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Mr. Jim Dymont
MHBC Planning
113 Collier Street
Barrie, Ontario
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and

Ms. Andrea Furniss
Town of Georgina
Keswick, Ontario
L4P 3G1

Dear Mr. Dymont and Ms. Furniss:

Re: Official Plan Review - Maple Lake Estates

As you know, my December 20, 2013 letter on behalf of my client, the North Gwillimbury Forest Alliance (NGFA), addressed among other things the issue of a prospective Maple Lake Estates development approvals exchange within the context of the Official Plan review.

I concluded in that letter that:

"[Criteria quoted from the provincial and regional policy documents referenced] suggest that all other things being equal, and again without judging feasibility at this time, the most attractive exchange option would be for equivalent approvals on lands within Keswick, as this would promote intensification and avoid any expansion of the existing urban designation into the Greenbelt. A less attractive option would be lands abutting Keswick, which would at least avoid leapfrog development. The least attractive option would be for lands not abutting Keswick."

Since then, I have further researched and considered these options, and wish to offer the following.

What are "equivalent approvals"?

This concept, to the best of my knowledge, first appears in the Town's staff report to the June 24, 2013 Council meeting, describing the exchange proposed by Metrus Developments Inc. The question remains, equivalent to what?

Area

The current Maple Lake Estates property is 200 ha. There appears to be general agreement that an equivalent area is not required, especially as Metrus no longer wishes to develop a golf course. The Maple Lake Estates Inc. lands between Deer Park Drive and Boyer's Sideroad that Metrus has proposed as an alternative location total 108 ha, and include some undevelopable provincially significant wetland and significant woodland.

As discussed below, much less area should be needed for an alternative greenfield location.

Number of dwellings

The existing planning approvals are for 1,073 dwellings. However, these are described in the approvals as small, two-person dwellings. Metrus has expressed interest in larger dwellings, whether on the currently approved site or in an alternative location. So, the number of dwellings should not be determinant.

Number of people

The existing approvals intend a population of 2,200, based on approximately two persons per dwelling (Official Plan section 3.20.2.11). Keswick sewage capacity has been reserved for two persons per dwelling (2,146 persons-equivalent).

Economic value

There is an excellent case to be made that "equivalent" should mean "as profitable as", and there is a good probability that a well-planned, freehold subdivision of considerably fewer homes and considerably smaller area would be at least as profitable to Metrus as would the currently approved Maple Lake Estates.

Conclusion

Since information on the economic value equivalent to Maple Lake Estates is not currently available, for purposes of this analysis I will consider whether 2,146 persons-equivalent can be relocated to the alternative exchange options described in my December 20, 2013 letter.

How much land does 2,146 persons-equivalent require?

The Greater Golden Horseshoe Growth Plan (section 2.2.7.2) says the minimum density target for greenfield development shall be "not less than 50 residents and jobs combined per hectare". The York Region Official Plan (section 5.2.14) uses similar wording. Both plans exclude from this calculation environmental/natural heritage lands, using slightly different wording.

Therefore, a greenfield residential development for 2,146 persons should require not more than 43 ha.

Where could such development be located?

I looked further into the options that would be more attractive than Metrus's currently proposed alternative, as described in my December 20, 2013 letter.

Regarding sites outside Keswick but abutting its boundary:

- ▶ Such a site should not abut the Business Park Secondary Plan area, or intrude onto lands designated Environmental Protection or Agricultural Protection.
- ▶ That leaves only one site that is large enough to accommodate a 43 ha development - and much of it is occupied by the Orchard Beach Golf and Country Club, a valued community recreational facility.

Therefore, I concluded that any feasible, more attractive options would be within Keswick proper.

Schedule F1 of the Keswick Secondary Plan shows four development area overlays that represent the major undeveloped areas within Keswick when the Secondary Plan was adopted in 2004.

Area 1 (Queensway West) is too small.

