



White Owl Properties Limited

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December 2, 2022

Environmental Registry of Ontario

Submitted by Email to greenbeltconsultation@ontario.ca and <https://ero.ontario.ca/>

**Re: ERO Postings 019-6216, 019-6217 and 019-6218
Bloomington Aggregates Site, Town of Richmond Hill**

Please accept this comment and proposal with respect to the policy initiatives outlined in ERO Postings 019-6216, 019-6217 and 019-6218.

White Owl Properties Limited supports these policy initiatives to help address the existing and future housing needs of the Province. We offer for the government's consideration, as outlined below, an additional parcel of land in the Oak Ridges Moraine that we believe meets the applicable criteria. We are not proposing removal of any lands from the Greenbelt. Rather, similar to proposed modifications in Map 1 in the above-noted Registry postings concerning another parcel of land in York Region, we are simply proposing that approximately 160 acres of land in Richmond Hill currently designated Countryside Area in the Oak Ridges Moraine Conservation Plan (ORMCP), be redesignated as Settlement Area. Our proposal also offers to make available for conservation purposes three additional parcels of land in the Oak Ridges Moraine as further discussed below.

Background

White Owl Properties Limited is the real estate arm of the White Owl Family Office Group. The Family Office was established to manage the assets held by the Carrick and McArthur families including several companies active in delivering major infrastructure works to various levels of government across Canada. Among these companies are McAsphalt Industries Limited, Miller Paving Limited, Miller Aggregates, Miller Cement and Miller Concrete. Since the sale of these companies to Colas Canada Inc. in 2018, the Family Office has managed assets appropriately allocated among private equity, publicly traded investments, and real properties.

On the private equity side White Owl currently holds in addition to outright ownership of Miller Waste Systems Inc. and Miller Transit Limited, majority and minority positions in operating companies covering building products, environmental and waste management, logistics, industrial manufacturing, and financial technology services, serving markets in Canada and the United States.

White Owl, with its investment managers, controls a large and diversified portfolio of public and private equity and debt positions, through funds and funds-of-funds investing in Canadian and U.S companies. Investments are in diversified sectors and include both growth and value-oriented enterprises at various stages of their business and financial life cycles.

The White Owl real estate portfolio consists of (a) a significant number of owned, unlevered, developed and undeveloped properties, (b) several industrial, and commercial income producing buildings and

sites under development, and (c) multiple partnerships in the development of low/high density rental and condominium residential buildings. Most properties are in Ontario, Manitoba and Atlantic Canada.

The White Owl real estate team possesses the capabilities to allow focus on multiple projects at one time. The group has significant in-house capability, including planning, development, and construction resources, at both the corporate level and in the operating companies to assist where necessary to deliver successful projects on time and on budget.

Lands Proposed for Settlement Area Redesignation

White Owl owns a parcel of approximately 400 acres located in the Town of Richmond Hill. The subject land is referred to herein as the “Bloomington Aggregates” site. As depicted below in Figure 1, current uses on Bloomington Aggregates include an asphalt plant, a municipal waste composting facility operated by Miller Waste under contract to York Region and a public golf course (Bloomington Downs). More than one third of the Bloomington Aggregates site (153 acres) is also the subject of a currently unused but valid permit under the *Aggregate Resources Act* for aggregate extraction. Roughly 3 million tonnes of reserves are contained in the licenced area with a permitted annual extraction limit of 100,000 tonnes. The permit is grandfathered under the *Oak Ridges Moraine Conservation Act*.

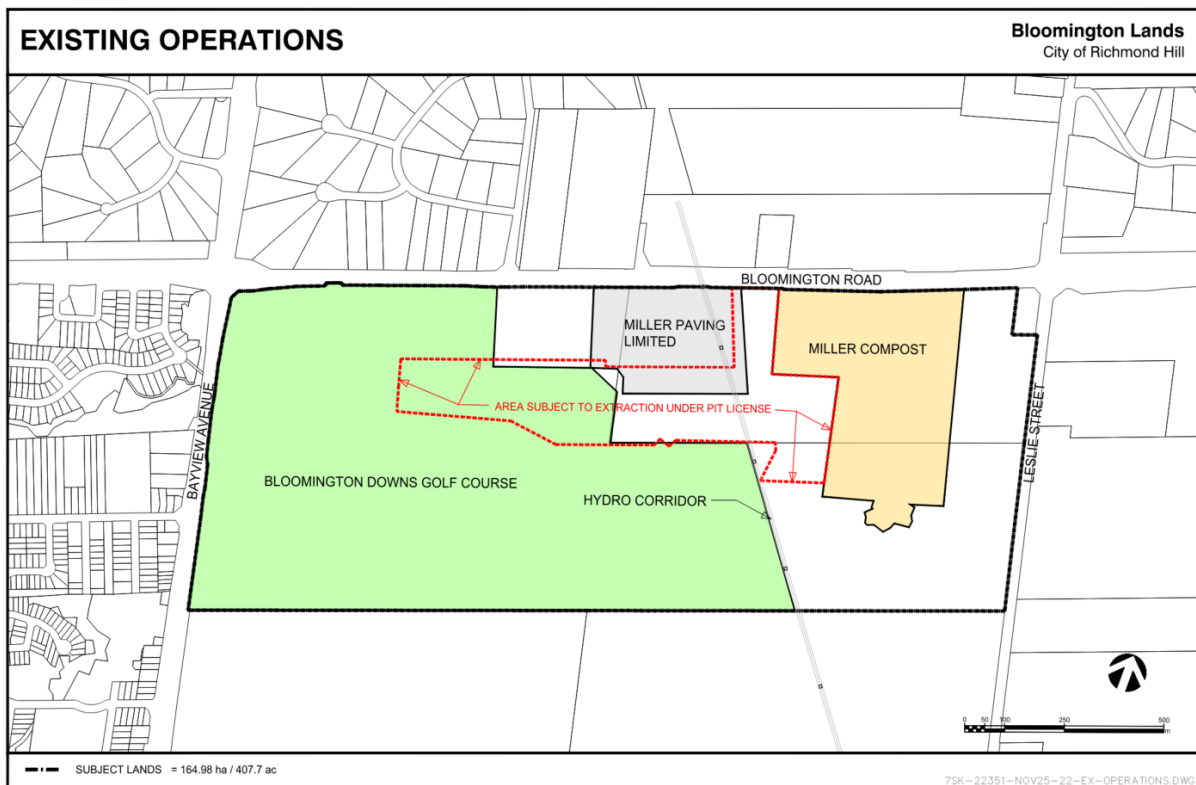


Figure 1 - Existing Operations

Surrounding Land Uses

As depicted in Figure 2 below, the Bloomington Aggregates site is surrounded on the west and north by existing residential development. Of note, the Bloomington Aggregates site itself was also proposed for residential development pursuant to OPA 200 of the Town of Richmond Hill until the *Oak Ridges Moraine Conservation Act* was passed in 2001. There is a relatively new GO Station just to the east of the site at Bloomington Rd and Highway 404.

