



**Andrew Brouwer**

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October 14, 2016

Mr. Denis Kelly, Clerk  
The Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6X9

Dear Mr. Kelly:

**RE: Town of Newmarket's Comments, Coordinated Provincial Plans Review**

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Council of the Town of Newmarket considered its comments on the Coordinated Provincial Plans Review at its October 3, 2016 meeting, referencing Development and Infrastructure Services/Planning and Building Services Reports 2016-28 and 2016-41.

Attached, please find the Town of Newmarket's comments on the Coordinated Provincial Plans Review (Appendix 'A').

For a copy of Development and Infrastructure Services/Planning and Building Services Reports 2016-28 and 2016-41, please contact the Town of Newmarket's Legislative Services Department.

Yours sincerely,

Andrew Brouwer  
Director of Legislative Services/Town Clerk

copy: Mr. R. Nethery, Director of Planning and Building Services



**Appendix 'A'**

**Comments on the Coordinated Provincial Plans  
Review**

**Adopted by Newmarket Council on October 3, 2016**

### Greenbelt Plan

- It may be appropriate to review, with the appropriate neighbouring municipalities, land on the east side of Highway 404 adjacent to Newmarket with the purpose of removing it from the Greenbelt Plan area. This reflects other Provincial policy which supports growth for employment lands in appropriate locations with minimal infrastructure expansion.
- Again, it is understood that Provincial staff will be meeting with municipalities to discuss such mapping revisions, **Town staff formally request such a meeting.**

### Growth Plan

- It is recommended that a consistent set of “persons per unit” numbers by unit type, on an upper tier municipality basis, be included as a revision to the Growth Plan. Having such metrics would be helpful as it would increase the Plan’s enforceability and assist in providing standardized land budget methodology.
- Clarification is required regarding which density targets must be used in cases where an area satisfies multiple locational criteria (2.2.4.5). For example, a vivaNext Rapidway satisfies the definition for a “Major Transit Station Area” and therefore would need to target a minimum 160 residents and jobs per hectare. However, if the Rapidway station is in the proximity of a GO Train Station, a minimum 150 residents and jobs per hectare are required. If the higher target applies in these situations, the policy should be clarified as such.
- The proposed Plan states that: “*Major office* and appropriate major institutional development will be directed to *urban growth centres, major transit station areas* or other *strategic growth areas* with existing or planned *frequent transit service*.” (2.2.5.9). It is unclear if this means that such office and institutional uses should not be directed to *major transit station areas* or *strategic growth areas* that do not have existing or planned frequent transit (15 minute) service. This is a key concern relative to the Newmarket GO Station, which is envisioned by the Urban Centres Secondary Plan as a transportation hub and is currently the subject of a Mobility Hub Study being undertaken by Town in partnership with Metrolinx. Newmarket will see train service increased to 30 minutes as opposed to the required 15 minute service. Clarification and/or re-wording is suggested.

- The term “Prime Employment Areas” should be replaced by “Transportation-reliant Employment”, or “Freight-supportive Employment”, or similar. The use of the word “Prime” is misleading as it is typically used to refer to prestige / office-type uses. This difference is important in this instance because of the prohibitory language that the Plan includes regarding “Prime Employment Areas” and other land uses (see below), whereas mixing prestige industrial / office uses with other land uses is an accepted and encouraged practice to support the notion of ‘complete’ communities.
- The definition for “Prime Employment Areas” should be updated to reference one of its main characteristics, being close proximity to transportation infrastructure such as *major goods movement facilities and corridors*, and major highway interchanges, as per 2.2.5.3.
- The proposed revisions carry through, and in some instances, exacerbate the philosophy of separating land uses, which is contrary to other policies of the Plan that encourage the concept of mixed use. For example, Sections 2.2.5.5 and 2.2.5.6 explicitly prohibit mixing residential and employment uses. It seems unnecessary that the Employment section have such a strong focus on the separation of employment from other uses. In order to implement other policies of the Plan, including those dealing with climate change, community health and economic prosperity, it is strongly encouraged that the Plan move away from segregated office parks in favour of truly mixed use, walkable, complete communities.
- Include district energy system policies more explicitly in Sections 3.2.1 (Integrated Planning) and 3.2.5 (Infrastructure Corridors). District energy is currently addressed in Section 4.2.9 (A Culture of Conservation), but discussing it again as infrastructure to support growth would be beneficial.

