

October 14, 2020

By E-Mail Only to *regional.clerk@york.ca*

Chairman Wayne Emmerson and Members of Regional Council
The Regional Municipality of York
17250 Yonge Street
Newmarket, ON
L3Y 6Z1

Attention: Mr. Christopher Raynor, Regional Clerk

Dear Chairman Emmerson and Members of Council:

**Re: Municipal Comprehensive Review (“MCR”)
Planning for Employment and Employment Conversions
3450 Elgin Mills Road East (the “Snider Farm”)
City of Markham (the “City”)
Romandale Farms Limited (“Romandale”)**

RJ Forhan and Associates are the land use planning consultants for Romandale, which owns the Snider Farm.

We have now had the opportunity to review the Region of York (“**Region**”) staff report dated October 15, 2020 which outlines recommendations on conversion requests and on proposed Employment Area mapping (the “**Report**”). The Report refers to the Snider Farm as ID no. M10.

To summarize prior correspondence filed on behalf of Romandale, the Snider Farm is not subject to an employment conversion as it is not currently designated employment. The Snider Farm is currently designated Urban Area in the Region’s Official Plan. While the Snider Farm was proposed to be designated Future Employment Area in the Markham Official Plan, 2014, this designation was appealed by Romandale to the Local Planning Appeal Tribunal (the “Tribunal”). This appeal remains outstanding and the designation is therefore not in force.

The Report confirms that Regional staff do not recommend that the Snider Farm be converted as part of this MCR. Staff consider the conversion request to be premature as the lands were recently brought into the urban boundary through the Region’s previous MCR and have not yet had the opportunity to develop. This recommendation is also not consistent with the City of Markham (“**City**”) Council’s position that the consideration of this request for conversion should be postponed and dealt with through the City’s secondary plan process.

As stated in our September 16, 2020 letter to Regional Council (appended) and summarized below, a purely employment land use designation for the Snider Farm is neither good planning, nor in the public interest:

- The Snider Farm is not in a Provincially Significant Employment Zone;
- Designating the Snider Farm for employment-only use cannot be justified, as staff suggest, by its proximity to a 400 series highway, since ready access to existing transportation infrastructure is equally a hallmark of good mixed-use communities;
- A mixed-use designation, as proposed by us for the Snider Farm, will create more and better jobs, and they will be created sooner than with an employment-only designation;

- Our proposed approach will result in development that will contribute to both the Region's employment and residential growth targets - 43% of the total developable area of the Snider Farm will be used for employment; and,
- A mixed-use community on the Snider Farm will support Regional transit, protect and enhance natural and cultural heritage resources, and will harmonize with surrounding land uses, both planned and proposed.

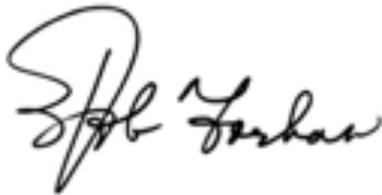
Since 2013 Romandale has been working in good faith with City Council and staff with the understanding that the land use for the Snider Farm would be addressed through the secondary planning process for the City's Future Urban Area. Romandale has also been patiently waiting since 2014 to have its Tribunal appeal adjudicated.

We maintain our view that the appropriate land use designation for the Snider Farm should be determined through the greater detailed planning analysis inherent in the City's secondary plan process. This will allow the Region to make a more informed decision on the most appropriate designation for the Snider Farm at the appropriate time.

Romandale urges Regional Council to heed the City Council position to defer any decision related to the Snider Farm. This, we feel, will allow the City's Future Urban Area Secondary Planning process to continue and better inform any future Regional Council decision.

Please contact us if you require further clarity on this matter.

Sincerely,



Bob Forhan RPP

c.c. Romandale Farms Limited
Paul Freeman
Paul Bottomley
Marg Wouters
Michael Melling

September 16, 2020

By E-Mail Only to *regional.clerk@york.ca*

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RJ Forhan and Associates are the land use planning consultants for Romandale, which owns the Snider Farm.

The purpose of this letter is to advise that a purely employment land use designation for the Snider Farm is not, in our view, either good planning or in the public interest.

