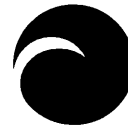

North East Sutton Ratepayers Association

NESRA is an incorporated, not-for-profit organization in the Lake Simcoe watershed
Dr. Margaretha Vandervelden, PhD President, Box 592, Sutton West, Ontario L0E 1R0
Tel 905.722.6958



The Lakewatch Society

LWS is a private, national, not-for-profit, environment & society organization
Peter Sibbald Brown, MFA Director, Box 488, Sutton West, Ontario L0E 1R0
Tel 905.722.5964 Fax 905.722.9126



Members of the Canadian Environmental and Ontario Environment Networks and the Ontario Greenbelt Alliance

For this joint NESRA/LWS communication please direct correspondence to
Box 592, Sutton West, Ontario L0E 1R0 Tel 905.722.6958 Fax 905.722.9126

7 September, 2004

Mr. Denis Kelly, Regional Clerk
York Region,
17250 Yonge Street,
Newmarket, ON L3Y 6Z1



Re: Public Meeting Wednesday, September 8, 2004
Proposed Official Plan Amendment (File NO.ROPA 43)

Dear Mr. Kelly,

We are unable to attend this meeting and on behalf of our organizations would like to make available to the Members of Regional Council the information as enclosed.

Respectfully,

A handwritten signature in cursive script, reading "Margaretha Vandervelden".

Margaretha Vandervelden, President
North East Sutton Ratepayers Association Inc.

North East Sutton Ratepayers Association

NESRA is an incorporated, not-for-profit organization in the Lake Simcoe watershed
Dr. Margaretha Vandervelden, PhD President, Box 592, Sutton West, Ontario L0E 1R0
Tel 905.722.6958

The NESRA logo consists of the word "nesra" in a white, lowercase, sans-serif font, centered within a black rounded rectangular background.

The Lakewatch Society

LWS is a private, national, not-for-profit, environment & society organization
Peter Sibbald Brown, MFA Director, Box 488, Sutton West, Ontario L0E 1R0
Tel 905.722.5964 Fax 905.722.9126



Members of the Canadian Environmental and Ontario Environment Networks and the Ontario Greenbelt Alliance

For this joint NESRA/LWS communication please direct correspondence to
Box 592, Sutton West, Ontario L0E 1R0 Tel 905.722.6958 Fax 905.722.9126

7 September 2004

Sean Hertel, Planner
Planning & Development Services Department
17250 Yonge Street
Newmarket, Ontario L3Y 6Z1

FILE NO. ROPA 43, REGIONAL CENTRES & CORRIDORS

Dear Mr. Hertel,

On behalf of the North East Sutton Ratepayers Association Inc. and the Lakewatch Society, we respectfully make the following submission.

On July 29th, we attended the Places to Grow meeting in Markham, hosted by Minister Kaplan (Ontario Ministry of Public Infrastructure Renewal). At this meeting, Regional Chair Fish, speaking on behalf of York Region, expressed strong support for the province's endeavors to promote growth that is both economically and environmentally sustainable.

In our understanding, the proposed ROPA 43 underscores this support through the identification of four Regional Centres and Regional Corridors as places for urban intensification; thereby implementing the Emerging Urban Centres identified in Places to Grow Better Choices. Brighter Future (Discussion Paper Summer 2004, Ontario Ministry of Public Infrastructure Renewal). We support York Region and the Province in this regard.

However, after careful review, we understand that whereas in its present form ROPA 43 is explicit and directive in the matter of intensification, it fails to address in a similarly

clear manner the need to arrest unsustainable growth. Specifically, the draft document fails to clarify the connection, as stated on page 9, para 2, between the Regional Centres and Corridors (or higher-order land uses) and greater environmental and economic (infrastructure) sustainability elsewhere in the region. We will briefly and selectively elaborate, as follows.

