

November 22, 2023

Ramin Jalalpour  
c/o Arkfield  
75 Scarsdale Road, Unit 203  
North York, ON M3B 2R2

Dear Ramin:

**RE: Letter of Opinion for 2576 Stouffville Road, Gormley**

Colville Consulting Inc. was retained by Ramin Jalalpour on behalf of Nevair Alexanian to assess the agricultural character of the lands located near Gormley, Ontario. Nevair Alexanian owns the property located at 2576 Stouffville Road, Gormley. The property is situated within Part Lot 1, Concession 4 in the Township of Whitchurch-Stouffville, Regional Municipality of York. These lands, herein referred to as the Subject Lands, are located immediately east of the Gormley Industrial Area, north of Stouffville Road, west of Warden Avenue, and south of the Station Creek and Rolling Hills golf clubs. The location of the Subject Lands is shown in Figure 1.

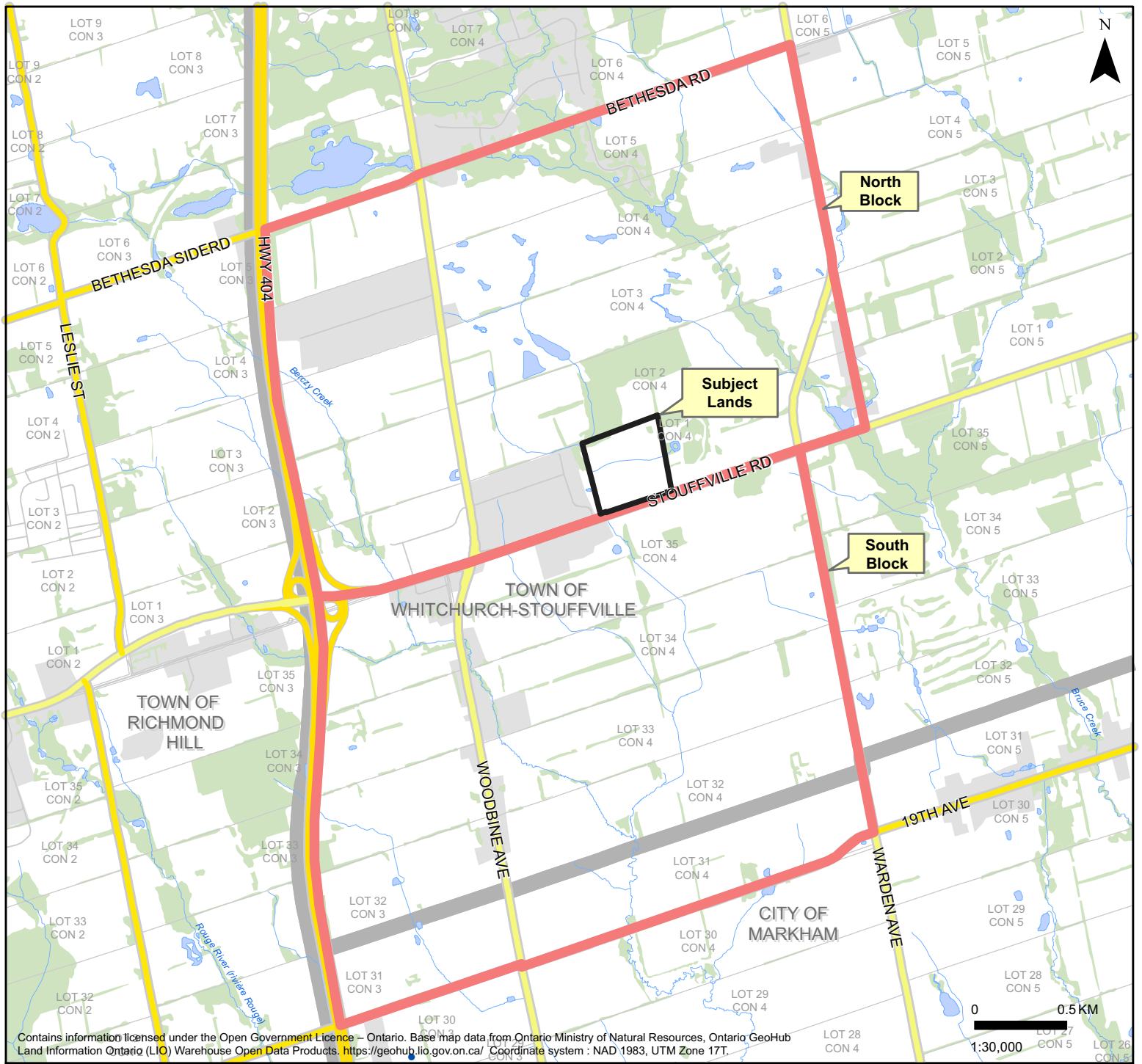
The Subject Lands are approximately 16.8 ha (41.5 acres) in size and are designated Agricultural Area in the York Region Official Plan and Oak Ridges Moraine (ORM) Countryside Area in the Whitchurch-Stouffville Official Plan. These lands are located within the Greater Golden Horseshoe and are mapped in the Ontario Agricultural Systems ([Agricultural Systems Mapping \(arcgis.com\)](https://arcgis.com)) as prime agricultural area.

Our analysis of the agricultural character of the Subject Lands and surrounding area is based on a review of the municipal land use schedules; a desktop review of the land uses (both agricultural and non-agricultural) surrounding the Subject Lands; and a review of on-line data sources such as Ontario Ministry of Agriculture, Food and Rural Affairs' (OMAFRA) AgMaps and the Agricultural Systems Portal. The online data sources provide soil and CLI information, parcel fabric showing the fragmentation of the agricultural land base, investments in artificial drainage installations and land improvements, agri-food components, and other relevant agricultural-related information.

The purpose of the agricultural characterization of the Subject Lands and surrounding area is to provide an opinion as to whether these are high priority agricultural lands and should remain part of the Township's and Region's prime agricultural area; or whether it is more appropriate that they should be included within a rural designation.

## **STUDY AREA**

Throughout this letter, the terms 'north block' and 'south block' are used to compare similar areas to the north and south of Stouffville Road. The north block includes all lands within the block located north of Stouffville Road, west of Warden Avenue, east of Highway 404, and south of Bethesda Side Road.



**Figure 1**  
Location of Subject Lands

Opinion Letter for  
2576 Stouffville Road, Gormley

Prepared for: **Arkfield**

Prepared by: **COLVILLE**  
CONSULTING INC.

