



*land use planning  
&  
development*

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January 13, 2021

Chair Wayne Emmerson and Members of Committee of the Whole  
Region of York  
17250 Yonge Street  
Newmarket, Ontario

Dear Chair Emmerson:

Re: Regional Official Plan Update Housing Challenges and Opportunities

I act on behalf of the Leslie Stouffville Landowners Association (LSLA), landowners in the Leslie Street/Stouffville Road area, encompassing approximately 500 acres/200 hectares of land in the area of Leslie Street and Stouffville Road, surrounding the Gormley GO Station. This submission provides some general comments on the Regional Official Plan Update Housing Challenges and Opportunities Report, which is Item C.2 on the Committee of the Whole Planning and Economic Development Agenda of January 14, 2021. We wish to note that LSLA, although representing a large number of landowners with significant land holdings, does not include members of BILD. For the purposes of the Regional Municipal Comprehensive review LSLA requests that it be given the same level of status as a stakeholder group as the planning process moves forward.

As part of the Regional Official Plan Update we also wish to reference the correspondence from the City of Richmond Hill dated February 28, 2020 (Attachment 1) and received by the Region of York Committee of the Whole at its meeting of March 12, 2020 (Item C.2) which provided Recommendations for the York Region Municipal Comprehensive Review related to the Gormley GO Station Area and lands associated with the development of a Highway 404 Economic Corridor. This area was to facilitate housing and economic development in the City of Richmond Hill and the Town of Whitchurch-Stouffville. The recommendation adopted by Richmond Hill Council also resolved that lands currently designated COUNTRYSIDE AREA along this corridor be re-designated SETTLEMENT AREA with NO change to the designated LINKAGE AREA or CORE AREA lands and the Region of York and the City of Richmond Hill, through their ongoing respective Municipal

Comprehensive Reviews (MCR), provide direction for the preparation of a Secondary Plan for the area north of 19<sup>th</sup> Avenue, north of the North Leslie Secondary Plan up to Bethesda Road, east and south of the West Gormley Secondary Plan Area. My letter of February 25, 2020 to Richmond Hill Council, in support of the recommendations that were adopted, is also attached (Attachment 2) for your information.

It should be noted that this correspondence was also included in the material prepared by the Town of Whitchurch-Stouffville for their submission to the Minister of Municipal Affairs and Housing in support of a South Gormley Employment Area Expansion and Greenbelt Enhancement Options.

The Regional Official Plan Update Housing Challenges and Opportunities report clearly recognizes that “York Region is not achieving housing affordability targets and in recent years has fallen short of forecasted growth levels”. The referenced Watson Report highlights “the lack of affordable housing options” has led to slower growth in the region over the last decade. The report also indicates that “a robust housing supply and full mix of housing options, including affordable options is integral to building complete communities where people of all ages and incomes can live, work and play. Complete communities provide housing options for all residents and workers that results in more inclusive communities, reducing the need for long commutes and the associated climate related impacts that accompany them.”

The Report also indicates that “planning to achieve population forecasts requires growth and infrastructure investment. If the infrastructure is underutilized, it is not fiscally sustainable.” It should be noted that the Gormley GO Station is an existing part of the transportation infrastructure, which in addition to the recently upgraded Highway 404, provides for an Economic Corridor to facilitate housing and economic development in the City of Richmond Hill and the Town of Whitchurch-Stouffville.

The input received from both the City of Richmond Hill and the Town of Whitchurch-Stouffville support this area being considered as a future development and growth area, in support of the utilization of provincial infrastructure and to provide for a future employment area and the provision of a full range of residential options, other supporting land uses and the maintaining and enhancement of core and linkage area greenspace for the development of a complete community. This input has not been recognized in the subject report, or in work on the Municipal Comprehensive Review to date.

In support of this area being considered for future development as a complete community, we have also provided information that identifies the need for a review of the COUNTRYSIDE land use designation which is no longer appropriate for the area in question as a result of the erosion of the agricultural community and the expansion of transit and urban development surrounding this area. There is an urgent need for transition of these GO Station Area lands to urban use for compatibility and appropriate comprehensive development. This will provide the best solution for the long-term protection of the key environmental components of the ORMCP, while addressing the

needs of the remaining local farmers to transition to other more appropriate rural areas to carry on their farming activities.