Limits to Growth in Local Centres and Corridors/new development areas

First, ROPA 43 does not set explicit limits to growth where this necessarily results in further destruction of the region's natural heritage (forest and wetlands), and where growth most risks negative impacts to groundwater, Lake Simcoe, and its tributaries. On that matter, the Draft Amendment is especially ambiguous in the matter of local centres and corridors, other than stating that local centres will be identified in area municipal plans (p. 8, para 6). This problem is not resolved by the provision of descriptive details under f) to h) under Section 5.4 Local Centres without a clear criterium for identification (e.g., historic centre) That is, it may be difficult to determine what constitutes a "balance of growth" in these local centres and corridors, especially, when identification of an existing local centre and corridor is wrought with ambiguity due to a dispersal of centres and main capacity roads within secondary plan areas due to past sprawl development practices.

Questions may also be raised on what constitutes managed growth in new development areas. For example, can new development areas be created in any one of the region's secondary plan areas, including areas at the most northern boundaries of York Region and the GTA? (see page 3, para 3, last sentence). Does item 7. j) on page 5 imply that a particular "greenfield" within a secondary plan area identified as part of the Regional Greenlands System (or a municipal Greenlands System for that matter) can not be designated or zoned for residential development? Unless item 7.j) implies a constraint to development, it must be acknowledged that ROPA 43 will fail the cause of environmental sustainability. For example, in the Sutton Secondary Plan Area alone, at last count, about 800 acres of woodlands will be lost to development in the near future.

Will local municipalities remain the ultimate authority to set growth targets? If so, what implications may this hold that such targets are commensurate with ensuring sustainable growth? Could this mean "business as usual"?

Finally, we suggest that with respect to Centres as primary destinations (p. 8, para 2, line 2), some areas might be recognized as primary tourist destinations. For example, in the GTA, the Town of Georgina, a municipality of still mostly forests and wetlands, may seem a prime candidate for "tourist status", to include, necessarily, the appropriate supports and conservation provisions to ensure long term sustainability.

Infrastructure and Funding Practices

On page 5 of ROPA 43, Policy 8. states that major growth in towns and villages identified on Map 5 be governed by secondary plans based on a set of criteria. In this set,

the availability of sewer and water services to accommodate proposed growth is listed as a first criterion.

We are concerned that in the matter of infrastructure and economic sustainability, the ROPA 43 seems intent to continue, and in fact extend, the practice of frontending. For example, on page 12, item 12. c) seems to suggest an extension of frontending to transit infrastructure.

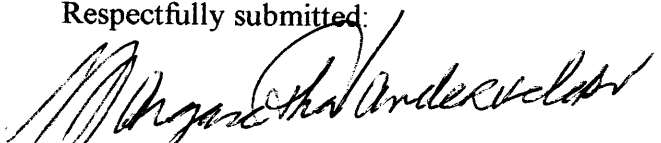
In the past, start-up funding of infrastructure through pre-payment of development charges has pressured where and when development is to occur. Moreover, in the case of municipal water and wastewater, frontending carries the risk that, in practice, special interest groups, rather than governments, control who will, and who will not, receive these services.

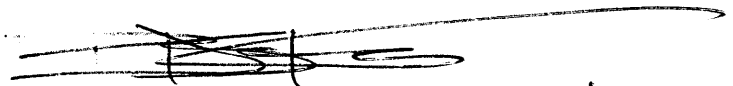
First and foremost, frontending builds infrastructure to facilitate development and, therefore, carries a risk of fueling urban sprawl, including creating potential demands for infrastructure due to risks to the private water supplies of existing residents in semi-rural areas (north-east Sutton may serve as an example) (See Afterword in *Deconstructing Forest Significance Conservation versus Development in York Region*, Vandervelden, 2004, copy enclosed).

In short, frontending can work against achieving sustainable growth as set forth in ROPA 43 (see above) and as also set out in Places to Grow (Ontario Ministry of Public Infrastructure Renewal, Summer 2004).

To conclude, and so that we can make appropriate comment, we would like to receive further clarification of section 5.2 **It is the policy of Council**, item 15 (page 7.) which reads: To work with the Town of Georgina to address environment and development issues as well as servicing implications along the Lake Simcoe shoreline.

Respectfully submitted:


Margaretha Vandervelden, President
North East Sutton Ratepayers Association Inc.


Peter Sibbald Brown, Director
The Lakewatch Society

Copy of attachment on file with Regional Clerk.