panel Members  
Advisory Panel - Coordinated Land Use Planning Review  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay St. Suite 425 (4<sup>th</sup> Floor)  
Toronto, ON  
M5G 2E5

*MGP File: 15 - 2355*Via email to [landuseplanningreview@ontario.ca](mailto:landuseplanningreview@ontario.ca)

Dear Messrs. and Madame:

**RE: Provincial Coordinated Review of Land Use Plans  
Request for Protection of Whitebelt Areas  
Sharon Heights Landowner Group, Town of East Gwillimbury**

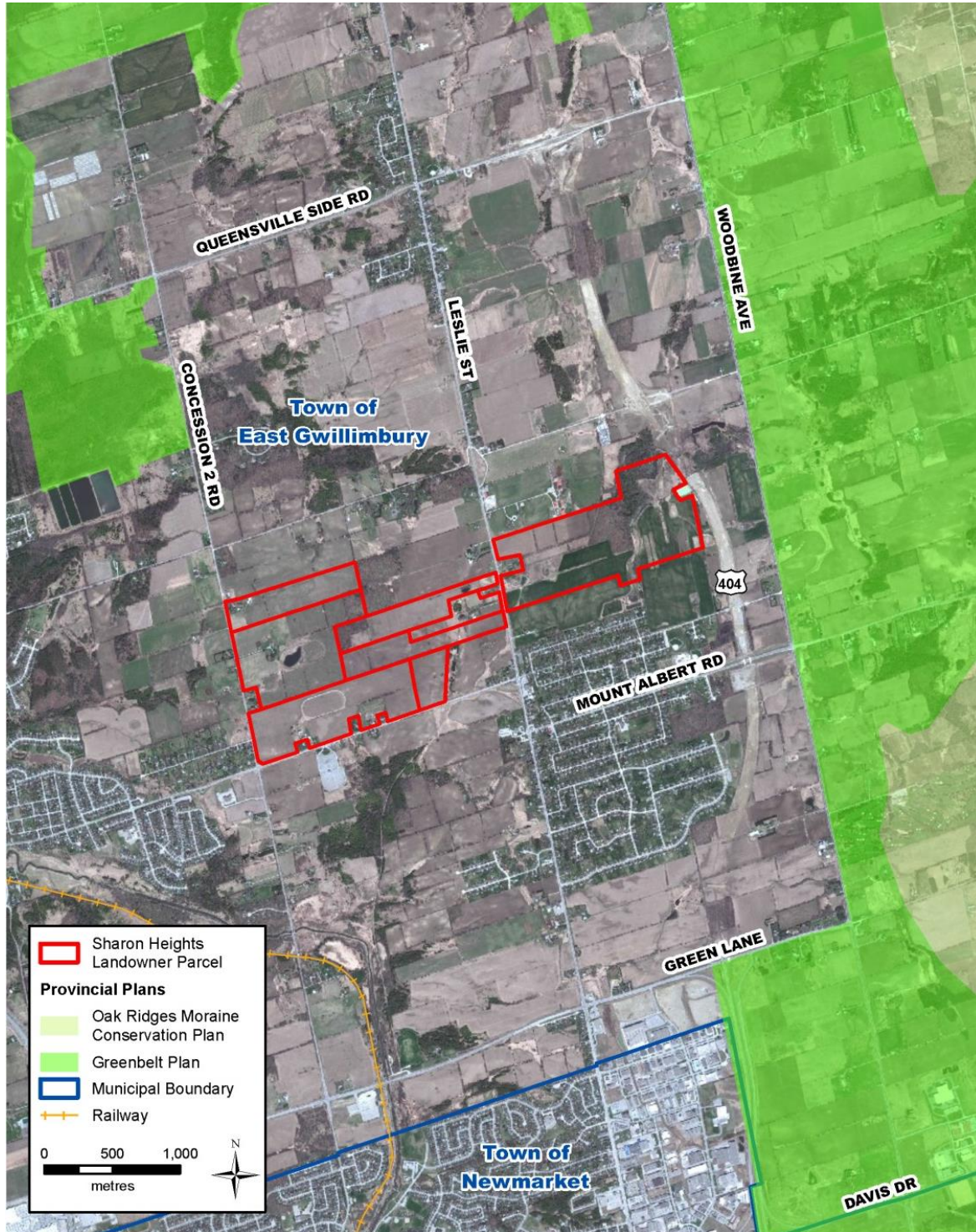
This letter is submitted on behalf of the **Sharon Heights Landowner Group** who own lands between the Queensville and Sharon Secondary Plan Areas in the Town of East Gwillimbury (the “subject lands”, (see Figure 1)). We are writing to request that the subject lands, and surrounding Agricultural and Rural lands in Southwest East Gwillimbury, be protected and identified for growth and should NOT be included in the Greenbelt Plan.

