



Interoffice Memorandum

GEORGINA

Development Planning Division

To: Ryan Cronsberry, CAO

From: Harold Lenters, Director of Development Services

cc: Shawn Nastke, Acting Deputy CAO

Date: December 3, 2021

Re: PROPOSED GENERAL AVIATION AERODROME
7818 and 7486 Old Homestead Road, Town of Georgina

Background

On or around November 11, 2021, the Town of Georgina became aware of a sign posted on lands municipally addressed as 7818 and 7486 Old Homestead Road (Subject Lands) advising of a proposed aerodrome. An image of the sign is provided as Attachment 1.

Aerodromes are regulated by the Government of Canada through Transport Canada. As per Part III, Subpart 307 of the Canadian Aviation Regulation, proposals for new aerodromes must involve consultation with the community. In this regard, Section 5.0 of Transport Canada's Circular - ac - no - 307- 001 states the following:

“Although not required in the Regulation, an industry best practice is to pre-consult with key stakeholders during the planning and development stage and is highly recommended. It permits the proponent to ascertain the feasibility of a project and establish proof of concept that can be presented during the actual consultation period. Proponents who go forward without proof of concept will do so at their own peril and may experience consequential delays if safety or navigation related issues arise.”

To staff's knowledge, the Town of Georgina was not contacted in terms of any pre-consultation, but instead it appears the Proponent proceeded directly to undertaking consultation, including the posting of the aforementioned sign on the Subject Lands.

The posted sign provides: a general concept plan along with a brief summary of the aerodrome proposal (Project); a website to obtain additional information, and; indicates that comments or objections are welcome from November 5, 2021 until December 22, 2021.

According to the sign notice, the Project includes the following three major components:

- 1) AIRFIELD DEVELOPMENT AREA
 - Two (2) paved, all-weather Runways up to 991 m in length
 - Supporting Taxiways and Parking Apron
 - Aircraft Hangar Development Lots
 - Supporting Flying Clubhouse/Administration (400-500 sq. m)
 - Aerodrome Access Road and Services and Utilities
- 2) FUTURE AIRCRAFT HANGERS/AIRSIDE COMMERCIAL
- 3) WETLAND PROTECTION AREA

It is noted that the Proponent's website provides no additional information or studies/analysis which provide more details or demonstrates the need, appropriateness and feasibility of the Project, and that its construction is in the public interest.

As previously mentioned above, Airports and Aerodromes fall within the Federal government's jurisdiction and accordingly, this Project will be considered in accordance with federal legislation. In other words, a local municipality has no authority or decision making power with respect to either allowing or refusing a proposed Aerodrome.

Notwithstanding, the Town will be establishing its position in respect of the proposed Aerodrome and submitting comments to the Proponents within the prescribed commenting time period.

To assist Council in establishing the Town's position, you have requested Planning staff's comments. To this end, staff have undertaken a preliminary review of the Project in terms of assessing it against provincial, regional and local land use planning policies and plans and have formulated comments, which are presented below.

Subject Lands and Surrounding Land Uses

The Subject Lands are located on the north side of Old Homestead Road, north-west of the Old Homestead Road and Stoney Batter Road intersection. An air photo of the Subject Lands is provided in Attachment 2.

Surrounding land uses are described as follows:

- **North**: Agricultural uses and single family dwellings
- **East**: Agricultural uses, single family dwellings and extensive wetlands and woodlands
- **South**: Single family dwelling, a Hydro One transmission corridor and extensive wetlands and woodland
- **West**: Agricultural uses, single family dwellings and a renewable energy project

The Subject Lands contain prime agricultural lands, and Provincially Significant Wetlands and Woodlands. A watercourse runs north-east and south-west across the south-eastern portion of the Subject Lands.

Provincial Policy Statement (2020)

The Subject Lands are located within a Rural Area as per the Provincial Policy Statement (PPS). Rural Areas include prime agricultural areas. Policy 2.3 states that prime agricultural areas shall be protected for long-term use for agriculture.

Comment

A significant portion of the Project (the runways, supporting taxiways and parking apron, and aircraft hangar development lots), appear to be located on prime agricultural lands, which is contrary to the PPS policy of protecting such lands for long-term agricultural use.