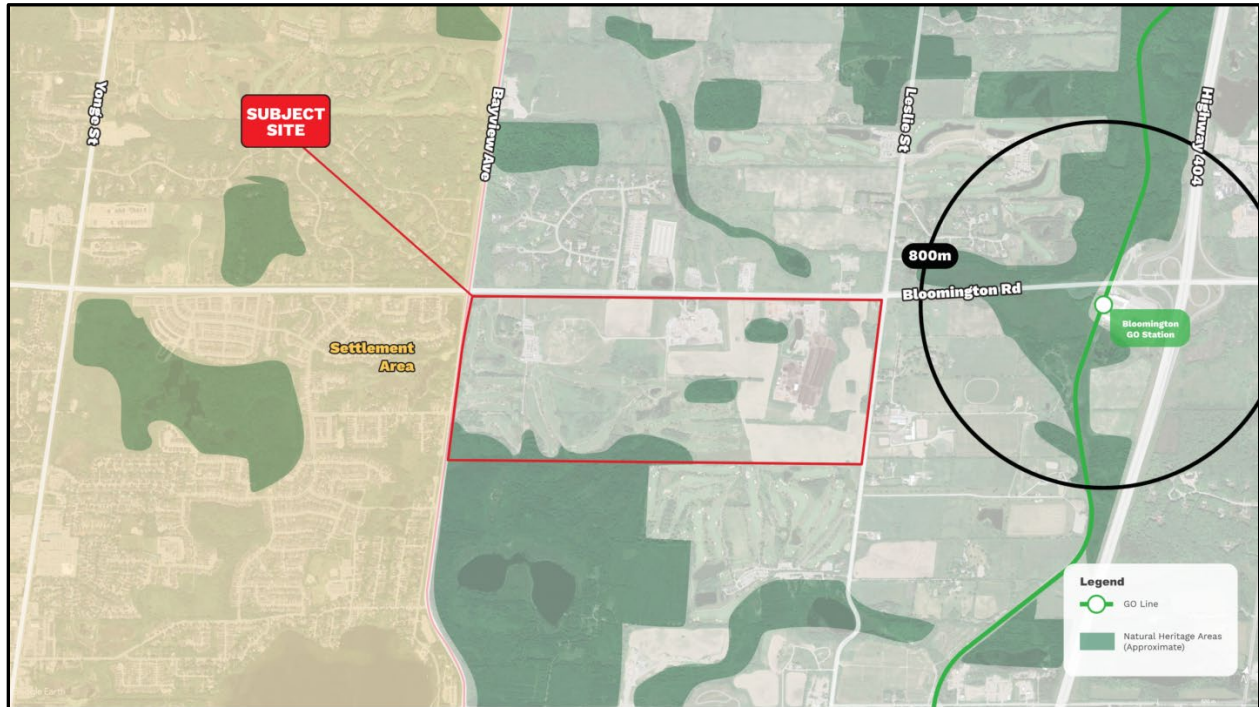


Figure 2 - Area Context

Planning Rationale

As further elaborated on in the Planning Rationale document attached to this submission as Appendix A, redesignation of the portion of the Bloomington Aggregates site currently designated Countryside Area under the ORMCP to Settlement Area is a logical and easily defensible decision, which we respectfully request be considered, for the following reasons:

- The site was previously designated for residential use pursuant to OPA 200 of the Town of Richmond Hill, prior to the *Oak Ridges Moraine Conservation Act* being passed. With Council and Town Planning staff support to bring lands including this site within the urban area, this matter was referred to the former Ontario Municipal Board and the Town's intent to allow for residential development for the Bloomington Aggregates site was not carried forward once the Oak Ridges Moraine Conservation Plan and Act came into effect.
- The Bloomington Aggregates site is contiguous to significant existing residential development to the immediate west and north of the site

- The majority of the existing permitted uses on the Bloomington Aggregates site (asphalt plant, municipal compost operation and unopened aggregate extraction site) are to a significant degree incompatible with the surrounding existing residential land uses. In addition, the permitted aggregate extraction site would remove/impact some Natural Core Areas under the ORMCP. Redesignation of the Bloomington Aggregates Countryside Area to Settlement Area, as outlined in this proposal, would preserve some of those Natural Core Areas
- As depicted in the map above a new GO Station is proximate to the east of the Bloomington Aggregates site
- The existing road network provides ready and quick access including to Highway 404 to the east and no material changes are required

There are existing regional and municipal water servicing options in the vicinity, as well as feasible connections to the York-Durham Sewage System. White Owl has the resources to move quickly to secure necessary approvals, undertake the subdivision design including servicing connections, and begin construction as soon as approvals are granted. Redesignation under the ORMCP supports Provincial interests in providing additional housing, with water and wastewater servicing connectivity, while designated Natural Core and Natural Linkage Areas are enhanced and protected. Redesignation also supports the Province’s initiatives under Bill 23, *More Homes Built Faster Act*.

Potential Residential Yield

A high-level concept plan showing the residential development potential of the Bloomington Aggregates site is shown below in Figure 3.

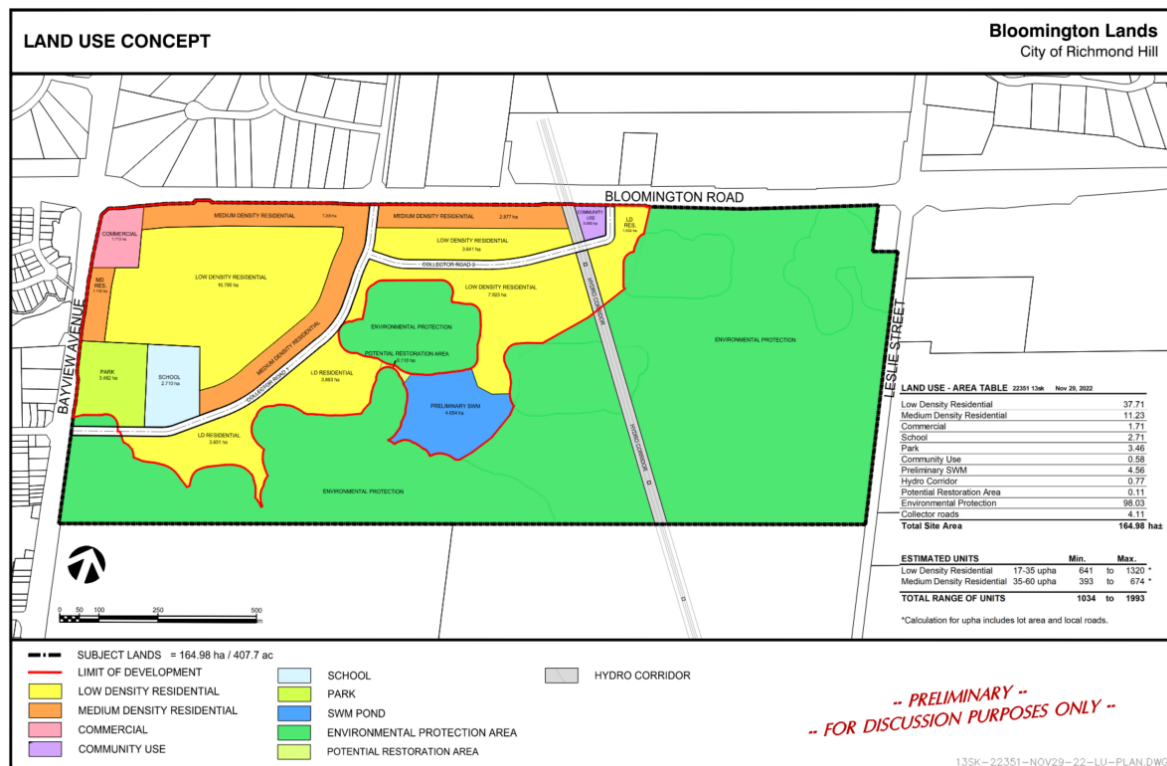


Figure 3 - Residential Development Concept

Oak Ridges Moraine Considerations

Outlined in the attached summary as Appendix B from GEI Consultants and shown below in Figure 4, the Bloomington Aggregates site is comprised of areas currently designated Countryside, Linkage and Natural Core under the ORMCP. A more detailed Feasibility Review report uploaded with this letter as a separate Appendix B-1, indicates that the Linkage portion of the site does not, in fact, function as an ecological link to any material degree. We are, notwithstanding, currently proposing that of the 400-acre Bloomington Aggregates site, 160 acres of the site designated Countryside, be redesignated as Settlement Area. Whether ancillary recreational or open space uses that would support the residential component of the site could be placed in the Linkage portions of the Bloomington Aggregates site is something we would discuss with the Town of Richmond Hill/York Region.