DATE: Nov 2023

FILE: C23111

The south block includes all lands within the block located south of Stouffville Road, west of Warden Avenue, east of Highway 404, and north of 19<sup>th</sup> Avenue.

The Study Area includes the north block, and the south block are shown in Figure 2 below.

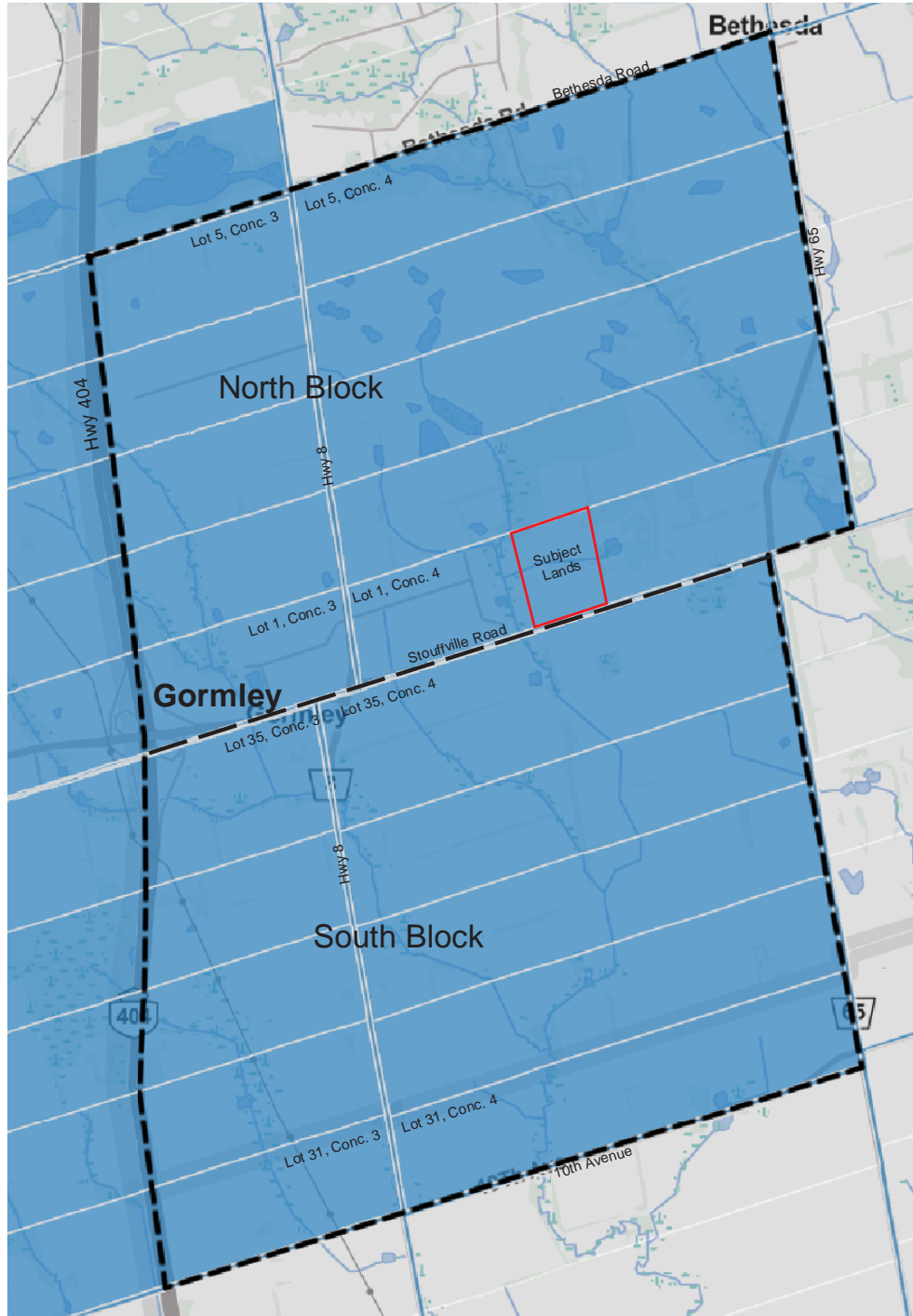


Figure 2: Study Area

## **LAND USE DESIGNATIONS**

### **Subject Lands**

The Subject Lands are designated Agricultural Area in the York Region Official Plan and ORM Countryside Area in the Whitchurch-Stouffville Official Plan. These lands are also part of the Greater Golden Horseshoe and are mapped in the Agricultural Land Base (OMAFRA) as part of a prime agricultural area.

### **Surrounding Area**

#### **North Block**

The north block is primarily designated Agricultural Area, with the western portion of the north block designated Rural Area and the southwestern portion of the block designated Hamlet in the York Region Official Plan. The majority of the north block is designated ORM Countryside Area, with a smaller central portion designated ORM Natural Linkage Area and the southwestern portion designated Secondary Plan Area (Gormley Industrial Area) in the Whitchurch-Stouffville Official Plan.

The majority of the north block is mapped in the Agricultural Land Base as part of a prime agricultural area, with the exception of the lands within the hamlet of Gormley.