The Oak Ridges Moraine Conservation Plan provides a clear definition for purpose of the COUNTRYSIDE designation which is:

**13. (1) The purpose of Countryside Areas is to encourage agricultural and other rural uses that support the Plan's objectives by,**

**a. protecting prime agricultural areas;**

**b. promoting and protecting agricultural and other rural land uses and normal farm practices;**

**c. maintaining the rural character of the Rural Settlement**

Within the area encompassed by the LSLA, (as well as the lands on the east side of Hwy.404 in Whitchurch-Stouffville) "normal farm practices" can no longer be carried out and the "rural character" continues to be eroded. The area, which is in the City of Richmond Hill, is no longer a "Rural Settlement" but part of the changing fabric of the City as it urbanizes into the future. As part of York Region's Municipal Comprehensive Review, this matter should also be addressed through a review of the agricultural policies and Oak Ridges Moraine Policies, which have not been properly evaluated since their original creation almost 20 years ago. This matter has also been addressed in correspondence to you in the past from John Doner Limited (a member of LSLA) and most recently in a letter from John Doner Limited to Steve Clark, Minister of Municipal Affairs dated November 16, 2020 (Attachment 3).

It is therefore requested that the Committee of the Whole direct regional staff and their consultants carrying out York Region's Municipal Comprehensive Review to:

1. Carry out a review of the COUNTRYSIDE area as referenced in this and previous correspondence for consideration of redesignation to SETTLEMENT AREA;
2. Consider this area for the creation of a "complete community" through the preparation of a comprehensive inter-municipal Secondary Plan level planning exercise in order to be part of the solution for providing affordable housing options and other related urban uses associated with the Gormley GO Station MTSA; and
3. Confirm that LSLA be accepted as a significant stakeholder in the future as part of the York Region Municipal Comprehensive Review process.

Thank you for the opportunity to provide our input to this document and the regional planning process. We look forward to working with the Region as the Regional Official

Plan Update process continues.

Yours truly,

MPLAN Inc.

A handwritten signature in blue ink that reads "Michael S. Manett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Per: Michael S. Manett, MCIP, RPP.

Encl.

cc. LSLA  
City of Richmond Hill  
Town of Whitchurch-Stouffville

# ATTACHMENT 1



Office of the City Manager  
Office of the City Clerk

**Sent Via Email**

February 28, 2020

Chris Raynor  
Regional Clerk  
Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z1

Dear Mr. Raynor,

**Re: SRPRS.20.004 – York Region’s Municipal Comprehensive Review (Part 2): Major Transit Station Areas, Settlement Area Expansion, and Agriculture System**

Richmond Hill Council, at its meeting held on February 26, 2020, adopted the 2 separate recommendations with respect to staff report SRPRS.20.004, as follows:

**Recommendation 1:**

- a) That staff report SRPRS.20.004 regarding York Region’s Municipal Comprehensive Review (Part 2): Major Transit Station Areas, Settlement Area Expansion, and Agricultural System, be received;
- b) That Council endorse the staff recommendations contained in staff report SRPRS.20.004 for modifications to the identification, boundaries, and resident to job ratios of York Region’s proposed Major Transit Station Areas, as follows:
  - i) Staff Recommendation 1: Link the Richmond Hill Centre and Bayview MTSA’s,
  - ii) Staff Recommendation 2: Investigate through the OP Update the inclusion of lands on the east side of Bathurst Street in the Bathurst/Highway 7 MTSA,
  - iii) Staff Recommendation 3a: Consider Employment Conversion requests in setting of residents to jobs ratio,
  - iv) Staff Recommendation 3b: Increase Bayview MTSA to a ratio of 80 residents to 20 jobs, and
  - v) Staff Recommendation 3c: Increase Weldrick MTSA to a ratio of 80 residents to 20 jobs;

- c) That Council continue to direct City staff to communicate to the Region the desire to include the following GO Stations as MTSA's in the Region's intensification framework:
  - i) the Richmond Hill (Newkirk) GO Station; and
  - ii) the Gormley GO Station
- d) That Council support Regional Staff's proposed refinement of the Provincially identified Prime Agricultural Areas within the City of Richmond Hill;
- e) That York Region be advised of Council's support for the recommendations as set out in staff report SRPRS.20.004, and that the City Clerk forward a copy of staff report SRPRS.20.004 to York Region as input to York Region's Municipal Comprehensive Review Process.

