

November 21, 2022

MGP File: 16-2502

Tercot Acquisitions Limited
c/o Tercot Development Group
56 The Esplanade, Suite 406
Toronto, ON M5E 1A7

*via email: jvalela@tercot.com***Attention: Mr. Giuseppe Valela**

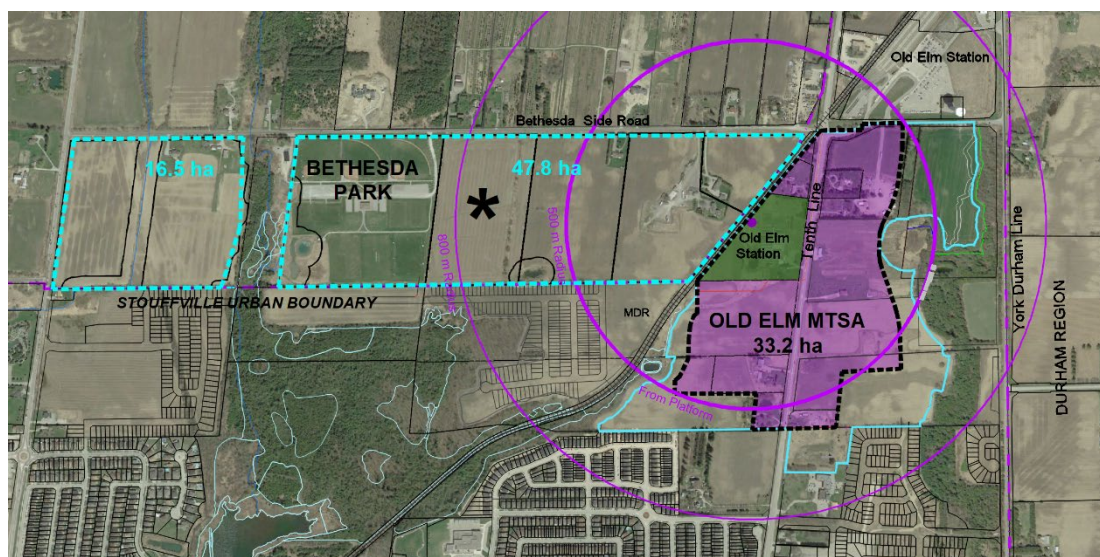
Dear Mr. Valela:

**RE: Redesignation of Stouffville Settlement Area Expansion lands
Planning Opinion**

Malone Given Parsons Ltd. has been asked to supply a planning opinion on York Region's proposed Settlement Area Expansion lands south of Bethesda Road in the Town of Whitchurch-Stouffville, approved by the Region of York in their 2022 Official Plan (OP). The lands are south of Bethesda Road, along the Town of Stouffville's northern urban boundary between 9th Line and the railway line. The eastern boundary is adjacent the new Old Elm Metrolinx station and lands designated by the Region as a Major Transit Station Area (MTSA). See Figure 1.

MGP understands that Tercot is contemplating making a submission with respect to the consultation on ERO number 019-6216, which includes a proposal to "Redesignate lands in the Oak Ridges Moraine Conservation Plan Area that could be suitable for residential development in the near term". This analysis has been prepared to provide a planning opinion to Tercot with respect to such a submission responding to the consultation.

Figure 1: Subject Lands



Source: Linework by MGP. Air photo base, Google Maps, May 2018.

The “Tercot lands” (shown with an asterisk in Figure 1) consist of approximately 10 hectares within the Region’s proposed Settlement Area Expansion (Expansion) lands, immediately east of the Town’s community park. The Expansion lands are just under 65 ha, excluding mapped environmental features and their buffers.

Site Characteristics and Planning Context

By adding an average of approximately 800 residents per year, Stouffville achieved a growth rate of 8.8 percent between 2016 and 2021, exceeding both regional and provincial growth rates according to Stats Canada. The average age of the town’s population is 40.8 years old, slightly lower than the average for York Region. The senior’s category (65+) is the fastest growing category, increasing by 22% over the 5-year census period.

The Expansion lands are on the south side of Bethesda Road next to the current urban boundary. Bethesda Road is the northern boundary for a substantial portion of the Town and provides a third east/west route. The lands are generally flat and in agricultural / rural residential use except for the 16 ha± community park. Bethesda Park has lit playing fields and its location predates the ORMCP and the Greenbelt Plan.

Major Transit Station Area

Stouffville has two Metrolinx/GO Transit train/ GO bus stations, one in the center of town and the other in the northeast corner of the Town’s boundary. The Region has designated MTSA around each. The new location of Metrolinx’s Old Elm (formerly Lincolnville) GO train and GO Bus station MTSA is under construction and adjacent to the Expansion lands.

