

HUMPHRIES PLANNING GROUP INC.

FOUNDED IN 2003

December 3, 2022

HPGI File: 22829

Ministry of Municipal Affairs and Housing
Municipal Services Office - Central Ontario
777 Bay Street
Toronto, ON
M7A 2J3

**Re: Proposed Amendments to the Greenbelt Area Boundary Regulation
11840 Keele Street, City of Vaughan
100032319 Ontario Inc.**

Humphries Planning Group Inc. (HPGI) represents 100032319 Ontario Inc., the registered owner of the property located at 11840 Keele Street in the City of Vaughan (the "Subject Property"). This correspondence formally requests consideration for removal of the Subject Property from the "Natural Linkage Area" of the Oak Ridges Moraine Conservation Plan Area in order to permit a to a greater range and mix of uses, including employment, industrial and commercial, as part of the Province of Ontario's proposed amendments to the Greenbelt Plan and Oak Ridges Moraine Conservation Plan (*O. Reg. 140/02*).

Property Description

The Subject Property is located along the west side of Keele Street, north of Kirby Road. The site has an area of approximately 2.34 Hectares (5.78 acres) and a frontage of approximately 173 metres along Keele Street. The Subject Site is currently developed with an industrial storage warehouse building with associated ancillary office, gravel parking area, as well as a commercial landscape operation with associated outdoor storage of various materials, machinery, implements and equipment. The site does not contain any natural heritage features or systems and do not form part of a contiguous linkage area.

Surrounding land uses include commercial and industrial land uses to the south, including a boating showroom and accessory service and repair shop, as well as a retail nursery and nursery services. The site is further bounded by the railway corridor to the west, Keele Street to the east, and rural areas to the north.

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Land Use

The Subject Property is identified as being located in the Natural Linkage Area in accordance with the Oak Ridges Moraine Conservation Plan Area. Natural Linkage Areas protect critical natural and open space linkages between the Natural Core Areas and along rivers and streams. Permitted use only include existing uses, agricultural uses and very restricted new resource management, low intensity recreational, home businesses, and infrastructure uses, plus some aggregate resource operations.

Discussion

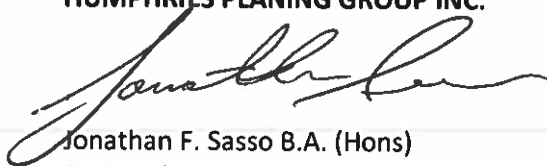
The existing policy framework provides for limited land use opportunities including uses reflective of the existing operations and only permits for agricultural and related type uses. There are many considerations that hinder the potential of a successful farm or agricultural operation on the Subject Property. The site is previously developed and is further fragmented to the larger agricultural area by the rail corridor, existing non-agricultural uses in the surrounding area (which contribute to lower capability for agriculture production), as well as their close proximity to urban development and the south-east corner of Keele Street and Kirby Road. As such, the Subject Property does not provide for a continuous, productive or permanent agricultural land base. Additionally, the site does not contain any natural features and it is unclear how the site has been evaluated and identified as forming part of the critical natural and open space linkages

between the natural core areas. Therefore, it is our opinion that the subject lands should be removed from the ORMCP area in order to permit a to a greater range and mix of uses, including existing employment, industrial and commercial.

We look forward to continuing to work with Provincial staff through the review and amendment process to ensure the evolving policy framework is flexible enough to accommodate the detailed technical studies and delineation of natural feature boundaries to accurately reflect the situation on the ground.

Yours truly,

HUMPHRIES PLANING GROUP INC.

A handwritten signature in black ink, appearing to read 'Jonathan F. Sasso', written over a horizontal line.

Jonathan F. Sasso B.A. (Hons)
Senior Planner

cc: 100032319 Ontario Inc