

September 14, 2001

The Hon. Chris Hodgson  
Minister of Municipal Affairs and Housing  
Oak Ridges Moraine Consultations  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M5G 2E5

**RE: Oak Ridges Moraine Consultations - *Share Your Vision***

Dear Mr. Hodgson:

This letter provides comments from the Ontario Professional Planners Institute (OPPI) with respect to the Ministry's *Share Your Vision* document for the Oak Ridges Moraine. As you know, OPPI represents professional planners throughout the province. Our members advise governments, corporations, NGOs and individuals on the social, environmental, economic and technical implications of land use decisions and on the mechanisms for facilitating, controlling and guiding land use change. We ask that you consider our comments carefully and give us the opportunity to discuss our perspective as well as provide additional input as you develop the implementation strategy.

In June 2000, OPPI issued a Position Paper on the Oak Ridges Moraine (attached). OPPI supports the Province's recent stand on protection of the Moraine through the *Oak Ridges Moraine Protection Act, 2001* including the six month moratorium on new development because it is consistent with our Position Paper.

Further to our Position Paper, the following provides our comments on the recently released Oak Ridges Moraine *Share Your Vision*® including the Draft Strategy For Community Growth and Natural Protection put forward by the advisory panel (August-September 2001).

**Four Key Comments**

1. There is a need for the Province to provide a **clear and detailed plan** (i.e. map) as the basis for implementation for the entire Moraine area.
2. Clearly, the **implementation strategy** will have a huge impact on whether the vision and Draft Strategy for the Moraine is fulfilled. In particular: 1) the Province must provide leadership through strong legislation; 2) significant funds must be available for sensitive area purchase and programs; and 3) policies and initiatives must be put in place for the cross-municipal linkage areas (e.g. trails, restoration programs, arrangements with landowners, tax incentives). *Specific questions with respect to implementation are listed in the section below.*

3. Clearly the **Smart Growth initiatives** of the province and municipalities are related to the strategy for the Oak Ridges Moraine and the connections should be defined. An explicit Growth Management Initiative must be initiated to go hand in hand with the Oak Ridges Moraine Strategy that: 1) develops initiatives to make better use of existing urban areas (e.g. intensified uses, increased transit and equitable employment distribution); and 2) re-assesses growth accommodation across the entire GTA to clarify where growth should be directed to minimize environmental impacts and improve quality of life and economy.
4. The strategy should emphasize the importance of environmentally sensitive development where development is permitted. The province must take the opportunity to show leadership in guiding the form and nature of development as well as its location on the Moraine.

### Specific Comments and Questions

- \$ We request more clarity and detail regarding suggested legislative basis for implementation outlined in the *Share Your Vision* document. As outlined in our earlier position, OPPI supports strong provincial leadership on this issue to ensure consistent and long-lasting protection of the Moraine. Specifically, this implementation scheme needs to spell out:
- the legislative authority, whether the *Ontario Planning and Development Act* or a similar statute specific to the moraine, and what will be covered by the legislation proper;
  - clarification of what will be covered by the land use plan adopted under that authority;
  - an open and accessible process allowing anyone to propose an amendment to the plan, and for the consideration of those amendments in the context of the vision and goals established for the moraine by the statute and/or plan, similar to that under the *Niagara Escarpment Planning and Development Act* or *Ontario Planning and Development Act*;
  - due to the technical nature of environmental issues, the role of the Ontario Municipal Board in this process;
  - a relationship between the Moraine plan and municipal plans that is not simply top-down, and that recognizes and continues the leadership of the upper tier municipalities in seeking to protect the Moraine; and
  - the broadest possible roles for municipalities and conservation authorities in implementing all aspects of the Moraine vision.
- \$ We request further information with respect to treatment of development that is in the process of approval and currently caught in the six-month moratorium. How is Approved@ to be defined with respect to the May 17<sup>th</sup>, 2001 date?

- \$ We look forward to confirmation of the redefinition of the Countryside Areas designation to further restrict residential development as announced at the Uxbridge public forum on August 28<sup>th</sup>. Any interpretation that *Share Your Vision* would permit widespread rural and estate residential, commercial or industrial development in the Countryside designation would be inconsistent with the intent of our 2000 submission. We understand that the interpretation of this designation is being clarified.
- \$ In particular, will the definition of institutional encompass specialized areas such as seniors communities and other quasi-institutional uses?
- \$ Aggregate resource extraction is retained as a permitted use throughout most of the Moraine in the *Share Your Vision* document. Our concern is that the cumulative effects of resource extraction will not be considered across the Moraine with the current Draft Strategy. We suggest that this aspect of the strategy be further explored to more clearly define the appropriate locations and form of resource extraction so that the Moraine can continue to contribute to our economy while respecting the overall integrity of the Moraine.
- \$ We request information regarding the basis for the boundaries of the Moraine as defined in the *Share Your Vision* document as well as an explanation of differences in the boundaries defined by the MNR/MOE at the Richmond Hill Hearing and in previous provincial documents.
- \$ In keeping with the Government's developing Smart Growth strategy, we would like to see further clarification regarding future urban expansion. As the mapping currently is presented, future urban development will largely be confined to existing settlement areas. In order to promote smart growth and protection of the ecological integrity of the Moraine, possible future urban expansion directions and priorities should be defined now and not left to future municipal discretion through the five year Official Plan review process. For example, no settlement areas are identified east of York Region. The strategy must avoid the potential for gradual erosion of the goals and vision of the Provincial strategy for the moraine. This is critical given the current pressure for growth in the municipalities on the moraine.
- \$ As OPPI requested, the strategy appears to treat the Moraine as an inter-jurisdictional resource requiring cooperation among all of the stakeholders noted in the strategy - provincial government, municipalities, conservation authorities, the federal government and the proposed Oak Ridges Moraine Legacy Trust.
- \$ We are pleased that the vision outlined for the Moraine shows that the Province intends to recognize that the Moraine is a provincially significant natural heritage resource. The province's goal is to protect the moraine and its ecological functions and ensure a continuous natural environment for future generations...@

- \$ We are pleased that the vision, goals and Draft Strategy address the entire Moraine and clearly define areas that may be developed and those to be protected.
- \$ In our 2000 Position Paper, OPPI urged that a significant portion of the Moraine be protected. Depending on your response to our earlier question about the moraine boundaries presented by MNR/ MOE at the Richmond Hill OMB hearing, we would be satisfied that this protection will be achieved by the Draft Strategy as currently mapped if it is fully and consistently implemented.
- \$ We are pleased that the strategy appears to recognize that implementation can fundamentally build, Aon the work of organizations that have already made important contributions to the moraine=s sustainability.” Similarly, we are glad that the Province recognized that action could take immediately.

In general, we support the direction taken by the Province for the Moraine and we look forward to the opportunity to comment on the details of the plan and the implementation strategy.

Sincerely,

A handwritten signature in black ink that reads "Dennis Jacobs". The signature is written in a cursive, flowing style.

Dennis Jacobs MCIP RPP  
President