Under the Growth Plan and the Region’s OP, MTSA are defined as the *approximately 500- to 800-metre radius surrounding an existing or planned higher-order transit stop or station. According to the Region’s OP, MTSA are to offer a range of compact housing forms and tenures, and intrinsically affordable units (min. of 35%) for low- and moderate-income households.*

The Old Elm MTSA is approximately 33 ha in size and will have a minimum density of 150 persons and jobs per hectare, with higher density and mixed-use development located along 10th Line near Bethesda Road and the Metrolinx GO station.

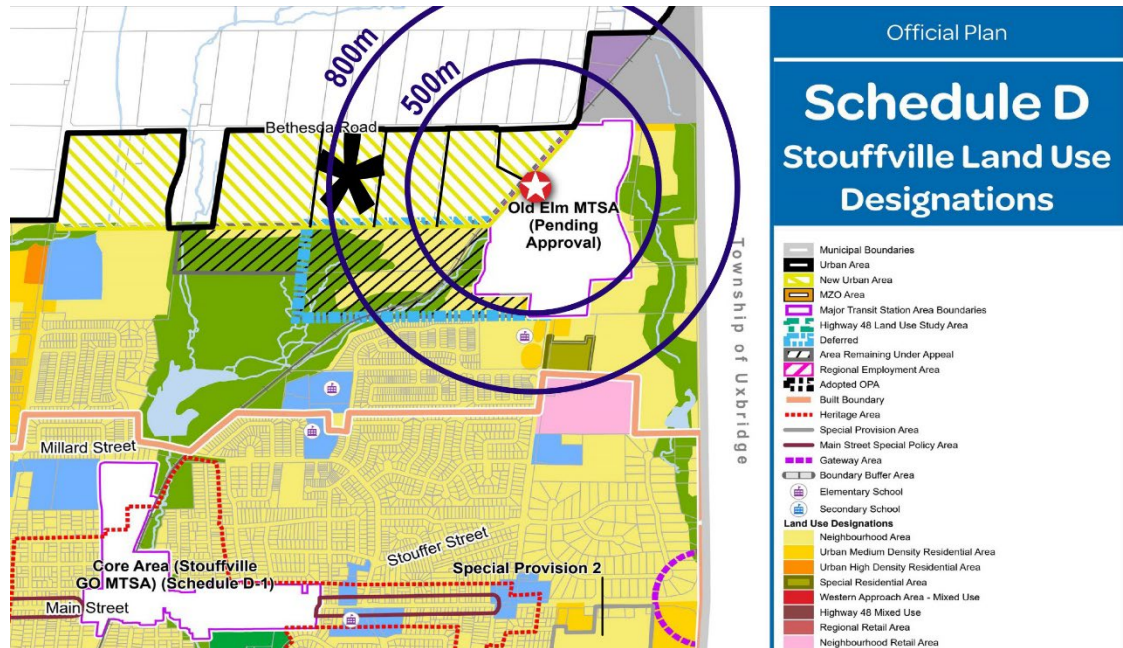
Urban Lands to the South

Lands south of the Expansion lands and west of the railway are within the Town’s urban limits. As a crossing of the railway other than Bethesda Road is not contemplated at this time, these lands will require public road access to Bethesda Road through the Expansion lands. The proposed development pattern for the lands south of the Expansion lands is shown on Figure 1.

Municipal Services

As you are aware, the Phase 3E Landowners Group, who own approximately 76% of the approximately 47 ha of developable lands within the Old Elm MTSA/secondary plan area, will be responsible for extending sanitary servicing, from south of Main Street along the York Durham Line, to service their lands at an estimated cost of \$9 million. The Town has previously asked for the group to plan for oversizing the sewer to accommodate the Expansion lands within the trunk services. With the development of the Old Elm MTSA and lands to the south, full municipal services will be located adjacent to the Expansion lands within the next 5 years or so.

Figure 2: Context Plan - Extract from Town of Whitchurch-Stouffville Draft Official Plan



Source: June 2022 draft OP schedule, Town of Whitchurch-Stouffville, Official Plan Review website.
A 500m and 800m radius from the center of the train platform has been added to the plan by MGP.

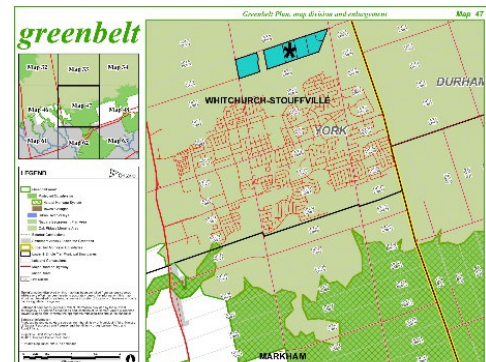
The Region of York's Municipal Comprehensive Review

The Town of Stouffville is a *Settlement Area* within the Oak Ridges Moraine Conservation Plan (ORMCP) with the surrounding lands primarily designated as *Countryside Area*. The 2022 York Region Council Adopted Official Plan proposed the redesignation of approximately 65 hectares of *Countryside Area* land within Whitchurch-Stouffville and within the **Oak Ridges Moraine Conservation Plan (ORMCP)** to urban uses; more specifically to Towns and Villages and Designated Greenfield Area in the OP, subject to the Province amending O.Reg. 140/02.