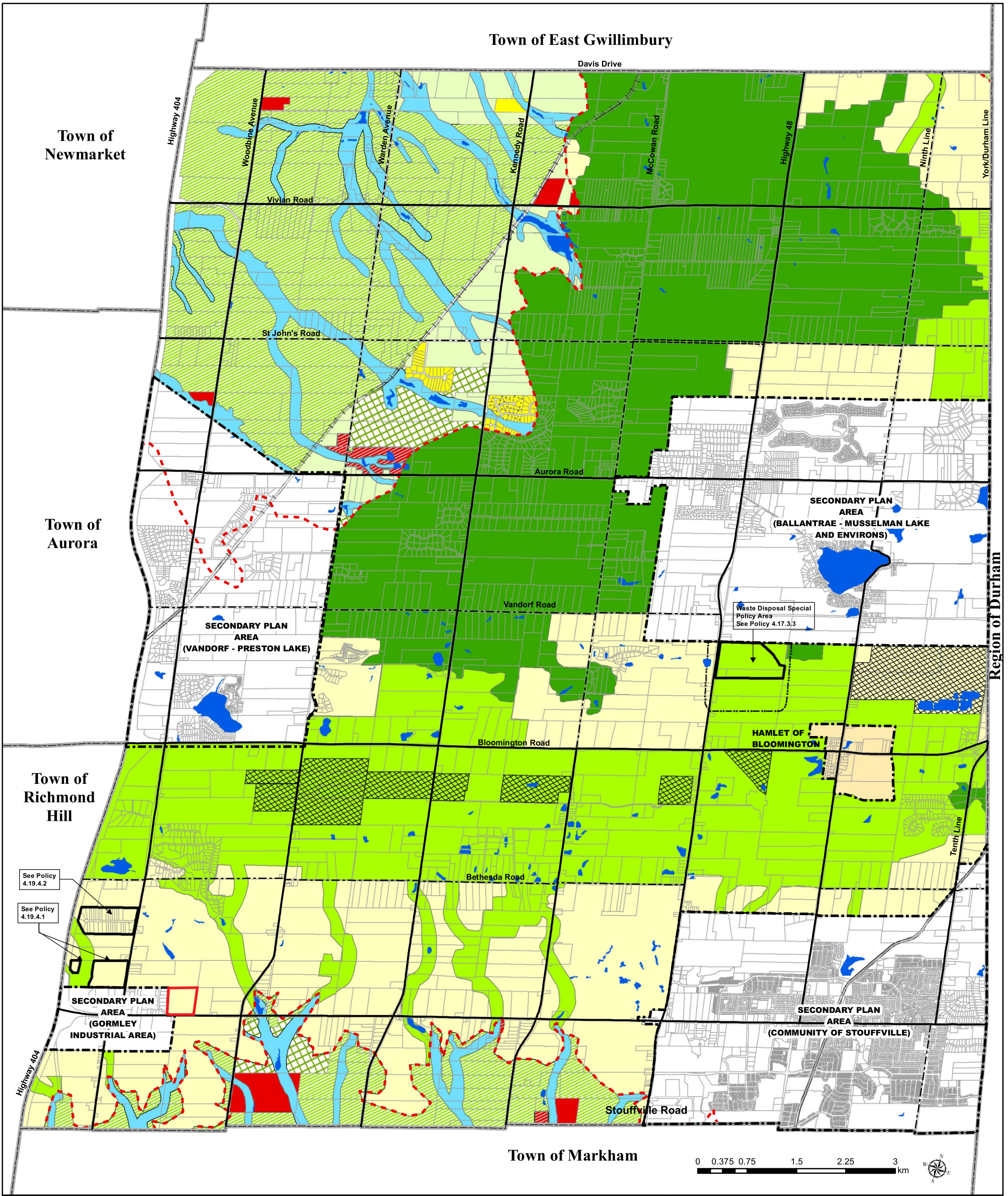
#### **South Block**

The south block is primarily designated Agricultural Area, with smaller portions designated Hamlet and Community Area in the Region of York Official Plan. The south block is designated ORM Countryside Area, Agricultural Area, Significant Environmental Area, and ORM Natural Linkage Area, with the northwestern portion of the block designated Secondary Plan Area (Gormley Industrial Area).

The majority of the south block is mapped in the Agricultural Land Base as part of a prime agricultural area, with the exception of the lands designated Hamlet and Community Area in the York Region Official Plan.

The Land Use Schedules of the Whitchurch-Stouffville Official Plan and the York Region Official Plan, indicating the location of the Subject Lands, are shown in Figure 3 and Figure 4, respectively.





Town of Newmarket

Town of Aurora

Town of Richmond Hill

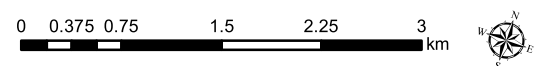
Town of East Gwillimbury

Town of Markham

Region of Durham

**LEGEND**

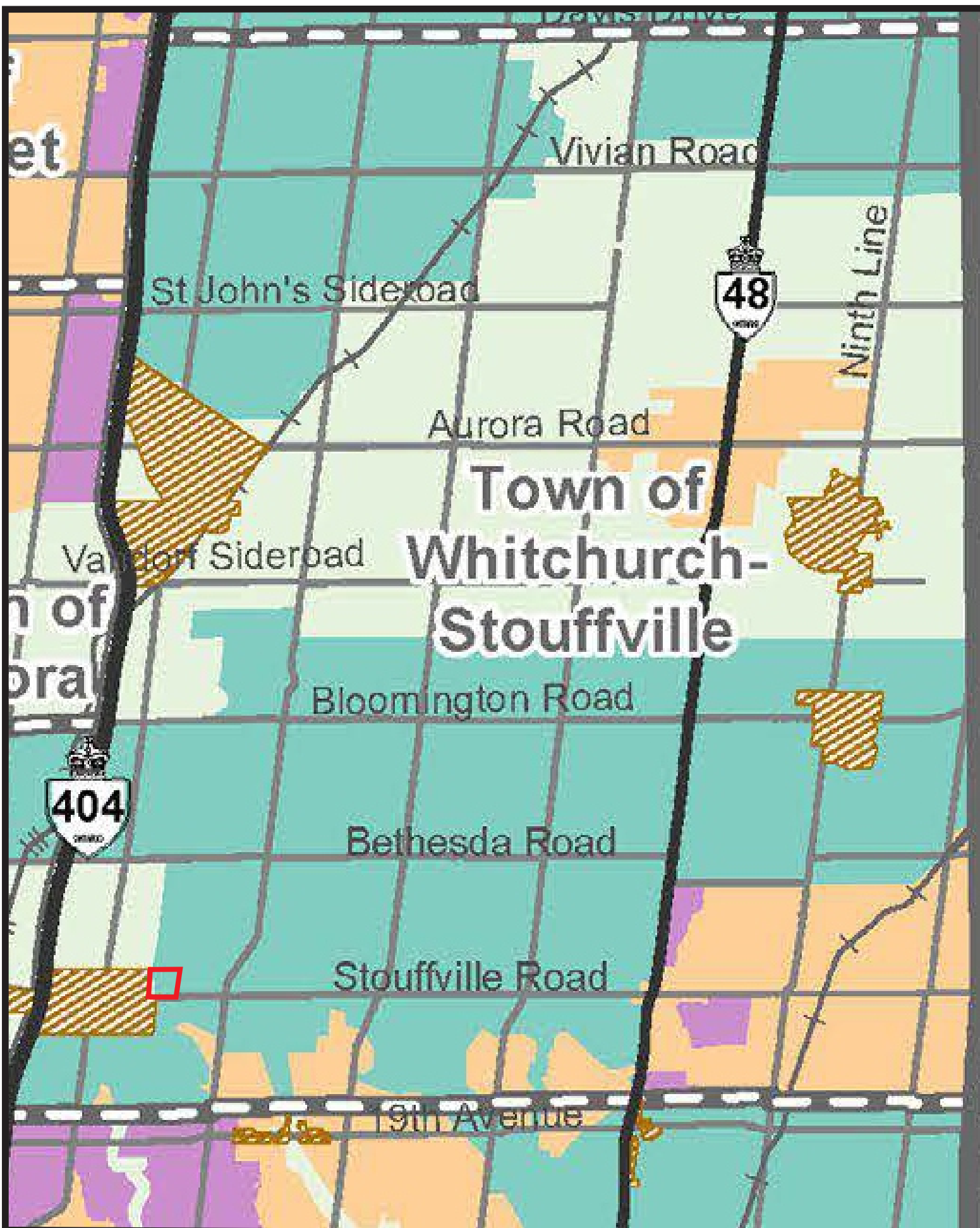
SUBJECT LANDS	ORM COUNTRYSIDE AREA
OAK RIDGES MORaine PLAN BOUNDARY	ORM HAMLET AREA
SECONDARY PLAN AREA BOUNDARY	ORM NATURAL CORE AREA
REGIONAL AND MAJOR ARTERIAL ROAD	ORM NATURAL LINKAGE AREA
MINOR ARTERIAL ROAD	PUBLIC OPEN SPACE AREA
PROPOSED MINOR ARTERIAL ROAD	RURAL AREA
AGRICULTURAL AREA	RURAL COMMERCIAL/INDUSTRIAL/INSTITUTIONAL AREA
COMMERCIAL RECREATION AREA	SIGNIFICANT ENVIRONMENTAL AREA
ESTATE RESIDENTIAL AREA	MORaine AGGREGATE RESOURCE AREA
ESTATE RESIDENTIAL AREA SPECIAL	WASTE DISPOSAL AREA OF INFLUENCE