**Recommendation 2:**

Whereas, the COUNTRYSIDE AREA designation of the Oak Ridges Moraine Conservation Plan (ORMCP) is intended to protect prime agricultural areas, promote and protect agricultural and other rural land uses and normal farm practices and maintain the rural character of a Rural Settlement; and

Whereas, the agricultural industry along the Leslie Street and Hwy. 404 Corridor is no longer economically viable, practical or safe and this intent can no longer be met; and

Whereas, the 2001 ORMCP direction for the designated COUNTRYSIDE AREA for this part of the City of Richmond Hill conflicts with the 2020 direction by the province to produce more housing faster (more homes and more choice) and provide for land use intensification within urban areas; and

Whereas, the ongoing protection and enhancement of the NATURAL CORE and NATURAL LINKAGE areas of the ORMCP can fulfill the core mandate of the ORMCP; and

Whereas, the province and Metrolinx have developed two new GO stations on the Oak Ridges Moraine in Richmond Hill; and

Whereas, Metrolinx has announced its desire to see urban intensification related to its Go Station lands and in the vicinity of its stations; and

Whereas, the Town of Whitchurch - Stouffville has no substantial marketable employment lands upon which to foster economic development; and

Whereas, the province has announced it will entertain 40 hectare urban SETTLEMENT area land expansions to provide for comprehensive planning; and

Whereas, discussions have taken place with the Toronto Region Conservation Authority (TRCA) staff confirming their support with the direction proposed in this motion;

Therefore, be it resolved that;

- i. The City of Richmond Hill and the Town of Whitchurch - Stouffville formally work together to approach the Region of York and the Province of Ontario to develop a Highway 404 economic corridor to facilitate the housing and economic development aspirations held by the province in 2020;
- ii. That the lands currently designated COUNTRYSIDE AREA along this corridor be re-designated SETTLEMENT AREA with NO change to the designated LINKAGE AREA or CORE AREA lands;
- iii. The Region of York and the City of Richmond Hill, through their ongoing respective Municipal Comprehensive Reviews (MCR), provide direction for the preparation of a Secondary Plan for the area north of 19<sup>th</sup> Avenue, north of the North Leslie Secondary Plan up to Bethesda Road, east and south of the West Gormley Secondary Plan.

In accordance with Council's directive, please find attached a copy Staff Report SRPRS.20.004 regarding York Region's Municipal Comprehensive Review (Part 2): Major Transit Station Areas, Settlement Area Expansion, and Agriculture System.

If you have any questions, please contact Patrick Lee, Director, Policy Planning at (905) 771-2420.

Yours sincerely,



Stephen M.A. Huycke  
Director of Legislative Services/City Clerk

Attachments



## ATTACHMENT 2

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February 25, 2020

Mayor Barrow and Members of Council

225 East Beaver Creek Road

Richmond Hill, Ontario L4B 3P4

Re: SRPRS.20.003 and SRPRS.20.004

Dear Mayor Barrow and Councilors,

I act on behalf of the Leslie Stouffville Landowners Association (LSLA), landowners in the Leslie Street/Stouffville Road area, encompassing approximately 500 acres/200 hectares of land (outlined on the attached map), impacted by the above noted reports and the recommendations contained therein.

- The purpose of the two referenced Staff Reports is to provide recommendations to City Council, on input to be provided to the Region of York, with respect to the Region's Municipal Comprehensive Review, which will lead to a new/updated Region of York Official Plan.

In this regard, at the outset, we wish to **support Recommendation d) i) in SRPRS.20.004** which supports "pursuing an expansion to the Urban Settlement Boundary and possible designation of an MTSA" in the vicinity of the Gormley GO Station.

The Gormley GO Station is within the area encompassed by the LSLA and is the core of an area that we have been studying on behalf of this landowner's group for the past year and a half.

- We also support the **Recommendation e)** which indicates that the lands south of Bethesda Road (as indicated on Map 5), are not to be considered within a Prime Agricultural Area.