York Region’s 2041 Draft Growth Scenarios and Land Budget have anticipated the Town of East Gwillimbury to accommodate a significant portion of the Region’s population growth. This growth is planned to be accommodated through the extension of servicing capacity to allow for full development of the Town’s existing secondary plan areas (Sharon, Queensville & Holland Landing), ROPA 1 lands and additional urban expansion lands. As such, the subject lands and additional Whitebelt lands located within the Town of East Gwillimbury will be required to accommodate the projected future growth. In anticipation of the distribution of long-term growth, the Town of East Gwillimbury has included infrastructure plans for the Whitebelt lands in their Official Plan; therefore, it is critical that these lands are protected for growth in order for planned infrastructure to be efficient. Regional Staff, in a report to York Regional Council for May 21, 2015, recommended that Whitebelt lands should be reserved to accommodate long-term growth. We share and endorse the recommendation of Regional Staff to protect the Whitebelt as a future growth area. The remainder of this letter provides the basis for our request.

Overall, the Whitebelt is required to accommodate long term growth needs. There is approximately 1.1 million hectares of agricultural land in the GGH, or 36% of the land base of 3.1 million hectares. The Growth Plan plans for the GGH to accommodate 13.5 million people by 2041, which would result in a ratio of agricultural land at 0.08 ha per capita. The GTA Whitebelt is approximately 40,950 ha – its use for urban uses would not result in a significant change in the per capita rate, where agricultural land per capita would remain at 0.08ha per capita. In land terms, the total Built Up, Designated Greenfield Areas, Expansion Areas, and Whitebelt, which cumulatively could comprise the Settlement Area in total in the GGH to 2051, is 524,000 ha – with that development, there would still remain a ratio of 2 agricultural ha

for every 1 ha of settlement area in the GGH for the foreseeable future.

**Figure 1 Site Location**



Source: Malone Given Parsons (2015)

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In contrast, preclusion of the Whitebelt from growth for the region would not be good planning for the following reasons:

- 1) It would result in a housing supply and mix in the existing urban areas that does not match the forecasted demography, thereby frustrating the achievement of growth targets of the Growth Plan;
- 2) It would not use existing and planned infrastructure effectively, squandering the investment into water, waste water, transit, roads, community facilities, and planning to accommodate growth;
- 3) It would result in a fragmented road pattern on the edge of urban areas that would make transit delivery on the periphery of the GTAH difficult or unachievable in the foreseeable future; and,
- 4) It would preclude any new land required to accommodate growth in the next 50 years from being provided contiguous to the largest urban communities – this would increase pressures to displace growth to other parts of the GGH, the Province and beyond.

As such, the Whitebelt should be planned and phased appropriately against minimum intensification targets in its entirety and in concert with infrastructure master planning, to ensure communities are comprehensively planned, and that there is a clear vision for growth in the GTAH for the lifespan of the Growth Plan.