Greenbelt Plan (2017)

The Subject Lands are located within the Protected Countryside of the Greenbelt Plan (GBP) and are situated entirely within the GBP's Natural Heritage System (NHS). In Section 3.2- Natural System and specifically in 3.2.1 of the GBP, it states:

"The Protected Countryside contains a Natural System that provides a continuous and permanent land base necessary to support human and ecological health in the Greenbelt and beyond. The Natural System policies protect areas of natural heritage, hydrologic and/or landform features, which are often functionally inter-related and which collectively provide essential ecosystem services, including water storage and filtration, cleaner air, habitat, support for pollinators, carbon storage and resilience to climate change."

The GBP further states:

"The Natural System is made up of a Natural Heritage System and a Water Resource System that often coincide given ecological linkages between terrestrial and water-based functions.

The **Natural Heritage System** includes core areas and linkage areas of the protected Countryside with the highest concentration of the most sensitive and/or significant natural features and functions. These areas need to be managed as a connected and integrated natural heritage system...

The **Water Resource System** is made up of both ground and surface water features and areas and their associated functions, which provide the water resources necessary to sustain healthy aquatic and terrestrial ecosystems and human water consumption...The Protected Countryside includes several areas of hydrologic significance, including: The portions of the Lake Simcoe watershed and the former Lake Algonquin shoreline within York and Durham Regions... These

areas of hydrological significance incorporated into the Greenbelt function together with other hydrologic features and areas both within the Greenbelt and within the remainder of the watersheds that extends outside of the Greenbelt to form water resource systems.”
(underline by the writer).

Comment

The Project is proposed within a hydrologically significant portion of the Ontario Greenbelt's Natural Heritage System which raises concern with respect to potential adverse impacts to surface/ groundwater resources and to aquatic and terrestrial ecosystems, resulting from an Aerodrome use and associated activities.

Based on Features mapping provided by the Lake Simcoe Region Conservation Authority (LSRCA) (refer to Attachments 3 and 4), a significant portion of the Project (the access road and services and utilities, stormwater management pond, maintenance building, aviation fuel area, utility building, supporting flying clubhouse/administration building), appears to be located either in close proximity to or within, a Provincially Significant Wetland, other Evaluated and Unevaluated Wetlands, or within the adjacent lands to a regulated wetland.

As such, the Project conflicts with the GBP's intent and policies aimed at protecting and enhancing key natural heritage and key hydrologic features, and to maintain a NHS that provides a continuous and permanent land base that needs to be managed as a connected and integrated system. This Project would appear to have the opposite effect in that it proposes to remove ecologically sensitive lands and locate development that would disconnect features and linkages and thereby disrupt the overall continuity of the Natural System in the area.

York Region Official Plan (2010)

The Subject Lands are located within the Greenbelt Protected Countryside, Regional Greenlands System and Agricultural Area within the York Region Official Plan. The proposal is within 120 meters of a Life Science Area of Natural and Scientific Interest (ANSI), and the lands contain Provincially Significant / Provincial Plan Area Wetlands, a Significant Groundwater Recharge Area (SGRA), and Highly Vulnerable Aquifers (HVA), as well as woodlands.

York Region staff have provided written comments (refer to Attachment 5) on this major development proposal. These comments note the lack of pre-consultation, the absence of supporting information with respect to potential impacts to significant environmental features and the agricultural area, and no demonstrated benefit of the proposal to the community.

Town of Georgina Official Plan (2016)

Section 2.1 of the Official Plan provides the following Vision for the Town:

“To be a well-balanced and vibrant community that preserves and protects Georgina’s natural environment and rural character, while providing for a high quality of life, growth and economic development in a sustainable manner.”

Section 2.2.3- Natural Environment Guiding Principle, reads as follows:

“The preservation, protection, enhancement and support of the natural heritage and hydrologic features, functions, attributes and interconnections of the natural environment is essential in order to maintain a sustainable ecosystem, not only to provide a healthy environment, but also as an important component of the Town’s economic and community health; and to preserve the visual landscape in Georgina, for this and future generations”

Section 2.2.10 Rural and Agricultural Areas Guiding Principle, reads as follow:

“To preserve, protect and support a permanent, healthy, sustainable Countryside Area and agricultural industry in the Town of Georgina, not only for the production of food and other products, but also as an important component of the Town’s economic base, a source of employment and a basis for Georgina’s rural community way of life”.

