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Mr. Tolek Makarewicz
Development Services Department
Town of Georgina
26557 Civic Centre Road
Keswick, Ontario
L4P 3G1

Dear Mr. Makarewicz:

Re: Keswick Secondary Plan Review

On behalf of my client the North Gwillimbury Forest Alliance (NGFA), I would like to provide some comments on aspects of the Secondary Plan review relevant to the NGFA's mission.

As you know, NGFA has consistently opposed the development of the original Maple Lake Estates (MLE) property, while recognizing the desirability of providing some form of development approvals exchange with the owner to facilitate a resolution. NGFA's and my view has always been that the best way to accomplish this would be to provide alternative approvals on lands within Keswick.

Our views on this were provided in considerable detail in my letters of March 20 and May 29, 2014 to the Town, during the review of the parent Official Plan, which I enclose.

We concluded that the best location would be in South Keswick, on lands that, like the MLE property, are owned by affiliates of the DG Group. The present Secondary Plan limits the type of residential neighbourhood development envisioned in the South Keswick Development Area Plan for the DG-affiliate lands, to a maximum density of 14.5 units/gross ha. As I wrote in my May 29, 2014 letter, a development approvals exchange "could be accomplished by permitting a moderate unit density increase in South Keswick".

Later in 2014, DG affiliates in South Keswick proceeded with rezoning and subdivision applications for what was known as Phase 9. We opposed these applications as premature, because they would take up 36% of the remaining DG-affiliate lands in South Keswick that would be suitable for a development approvals exchange, without addressing our Official Plan review submissions. I enclose my letters to the Town of September 8, 2014 and March 2, 2015. Nonetheless, the applications were approved.

Of course, in addition to the development of Phase 9 since I wrote my Official Plan review letters, we now have the 2019 Growth Plan although I don't believe that change would significantly affect my conclusions. Another development that would certainly differently colour my conclusions is the Local Planning Appeal Tribunal's December 2019 decision on the MLE designation in the parent Official Plan. The effect of this decision is unquestionably to significantly lower the value of the

existing development approvals that would be subject to exchange, from what we were assuming in 2014 (which would affect the discussion of "equivalent" in my March 2, 2015 letter).

Nevertheless, it remains my view that South Keswick remains the best opportunity for some sort of development approvals exchange that would facilitate the final consensual termination of all existing approvals on the MLE property and the transfer of the MLE lands to a public agency. The Secondary Plan review provides a new opportunity to revisit this question.

As the December 2019 Planning Review Report notes, York Region's current municipal comprehensive and Official Plan reviews are expected to increase the emphasis on intensification in the Regional Plan.

We commend and support the Planning Partnership's and Town's approach in this report, and I note in particular the following statements in Section 2.2, Opportunities for Discussion:

". . . as Keswick is the largest urban settlement in Georgina and the Town's Official Plan policies identify Keswick as a prime location for new growth and intensification, the Town may also consider selecting Secondary Plan-specific targets which are higher than those required by the Region, to offset lower density/intensification potential elsewhere in the Town."

"While the Keswick Secondary Plan Area does not currently identify strategic growth areas in conformity with the 2019 Growth Plan, it is likely that the existing Urban Centres and Corridors, which are already designated for higher density mixed uses, could fulfill this role, with the potential addition of portions of the Woodbine corridor, should any of those lands be deemed appropriate for residential uses through the Commercial and Employment Lands Analysis."

"Considering the focus on intensification within Provincial and Regional Plans, this Secondary Plan Review will explore opportunities for residential intensification throughout the Keswick community, as well as strategies for attracting and facilitating intensification to maximize those opportunities."

"The Secondary Plan Review does not intend to encourage radically dense development that is not compatible with the existing character and built form of the community. . . . Intensification within the context of Keswick is more likely to include built forms such as townhouses, stacked townhouses, low rise apartment or condominium buildings and mid-rise, mixed-use buildings, where appropriate."

I also note from the What We Heard report on the January 18, 2020 design workshop, that while intensification in Keswick generally and South Keswick specifically is not without controversy, there is a good deal of public support for it.

The bottom line is that developments to date in the Secondary Plan review process appear to open the door to a substantial replanning of the remaining undeveloped South Keswick lands, that would among other things involve increases from current permitted residential development densities. Not only would this be good planning consistent with applicable policy, but it could also facilitate final

resolution of the MLE situation.

I will continue to follow the Secondary Plan review once circumstances permit its resumption, and look forward to further positive developments along this line.

Yours sincerely,

[original signed by]

Anthony Usher, RPP