Key Points

- The Snider Farm is not in a Provincially Significant Employment Zone.
- Designating the Snider Farm for employment-only use cannot be justified, as staff suggest, by its proximity to a 400 series highway, since ready access to existing transportation infrastructure is equally a hallmark of good mixed-use communities;
- A mixed-use designation, as proposed by us for the Snider Farm, will create more and better jobs, and they will be created sooner than with an employment-only designation;
- Our proposed approach will result in development that will contribute to both the Region’s employment and residential growth targets - 43% of the total developable area of the Snider Farm will be used for employment; and
- A mixed-use community on the Snider Farm will support Regional transit, protect and enhance natural and cultural heritage resources, and will harmonize with surrounding land uses, both planned and proposed.

Background

The Snider Farm is a 38.8 hectare parcel of land, of which 26.84 hectares are developable; a map depicting its location is appended to this letter.

Currently, the City's in-force Official Plan designates the Snider Farm "Agricultural". This designation is outdated, as it is the intention of both the Region and the City that the lands be urbanized.

Our client filed an application for an amendment to the City's Official Plan (the "OPA") in order to set a policy framework for a mixed-use development. However, after the OPA was submitted, the City sought through its 2014 Official Plan (the "2014 OP") to re-designate the Snider Farm "Future Employment Area".

After the City adopted the 2014 OP, Romandale appealed it to the Local Planning Appeal Tribunal.

A Mix of Uses is Good Planning for the Snider Farm

The vision for the Snider Farm is a diverse range of employment, residential and community uses which will allow people to live, shop and play there.

Upon buildout, we estimate in excess of 1600 good quality and diverse jobs (as opposed to the minimum of 1337 jobs), together with 640 new residents, resulting in a density of approximately 83 persons and jobs *per* hectare. This will exceed the Region's requirement of 70 people and jobs *per* hectare.

The development plan will maintain the integrity of the Greenbelt Natural Heritage System, and our client is actively working with the Province, City and Conservation Authority to enhance habitat for species at risk. The plan will also protect the listed heritage structures on the Snider Farm, as well as the 100 maple trees planted in 1967, Centennial Row, to commemorate Canada's Centennial.

The intersection of Warden Ave. and Elgin Mills Rd. E., which anchors the Snider Farm, is intended pursuant to the City's conceptual master plan to be a Central Node. The proposed development meets this objective.

This plan will complement approved and proposed land uses surrounding the Snider Farm, which include:

- Approved mid-rise residential land uses to the south;
- Existing and proposed residential and low-rise mixed-use land uses to the West;
- Employment uses and the Markham Innovation Exchange District envisioned to the north; and
- A Regionally-proposed urban expansion to the east to accommodate residents and jobs.

Employment-Only Use of the Snider Farm is Poor Planning

The creation of good jobs will not be achieved by imposing an employment-only designation on the Snider Farm. In our experience, these designations attract fewer and less desirable jobs like computer infrastructure/data centres and large warehouses, which employ very few people. Or they attract users that generate significant adverse impacts (visual/aesthetic, noise, dust, odour).

Neither are the type of employment the Region and City should be striving for in this area.

In addition, an employment-only designation will not result in compact development, will not create a pleasing sense of place, and will not support transit or make efficient use of the Region and City's existing and proposed infrastructure.

The Region's Goal Should be Complete Communities

Our client's vision for the Snider Farm is a mix of different employment types with mid-rise residential. A conceptual plan has been shared with City staff on a without-prejudice basis.

The Region should be trying to build complete communities, which can only be achieved by offering a range of employment opportunities in proximity to housing and community facilities. Our client's proposal will do that.

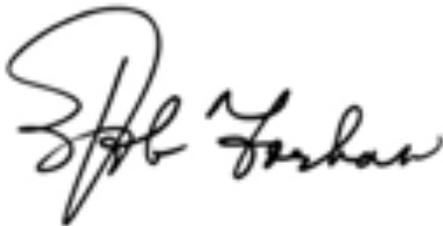
Conclusion

We, our client and its consulting team are well-versed in local knowledge and experience, and have undertaken countless hours of analysis and research in support of our client's vision. This has resulted in a deep and thorough understanding of the Snider Farm and the surrounding area.

For the reasons we have outlined here, we ask that Regional Council reject an employment-only designation for the Snider Farm, as well as any suggestion that it be identified as any kind of significant employment area. Again, the Snider Farm is not currently designated for employment and is not within a PSEZ.

