

November 25, 2022

Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, ON
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Submitted by email to: growthplanning@ontario.ca

**RE: Comments on the Review of A Place to Grow and Provincial Policy Statement
ERO Number 019-6177**

On behalf of the Nobleton Landowners Group (NLG), who collectively own approximately 80 ha of land situated within the Nobleton Settlement Area in the Township of King, thank you for undertaking this important work to review and revise the Growth Plan and the Provincial Policy Statement to build more housing, faster. NLG commends the government's work and has a proposal in support of these efforts.

A small change to the Growth Plan to allow areas like Nobleton to consider lake-based servicing would eliminate an ongoing constraint to development and better protect the environment. Despite being situated within an approved Settlement Area, Nobleton has limited growth as it relies on a stand-alone sanitary treatment plan. This is an issue facing several communities, including Caledon and Clarington. York Region supports this initiative and in 2015, 2016 and 2020 made requests for this change.

Issue Background

Nobleton is identified as a "Towns and Villages" by the Growth Plan and the Greenbelt Plan, and is a Designated Greenfield Area in the York Region Official Plan.

Situated between King City and Bolton, Nobleton is ideally situated to help the province meet its commitment to build 1.5 million homes over the next ten years as part of the *More Homes Built Faster: Ontario's Housing Supply Action Plan: 2022-2023*. It is also in close proximity to the planned Highway 413 corridor and Pearson Airport.

However, despite being within an approved Settlement Area, the Region and Township have historically limited the amount of growth being directed to Nobleton due to 'servicing constraints'. Nobleton is currently serviced with a stand-alone sanitary treatment plant that discharges to a tributary of the Humber River.



The 2005 Greenbelt Plan (Policy 4.2.2.2) restricted lake-based servicing to settlement areas as a means of limiting growth. In 2017, similar policy (with some added flexibility) was transferred into the Growth Plan (now Policy 3.2.6.3).

Since 2005, the Growth Plan has introduced a far more advanced policy approach to growth management and limiting sprawl. Yet Policy 3.2.6.3(b) remains and has had the unintended consequence of restricting servicing options that, in some cases, may be more costly for municipalities and place an unnecessary burden on the environment.

York Region supports this change and requested in 2015, 2016 and in 2020 that the Province review Policy 3.2.6.3 to provide more flexibility for servicing. As currently worded, the Policy prevents the Region from considering lake-based servicing as part of a municipal Class EA, even though lake-based servicing may be preferable from both an ecological and economical perspective.

York Region Council Resolutions:

- "The Province revisit policies regarding servicing communities in the Greenbelt and ORMCP, in consultation with municipalities and stakeholders" (May 2015)
- "Revise the Plans to consider the extension of lake-based municipal servicing as a viable option to service existing communities within the Greenbelt and Oak Ridges Moraine Plan areas (Adapted from 2015 Recommendation No. 20)" (September 2016)

Lake-Based Servicing System

We recognize that lake-based servicing may not be appropriate for all settlement areas. However, municipalities should be permitted to consider all servicing options through a Class EA review.

Nobleton is one example where extending the lake-based servicing system is a viable servicing option. In the long term, a lake-based alternative would be an economical, sustainable solution and would remove phosphorous loading into the Humber River. It is also in-line with provincial policy since the 1980s, which has sought to reduce the reliance on stand-alone sanitary treatment plants. We note that the surrounding communities of Bolton, King City and Kleinberg all use lake-based services.

Proposed Change to Policy 3.2.6.3 (b)

The following changes to Policy 3.2.6.3(b) of the Growth Plan would correct this outdated policy and bring it in line with other provincial objectives to increase housing supply, create jobs, attract better investment, protect the environment and better align and support infrastructure planning.

(we are proposing to eliminate the words with ~~striketrough~~):

3.2.6.3 For *settlement areas* that are serviced by rivers, inland lakes, or groundwater, municipalities will not be permitted to extend water or wastewater services from a Great Lakes source unless:

- b. in the case of an upper- or single-tier municipality ~~with an urban growth centre outside of the Greenbelt Area~~:
 - i. the need for the extension has been demonstrated;
 - ii. the increased servicing capacity will only be allocated to existing *settlement areas* ~~with urban growth centres~~; and
 - iii. the municipality has completed the applicable environmental assessment process in accordance with the Ontario Environmental Assessment Act; or

Thank you in advance for considering our comments. We believe this small change to the Growth Plan could have significant benefits both in terms of building much needed housing and for the environment. We welcome any further discussion on the proposed changes.

Yours truly,

MHBC



Debra Walker

cc. *Nobleton Landowner Group*