**Figure 3:**  
 TOWN OF WHITCHURCH - STOUFFVILLE OFFICIAL PLAN  
 Schedule "B"  
 Land Use and Transportation Plan



**Figure 4:**  
York Region Official Plan  
Land Use Schedules



Region of Durham

- Subject Lands
  
- Urban System**
- Community Area
- Employment Area
  
- Agricultural System**
- Holland Marsh Specialty Crop Area
- Agricultural Area
- Rural Area
- Hamlet
  
- Provincial Highways**
- Existing
  
- Municipal Boundaries**
- Regional Municipal Boundary
- Local Municipal Boundary



Produced by: The Regional Municipality of York  
 Planning and Economic Development Branch, Corporate Services Department, 2023  
 Data: The Regional Municipality of York, The Regional Municipalities of Durham and Peel,  
 County of Simcoe, City of Toronto  
 Queen's Printer for Ontario 2003-2023, Includes Greenbelt and Oak Ridges Moraine  
 Boundaries and Water Features  
 Based on best available data and may contain minor errors or omissions.

## **AGRICULTURAL RESOURCES**

### **Soils and CLI**

The digital Provincial Soil Resource database is compiled and administered by OMAFRA and includes most of the soil surveys completed in Ontario. Much of this information is accessible from the Province's Agricultural Information Atlas. The database was last accessed in November 2023.

The Canada Land Inventory (CLI) is an interpretative system for assessing the effects of climate and soil characteristics on the limitations of land for growing common field crops. The CLI system has seven soil classes that descend in quality from Class 1, which has no significant limitations, to Class 7 soils which have no agricultural capability for common field crops. Class 2 through 7 soils have one or more significant limitations, and each of these are denoted by a capability subclass. There are thirteen subclasses described in CLI Report No. 2 (1971). Eleven of these subclasses have been adapted to Ontario soils.

The PPS defines prime agricultural areas as areas where prime agricultural lands predominate. Prime agricultural lands include specialty crop areas and Canada Land Inventory (CLI) Classes 1, 2 and 3 soils, in this order of priority for protection. Section 2.3.3.3, Permitted Uses, states that "New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae."

The *Soil Survey of York County – Report No. 19 of the Ontario Soil Survey* (1955) mapping shows that the soils within the Subject Lands are comprised primarily of Woburn Loam soils (98.80%), with a small area comprised of Bottom Land soils (1.20%).

### **Subject Lands**

#### **Woburn Loam**

The Woburn Loam is the well drained member of the Woburn catena and exhibits Grey-Brown Podzolic characteristics. These soils typically occur on smooth moderately rolling topography and are occasionally occur on steep slopes.

Woburn Loam soils are susceptible to sheet erosion, especially where slopes are steeper. These soils have good internal and surficial drainage and are suitable for growing a wide range of crops.

The loamy texture and porous parent material allow these soils to be cultivated early in the growing season. The main limitation in crop production is related to the soil's susceptibility to erosion. To control the effects of erosion, short crop rotations should be avoided. Frequent additions of manure are also required to maintain optimal organic matter content.

The Woburn Loam soils present on the Subject Lands have been given a Canadian Land Inventory (CLI) Classification of 1<sup>7</sup>2T<sup>3</sup>, meaning 70% of the soil is rated as CLI Class 1 lands and 30% of the soil is rated as CLI Class 2T lands. This equates to 11.63 ha (69.16%) of the Subject Lands being CLI Class 1 lands and 4.99 ha (29.64%) being CLI Class 2T lands. CLI Class 1 lands have no major limitations for common field crop production. CLI Class 2T lands have moderate limitations for common field crop production due to adverse topography.

### **Bottom Land**

Bottom Land soils are low lying soils which occur along stream courses and are often subject to flooding. These soils are immature and show little horizon differentiation. The soil profile usually consists of variable textures and the drainage also often varies but is usually poor.

Bottom Land soils are not good agricultural soils and are typically used for pasture or are not farmed. In areas where large amounts of Bottom Land soils are mapped, other agricultural crops can be grown, but are dependant on the timing and extent of flooding in the area.