Further to our support for these recommendations, and as part of the City of Richmond Hill input to the Region of York to the Municipal Comprehensive Review for the new Region of York Official Plan, and as input to the City's ongoing review and update of its own Official Plan, we want to provide additional input from the LSLA. This input specifically addresses the fact that the COUNTRYSIDE lands within the area north of the



North Leslie Secondary Plan Area and east and south of the West Gormley Secondary Plan Area, along the Hwy.404/Leslie Street corridor, are no longer appropriate or economically feasible to continue as agricultural and rural lands within the city of Richmond Hill.

The development and urbanization of lands within the City of Richmond Hill, through the implementation of the West Gormley Secondary Plan and the North Leslie Secondary Plan, as well as development in surrounding municipalities has created an unfavourable impact on the agricultural use of the lands within this area. This has rendering them impractical to continue as a functioning agricultural community and they no longer fulfill the purpose of the ORM COUNTRYSIDE designation as described in Section 4.10.3 of the Richmond Hill Official Plan and the Oak Ridges Moraine Conservation Plan (excerpt below).

The Oak Ridges Moraine Conservation Plan provides a clear definition for purpose of the COUNTRYSIDE designation which is:

**13. (1) The purpose of Countryside Areas is to encourage agricultural and other rural uses that support the Plan's objectives by,**

**a. protecting prime agricultural areas;**

**b. promoting and protecting agricultural and other rural land uses and normal farm practices;**

**c. maintaining the rural character of the Rural Settlement**

Within the area encompassed by the LSLA "normal farm practices" can no longer be carried out and the "rural character" continues to be eroded. The area, which is in the City of Richmond Hill, is no longer a "Rural Settlement" but part of the changing fabric of the City as it urbanizes into the future.

This important factor has not been considered in the "Long Term Planning for the North Richmond Hill Highway 404 Corridor" section of the SRPRS.20.004 (p.17). John Doner Limited, the major family farm company that has operated their agricultural business in this area of York Region and Richmond Hill since 1802, will also be commenting on the Staff Report and has prepared a more detailed Powerpoint Presentation that we would like to present to City staff and members of Council at another time to be scheduled separately from this Council meeting. This presentation will help to educate and explain why "normal farm practices" can no longer be carried out and the "rural character" continues to be eroded as part of the changing fabric of the City of Richmond Hill.

It is important to recognize that **the Oak Ridges Moraine Conservation Plan also provides for urban development through its SETTLEMENT AREA designation.** The purpose of this designation is:

**18. (1) The purpose of Settlement Areas is to focus and contain urban growth by, (O).a) 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;**

**(b) promoting the efficient use of land with transit-supportive densities, through Intensification and redevelopment within existing urban areas.**

Therefore, we (LSLA) request, and recommend to Council that the COUNTRYSIDE designated area within this part of Richmond Hill, through the Municipal Comprehensive Reviews being undertaken as part of the Region of York Official Plan and the City of Richmond Hill Official Plan review and update processes, be redesignated to SETTLEMENT AREA and that a comprehensive Secondary Plan process be initiated for these lands.

In this regard we have been carrying out discussions and meetings with a number of provincial and related agencies including Municipal Affairs and Housing; Ministry of Agriculture, Food and Rural Affairs; Ministry of Transportation; TRCA; Metrolinx; the Mayor of Whitchurch-Stouffville and several MPP's and MP's and local area representatives and landowners to address these matters.

We have initiated the planning work and created a first draft Proposed Community Development Plan, centred around the Gormley GO Station and including the Whitchurch-Stouffville lands identified by that municipality in their request to the Province for redesignation as an Employment Area, also referenced on p.18 of SRPRS.20.004. We are providing a copy of this initial Proposed Community Development Plan, as an attachment to this submission, along with the existing Oak Ridges Moraine Conservation Plan land use designations map and a map indicating the recommended changes from COUNTRYSIDE AREA to SETTLEMENT AREA. We request that this information be utilized by the City as our input to the Municipal Comprehensive Reviews being undertaken as part of the Region of York Official Plan and the City of Richmond Hill Official Plan. We therefore request that our submission be provided to the Region of York by the City for that purpose.