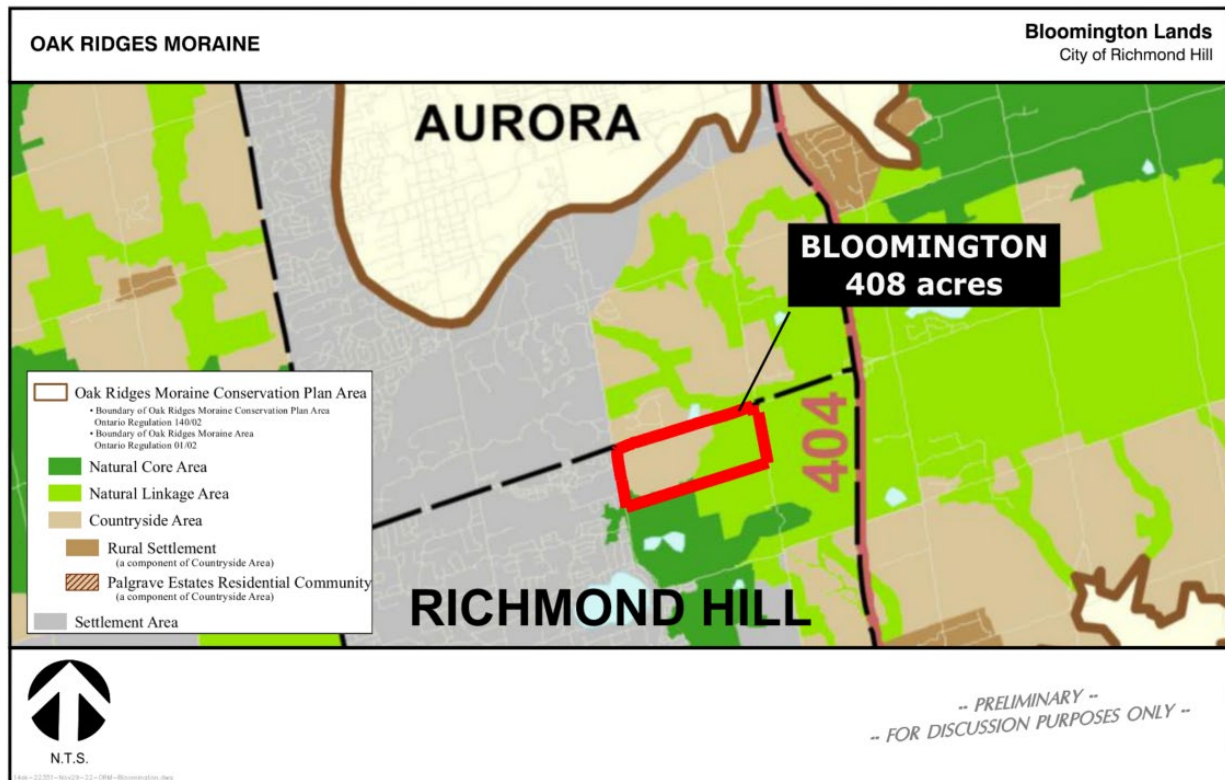


Figure 4 - ORM Designations: Countryside Area, Natural Linkage Area, Natural Core Area. Countryside Area representing 160 acres.

Surplus Additional Oak Ridges Moraine Lands Proposed for Dedication as Conservation Lands

White Owl controls certain additional lands in Uxbridge, referred to as the Boyington Lands, that are part of the ORMCP Area and depicted in Figure 5. As part of this proposal, and assuming this is of interest to the government, White Owl is proposing to either donate these lands for conservation purposes to an organization such as the Nature Conservancy or to make them subject to a conservation easement in favour of an organization such as the Oak Ridges Moraine Land Trust.

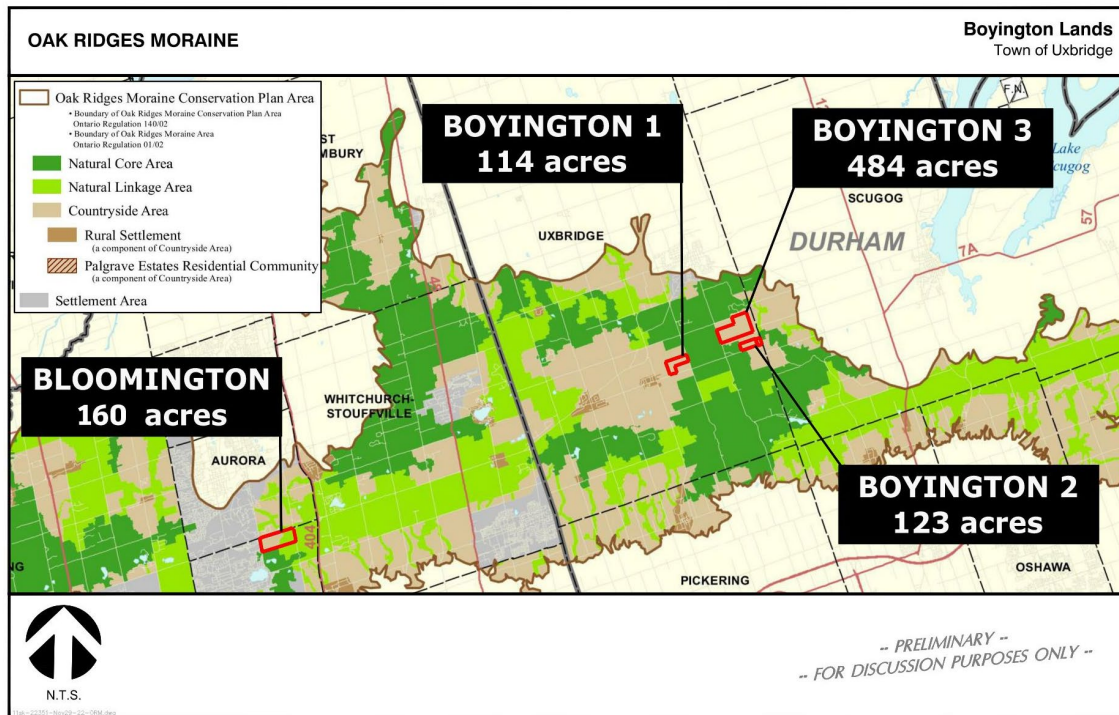


Figure 5 - Uxbridge Boyington Lands of approx. 720 acres. Redesignation of 160 acres out of 408 acres on Bloomington Aggregates Site

Concluding Comments

We believe that the Bloomington Aggregates site offers an excellent and ideal opportunity for the Province to expand the lands available for residential use within the Greater Toronto Area without the controversy associated with removal of lands from the Greenbelt:

- The policy action requested is a straightforward redesignation of a portion of the site that is 160 acres of lands, from Countryside to Settlement, as is already proposed for the King Township parcel, also in York Region, that is part of the lands set out in Map 1 of ERO postings 019-6216/7. The Bloomington Aggregates site would remain in its entirety part of the ORMCP Area. This policy action would also restore the land use determined for the site by Richmond Hill OPA 200 prior to the passage of the *Oak Ridges Moraine Conservation Act*;
- The urban boundary within Richmond Hill sits at the site's west property line on Bayview Avenue. The Bloomington Aggregates site is also adjacent to areas in Richmond Hill already designated and developed for residential purposes;
- The Bloomington Aggregates site is in close proximity to major water and wastewater servicing connections;
- Redesignation to Settlement Area and development would eliminate the possibility for the extraction of aggregates from the site preserving the integrity of the Natural Linkage and Natural Core Areas, and eliminating operations that are incompatible with the surrounding communities;

- Furthermore, future development on the Bloomington Aggregates site could result in the relocation of the asphalt plant and compost facility, further enhancing the natural environment;
- The Boyington Lands in Uxbridge, and within the Oak Ridges Moraine, cover 720 acres and can be protected through our donation for conservation purposes, or through a conservation easement; and,
- White Owl has the resources to expeditiously effect the delivery of developable land, and to provide 1,000 – 2,000 residential units to meet the growing demand for diversified housing.

We thank you for the opportunity to comment on these proposals and look forward to further discussing our submission.