The Region undertook a municipal comprehensive review (MCR) consisting of 3+ years of background studies and analysis before finalizing the land uses planned for the various municipalities and settlement areas within the Region, including the Stouffville lands. Their review and redesignation of the lands would have considered the overarching planning policies including the Provincial Policy Statement, The Growth Plan and the ORMCP. We accept the relevant policy requirements were satisfied before including the Stouffville Expansion lands within the Town's urban boundary.

The Town of Stouffville is entirely within the ORMCP (shown in light green on the Greenbelt mapping) except for a tip of Greenbelt feature in the southwest corner of the town. The Greenbelt lands shown in bright green were added to the ORMCP boundary.

The Province did not choose to include the Settlement Area expansion in their November approval of the Official Plan which is final and not subject to appeal, however, they have made changes to the ORMCP and to the Greenbelt Plan



through separate decisions posted on the Environmental Registry of Ontario (ERO) which are subject to comment up to December 4th of 2022.

Redesignation vs Removal – ORMCP vs Greenbelt Plan

Although the ORMCP is mapped within the Greenbelt Area, it is subject to its own policies and regulations, as stated in Section 2.1 of the Greenbelt Plan (Attachment 1). Section 2.1 is clear that if the lands are designated as *Countryside Area* in the ORMCP and subject to the policies of the plan, those policies apply, **not** the *Protected Countryside* policies of the Greenbelt Plan. Therefore, policies of the ORMCP apply to the Expansion lands.

Settlement Area expansions are treated differently in each provincial plan. As noted earlier, the subject lands are entirely within the Oak Ridges Moraine Conservation Plan and therefore are subject to the policies of that plan, **not** the Greenbelt Plan.

The ORMCP anticipates “changes or refinements” to the *Countryside* and *Settlement Area* boundaries either through a 10-year review process to “reflect changed or new priorities of the Provincial government”, among other criteria, **or** through a Municipal Comprehensive Review such as that undertaken by the Region.

The ORMCP text for *Settlement Area Expansions*, applicable to the Expansion lands, is copied below. Attachment 2 is the 10-year review text from the ORMCP.

Settlement Area Expansions

An upper-tier or single-tier municipality may consider the need to change or refine the boundaries of Settlement Areas as part of a municipal comprehensive review undertaken in accordance with policy 2.2.8 of the Growth Plan for the Greater Golden Horseshoe. Settlement Area boundaries are not permitted to expand into Natural Core Areas or Natural Linkage Areas.

As per the ORMCP, the purpose of Settlement Areas (18.1) is to focus and contain urban growth by encouraging the development of communities that provide their 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. The redesignation of the Expansion area lands also meets the ORMCP policy by minimizing the encroachment and impact of development on the ecological functions and by promoting the efficient use of land with transit-supportive densities and supporting the continuation and development of urban land uses consistent with the growth management strategies identified in the applicable official plans.

The Town’s Draft Official Plan schedule (Figure 2) shows the *Natural Linkage* area cutting through the lands which would not have been easily visible in the Region’s OP schedules due to the mapping scale.

The Region’s proposed **redesignation** of *Countryside Area* to *Settlement Area* was supported by a municipal comprehensive review in conformity with the ORMCP.

MGP assumes the work completed by the Region of York, through their MCR process, met the tests and the intent of the *Settlement Area* designation of the ORMCP.

Conclusion

The Expansion lands are well located to provide a large quantity and variety of more affordable medium and higher density housing next to a MTSA. Over half of the Expansion lands east of the community park are within a 500m radius of the Metrolinx station’s platform. The extension of the MTSA into the Expansion lands could add approximately 500

to 700 residential units to the MTSA in 10 hectares alone and another 700 + units at the Region's greenfield density of 55 persons and jobs per ha in the remaining Expansion area could be expected.

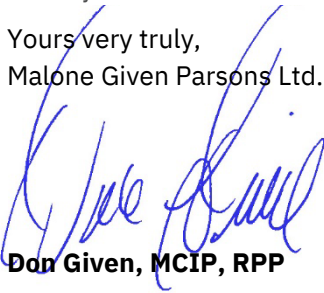
The more compact urban units within and around the MTSA will help contribute to more affordable housing.

The Town of Whitchurch-Stouffville is a growing community providing a range of commercial, employment, public service and transportation options.

The Expansion lands can be serviced within five years. The lands will be bisected by public road access between Bethesda Road and the urban lands to the south. Adjacent environmental lands will be protected by environmental protection zones determined by the ORMCP and technical studies and should not be impacted by development.

In my opinion, the Region's proposed Expansion lands were a logical area to provide higher density and more affordable housing the Town, Region and Province are seeking to provide.

Yours very truly,
Malone Given Parsons Ltd.



Don Given, MCIP, RPP