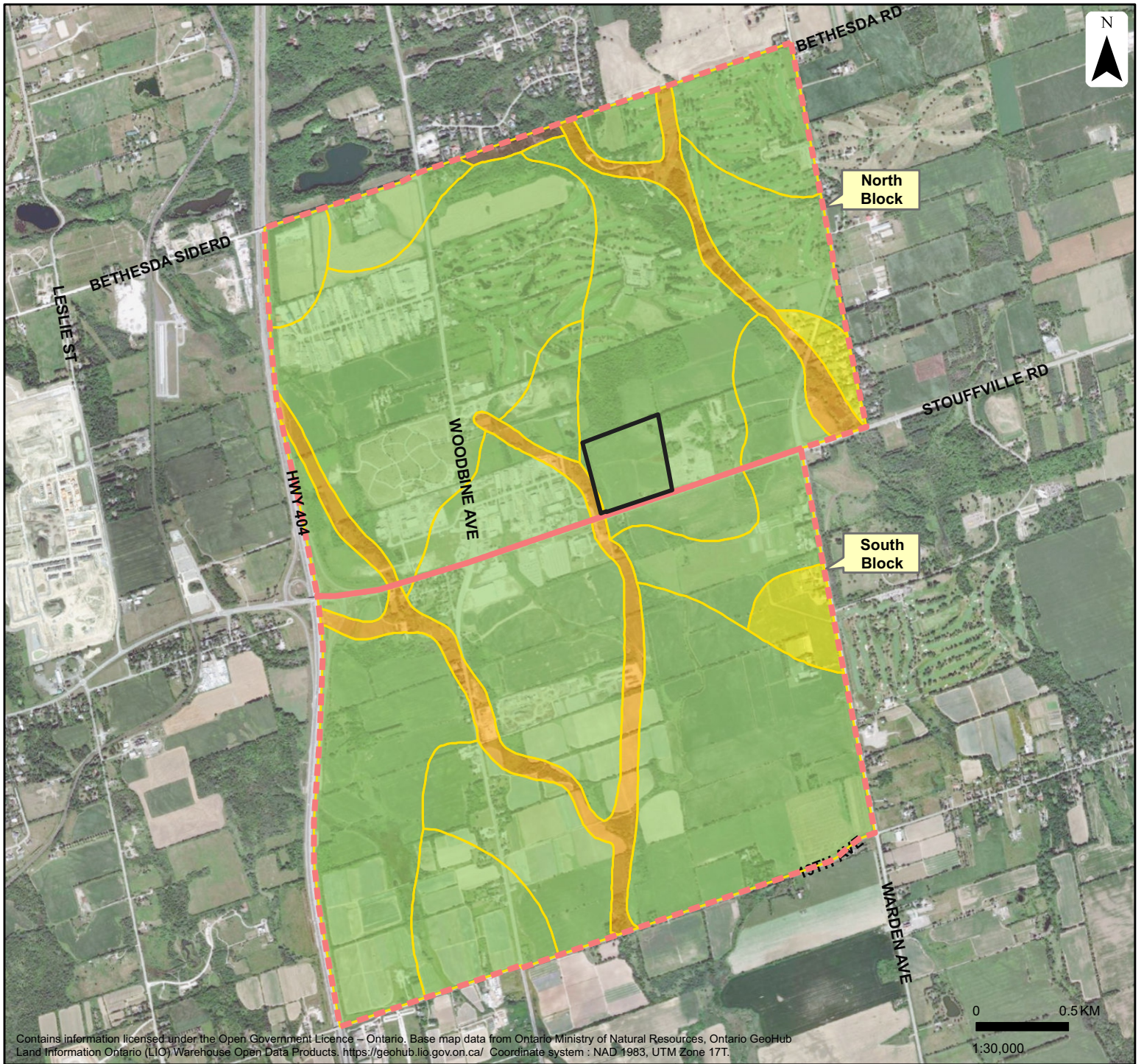
The Bottom Land soils account for 0.20 ha (1.20%) of the Subject Lands and have been given a CLI Capability rating of Class 5I. CLI Class 5I soils have very severe limitations for common field crop production due to periodic flooding by streams.

### **Surrounding Area**

The south and north block share most of the same types of soils, with small differences in the proportions of each soil series. Both blocks contain the well drained Woburn Loam soils; the imperfectly drained Chinguacousy Clay Loam soils, Milliken Loam soils, and Smithfield Clay Loam soils; and the poorly drained Bottom Land soils. The north block contains small amounts of poorly drained Muck soils and well drained Brighton Sandy Loam soils. The southern block contains small amounts of the well drained Bookton Sandy Loam soils.

The lands within the south and north blocks are very similar in terms of agricultural capability. Both the south and north blocks are primarily rated as CLI Class 1 lands, with smaller areas of Class 2 and Class 5 lands. Typically, built-up areas are not assigned a CLI Class as these lands can no longer be feasibly used for the production of common field crops. However, the hamlet of Gormley is still rated as CLI Class 1 lands. As shown in Figure 5, the Subject Lands have a similar agricultural capability compared to the surrounding area.





**Legend**

- Subject Lands
  - Study Blocks
  - Soil
- CLI Class**
- 1
  - 2
  - 5
  - O

## Figure 5 Canada Land Inventory Mapping

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## **LAND USES**

The number and type of agricultural operations, agriculture-related uses, on-farm diversified uses, and non-agricultural land uses within the north and south blocks were identified through a desktop review. Figure 6 shows the identified land uses and areas of cultivated lands. All identified land uses are numbered, and short descriptions of these operations are included in Appendix A.

### **Subject Lands**

The Subject Lands contain a dwelling, an implement shed, a Quonset hut, and a wood-sided bank barn. No structures on the Subject Lands are currently in use, however, the barn appears to be structurally sound. The Subject Lands are primarily cultivated for the production of common field crops and contain a small, forested area.

### **Surrounding Area**

#### **Non-Agricultural Uses**

##### North Block

Within the north block, twelve non-agricultural land uses were identified. These uses include six industrial operations, three commercial operations, two recreational uses, and one institutional use.