Yours very truly,



Larry Repar
President, White Owl Properties Limited

Encl: Appendix A – Planning Rationale
Appendix B – Executive Summary – Natural Environmental Evaluation, GEI Consultants
Appendix B-1 – Detailed Investigative Report, GEI Consultants (separate document)

PLANNING RATIONALE- BLOOMINGTON AGGREGATES SITE

**Re: Oak Ridges Moraine Conservation Plan – Partial Redesignation
13152 Bloomington Road Richmond Hill, ON**

This letter has been prepared in support of a request by White Owl to redesignate a portion of their lands in the Oak Ridges Moraine Conservation Plan (“ORMCP”) area, located at 13512 Bloomington Road East on the south side of Bloomington Road between Bayview Avenue and Leslie Street in the City of Richmond Hill (the “subject site” or the “site”), refer to **Figure 1**. The subject site, which is approximately 165.3 hectares (408.5 acres) in size, is currently used for a golf course, asphalt plant and composting facility. Environmental features are located throughout the southern and eastern portions of the site. The central portion of the site is subject to a license for aggregate extraction.

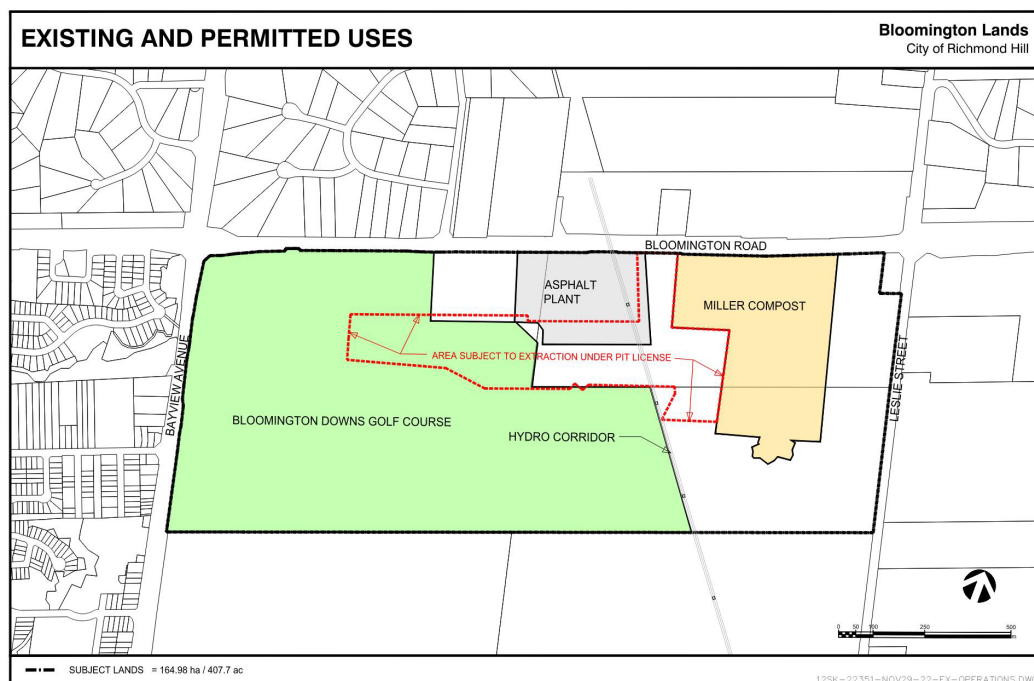


Figure 1. Subject Site

White Owl’s request is to redesignate only the western part of the site that is currently designated in the ORMCP as Countryside to Settlement Area. The request is not to remove the lands from the ORMCP, only to redesignate the lands. The lands are also located in the Greenbelt Plan area and would remain as such. A concept plan, described below, has been prepared to demonstrate how the western portion of the site could be developed while the lands designation ORM *Natural Core Areas* and *Natural Linkage Areas* would be retained.

The following includes a summary of how the redesignation supports provincial interests, including those outlined in Section 2 of the *Planning Act* and recent direction from the Province to provide more housing more quickly as set out in Bill 23, *More Homes Built Faster Act*.

Site and Surroundings

The subject site is located on the south side of Bloomington Road between Bayview Avenue and Leslie Street. The lands are currently used for a variety of uses including:

- The Bloomington Downs Golf Course, an 18-hole course with driving range, that covers most of the western half of the subject site
- An asphalt plant, located on Bloomington Road, mid-way between Bayview Avenue and Leslie Street
- A waste compost facility located on the eastern part of the site
- An easement for a hydro corridor
- Natural areas

The immediate surroundings, all of which are located in the Oak Ridges Moraine area are comprised of a mix of uses within the four designations of the ORMCP, as shown on **Figure 2**. Directly west and southwest, across Bayview Avenue is low density residential development that is included in the ORMCP Settlement Area designation. Much of this development was constructed following the introduction of the ORMCP. To the northwest of the subject site, north of Bloomington Road on the west side of Bayview Avenue, is an existing low density residential development with executive sized lots in the Town of Aurora. There is similar development on the northeast corner of Bloomington Road and Bayview Avenue. Adjacent to this low density neighbourhood is an auto recycling facility (1030 Bloomington Road) and a self-storage facility (1082 Bloomington Road). Further west on the north side of Bloomington Road is a crane storage facility and a truck storage yard. Northeast of the site is a low density large lot residential neighbourhood with a golf course further to the north. Directly east of the site is an equestrian farm with polo facilities. To the southeast, is farmland and to the south on the east side of the site, is another golf course. Further south, on the north side of Bethesda Road west of Leslie Street are two cemeteries. At the northeast corner of Bayview Avenue and Bethesda Road is Lake St. George and the Lake St. George Field Centre.

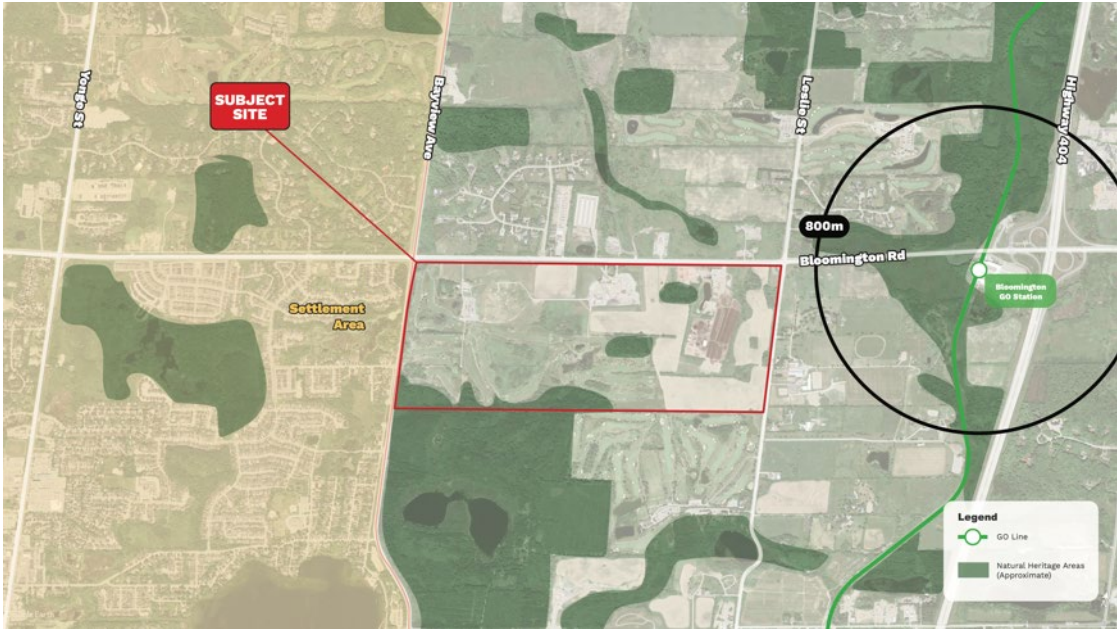


Figure 2. Surrounding Context

Summary of Applicable Policy and Regulatory Context

Planning Act

Section 2 lists the matters of provincial interest that the Minister, the council of a municipality, and the Ontario Land Tribunal shall have regard to when carrying out their responsibilities under the *Planning Act*, such as:

- protection of ecological systems
- protection of agricultural resources
- conservation and management of natural resources and mineral resource base
- conservation of features of architectural, cultural, archaeological, historical or scientific interest
- supply, efficient use and conservation of energy and water
- adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems
- minimization of waste
- orderly development of safe and healthy communities
- accessibility for persons with disabilities
- adequate provision and distribution of educational, health, social and recreational facilities
- adequate provision of a full range of housing, including affordable housing
- adequate provision of employment opportunities

- protection of financial and economic well-being of the Province and its municipalities
- co-ordination of planning activities of public bodies
- resolution of planning conflicts involving public and private interests
- protection of public health and safety
- appropriate location of growth and development
- promotion of development that is designed to be sustainable
- proposed of built form that is well-designed, encourages a sense of place and provide high quality public spaces
- mitigation of greenhouse gas emissions

While the matters of Provincial Interest are broad, the emphasis on the need for more housing, quickly, was reinforced in Bill 23, *More Homes Built Faster Act*.