Currently, the Growth Plan's lack of planning for new community areas results in incremental and fragmented planning of these areas. While the focus on intensification and guidance on infill development has greatly assisted municipalities in focusing as much growth as feasible into the Built Boundary and in intensifying Greenfield Areas, the lack of foresight in anticipating and providing a strategy for new community areas has resulted in uncoordinated settlement expansions within and between upper-tier municipalities. It has also meant that there are severe challenges to providing and funding new infrastructure. We recommend that the Growth Plan clearly identify the Whitebelt as a long-term growth area, provide direction as to the planning of communities and infrastructure in this swath, and make recommendations as part of the Big Move to create a web of transit that connects the northern portions of the GTAH with each other and to the south.

The lack of planning in the Whitebelt has forced municipalities to undertake the forecasted growth through incremental planning, although the goal of the Growth Plan was to encourage comprehensive planning. Without a standard land budgeting methodology, municipalities have embarked on planning exercises with vastly different community results – some communities are planned at 50 people and jobs per hectare and others at 70 or higher, often when preceding abutting development is occurring at much lower densities. In effort to assign growth targets to multiple communities and to encourage them to develop as completely as possible, growth is occurring in small portions, often under a threshold that would result in a complete community and where customized road and servicing infrastructure is required that will need to be expanded when additional growth occurs.

The Growth Plan should be amended to identify the Whitebelt as a future urban area and protected for long-term growth needs. Planning of new growth areas should be aligned in timeframes for planning infrastructure investment, which would result in a 50 year planning horizon for both, or a 2056 time horizon.

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Based on the above, we respectfully request the subject lands should be protected and identified for growth and should NOT be included in the Greenbelt Plan.

**Comments on the Greenbelt Plan**

It is our opinion that municipalities should be allowed to determine the location of Prime Agricultural Areas versus Rural Areas at any time. The policies of the Protected Countryside in the Greenbelt Plan anticipate a distinction between Prime Agricultural Areas and Rural Areas to be determined by implementing municipalities only at the time of implementation of the Greenbelt Plan. This is different from the policies of the Oak Ridges Moraine Plan which allow a municipality to determine Prime Agricultural Areas vs Rural Areas at any time. The same approach should be allowed in the Greenbelt Plan.

The Province should enhance and clarify the permission of infrastructure, parks, and institutional uses in the Greenbelt Plan area related to adjacent development, so long as the uses are located outside of the minimum vegetation protection zones of features in the Greenbelt Plan. These last two points are particularly relevant to local municipal partners (particularly the Villages and Hamlets in the Greenbelt Plan) that have fixed urban areas and have no ability to provide much needed community uses such as community parks, recreational, tourism opportunities, institutional uses, and employment opportunities.

Regarding the timing of the 10 year review, if it is not synced with the Growth Plan review, there should be an allowance for Amendment #2 implementation exercises to complete and be implemented in the Greenbelt Plan area. In particular, adjustments to the Greenbelt Plan area and designations (particularly adjustments to the Settlement Area Boundaries within the Greenbelt Plan are required, as anticipated in the plan to be considered during the 10 year review) should be permitted under policy 3.4.4 or a similar section.

In conclusion, the Growth Plan should identify and protect Whitebelt areas for future growth accommodation, such as the subject lands and surrounding Southwest East Gwillimbury. The Greenbelt Plan requires flexibility for municipalities to identify Prime Agricultural Areas versus Rural Areas and also requires expanded uses in Protected Countryside and Prime Agricultural Areas.

Thank you for this opportunity to provide comment as part of the Provincial Coordinated Review process, and we look forward to working together with the Province, Region, and Town going forward.

Yours very truly,

**MALONE GIVEN PARSONS LTD.**



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cc: Chair Wayne Emmerson and Members of York Region Council  
Mayor Virginia Hackson and Members of East Gwillimbury City Council  
Ms. V. Shuttleworth, York Region  
Ms. S. Malcic, York Region  
Ms. C. Kellington, Town of East Gwillimbury  
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