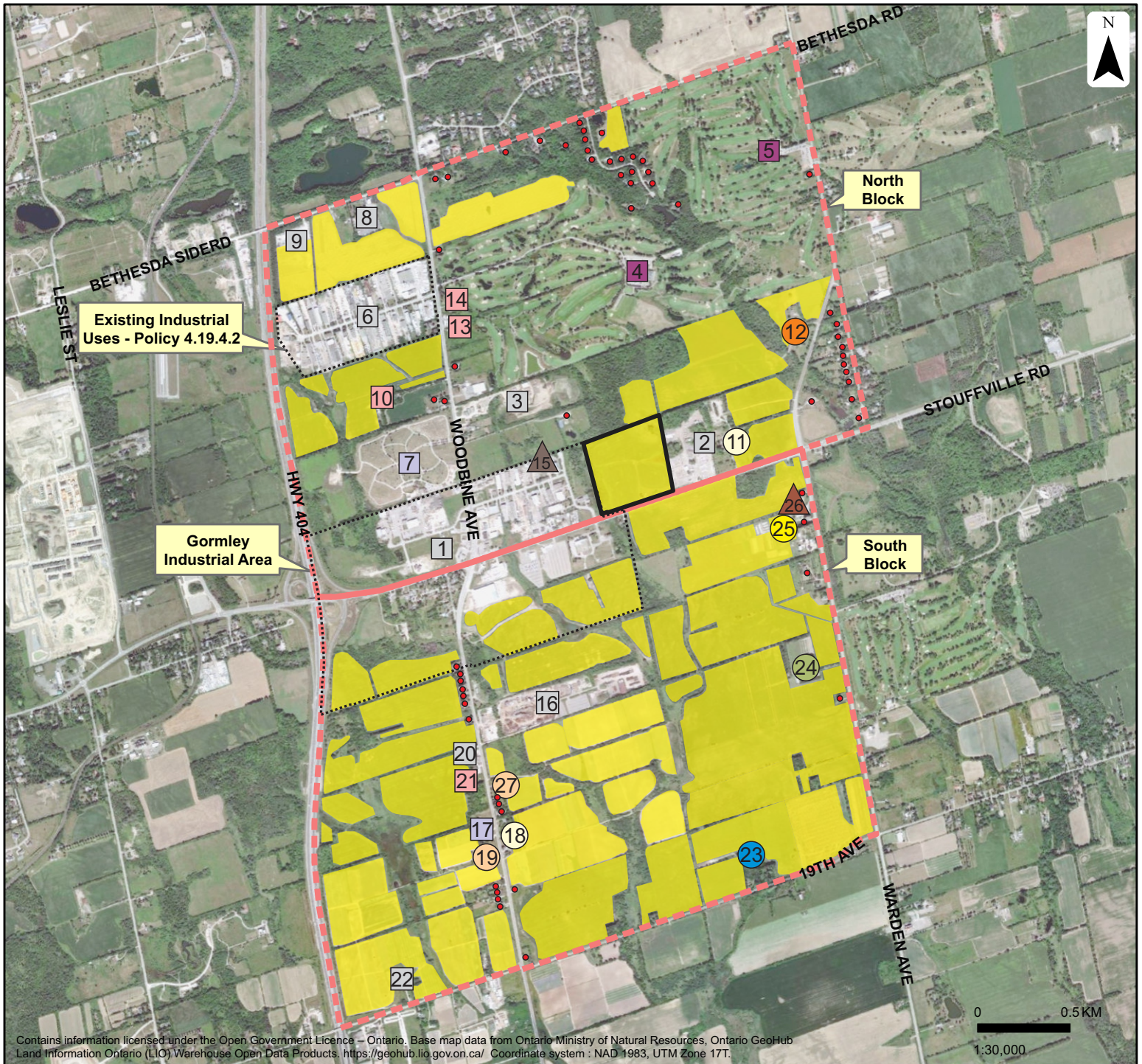
The Subject Lands are located immediately east of the Gormley Industrial Area and west of the industrial operation, 404 Stone. Jenkins Soil Mixtures is located approximately 200 m north of the Subject Lands. The Gormley Industrial Area contains a number of industrial, commercial and residential uses. 404 Stone is a landscape supplier which sells outdoor lawn equipment, precast pavers, and aggregates. The remaining industrial uses are located in the northwestern portion of the north block, with Operation #6 containing a number of existing industrial operations permitted through Policy 4.19.4.2 of the Whitchurch-Stouffville Official Plan.

The two recreational uses identified in the north block are both golf courses. Station Creek Golf Club is located approximately 415 meters north of the Subject Lands, whereas Bethesda Grange Golf Course is located approximately 1000 meters (1.0 km) northeast of the Subject Lands.

















The three commercial operations and the institutional use (funeral home and cemetery) are located northwest of the Subject Lands. The lands on which the non-agricultural land uses are located have been disturbed and are unavailable for agricultural production.

In addition to the twelve non-agricultural land uses identified within the north block, approximately 40 non-farm residences were identified. These non-farm residences are primarily located off of Highway 8, Sawmill Lane, and Warden Avenue.





**Legend**

-  Subject Lands
-  Study Blocks
- Agricultural Uses**
  -  Hobby Farm
  -  Equestrian Operation
  -  Dairy Operation
  -  Beef Operation
  -  Cash Crop Operation
  -  Empty Livestock Facility
  -  Cultivable Land
- Agriculture-Related Uses**
  -  Agricultural Wholesaler
- On-Farm Diversified Uses**
  -  Roadside Stand
- Non-Agricultural Uses**
  -  Commercial
  -  Industrial
  -  Institutional
  -  Recreational
  -  Non-Farm Residence

**Figure 6**  
General Land Use

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### **South Block**

Within the south block, six non-agricultural land uses were identified. These uses include four industrial operations, one institutional use, and one commercial use.

The Gormley Industrial Area extends into the south block and contains a variety of non-agricultural land uses. Don Mills Steel and Metal Ltd, an industrial use, is located approximately 500 meters south of the Gormely Industrial Area. The remaining two industrial uses are contracting businesses and are located southwest of Don Mills Steel and Metal Ltd. The commercial use, Victoria Auto Sales, and the institutional use, Heise Hill Cemetery, are also located southwest of Don Mills Steel and Metal Ltd.

In addition to the six non-agricultural land uses identified within the south block, approximately 20 non-farm residences were identified. These non-farm residences are primarily located along Highway 8.

### **Agriculture-Related Uses**

Agriculture-related uses are farm-related commercial and industrial uses. As defined in the PPS, these are uses “that are directly related to farm operations in the area, support agriculture, benefit from being in close proximity to farm operations, and provide direct products and/or services to farm operations as a primary activity”. Examples of agriculture-related uses include:

- ♦ retailing of agriculture-related products (e.g., farm supply co-ops, farmers’ markets, and retailers of value-added products like wine or cider made from produce grown in the area);
- ♦ livestock assembly yards;
- ♦ farm equipment repair shops;
- ♦ industrial operations that process farm commodities from the area such as abattoirs, feed mills, grain dryers, cold/dry storage facilities and fertilizer storage facilities, which service agricultural area;
- ♦ distribution facilities;
- ♦ food and beverage processors (e.g., wineries and cheese factories); and
- ♦ agricultural biomass pelletizers.