We have also initiated discussions with City staff and look forward to pursuing this input as part of the larger City building process that we believe is important to the long-term future planning and economic growth of the City of Richmond Hill within the Region of York.

Thank you for the opportunity to provide our input to Council and we look forward, on behalf of the LSLA, to the opportunity of presenting the Doner Powerpoint Presentation

to members of Council and City staff in the very near future.

Yours truly,

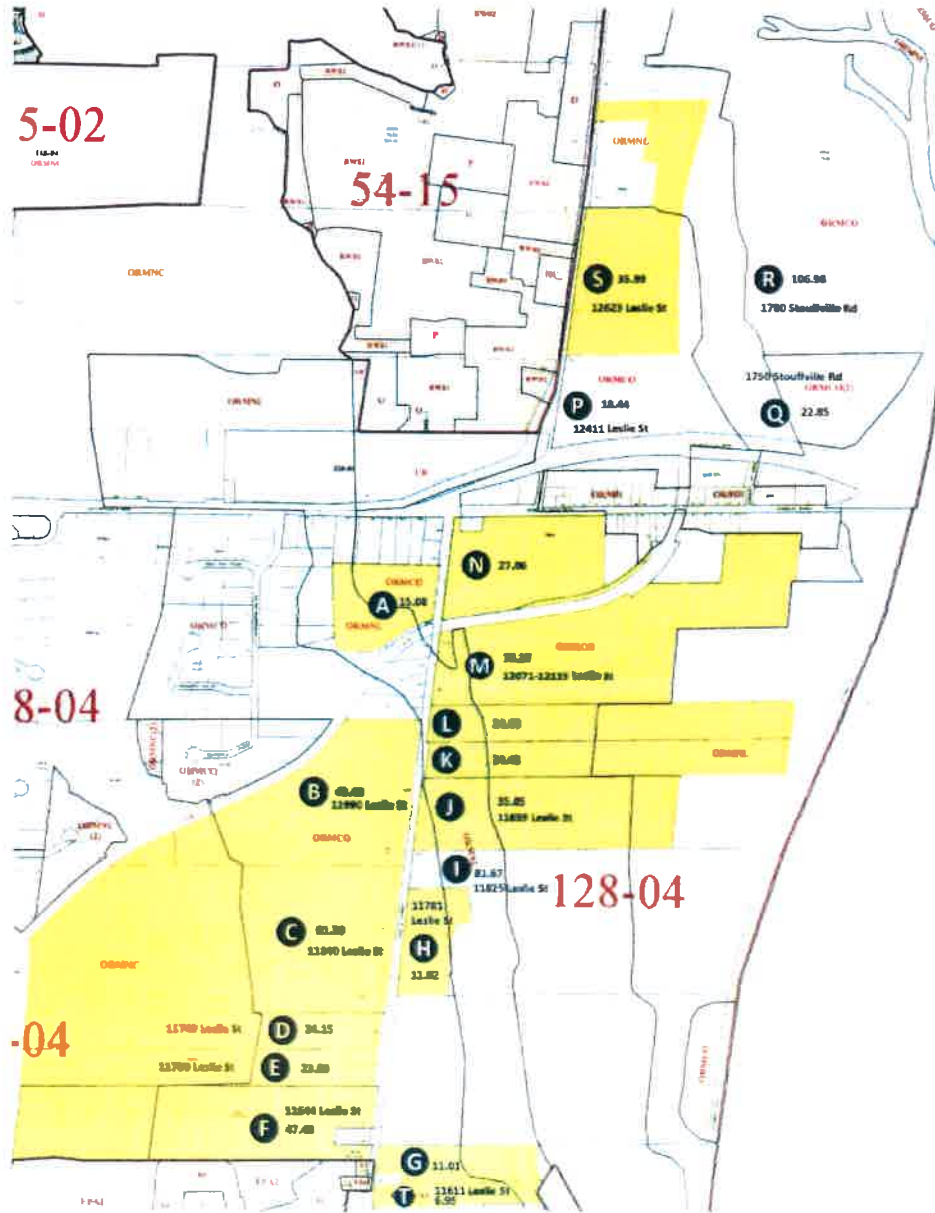
MPLAN Inc.

A handwritten signature in blue ink that reads "Michael S. Manett". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Per: Michael S. Manett, MCIP, RPP.