#### **Growth Plan Mapping:**

- Schedule 5: The Priority Transit Corridor extends to Aurora. It is logical and supportable to extend this corridor to the Newmarket Urban Growth Centre. This would support intensification within an identified Provincial Urban Growth Centre, support the objectives of the Urban Centres Secondary Plan, support the Newmarket GO Station Mobility Hub Study, and provide a logical connection between two of the Province’s major transit projects: Metrolinx RER and the vivaNext Rapidway along Davis Drive.



- Schedule 4: It is recommended that the text "Newmarket Centre" be placed to the east of the "Newmarket Centre Urban Growth Centre" symbol rather than to the north. The current positioning to the north covers the various designations in East Gwillimbury.

#### **A. Proposed Growth Plan - General Density Targets**

Like the existing Growth Plan, the proposed Growth Plan directs a significant portion of growth to "Built-up Areas" and "Strategic Growth Areas". The vast majority of the Town is designated "Built-up Areas", and "Strategic Growth Areas" are defined as those areas identified by a municipality or the Province as being appropriate to accommodate intensification, and includes Urban Growth Centres and areas located along higher order transit corridors (including bus rapid transit); as such, the entire Urban Centres Secondary Plan areas would meet the definition of a "Strategic Growth Area".

The minimum intensification target for Built-up Areas is 60%; increased from 40% in the existing Growth Plan. The minimum intensification target for "Strategic Growth Areas" in Newmarket is divided among various sub-categories: the Provincial Urban Growth Centre (200 people and jobs combined per hectare, which remains unchanged) and new density targets for Major Transit Station Areas (as discussed in "Proposed Growth Plan - Density Targets around Major Transit Station Areas" below).

The Town of Newmarket is in a unique situation where the vast majority of the municipality is located in the Built-up Area (all lands except for the Oak Ridges Moraine area and a portion of the northwest quadrant). Therefore, all new development that occurs in the Town (outside of these areas) helps achieve the 60% intensification target. In addition, the Urban Centres Secondary Plan was prepared to meet the 200 people and jobs combined per hectare target within the Provincial Urban Growth Centre, and similar density targets extend throughout the entire Plan area which will achieve approximately 33,000 residents and 32,000 jobs by build-out, over the 290 hectare Plan area. All new development that occurs within the Urban Centres Secondary Plan area will also help achieve the 60% intensification target, but also satisfy the intensification targets for "Strategic Growth Areas".

The planning context described above is far different than that of other municipalities in the Growth Plan area. Other municipalities, including some within York Region, have large Designated Greenfield Areas (including whitebelt lands) which are subject to the proposed density target of 80 people and jobs combined per hectare. Although Newmarket does not have large Designated Greenfield Areas, we share the concerns of our municipal neighbours regarding the designated greenfield density target, and note that an unintended consequence of such a target may be the development of areas along suburban fringes that host more intensive density than their existing Built-up Areas and/or Strategic Growth Areas. Further, locating high densities such as 80

people and jobs combined per hectare along suburban fringes is counter to the Growth Plans stated objective of directing significant portions of forecasted growth to “Built-up Areas” and “Strategic Growth Areas”.

Given the above, it is requested that the Province re-examine the designated greenfield density target of 80 people and jobs combined per hectare in the context of the Plan’s other growth management policies and objectives.

### **B. Proposed Growth Plan - Density Targets around Major Transit Station Areas**

Among other comments, The Town requested that the Growth Plan provide clarification on density targets in and around Major Transit Station Areas. The proposed Growth Plan defines Major Transit Station Areas as those areas generally within 500m of subway stations, bus rapid transit stations and GO Train Stations. Newmarket would be effected by the latter two, having both bus rapid transit stations and GO Train Stations (existing and planned). The minimum gross density for each bus rapid transit station area is 160 residents and jobs combined per hectare; and the minimum gross density for each GO Train Station is 150 residents and jobs combined per hectare.

Although the Town supports the concept of transit-oriented development, it is unknown if it is appropriate to target these exact densities within 500m of each of these station, given the context of each station area.

Given the above, it is requested that greater levels autonomy and flexibility be afforded to local municipalities in determining appropriate transit-oriented density targets and locations. In addition, it seems illogical that the minimum density target for bus rapid transit stations would exceed that of GO Train Stations, and therefore it is requested that this be re-considered.

