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June 15, 2022

Delivered by Email: minister.mah@ontario.ca

Minister Steve Clark
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay St
Toronto, ON M5G 2E5

Dear Minister Clark:

Re: Municipal Comprehensive Review and Updated Draft York Regional Official Plan

We represent 2621484 Ontario Ltd., the owner of the property located at 12041 Woodbine Ave., Town of Whitchurch-Stouffville (the "Property"). The Property is 19.67ha in size and located east of Woodbine Avenue and south of Stouffville Avenue. It has approximately 200m frontage along Woodbine Avenue. The Property is located just east of Hwy 404 within the Highway 404 corridor and southeast of the Gormley GO station. For ease of reference, a location map (Map 1) of the Property is attached hereto.

As per our letter to you dated, February 22, 2022, we wrote in support of the October 21, 2021 and November 25, 2021, Regional Council decision to approve the Town of Whitchurch-Stouffville's request to revise the draft Regional Official Plan to:

1. Include a settlement area boundary expansion to include the proposed South Gormley Employment Expansion Area;
2. Include a settlement area boundary expansion to the Community of Stouffville to include the proposed Bethesda Lands;
3. That this be in lieu of the Whitebelt lands identified in the September 16, 2021 report; and
4. That staff be directed to seek an amendment from the Minister of Municipal Affairs and Housing to O. Reg. 140/02: Oak Ridges Moraine Conservation Plan under the Oak Ridges Moraine Conservation Act to permit the proposed changes to the settlement area boundary.



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On behalf of our client, we have participated in the on-going Region's Municipal Comprehensive Review (MCR) process and made written and oral submissions to the Regional Council on several occasions in support of the Town of Whitchurch-Stouffville's request to the Region. As the Region's MCR process is coming to completion soon, we continue to support the Region's position and request that the Minister endorse and approve this amendment.

Our client's Property is located within the proposed South Gormley Employment Expansion Area. Map 2 provides the proposed South Gormley Employment Expansion Area with the location of the Property identified. The Property is within the Oak Ridges Moraine Conservation Plan boundary. It is designated mostly Countryside and partially Linkage in the Region of York Official Plan.

In agreement with the Town of Whitchurch-Stouffville and the Region of York, we believe that the proposed urban settlement area boundary expansion represents the most logical and appropriate locations for considering settlement boundary expansions as they are contiguous to the existing settlement areas and would make more efficient use of existing infrastructure and community services and facilities.

In particular, the South Gormley Employment Expansion Area would directly abut existing the Urban Settlement Area in the City of Markham and represents a logical extension of urban development along the Highway 404 corridor. Servicing would be accessible to Hwy 404 and serviceable through the extension of municipal infrastructure from the abutting employment area in the City of Markham. Accordingly, the South Gormley Employment Expansion Area is suited for future employment development and would support Provincial policies to designate and preserve lands adjacent to major transportation corridors for employment uses and promote economic development and competitiveness (Provincial Policy Statement, 2020, policy 1.3.2.6). In addition, policy 1.6.1 of the Provincial Policy Statement, 2020 promotes efficient use of infrastructure and public service facilities.

With respect to the Oak Ridges Moraine Conservation Plan, it recognizes the need for settlement area expansions and as such upper-tier municipality may consider the need to change or refine the Settlement boundaries as part of a municipal comprehensive review in accordance with policy 2.2.8 of the Growth Plan. Settlement Area boundaries are not permitted to expand into Natural Core Areas or Natural Linkage Areas. The request for the Town of Whitchurch-Stouffville proposed settlement boundary expansion through a municipal comprehensive review is in line with the ORMCP's policy for such an expansion.

As noted in the Region's proposed *2051 Forecast and Land Needs Assessment*, the Town of Whitchurch-Stouffville is forecasted to grow to 92,900 persons and 31,900 jobs by 2051. As outlined in Staff Report DS-052-19, the Town has identified a deficiency in the amount of



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designated employment land. The updated preliminary employment land needs for the Town are forecasted to be in the order of an additional 167 gross hectares of serviced employment land that is required to the 2041 planning horizon. Further updates to the Town's land needs are being undertaken to the 2051 planning horizon, which is anticipated to result in an even greater employment land deficiency. The 95ha of Whitebelt lands proposed to be designated as Employment in the Region's proposed *2051 Growth Forecast and Land Needs Assessment*, are non-contiguous and isolated parcels. As such, the Whitebelt lands are not the most logical lands for settlement expansion.

The importance of protecting and promoting employment lands is illustrated in the policies of the Provincial Policy Statement and the Growth Plan. Insufficient serviced employment lands in the Town will have long term serious impacts to the economic viability of the community and Town. As such, in Oct 2019, Town Council recommended supporting additional employment growth along the Highway 404 corridor and the addition of lands to the urban settlement area including the proposed South Gormley Expansion area. This area includes the Property. This expansion area will provide for the needed employment opportunities for the Town of Whitchurch-Stouffville as well as the Region of York.

