



Ducks Unlimited Canada
Conserving Canada's Wetlands

October 3, 2016

Valerie Shuttleworth,
Chief Planner, Planning and Economic Development
The Regional Municipality of York
Administrative Centre
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Re: Approval of the Town of Georgina's Official Plan

Dear Ms. Shuttleworth,

On behalf of Ducks Unlimited Canada, I would like to provide comments regarding York Region's on-going review and approval of the Town of Georgina's adopted official plan.

Ducks Unlimited Canada (DUC) takes a keen interest in both provincial and municipal land use policies because of the crucial role that Ontario municipalities play in conserving wetlands and other natural areas via the land use planning system.

As part of our Lake Simcoe-Georgian Bay Wetland Collaborative, DUC has been reviewing and providing input to local and upper tier municipalities, particularly in regards to their policies concerning wetlands. In July, 2015, we submitted comments to the Town of Georgina regarding their draft official plan during the public consultation process. We have since reviewed Town's adopted OP in relation to our previous comments, and would like to raise two specific areas of concern in the adopted OP that have yet to be addressed; and provide recommendations to York Region to inform their on-going review and approval of the Town's official plan.

The Town's adopted OP (ie. version dated April-2016 and currently posted on the Town's website) contains many strong, clear land use policies in regards to sustainability and

conservation of natural resources, including a policy in support of “ecological offsetting”. However, there is a significant gap in our opinion in terms of the lack of clear protection of wetlands (and other natural heritage features and hydrologic features) from development in “settlement areas”. In the April-2016 adopted OP, as was the case in the draft OP that we reviewed and commented on in July-2015, there does not appear to be any explicit policy that affords protection to wetlands/natural heritage features located in “settlement areas”. We do not see such policies in Section 5 (Greenlands System), Section 7.1 (Secondary Plan Areas), Section 7.2 (Urban Residential Area) or other sections in the OP. Given the large land area and considerable amount of natural heritage areas falling within “settlement areas” and provincial policy direction in the 2014 Provincial Policy Statement to protect significant wetlands etc, we consider this to be a major gap that should be addressed before the Town’s OP is approved. Whether or not those features lie within the identified “Greenlands System”, they warrant protection in keeping with the 2014 PPS and other provincial land use policy.

Recommendation: That York Region direct the Town of Georgina to amend their adopted OP to include clear explicit policy that affords protection to wetlands and other natural heritage features located in “settlement areas”.

Secondly, we would like to comment on the Town of Georgina’s adopted OP concerning Section 7.2 of the OP (Urban Residential Area, Maple Lake Estates). We understand there was official plan approval granted by the Town for the Maple Lake Estates (MLE) development dating back 28 years (circa 1988). However, we agree with other stakeholders that land use approvals and designations should not be in effect forever. At some point, given changes in public attitudes, scientific knowledge (eg. regarding sustainable development and ecosystem services), and public policy, land use approvals made dating back over a certain number of years (eg. 20 years) should lapse; and then be reconsidered based on a new application under the Planning Act. We think that the 1988-1990 approval for the MLE development is such a case.

Since the time of the original MLE approval, the science regarding ecosystem services for wetlands, woodlands, and other ecosystems has expanded substantially. The role of wetlands and other natural areas in improving water quality (eg. by removing phosphorus which is of particular relevance in the Lake Simcoe watershed), mitigating floods and droughts, and capturing carbon has become much clearer and more quantifiable. At the same time, our knowledge about wetland loss and degradation across southern Ontario has grown; while progress has been made, we continue to lose wetlands in southern Ontario due to urban expansion, infrastructure, and agriculture activities. Ontario and the Lake Simcoe watershed

can ill afford to lose anymore wetlands and all of the associated environmental, social, and economic benefits they provide.

Recommendation: That, prior to approving the Town of Georgina’s adopted OP, York Region direct the Town of Georgina to reconsider the historic approval of the MLE development (and the current designation of the MLE property as Urban Residential Area in their adopted OP) in light of current knowledge on wetland and woodland ecosystem services and changes in provincial policy and public attitudes.

After reconsideration of the original approval of the MLE development, if the Town determines that the proposed development should be ‘re-approved’ (eg. with a smaller footprint and reduced impact on wetlands and woodlands), we recommend that the new approval include a requirement for offsetting/compensation for any loss and degradation of wetlands and woodlands that cannot be reasonably avoided or minimized. Such an approach would be consistent with the Town’s OP policy for ecological offsetting (Section 5.8) in cases where there will be unavoidable losses to natural heritage features. That approach would also be in keeping with the Province’s intention to develop a no net loss policy for Ontario’s wetlands, as stated in the 2016 Draft Wetland Conservation Strategy prepared by the Ministry of Natural Resources and Forestry.

Thank you for the opportunity to provide these comments. Please don’t hesitate to contact me at any time (705 721-4444 x250 or k_rich@ducks.ca) if you have any questions regarding these comments.

Yours in conservation,



Kevin Rich
Head of Industry and Government Relations, DUC-Ontario

c. Harold Lenters, Town of Georgina