Area 2 (Queensway East) has enough land available, but:

- none is owned by Metrus or affiliates, so exchanges with other developers would be required,
- much of the available land is subject to a current subdivision approval process.

Area 3 (Glenwoods) has now been sufficiently developed that there is not enough land available net of Greenlands System designations.

That leaves Area 4 (South Keswick). This is much the largest development area, most of it remains undeveloped, and the majority of it is owned by Metrus affiliates. The remainder of this letter will demonstrate that this is the most attractive option.

Keswick Secondary Plan policies

The Secondary Plan, adopted in 2004 and subsequently approved, says that residential neighbourhoods are to be "predominantly low density residential areas" (section 9.1.1.4.3(a)). The general standard for low-density residential development is 11 dwelling units per "gross residential hectare". A gross residential hectare is net of environment/natural heritage, stormwater management, and major institutional lands, but includes roads and local community commercial and institutional uses. Low-density residential development is restricted to single-detached and two-unit dwellings (section 9.1.2.7).

In the South Keswick Development Area, development is allowed to a maximum density of 14.5 units/gross ha for low-density residential, which may be further increased to 16.6 units/gross ha if medium-density residential is included (section 9.1.3.8(f)(iv)). These densities exclude lands within the designated Glenwoods Urban Centre.

South Keswick Development Area Plan

In 1999, Georgina Council approved a revised South Keswick Development Area Plan, prepared by consultants to Metrus affiliates. The land use plan (figure 2) in that document has been replaced by an updated (2005) drawing to reflect subsequent subdivision approvals. The 2005 land use plan has never been approved by Council as an amendment to the 1999 Development Area Plan, but is relied upon by staff.

The Development Area Plan includes detailed information on projected land use areas, dwelling types, populations, and densities (tables 1-4), and appears to be the source of the South Keswick density policies in the Secondary Plan. These data have not been revised to reflect the changes in the land use plan, but as the plan changes are modest, any revised data should be only modestly different also.

The Development Area Plan indicates the following statistics for the whole of South Keswick:

- total area, 392.0 ha
- gross residential area, 310.1 ha
- dwelling units, 5,447
- population, 15,438 (based on 2.9 persons per low and medium density unit and 2.0 persons per high density unit).

This yields a density of 17.6 dwelling units per gross residential ha (a base that allows comparisons to the dwelling density standards in the Secondary Plan), and 39.4 persons per total ha (a base that allows comparisons to the population density standards in the Growth Plan and Regional Plan).

Within the lands identified as Residential Neighbourhood in the Development Area Plan (excluding lands within the designated Urban Corridor and Glenwoods Urban Centre), the statistics are:

- total area, 292.9 ha
- gross residential area, 214.0 ha
- dwelling units, 3,058 (for all practical purposes these are entirely low density)
- population, 8,868 (based on 2.9 persons per unit).

This yields a density of 14.3 dwelling units per gross residential ha, and 30.3 persons per total ha.

(Note that Table 4 of the Development Area Plan shows 14.5 units per gross ha, which appears to be the basis for the South Keswick density standard in the Keswick Secondary Plan. Based on the information presented in Table 1, the gross residential area and unit density figures in Table 4 are wrong and the correct figures are above.)

Metrus lands in South Keswick

Affiliates of Metrus own 241.0 ha of undeveloped land in South Keswick, according to the 2014 tax year assessment roll. This excludes the areas of subdivision plans 19T-95052, already developed by Metrus, and plan 19TG-2003-001, currently under development by Metrus. The Metrus undeveloped lands are shown on a marked-up copy of the 2005 South Keswick land use plan, attached.

I will also exclude the 8.3 ha area of subdivision plan 19T-10G02 (area A on attached plan). This

plan has been draft-approved, but does not yet appear to have been registered, nor has development yet begun. This leaves 232.7 ha of undeveloped Metrus lands.

From this should be deducted the following. All figures are as given on or measured from the attached 2005 land use plan.

