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**OSLER**

Toronto

October 6, 2022

Chris Barnett  
Direct Dial: 416.862.6651  
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Our Matter Number: 1210663

Montréal

Calgary

**SUBMITTED TO ENVIRONMENTAL REGISTRY OF ONTARIO**

Ottawa

Andrew Doersam  
Municipal Services Office - Central Ontario  
16th floor  
777 Bay Street  
Toronto, ON  
M7A 2J3

Vancouver

New York

Dear Sir:

**RE: Region of York Official Plan (ERO #019-5865)**

We write on behalf of Kennedy Road GK Holdings Limited and Kennedy Road GK II Holdings Limited (Humbold Properties), Meadowbrook Golf and Country Club, and Warden North GP Inc. (the “Owners”). Collectively, the Owners’ lands are approximately 510 acres and are located generally east of Warden Avenue and on either side of Kennedy Road, north of the southern boundary of the Town of Whitchurch-Stouffville (the “Whitebelt Lands”)<sup>1</sup>. The Owners made written submissions to Regional Council dated November 24, 2021, and we made deputations on their behalf to Regional Council at its meeting of November 25, 2021, the statutory public meeting on May 19, 2022 and the Committee of the Whole meeting on June 16, 2022.

During the MCR and Official Plan Review process, we made submissions on behalf of the Owners supporting the Region’s Planning Staff’s Land Needs Assessment Report (March 2021), which recommended the Whitebelt Lands be included in the urban area expansion to accommodate Regional growth to 2051. This was a logical recommendation that the Owners supported as the lands are adjoining Markham lands already in the urban area and adjacent to lands subject to recently granted MZOs in Stouffville.

However, in November 2021 Regional Council ignored the recommendations of the Land Needs Assessment in favour of including lands currently within the Greenbelt Plan at the southwest limits of the Town in the urban area in lieu of the identified Whitebelt Lands. It is the Owners’ position that it was improper to include lands within the Greenbelt Plan in the urban area for development ahead of any determinations by the Minister to amend the Greenbelt Plan and that the appropriate time for that determination would be through a comprehensive review of the Greenbelt Plan, which is to take place in a few years’ time. Notwithstanding the advice given to Regional Council by their Planning Staff, and our

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<sup>1</sup> See attached Figure 1

numerous presentations on behalf of the Owners, on June 30, 2022 Council passed a resolution which is attached to this letter as Appendix A. Section 3 of the resolution clearly concedes that if the Minister does not amend Reg. 140/02, the Minister will be requested to bring the Whitebelt Lands into the urban boundary.

On behalf of the Owners, we ask that the Minister modify the Region's adopted Official Plan by eliminating the inappropriate development expansion into the Greenbelt and adopt the Region's recommendation #3 to include the Whitebelt Lands in the urban expansion area, consistent with the staff recommendation. Doing so is of particular urgency in addressing lands for housing supply, given the current housing crisis in Ontario.

Finally, in your correspondence to the Region of York dated September 12, 2022 you notified the Region pursuant to provisions in Bill 109, the *More Homes for Everyone Act, 2022* that you were suspending the time period to make a decision. Bringing these Whitebelt Lands into the urban boundary as soon as possible will enable the landowners to engage in meaningful water and wastewater servicing discussions with the Markham development community immediately to the south. We therefore we ask that you make a decision on this matter as soon as possible. This will assist in moving the lands forward in a timely way to assist in bringing housing to market.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Barnett", with a long, sweeping flourish extending to the right.

Chris Barnett  
Partner

CB:

Enclosure

## Appendix A

<https://yorkpublishing.escribemeetings.com/Meeting.aspx?Id=0f70fdc2-b4df-4a33-8b40-5616080f3837&Agenda=PostMinutes&lang=English>

### Whitchurch-Stouffville Motion

Moved by Mayor Lovatt

Seconded by Regional Councillor Jones

That the main motion be amended to include the following clauses:

1. Council adopt an overlay Schedule identifying lands in the Town of Whitchurch-Stouffville requested to be designated as Provincially Significant Employment Zones as Future Strategic Employment Lands.
2. The Minister be requested to amend Reg. 140/02: Oak Ridges Moraine Conservation Plan under the Oak Ridges Moraine Conservation Act to permit and give effect to the adopted urban expansion on the Oak Ridges Moraine in the Town of Whitchurch-Stouffville, as follows:
  - a. Settlement area expansion for the Stouffville Bethesda Community Area lands as shown on the Maps of Attachment 1 and as outlined in Attachment 3; and
  - b. Settlement area expansion of the South Gormley Employment Area lands as shown on the Maps of Attachment 1 and as outlined in Attachment 3.
3. Should the Minister choose not to amend Reg. 140/02: Oak Ridges Moraine Conservation Plan under the Oak Ridges Moraine Conservation Act to permit the Council endorsed urban expansion on the Oak Ridges Moraine in the Town of Whitchurch-Stouffville, the Minister be requested to modify the adopted ROP to reflect urban expansion on the remaining Whitchurch-Stouffville Whitebelt lands, currently identified as “Future Urban Area” on Map 1B of Attachment 1, with the designations and identifications provided in the inset maps for these lands in the November 2021 Draft Regional Official Plan.
4. That the Minister be requested to modify A Place to Grow: Growth Plan for the Greater Golden Horseshoe to identify future Provincially Significant Employment Zones in the Town of Whitchurch-Stouffville for the purposes of long-term planning for job creation and economic development as identified in maps endorsed by Regional Council on March 21, 2019 and as provided to Regional Council and staff and amend Reg. 140/02 as required to permit the PSEZ overlay in the ROP.
5. And that if the Minister determines to include the settlement area expansions and the Whitebelt in Whitchurch-Stouffville that phasing of development be tied to the water & wastewater servicing master plan.

A recorded vote was as follows:

For: Bevilacqua, DiPaola, Emmerson, Ferri, Grossi, Hackson, Jackson, Jones, Li, Lovatt, Perrelli, Rosati, Scarpitti, Vegh (14)

Against: Hamilton, Heath, Mrakas, Pellegrini, Quirk, Taylor, West (7)

Absent: (0)

Carried

# CONTEXT MAP ILLUSTRATING SUBJECT "WHITEBELT LANDS"

OVERLAY ON TOP OF REGION OF YORK'S MARCH 2021  
RECOMMENDED LOCATIONS FOR URBAN EXPANSION  
(OCTOBER 2022)

## MAP 3 YORK REGION

City of Markham  
and  
Town of Whitchurch-Stouffville

Preliminary Recommended  
Locations for Urban Expansion\*

- Community
- Employment
- Non-developable  
(NHS, Infrastructure)

### Land Use Category

- Built-up Area
- Designated  
Greenfield Area
- Greenbelt
- Hamlet
- 2010 Urban  
Expansion
- Designated  
Greenfield Area  
- Agriculture

### Base Map

- Municipal Boundary
- Roads
- 400-Series Highways

\*Areas are draft and are awaiting approval through the Municipal Comprehensive Review and are subject to change



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March 2021

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Kilometers