The Agricultural Systems Portal identified one agriculture-related use in the area surrounding the Subject Lands. This use is Rouge River Farms, which distributes sweet corn to grocery stores throughout North America and is located in the Gormley Industrial Area, within the north block.

### **On-Farm Diversified Uses**

The PPS defines on-farm diversified uses as “uses that are secondary to the principal agricultural use of the property and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, and uses that produce value-added agricultural products.”

One on-farm diversified land use was identified during the desktop review. This use is Meadow Sweet Farm, which is located in the northwestern portion of the south block and produces vegetables, herbs, beef, and pork that is sold at a farm market on the same parcel.



## **Agricultural Uses**

The PPS definition of agricultural uses: “means the growing of crops, including nursery, biomass and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture; apiaries; agro-forestry; maple syrup production; and associated on-farm buildings and structures, including, but not limited to livestock facilities, manure storages, value-retaining facilities and accommodation for full-time farm labour when the size and nature of the operation requires additional employment.”

### **North Block**

Within the north block, two agricultural land uses were identified. These uses include one hobby farm and one equestrian operation. The equestrian operation is located northeast of the Subject Lands, whereas the hobby farm is located east of the Subject Lands. Immediately east of the north block, there is also one dairy operation and two equestrian operations. In addition to the two agricultural uses within the north block, small areas of land are cultivated and the lands appear to be tenant farmed based on the lack of agricultural facilities surrounding the cultivatable lands.

Agricultural uses and cultivated lands within the north block are interspersed between the various non-agricultural land uses. The amount of land used for the cultivation of crops within the north block pales in comparison to the amount of land used for non-agricultural uses. Within the north block, there are approximately 639 ha (1579 acres) of land, of which only approximately 116 ha (287 acres) are cultivated. Cultivatable lands within the north block account for approximately 18.2% of the total area of the north block, while the remaining lands are forested or used for non-agricultural uses. This, along with the lack of investment in agricultural facilities and the limited agricultural operations identified in the area, is indicative of the agricultural sector’s waning influence in the north block.

### **South Block**

Within the south block, six agricultural uses were identified. The uses include one hobby farm, one beef operation, one dairy operation, one cash crop operation, and two empty livestock facilities. In addition to the agricultural land uses identified, there are large areas of cultivated lands that also appear to be tenant farmed based on the lack of surrounding agricultural facilities.

Within the south block, agricultural operations and cultivated lands continue to be interspersed between non-agricultural land uses. However, the influence of agriculture in the south block is much more apparent, compared to the north block. Within the south block, the majority of the lands are cultivated for the production of crops. Within the south block, there are approximately 636 ha (1572 acres) of land, of which approximately 394 ha (974 acres) are cultivated. Cultivatable lands within the south block account for approximately 61.9% of the total area of the south block, while the remaining lands are primarily forested or used for non-agricultural uses.

The agricultural sector appears to have a greater influence in the character of the south block. The agricultural operations are larger in scale and there is significantly more cultivated land than the north block.

## **AGRICULTURAL LAND IMPROVEMENTS**

OMAFRA's Agricultural Information Atlas (AgMaps) provides artificial drainage mapping for the province. This online tool was accessed to obtain drainage mapping for the Subject Lands and the surrounding area.

According to AgMaps, no portion of the Subject Lands contain random or systematic tile drainage installations. Additionally, there are no constructed drains located within the Subject Lands.

Within the surrounding area of the Subject Lands, limited installations of both random and systematic tile drainage are present. Although tile drainage installations in the surrounding area are limited, investments in tile drainage are more abundant within the south block, compared to the lands within the north block. No portion of the south block, nor the north block, contain any constructed drains.

## **FRAGMENTATION**

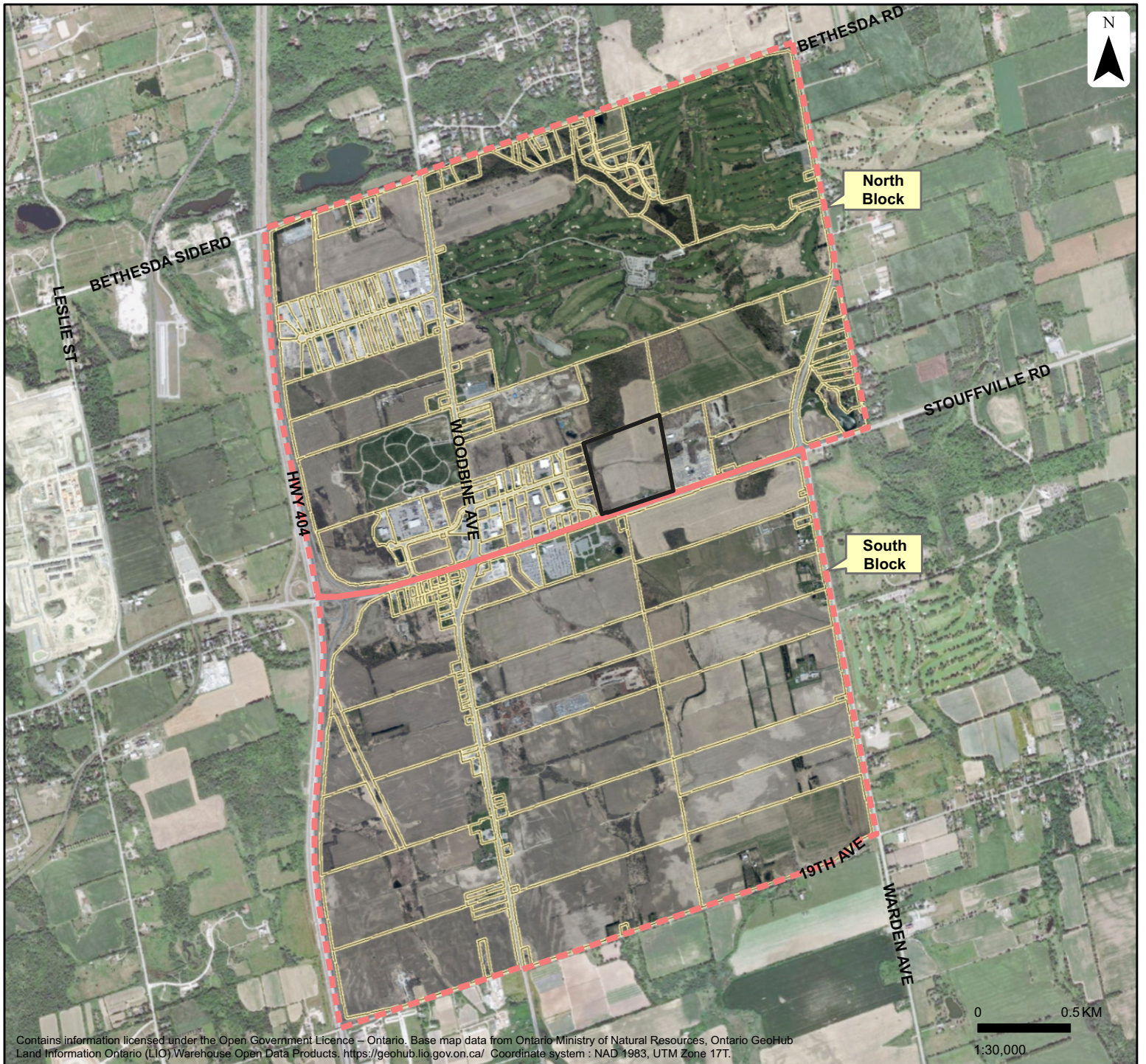
Fragmentation of agricultural lands can have a negative impact on the viability of agricultural lands and its long-term preservation for agricultural purposes. Fragmentation of farmlands can diminish the economic viability of the agricultural area by reducing farming efficiency and increasing operating costs for farmers who must manage multiple small, separated parcels. Larger farm parcels can accommodate a wider range of agricultural activities and ensure long term viability of the property. In contrast, smaller farm parcels cannot offer the same flexibility and may not be viable as standalone parcels. Generally, smaller farm parcels cannot sustain a family farm without a secondary source of income (off farm) to maintain the agricultural operation.