Greenbelt Plan, 2017

As discussed, the subject site is located within the Greenbelt Plan area, However, Policy 2.1 of the Greenbelt Plan provides that the requirements of the ORMCP (Ontario Regulation 140/02), made under the Oak Ridges Moraine Conservation Act, 2001, continue to apply and the Protected Countryside policies of the Greenbelt Plan do not apply, with the exception of section 3.3.

Section 3.3 of the Greenbelt Plan provides policies relating to Parkland, Open Space, and Trails, among other things, encouraging the development of new public parks, conservation areas, and trail systems throughout the Greenbelt area, promoting the good stewardship of these areas, and requiring municipalities to develop parks, open space, and trail strategies.

In this regard, although the site is located in the Greenbelt Plan area, other than the policies regarding parkland, open space and trails, the policies of this Plan do not apply.

Oak Ridges Moraine Conservation Plan, 2017

Part II of the Oak Ridges Moraine Conservation Plan provides policies relating to land uses, which are identified on the *Oak Ridges Moraine Conservation Plan Land Use Designation Map*. The subject site is identified as having three land use designations within the ORMCP, *Natural Core Areas*, *Natural Linkage Areas*, and *Countryside Areas* (See **Figure 3**).

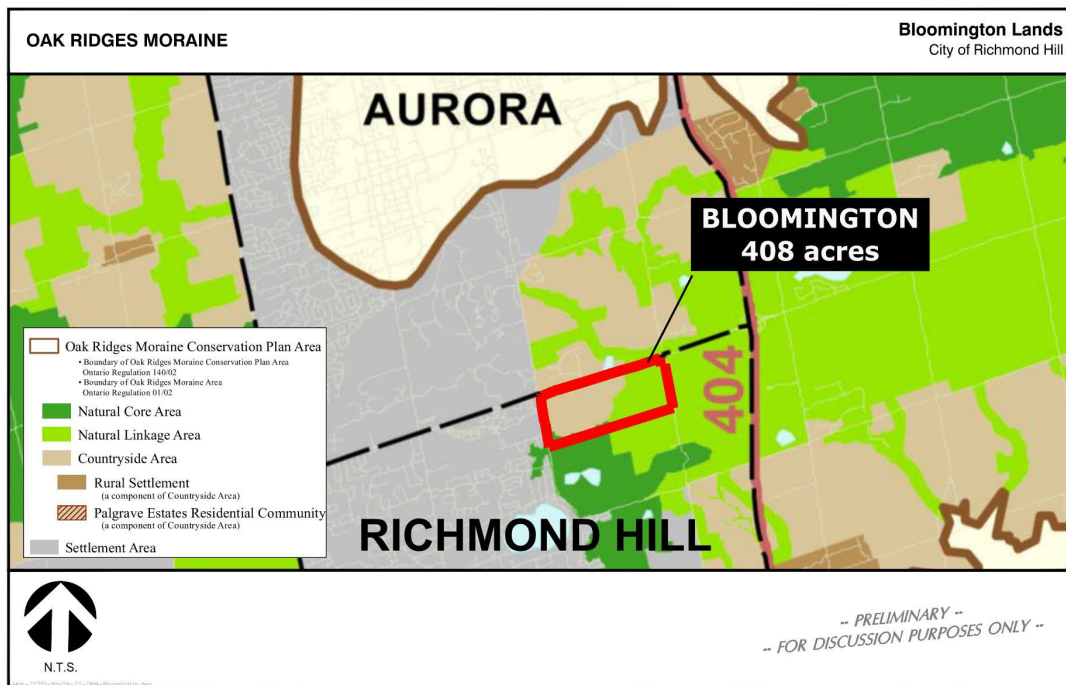


Figure 3. Oak Ridges Moraine Conservation Plan Land Use Designation Map

Policy 10(1) of the ORMCP provides a summary regarding the four land use designations within the plan: Natural Core Areas, Natural Linkage Areas, Countryside Areas and Settlement Areas. As discussed, all of these designations are on the subject site, excluding Settlement Areas. Natural Core Areas are areas with a high concentration of key natural heritage features, key hydrologic features, ecological functions or landform conservation areas; Natural Linkage Areas are areas forming part of a central corridor system that support or have the potential to support movement of plants and animals among the Natural Core Areas, Natural Linkage Areas, river valleys and stream corridors; and Countryside Areas are areas of rural land use such as agriculture, recreation, residential development, Rural Settlements, mineral aggregate operations, parks and open space. Settlement Areas are designated for development of an urban type and permit a range of residential, commercial, industrial and institutional uses.

Policy 10(2) of the ORMCP provides that when municipalities integrate the land use designations into their Official Plans, the land use designation areas may be further refined in general accordance with the ORMCP but with greater detail than can be shown on the *ORMCP Land Use Schedule*. Policy 10(3) provides that the further

definition of the designation's boundaries does not require an amendment to the ORMCP. Policy 10(4) provides that the outer boundary of the ORM plan area shall not be further defined under section 10(2).

Natural Core Areas

Section 11 of the ORMCP provides policies relating to Natural Core Areas. Policy 11(1) provides that the purpose of Natural Core Areas is to maintain and where possible improve or restore the ecological integrity of the Plan Area, by:

- maintaining, and where possible improving or restoring, the health, diversity, size, and connectivity of key natural heritage features, key hydrologic features and the related ecological functions;
- maintaining or restoring natural self-sustaining vegetation and wildlife habitat;
- maintaining the quantity and quality of groundwater and surface water;
- maintaining groundwater recharge; maintaining natural stream form and flow characteristics;
- protecting landform features; and
- protecting and restoring natural areas and features that sequester carbon and provide ecological functions, including water storage, to help reduce the impacts of climate change.

Policy 11(2) further provide that Natural Core Areas have the objectives of accommodating a trail system through the Plan Area, conserving cultural heritage resources, and providing for limited economic development that is compatible with the policies of 11(1) and 11(2).

Permitted uses Natural Core Areas are regulated through policy 11(3). Permitted uses include: fish, wildlife, and forest management uses, conservation projects and flood and erosion control projects, agricultural uses, infrastructure uses, home businesses, home industries, bed and breakfast establishments, on-farm diversified uses and agriculture-related uses (when located in prime agricultural areas), low-intensity recreational uses, unserviced parks, and uses accessory to other permitted uses.

Natural Linkage Areas

Section 12 of the ORMCP provides policies relating to Natural Linkage Areas. Policy 12(1) provides that the purpose of Natural Linkage Areas is to maintain, and where

possible improve or restore, the ecological integrity of the Plan Area, and to maintain, and where possible improve or restore, regional-scale open space linkages between Natural Core Areas and along river valleys and stream corridors. This will be achieved by:

- maintaining, and where possible improving or restoring, the health, diversity, size, and connectivity of key heritage features, key hydrologic features and the related ecological functions;
- maintaining, and where possible improving or restoring natural self-sustaining vegetation over large parts of the area to facilitate movement of plants and animals;
- maintaining a natural continuous east-west connection and additional connections to river valleys and streams north and south of the Plan Area;
- maintaining the quantity and quality of groundwater and surface water;
- maintaining groundwater recharge;
- maintaining natural stream form and flow characteristics;
- protecting landform features; and
- protecting and restoring natural areas and features that sequester carbon and provide ecological functions, including water storage, to help reduce the impacts of climate change.