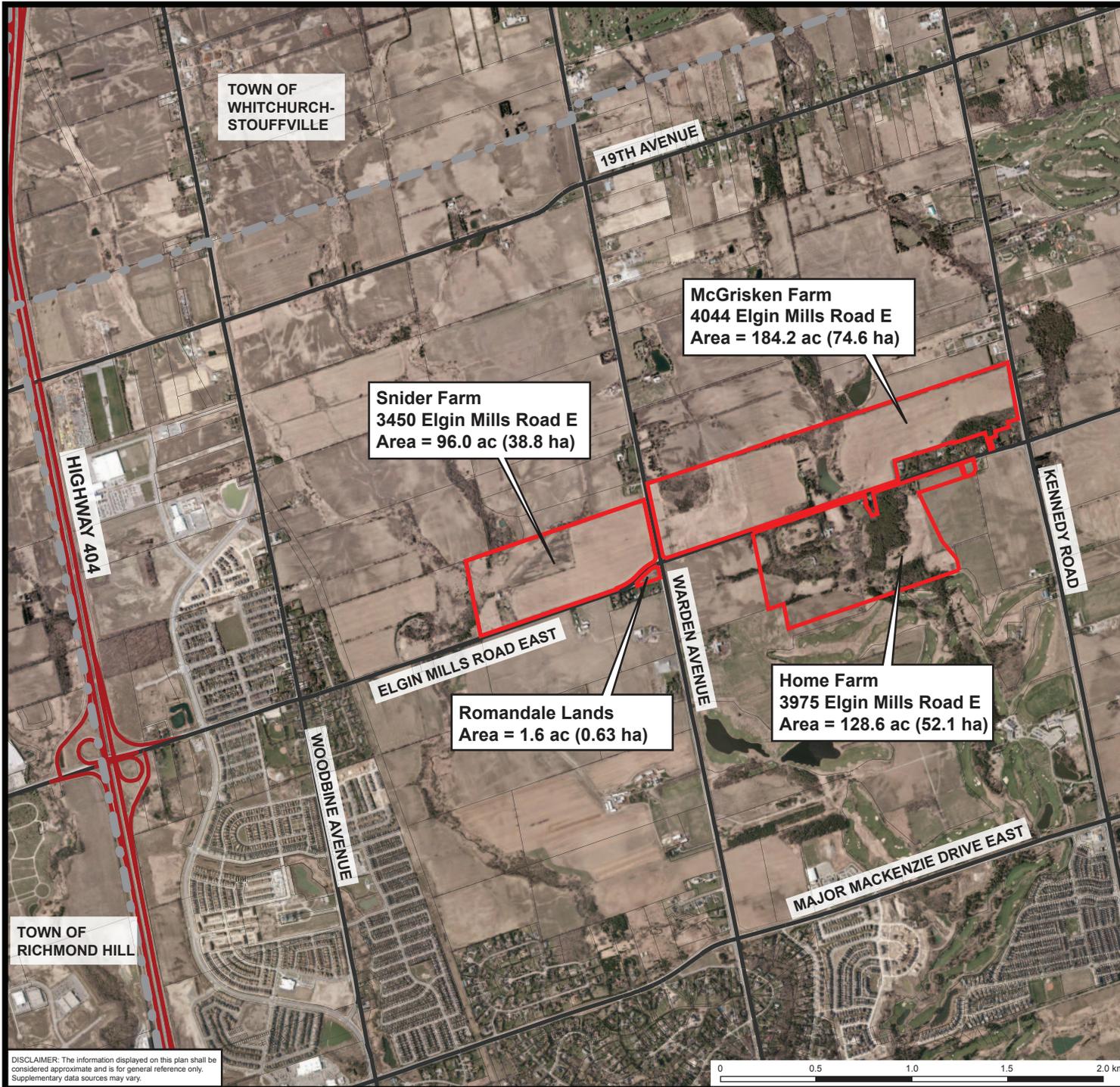
We would welcome an opportunity for continuing dialogue. In the meantime, please contact the undersigned should you have any questions or require clarification.

Sincerely,



Robert Forhan, RPP

c.c Romandale Farms Limited
Paul Freeman
Paul Bottomley
Marg Wouters
Michael Melling



LEGEND

- Romandale Farms Ltd Property Boundary
- Municipal Boundary
- = Provincial Highway

**Romandale Farms Ltd.
Landholdings**

Romandale Farms Ltd
City of Markham

Region of York Mapping
2013 Orthophotography

Scale: NTS
November 2014



RJ Forhan & Associates
Urban Planning Studio



DISCLAIMER: The information displayed on this plan shall be considered approximate and is for general reference only. Supplementary data sources may vary.