- Glenwoods Urban Centre - 22.7 ha
- Urban Corridor as shown on attached plan - 0.3 ha
- Lands redesignated to Urban Corridor in 2010 (area B on attached plan) - 2.7 ha
- Natural Features - 19.2 ha
- Commercial/Employment - 39.3 ha.

This leaves 148.5 ha owned by Metrus that is identified for Low Density Residential development, but is still undeveloped, and apparently not subject to any approved plan of subdivision.

Can 2,146 persons-equivalent be accommodated on Metrus lands in South Keswick?

This can be looked at in two ways.

Unit density

- ▶ The Secondary Plan currently limits development on Metrus's 148.5 ha to a density of 14.5 units/gross residential ha, for a total of 2,153 units.
- ▶ 2,146 persons-equivalent translates into 740 units, based on the 2.9 persons/low-density unit standard in the Development Area Plan.
- ▶ Permission to add 740 units to what is currently allowed on the Metrus lands would increase Metrus unit numbers to 2,893 units, or 19.5 units/gross ha. (Metrus originally sought 20.7 units/gross ha for draft plan 19T-10G02 - see staff report to December 4, 2013 Council.)
- ▶ For the Residential Neighbourhood area as a whole, units would increase from 3,058 (Development Area Plan) to 3,798, and density from 14.3 units/gross ha to 17.7 units/gross ha. This would still be considerably less than the 24.9 units/gross ha projected by the Development Area Plan for the higher-density Glenwoods Urban Centre and Urban Corridor.

Population and employment density

- ▶ I have already referred to the "50 residents and jobs combined per hectare" density standards in the Growth Plan and Regional Plan.
- ▶ As well, Policy 5.2.15 of the Regional Plan says,

"That approved secondary plans within the designated greenfield area that are not completely built should be re-examined to determine if 50 residents and jobs per hectare in the developable area can be achieved."

- ▶ As noted above, the Development Area Plan projects 15,438 residents for South Keswick.

Adding 2,146 persons-equivalent from Maple Lake Estates would increase this to 17,584 residents.

- ▶ 50 residents and jobs per ha yields 19,602 residents and jobs for South Keswick. That allows for another 2,018 residents or jobs on top of the Maple Lake Estates residents - there would be no more residents, but we have not yet accounted for jobs.
- ▶ As is well known, projecting or documenting employment densities is a challenging task. This has been most recently acknowledged in *Technical Report on Preliminary Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006*, Ministry of Infrastructure, undated but published February 2014.
- ▶ The Development Area Plan indicates 56.6 ha of employment lands. If these lands were to provide 2,018 jobs, bringing South Keswick's overall density up to 50 residents or jobs per hectare, that would be 35.7 jobs provided per hectare of employment lands. The table, Population and Job Density in Urban Growth Centres - 2006 & 2011, at page 13 of the above-referenced *Technical Report*, suggests that employment densities in South Keswick would not likely exceed that figure.

Conclusions

In my opinion, the best option for a Maple Lake Estates development approvals exchange would be to provide equivalent development approvals on lands owned by Metrus affiliates in South Keswick, over and above the level of residential development currently permitted or contemplated there.

This option:

- would best conform to the planning policies referenced in my December 20, 2013 letter,
- would fulfil the Regional Plan requirement to reconsider densities in South Keswick,
- would avoid leapfrog development,
- would avoid any development of lands designated Protected Countryside in the Greenbelt plan, or Environmental Protection, Agricultural Protection, or Rural in the Town's Official Plan,
- could be accomplished by permitting a reasonable unit density increase in South Keswick, and,
- using the example of 2,146 persons-equivalent, could be accomplished within, and without exceeding, the Growth Plan and Regional Plan targets for greenfield population and employment density.

As you know, negotiations are currently taking place regarding a possible development approvals exchange. I ask that you take my analysis and conclusions into consideration in the Official Plan review, and ensure that all options are kept open.

Please let me know if you need any further information or clarification.

Yours sincerely,

[original signed by]

Anthony Usher, MCIP, RPP