Policy 12(2) additionally provides that Natural Linkage Areas will also have the objectives of accommodating a trail system, conserving cultural heritage resources, contributing to a regional network of green infrastructure, and providing for limited economic development that is compatible with the objectives set out in polices 12(1) and 12(2).

Permitted uses Natural Linkage Areas are regulated through policy 12(3). Permitted uses include: fish, wildlife, and forest management uses, conservation projects and flood and erosion control projects, agricultural uses, infrastructure uses, home businesses, home industries, bed and breakfast establishments, on-farm diversified uses and agriculture-related uses (when located in prime agricultural areas), low-intensity recreational uses, unserviced parks, mineral aggregate operations, wayside pits, and uses accessory to other permitted uses.

Policy 12(2) additionally provides that Natural Linkage Areas will also have the objectives of:

- maintaining, and where possible improving or restoring the ecological integrity of the Plan Area;
- maintaining, and where possible improving or restoring, the health, diversity, size, and connectivity of key natural heritage features, key hydrologic features and the related ecological functions;
- maintaining the quantity and quality of groundwater and surface water;
- maintaining groundwater recharge;
- maintaining natural stream form and flow characteristics;
- protecting landform features;
- accommodating a trail system through the Plan Area and trail connections to it;
- conserving cultural heritage resources; and
- providing for limited economic development that is compatible with the objectives set out in polices 12(1) and 12(2).

Permitted uses Natural Linkage Areas are regulated through policy 12(3). Permitted uses include: fish, wildlife, and forest management uses, conservation projects and flood and erosion control projects, agricultural uses, infrastructure uses, home businesses, home industries, bed and breakfast establishments, on-farm diversified uses and agriculture-related uses (when located in prime agricultural areas), low-intensity recreational uses, unserviced parks, mineral aggregate operations, wayside pits, small-scale commercial, industrial, and institutional uses as described in section 40 and subject to policy 13(5), major recreational uses as described in section 38 and subject to policy 13(5); Residential development in accordance with section 14, and uses accessory to other permitted uses.

Countryside Areas

Section 13 of the ORMCP provides policies relating to Countryside Areas. Policy 13(1) provides that the purpose of Countryside Areas is to encourage agricultural and other rural uses that support the Plan's objectives. This will be achieved by:

- protecting prime agricultural areas;
- promoting and protecting agricultural and other rural land uses and normal farm practices;
- maintaining the rural character of the Rural Settlements;

- protecting and restoring natural areas and features that sequester carbon and provide ecological functions, including water storage, to help reduce the impacts of climate change; and
- maintaining existing public service facilities and adapting them, where feasible, to meet the needs of the community.

Policy 13(5) provides that Small-scale commercial, industrial, and institutional uses as well as major recreational uses are prohibited within prime agricultural areas and areas designated primarily for agricultural uses within the applicable official plan.

Section 40 of the ORMCP provides regulations relating to small-scale commercial, industrial, and institutional uses.

Policy 40(1) provides that small-scale commercial, industrial and institutional uses are supportive of, complementary to or essential to uses that are permitted in Countryside Areas under sections 13, 14 and 17; do not require large-scale modification of terrain, vegetation or both or large-scale buildings and structures; and include, but are not limited to, commercial sales or services related to the management or use of resources located in the surrounding area, portable mineral aggregate crushing plants, portable asphalt plants and composting plants, and schools, places of worship, community halls, retirement homes, and cemeteries, intended mainly to serve nearby Rural Settlements within the Plan Area.

Policy 40(2) provides that an application for a small-scale commercial, industrial or institutional use with respect to land in a Countryside Area shall not be approved unless the applicant demonstrates that it is not feasible to locate the use in a settlement area and that the buildings and structures will be planned, designed, and constructed to not impact the rural character of the Countryside Areas and the ecological integrity of the ORMCP area.

Policy 40(5) provides that an application to establish or expand a small-scale commercial, industrial or institutional use shall demonstrate that the new or expanded use will have no adverse impacts on surrounding agricultural operations and lands or that such impacts will be minimized and mitigated to the extent possible.

Policy 38 of the ORMCP provides policies relating to major recreational uses. Major recreational uses are recreational uses that require large-scale modification of terrain, vegetation or both and usually also require large-scale buildings or structures, including

but not limited to golf courses, serviced playing fields, serviced campgrounds, and ski hills. The policy additionally sets out a variety of criteria required for new major recreational uses relating to green infrastructure, water use, and manicured grass areas, and sets out a requirement for new or expanded major recreational uses to provide a vegetation management plan and require that applications demonstrate that the proposed use will be compatible with the natural character of the surrounding areas, will be designed to not conflict with adjacent uses, will have adverse impacts on surrounding agricultural operations, and will maintain and where possible improve or restore the ecological integrity of the ORMCP area.

Settlement Areas

In the Introduction to the ORMCP, Settlement Areas vary significantly in size and population, economic activity, diversity and intensify of uses, the types of services and the role they will play in municipalities. Land use patterns in Settlement Areas will support the development of complete communities.

Section 18 provides policies regarding Settlement Areas including that they will focus on and contain urban growth. Policy 18(1) provides that the purpose of Settlement Areas is to:

- encourage the development of communities that provide residents with convenient access to an appropriate mix of employment, transportation options and local services and a full range of housing and public service facilities;
- minimize encroachment and impact of development on the ecological functions and hydrological features of the Plan area;
- promote efficient use of the land with transit-supportive densities and intensification; and
- provide for the continuation and development of land uses consistent with growth management strategies in applicable official plans.

Policy 18(2) provides that the objective of Settlement Areas is to:

- maintain, improve and restore the health and diversity, size and connectivity of key natural heritage features, key hydrologic features and ecological functions;
- accommodate a trail system;
- promote strong communities, a strong economy and a healthy environment;

- promote the location of compatible public services in one building in places that are accessible to local residents;
- ensure that development reduces greenhouse gas emissions;
- conserves cultural heritage resources;
- ensures the sustainable use of water and resources; and
- provides for economic development.

Policy 18(3) provides that in Settlement Areas, all uses permitted in the by the applicable official plan are permitted subject to the provisions of subsections 19(3) and 31(4).

York Region Official Plan, 2022

York Region's Official Plan was adopted by Regional Council in June 2022 and approved by the Province in November 2022.

In the Regional Structure Map (Map 1), the subject site is included in the Agricultural System with portions also included in the Regional Greenlands System whereas Map 1A of the Region's Official Plan designates the subject site as Rural Area. Map 1C of the Regional Official Plan identifies the ORMCP land use designations with Map 2 identifying the portions of the site in the Natural Core Areas and Natural Linkage Areas in the Regional Greenlands System. Map 3 identifies the southwest corner of the site as an Area of Natural and Scientific Interest. The subject site is located between two existing and planned higher order transit routes: the Bloomington GO Rail station at Highway 404 and Bloomington Road as well as the future Rapid Transit Corridor along Yonge Street.

Policy 3.3.5 provides that major development on the Oak Ridges Moraine is prohibited unless a water budget and water conservation plan is prepared consistent with the applicable watershed plan. The policies of the Regional Official Plan also provide direction on the protection of woodlands, wetlands and other natural features, including those located in the ORMCP and requirements for setbacks from these features. The Regional Official Plan requires that local municipalities integrate landform conservation mapping, in accordance with Map 13 of the Regional Official Plan, requiring disturbance we kept to a minimum. Of note, the subject site is not identified as a landform conversation area on Map 13.