Additionally, agricultural areas which have been fragmented often have a higher occurrence of non-agricultural land uses, which in turn can result in more frequent occurrences of conflict arising between agricultural and non-agricultural land uses. Agricultural areas with lower levels of fragmentation are considered to be more viable economically for agricultural uses and generally have fewer sources of non-agricultural land use conflicts. In most cases, these areas have a higher priority for protection. High levels of fragmentation in an agricultural area lower the areas agricultural priority.

Based on our review of the lot fabric in the surrounding area of the Subject Lands using AgMaps, there is a mix of parcel sizes ranging from single residential (< 1 ha) to large agricultural parcels (>40 ha). It should be noted that the level of fragmentation is much higher for the lands within the north block, compared to the lands within the south block.

The north block has experienced a high level of fragmentation which is partially attributed to the Gormley Industrial Area, residential uses located off Sawmill Lane and Highway 8, and the presence of a number of non-agricultural land uses. The majority of parcels within the north block are not suitably sized for a variety of agricultural uses.

The south block has experienced significantly less fragmentation than the lands within the north block. The majority of parcels within the south block are greater than 20 ha in size and have fewer occurrences of residential land uses and other non-agricultural land uses. The majority of parcels within the south block are suitably sized for a variety of agricultural uses. The lot fabric in the area surrounding the Subject Lands is shown in Figure 7 below.



**Legend**

Subject Lands
  Study Blocks

## Figure 7 Land Fragmentation

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## **ASSESSMENT OF AGRICULTURAL PRIORITY**

The PPS requires that non-agricultural development avoid locating in prime agricultural areas whenever possible. Where this is not possible or practical, the PPS directs development to lands with lower agricultural priority. When choosing between two or more locations with the same or similar agricultural capability, the PPS directs development to “lower priority agricultural lands”. Although, neither the PPS nor OMAFRA specifically defines in policy “lower priority agricultural lands”, there are a number of considerations used by OMAFRA to determine the 'agricultural priority' of an area. These considerations include the ability of the site to comply with the requirements of MDS I, current land use, amount of capital investment in agricultural infrastructure, amount of land under active cultivation, existing degree of lot fragmentation to the surrounding agricultural land base, and proximity to incompatible land uses such as urban and rural settlement areas.

The Subject Lands are located within the York Region Official Plan’s Agricultural Area land use designation. To determine whether the Subject Lands would be more appropriately designated as Rural Area, the agricultural priority of the Subject Lands was assessed.

We have concluded that the Subject Lands are lower priority agricultural lands for the following reasons:

1. The Subject Lands are not located within a specialty crop area and the surrounding area does not show any characteristics of a specialty crop area;
2. There does not appear to be any investment in agricultural infrastructure and land improvements such as tile drainage;
3. The Subject Lands are located in a highly fragmented agricultural area in which there is a mix of agricultural and non-agricultural land uses. This is especially evident in lands within the north block. The presence and prevalence of the non-agricultural land uses increases the potential for conflict arising between agricultural and non-agricultural land uses, which in turn reduces the agricultural priority of the area;
4. The Subject Lands are located immediately east of the Gormley Industrial Area. The close proximity and high concentration of non-agricultural land uses significantly increases the potential for conflicts with agriculture and make these lands less desirable to farm than other lands further removed from these non-agricultural influences;
5. The majority of lands in the north block are used for non-agricultural land uses, with only approximately 116 ha of the 639 ha block (approximately 18.2%) of the area available cultivation of crops;
6. The presence of the existing non-farm land uses will significantly limit the establishment of livestock operations in the area because they will not likely be able to meet the minimum distance separation II formula;
7. High traffic volumes along Highway 8, Stouffville Road, and Warden Avenue make moving farm machinery difficult and dangerous at times. A number of agricultural parcels located north of



Stouffville Road are situated between non-agricultural land uses on all sides, forcing farm machinery to use these highly trafficked roads; and

8. The close proximity of the Gormley Industrial Area and additional non-agricultural land uses creates potential MDS II setback constraints that would limit the opportunity for new or expanding livestock operations within the Subject Lands.

## CONCLUSIONS

Despite the relatively high agricultural capability of the lands, it is our opinion that the Subject Lands and the north block are not part of a prime agricultural area as they are dominated by non-farm land uses. Establishing a farm operation in this area will be compatible with many of the existing land uses. We consider the lands within the north block to have a lower agricultural priority compared to those in the south block; and redesignating the north block to a rural designation to be a reasonable consideration that more accurately represents the existing conditions. A rural designation would still permit existing agricultural uses and activities.

Respectfully submitted by:



Sean Colville, B.Sc., P.Ag.  
President, Colville Consulting Inc.