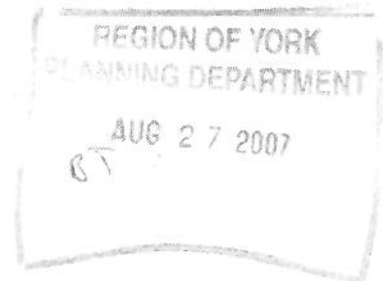




YORK-SIMCOE NATURALISTS
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August 15, 2007

Commissioner of Planning and Development Services
York Region Administrative Centre
Box 147, 17250 Yonge Street
Newmarket, ON L3Y 6Z1



Re: ROPA 58 (Bradford Bypass)

Dear Commissioner of Planning and Development Services,

York-Simcoe Naturalists (YSN) is a local branch of Ontario Nature based in the Bradford/Holland Landing/Queensville area. The aims and objectives of the York-Simcoe Naturalists are: to further public awareness of the natural environment of the area; to identify and encourage the protection and preservation of environmentally significant habitat and species; to establish and maintain a permanent record of environmental change in the area; and to institute and advance a co-operative working relationship with other conservation-minded organizations.

Submission

We object to the proposed ROPA 58 for the following reasons:

1. ROPA 58 regards the Bradford Bypass, which is a controlled-access highway and is therefore subject to the exclusive planning control of the Ministry of Transportation Ontario, not the planning jurisdiction of York Region or East Gwillimbury.
2. ROPA 58 is wholly premature because the class environmental assessment for the Bradford Bypass has not been completed, nor have the conditions of the 2002 Environmental Assessment approval Order-In-Council dated August 28, 2002 been fulfilled, in whole or in part. The Bradford Bypass is therefore not subject to any approval in the near future.

3. ROPA 58 is inconsistent with provincial laws and policies regarding planning in the region, including but not limited to:
 - a. the Provincial Policy statement (2005) because it traverses a designated environmentally significant area without mitigation of impacts.
 - b. The Places to Grow plan and act which does not envision the creation of the Bradford Bypass within the 2031 planning horizon, or the mandatory 20 year planning horizon under that plan. The inclusion of a construction date by 2012 is not supported by any funding arrangements for the Bradford Bypass, or any provincial construction plans. The Region cannot simply pretend the highway is planned within the appropriate planning horizon, they must actually have some reasonable basis for predicting this.
 - c. The Greenbelt Plan and act which, like the Provincial policy statement requires demonstration of no reasonable alternative or no negative impacts in environmentally significant areas and wetlands such as those traversed by ROPA 58.
4. The purpose of this ROPA is to facilitate local OPA amendments which also violate the above laws and policies. This process represents a bottom-up rather than a top-down planning process envisioned by the *Planning Act*.
5. The policies put forward in ROPA 58 are inaccurate and misleading.
 - a. The Bradford Bypass has not been fully approved under the Environmental Assessment Act, as it is subject to further conditions set out in an Order-in-Council including the completion of a Class EA, which has not been completed, sent for public review, or approved.
 - b. The policies are worded to indicate a possible construction date of 2012 for the Bradford Bypass although no construction is planned for the Bradford Bypass at this date.

Recommendation:

1. Delete the construction dates from ROPA 58 in any paragraph mentioning the Bradford Bypass.
2. Delete reference to planning matters, including the Bradford Bypass which are beyond the 2031 planning horizon and therefore in contravention of the Places to Grow Act.
3. Insert reference to areas in the subject area that are subject to specific policies in the PPS (2005) and the Greenbelt Plan (2005).

Sincerely,



Sylvia Bowman
President
Laura Bowman
Public Consultation Coordinator
York-Simcoe Naturalists

Cc: Ministry of Municipal Affairs and Housing
Cc: Ministry of Natural Resources
Cc: Town of East Gwillimbury
Cc: Ontario Nature