Furthermore, this area, being the southern boundary of the Oak Ridges Moraine, no longer provides normal farm practices and the rural character of the area has been evolving over time as urbanization has been occurring in the surrounding areas. A reconsideration of maintaining these lands, including the Property, as Countryside Areas and Agricultural land use is prudent at this time to accommodate future growth needs as noted in the proposed *2051 Forecast and Lands Needs Assessment*.

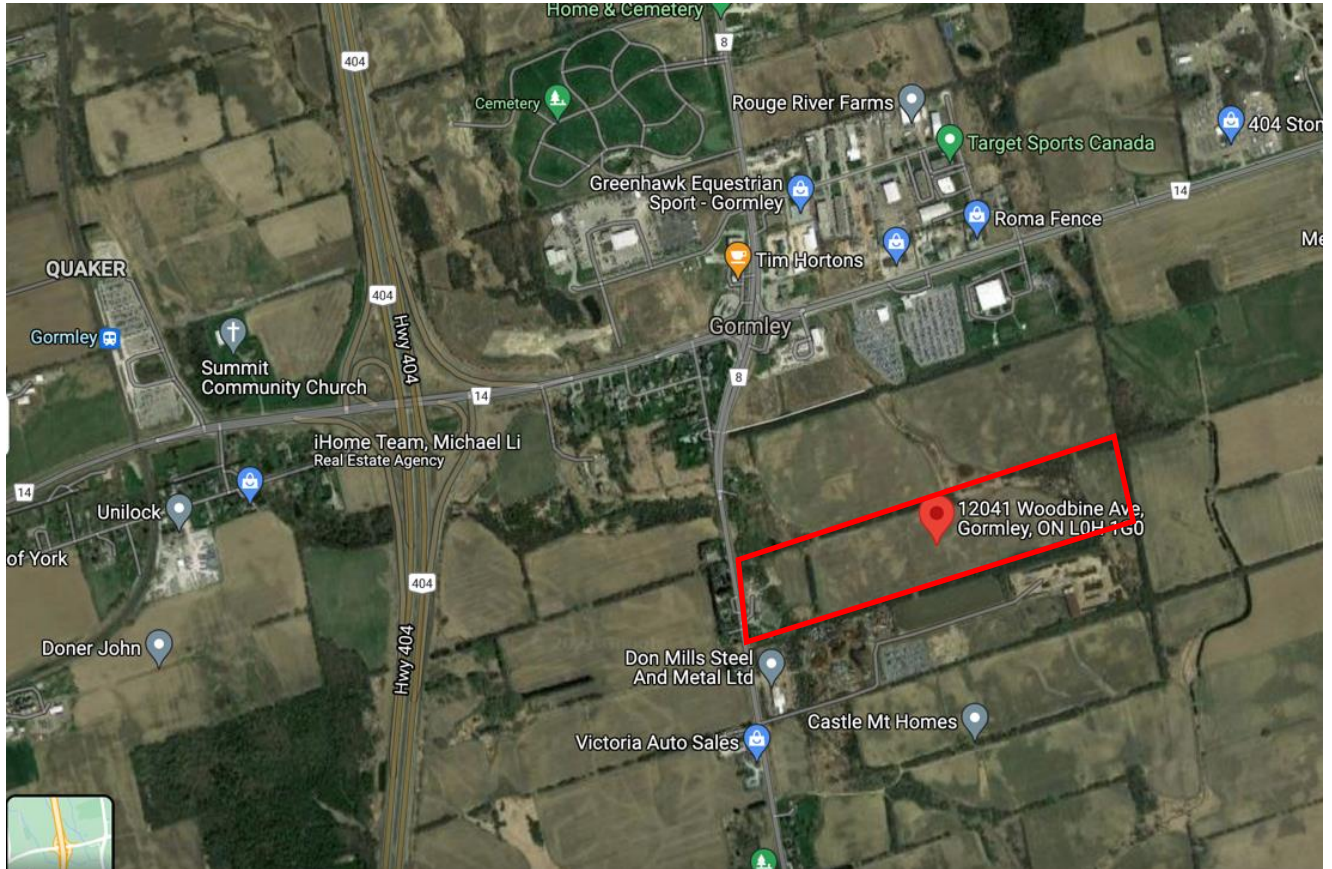
We thank you for your time and consideration, and we will continue to participate in the on-going Municipal Comprehensive Review process.

Yours truly,

A handwritten signature in black ink, appearing to read 'May Luong'.

May Luong, RPP, MCIP

Location Map – Map 1



Proposed South Gormley Employment Expansion Area with Property location – Map 2