The subject properties are designated a combination of Agricultural Protection Area (APA) and Environmental Protection Area (EPA) in the Town’s Official Plan. All of the subject properties are subject to the Greenlands System Overlay (refer to Attachment 6).

The intent of the APA designation is to protect prime agricultural areas for long-term agricultural use. The intent of the EPA designation is to protect lands that contain environmental features and their buffers.

The Greenland System overlay reflects the boundaries of the Natural Heritage System as defined in the GBP. The Greenlands System includes key natural heritage and hydrological features, their buffers, and linkages between features.

Schedule B3 - Source Water Protection Areas shows a portion of the Subject Lands is located within a Significant Groundwater Recharge Area, Ecologically Significant Groundwater Recharge Area, and Highly Vulnerable Aquifer (refer to Attachment 7).

Schedule C - Natural Hazards shows a portion of the Subject Lands, specifically the areas surrounding the southern watercourse, are hazard lands (refer to Attachment 8).

In Section 9.2.6.2- Airports and Aerodrome, it states that “the Town shall not be supportive of airports and aerodrome facilities being located within the Environmental Protection Area designation or in locations that would result in land use conflicts with surrounding uses.”

Comment

The Project does not comply with the Town of Georgina’s Official Plan. It is contrary to, or in conflict with, the Official Plan’s Vision statement, the Natural Heritage Guiding Principle, the Rural and Agricultural Areas Guiding Principle, the Agricultural Area designation and Environmental Protection Area designation policies, and the Airports and Aerodrome policies.

Town of Georgina Zoning By-law

Section 2.9 of the Zoning By-law defines an ‘airport’ as follows:

“means an Aerodrome as defined herein, for which an Airport Certificate has been issued under Part III of the Air Regulations, C.R.C.C.2.”

The Subject Lands are zoned Rural (RU) in the Town’s comprehensive Zoning By-law No. 500.

An Aerodrome (private) is a permitted use in the RU zone. Section 28.4 specifies that no person shall develop an aerodrome except in accordance with the following provisions:

- No lot having less area than 20 hectares shall be used for a private aerodrome;
- No person shall maintain or store more than two aircraft on any lot;
- One accessory building for the purpose of parking or storing an aircraft shall be permitted on a lot, but shall be located not less than 3 meters from any building used for residential purposes;
- No runway, hanger, or parking/storage of aircraft shall be located closer than 180 meters to any residential dwelling located on an adjacent lot, nor 100 meters to any lot line; and,
- No person shall use any land or erect, alter or use any building or structure for the purposes of facilitating or permitting the arrival, departure, movement, servicing or storage of ultra-light aircraft.

Comment

A private Aerodrome has been a permitted use within the Town’s Zoning By-law since at least when the initial comprehensive Zoning By-law No. 911 was adopted in 1977. However, the specific zoning provisions governing the construction and use of a private Aerodrome are quite restrictive. In staff’s view, these provisions were and still are intended to allow such a use in a relatively small or limited form, to help ensure compatibility within the surrounding landscape.

As previously noted, no supporting materials have been provided to the Town with respect to the proposed Aerodrome. Staff have insufficient information on the proposal to determine if it complies with all sections of Zoning By-law No. 500 (number or nature of aircraft to be stored and serviced, number of primary and accessory buildings, required setbacks). Staff do note that the Subject Lands are of sufficient size to permit a private Aerodrome in accordance with Section 28.4 of the Zoning By-law as noted in the chart below.

Property Address	Property size (hectares)
7818 Old Homestead Road	101.17
7486 Old Homestead Road	40.47
Total	141.64

Based on the limited information provided, it would appear that the proposed Aerodrome is of a much larger size and scale such that it would not comply with all of the requirements of Section 28.4, and hence would not be in compliance with Zoning By-law No. 500.

Concluding Comment

The Project is proposed to be located in the heart of Georgina's Greenlands System, partially within, and largely surrounded by, provincially significant wetlands and significant woodlands. The site and surrounding area serves a provincially significant hydrological function as a groundwater recharge area and highly vulnerable aquifer, as noted by York Region and as shown on the provided LSRCA mapping.

Based upon Provincial, Regional, and local planning policy, and without any detailed information on the Aerodrome proposal, Staff are of the opinion that the Subject Lands are not an appropriate location for the proposed Project, both from an environmental perspective and that of maintaining the rural character and visual landscape in this part of Georgina, which needs to be protected for current residents and future generations.