Richmond Hill OP, 2010, as amended

The Richmond Hill Official Plan, 2010, Office Consolidation 2021, was partially approved by the Ontario Municipal Board with some parts of the plan remaining under appeal. This version of the City's Official Plan was approved after the introduction of the Oak Ridges Moraine Conservation Plan through the Oak Ridges Moraine Conservation Act, 2001. Before the ORMCP and the ORM Conservation Act, City (at that time a Town) Council supported a recommendation for an Official Plan Amendment (Official Plan Amendment ("OPA") No. 200 – the Boundary Corridor Amendment) that would bring additional lands into the urban area for additional residential development, including the subject site to be presented to the public in early 2000. Richmond Hill planning staff had supported this direction. At that time, Council referred the matter to the Province as a matter before the former Ontario Municipal Board. This intention by Richmond Hill staff to include the subject site in an area for residential development was not carried forward once the Oak Ridges Moraine Conservation Plan and Act came into effect.

Regarding the City's current Official Plan (2010, Office Consolidation 2021), applicable policies related to the subject site are centred on the inclusion of the site in the ORMCP. The land use designations in the Official Plan are consistent with the designations in the ORMCP. Policies regarding the Oak Ridges Moraine Conservation Plan area are included in the Environment section (3.2) as well as the land use section, including 4.10.1 ORM Natural Core, 4.10.2 ORM Natural Linkage, 4.10.3 ORM Countryside and various sections regarding land uses in the settlement area. The permitted uses in each of these designations are consistent with the permitted uses in the ORMCP for these designations. Lands in the Settlement Area portions of the ORMCP are subject to policies and designations for urban development for residential and non-residential uses.

Requested Redesignation and Preliminary Concept Plan

White Owl's request that part of the western side of the subject site be redesignated to the Settlement Area designation is supported by the technical analysis regarding the lands, planning analysis regarding the appropriateness of the existing designation and Provincial interests to provide more housing.

The redesignation from Countryside Areas to Settlement Areas is supported by supported by technical analysis prepared by GEI that concludes that the lands in the

Countryside Area that are currently used for industrial uses, managed open spaces, cultural meadows and limited agricultural areas do not meet any of the criteria to qualify as a Key Natural Heritage Feature or a Key Hydrologic Feature, subject to more detailed investigations to determine precise boundaries. Further, the GEI study concluded that there were no geotechnical, hydrogeological or geo environmental constraints that should significantly inhibit design and construction above or beyond typical approaches for similar sites.

As discussed, all of the lands would remain in the Oak Ridges Moraine Conservation Plan area and the Greenbelt Plan area. Further, all of the lands in the Natural Core Area designation and the Natural Linkage Area designation would remain in these protected areas. In addition, through GEI’s work, additional natural features that are located outside the Natural Core Area and Natural Linkage Areas have also been identified that could be protected and 30 metre Vegetation Protection Zones are identified for all of these features. These additional natural features could be added to the Natural Core Areas designation thereby increasing the amount of protected natural area on the site. There are additional opportunities to contribute to the protection of natural and hydrologic features in other parts of the Oak Ridges Moraine one other sites owned by White Owl, refer to **Figure 4**.

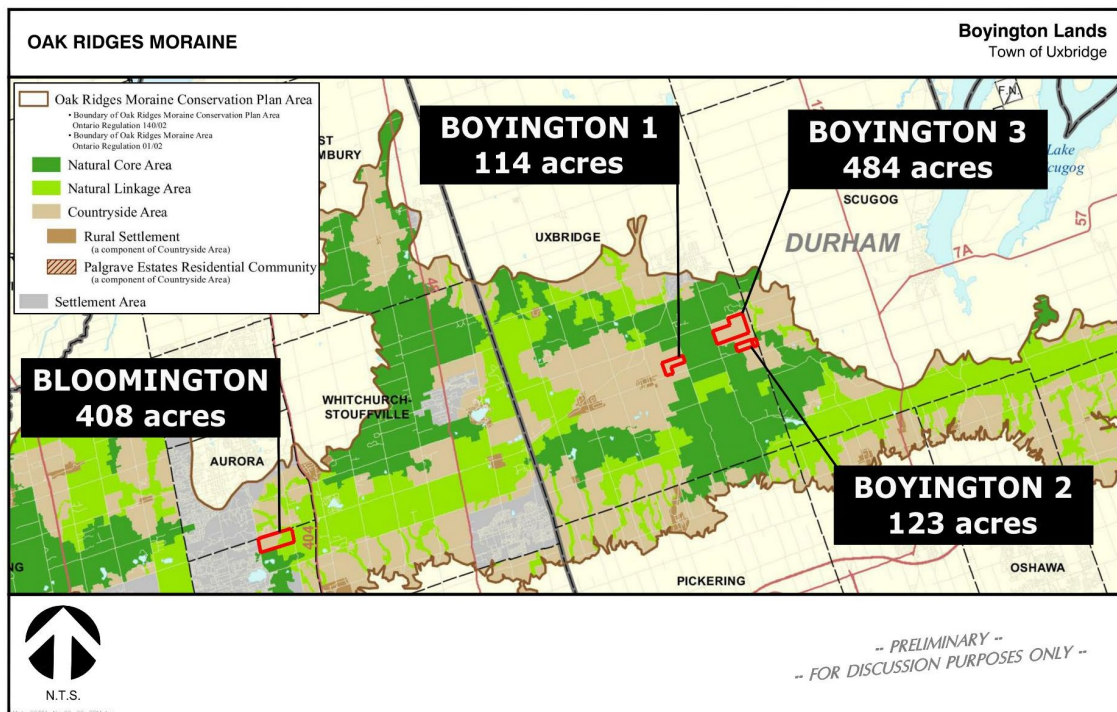


Figure 4. White Owl Lands in ORMCP

In this regard, the requested redesignation is consistent with the ORMCP policies which provide that Settlement Areas are intended to minimize encroachment and impacts on the ecological functions and hydrologic features of the ORMCP. Further, the requested redesignation aligns with the objectives in the ORMCP maintaining the key natural heritage features and key hydrologic features in Settlement Areas by limiting the redesignation area to only the Countryside Area lands and not the Natural Core Areas and Natural Linkage Areas on the site.

Further the request to redesignate the lands is consistent with direction from the Region's recently approved Official Plan. In the Region's Official Plan, the lands are designated as Rural Areas and not agricultural. This is an important distinction because according to the purpose outlined in the ORMCP, the Countryside Area designation is intended to, amongst other matters, encourage agricultural and other rural uses by protecting prime agricultural areas, promoting and protecting agricultural and other rural land uses and normal farm practices. With the existing use of the lands for predominantly recreational and industrial uses and the designation of Rural Areas, there is recognition that these lands are not providing the agricultural purpose that is a key element of the Countryside Area designation. The disturbed nature of the existing uses and the isolation of the lands from other agricultural uses, particularly on the west side of the site, would have contributed to the rural designation vs. agricultural. Further, the existing license for aggregate extraction means that the lands subject to the license would be further disturbed if the license were acted upon. In this regard, the redesignation of the lands from Countryside Areas to Settlement Areas is better aligned with the disturbed nature of the lands in the Countryside Area.

Finally, the request for redesignation addresses the Provincial interests outlined in Section 2 of the *Planning Act*, including the protection of environmental features, the ability to service the site, the adequate provision of housing, amongst other matters. Further, Bill 23, reinforces the Province's commitment to provide more housing, faster. In this regard, the subject site is located adjacent to an existing Settlement Area that contains existing residential development on municipal services. An extension from the Settlement Area to the west is a logical extension that will make efficient use of resources and existing infrastructure to address this urgent need for more housing. There are already extensive areas of urban development in the immediate surroundings that are located in the Settlement Areas of the Oak Ridges Moraine.

To demonstrate how the lands could be developed if the redesignation to Settlement Area were to occur, a concept plan has been prepared (refer to **Figure 5**).

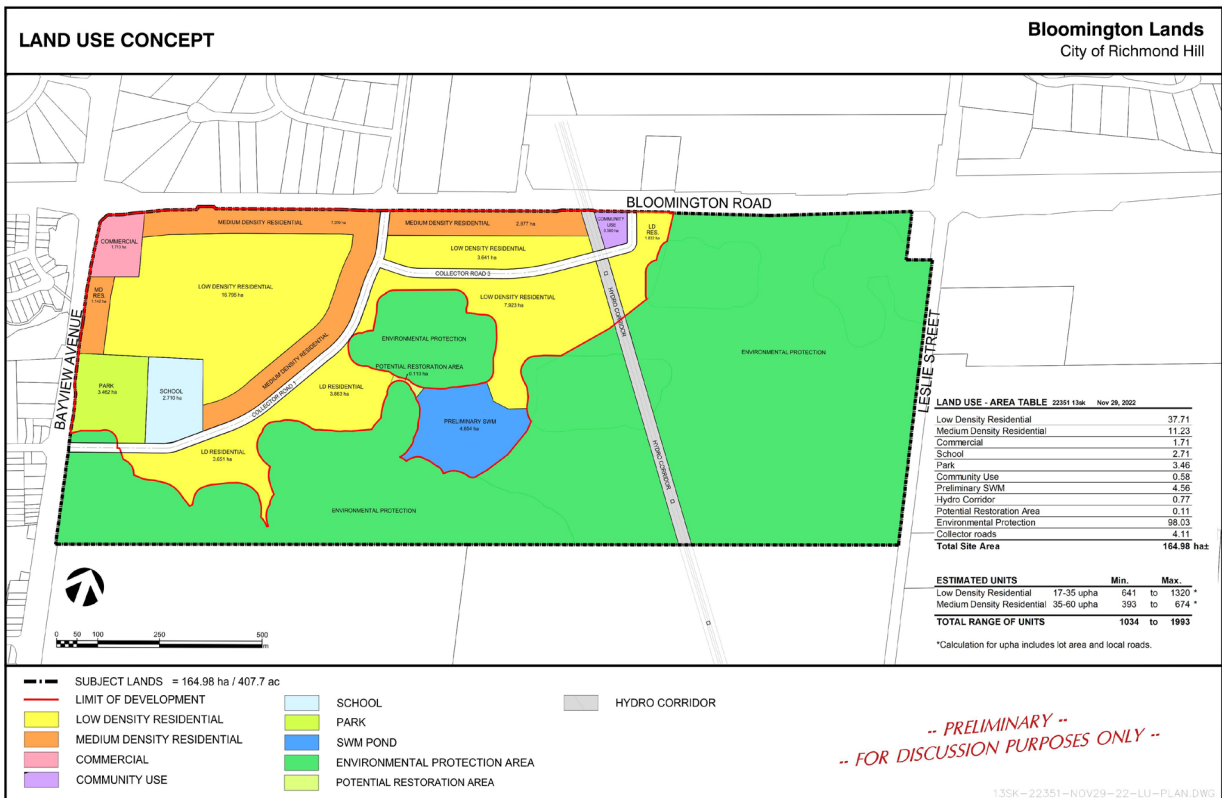


Figure 5. Concept Plan

The concept plan has been prepared in the context of the policy direction from the PPS, A Place to Grow: The Growth Plan for the Greater Golden Horseshoe, the Region's Official Plan and the City's Official Plan as well as the direction in the ORMCP regarding the Settlement Area designation. The plan addresses these policies, in particular the Settlement Areas in the ORMCP, which is a designation intended to support the urban type development with a diversity of uses, contributing to complete communities, promoting the efficient use of land. In this regard, the concept plan demonstrates that urban type development can be introduced on the west side of the site with a mix of residential, commercial and community uses. The configuration of the concept plan demonstrates that a compact form that is compatible with the adjacent residential areas can be accommodated on the western part of the site. Approximately 1,000 to 2,000 low and medium density residential units could be accommodated on the portions of the site redesignated as Settlement Area. The plan provides for an additional school, park and LD community uses, all set in the context of the protected environmental areas. A retail/commercial block at the northeast corner of the site could serve the new community as well as the adjacent existing low density residential areas. Of note,

approximately 100 hectares of the 165 hectare site would remain in or be added to the ORM Natural Core Area and Natural Linkage Area designation.

Ability to Service the Subject Site

In addition to identifying through the concept plan how the site would contribute to a complete community with services such as a park, a school, community uses and stormwater management, GEI has concluded that servicing from the York-Durham Sewage System (“YDSS”) and with watermain distribution and treatment are feasible, as well as controlling post-development flows on-site with various end of pipe facilities. There are existing regional and municipal services in the immediate surroundings, many located adjacent to the site, that provide a variety of options for connections to these services. GEI has explored different strategies to service the site and has concluded that the site is functionally serviceable by sanitary, water distribution and stormwater.

Conclusion

The requested redesignation of part of the subject site, which is located in the Oak Ridges Moraine Conservation Plan Area, to Settlement Area supports Provincial Interests to provide additional housing in an area that can be serviced while lands in the ORMCP Natural Core Area and Natural Linkage Area designations are protected and enhanced. The site is adjacent to an existing Settlement Area and to existing municipal services. Further, Richmond Hill had identified the site as part of an area for future development (through OPA 200 in 2000) prior to the introduction of the ORMCP. Based on the foregoing, the requested redesignation, which maintains the lands in the ORMCP and the Greenbelt Plan area is appropriate and supports the Province’s objectives in Bill 23, *More Homes Built Faster Act*. The addition of housing in this location will increase housing supply in an area close to existing services to support complete communities.

Executive Summary- Natural Heritage, Geotechnical, Hydrogeological and Site Servicing Review - GEI Consultants Ltd.

GEI has been retained by White Owl Properties Ltd. (“**WOP**”) to complete a review of the Greenbelt and Oak Ridges Moraine Planning Areas with reference to the Bloomington Aggregates site on Bloomington Road in Richmond Hill, Ontario (“Subject Lands”).

With an increase in housing demand within Southern Ontario, a review of existing Planning Areas was completed to understand whether additional development areas may be present within the Subject Lands while ensuring protection and enhancement of existing natural heritage features. GEI has reviewed secondary source information and completed a site reconnaissance to inform this review to identify opportunities for refinement of the existing planning areas to further optimize developable area within the Subject Lands.

The Subject Lands are located within the Oak Ridges Moraine Conservation Plan (**ORMCP**) Area and are designated as a mix of Countryside, Natural Core Area and Natural Linkage Area.

Currently the Subject Lands consist of a golf course and industrial uses (asphalt plant and composting facility). There are several candidate and confirmed Key Natural Heritage Features (**KNHF**), Key Hydrologic Features (**KHF**) and Key Hydrologic Areas (**KHA**). All significant natural heritage features are shown on **Figure 3B** and discussed within **Section 3.3** of the report. In accordance with local and provincial policies, a proposed 30 m Vegetation Protection Zone (**VPZ**) would be reviewed after detailed investigations and applied to KNHF and KHF, as applicable, to ensure the protection of features and their associated functions.

Based on GEI’s review, redesignation of the portion of the Bloomington Aggregates site currently designated Countryside Area under the Oak Ridges Moraine Conservation Plan to Settlement Area appears feasible to facilitate residential development while ensuring important natural heritage features are protected. No redesignation of the Natural Linkage Area or Natural Core Areas are proposed at this time. The proposed refinements are located within the Countryside designated areas which are generally within active golf course, industrial and agricultural areas. Existing KNHFs and KHFs, along with some proposed enhancement areas within the proposed Settlement Area would be protected from negative impacts associated with development. Several constraints scenarios were identified as future changes to wetland evaluation processes in the province may provide alternative future development scenarios. Constraint mapping is illustrated on **Figures 7A** and **7B** (within the report).

Additional ecological, hydrogeological and geotechnical investigations could be undertaken to refine the existing constraints within the Subject Lands to determine the available developable footprint and determine design/construction approaches. Several sanitary servicing strategies have been explored (as shown on **Figures 10A-10H** within the report) and determined that servicing from the York-Durham Sewage System (**YDSS**) is feasible. Servicing the Subject Lands

with watermain distribution from regional and city infrastructure is also viable. Stormwater will be controlled on site to pre-development scenario with various end-of-pipe facilities.

A full copy of the GEI report can be downloaded directly from here: [Bloomington ERO Submission Folder - GEI](#).