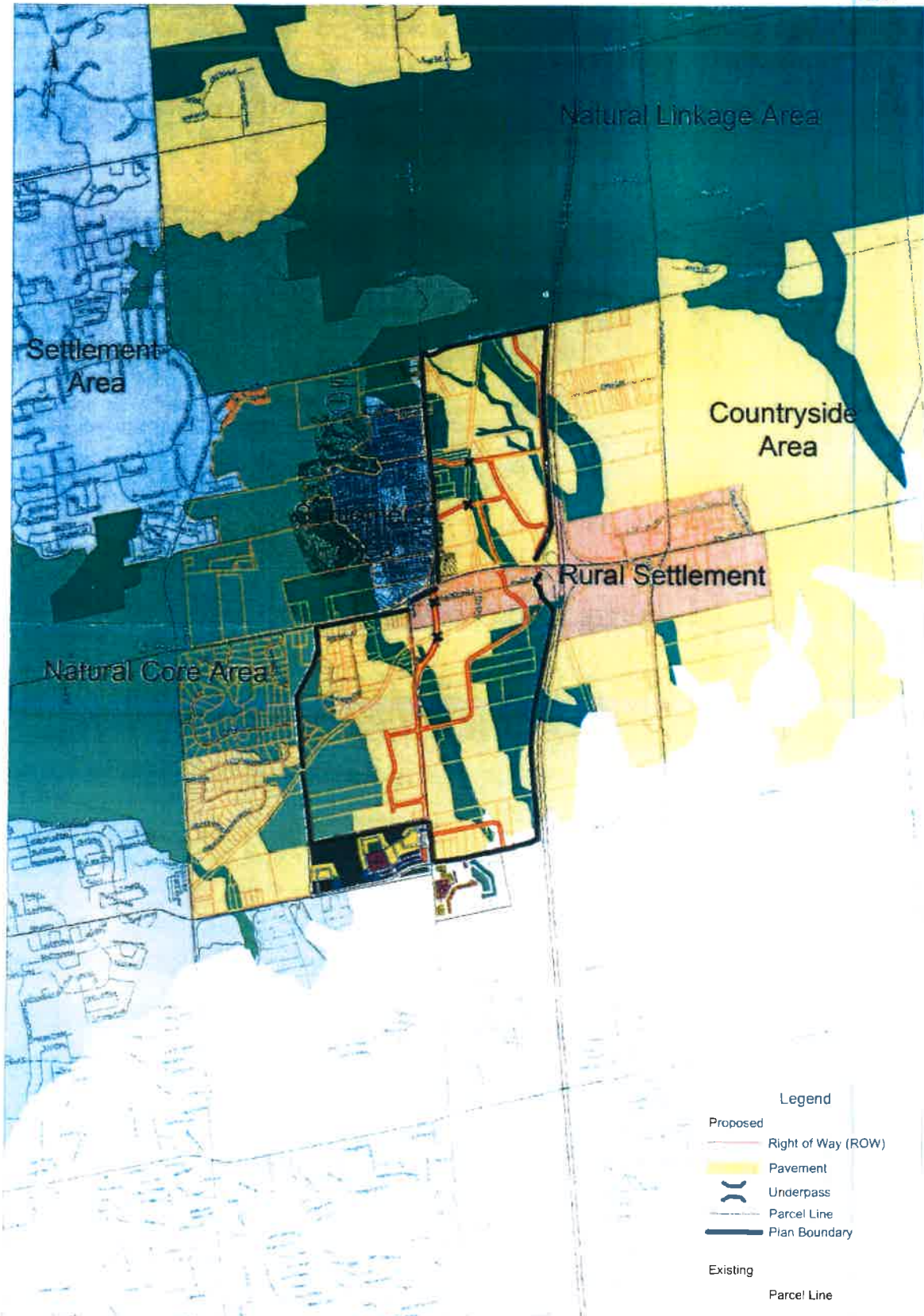
Encl.

LESLIE STOUFFVILLE LANDOWNERS ASSOCIATION OWNERSHIP MAP NOV. 1/19



# ORMCP (2017) Land Use Designations with Proposed Street Network

Gormley GO Station/Leslie Street and Stouffville Road Area

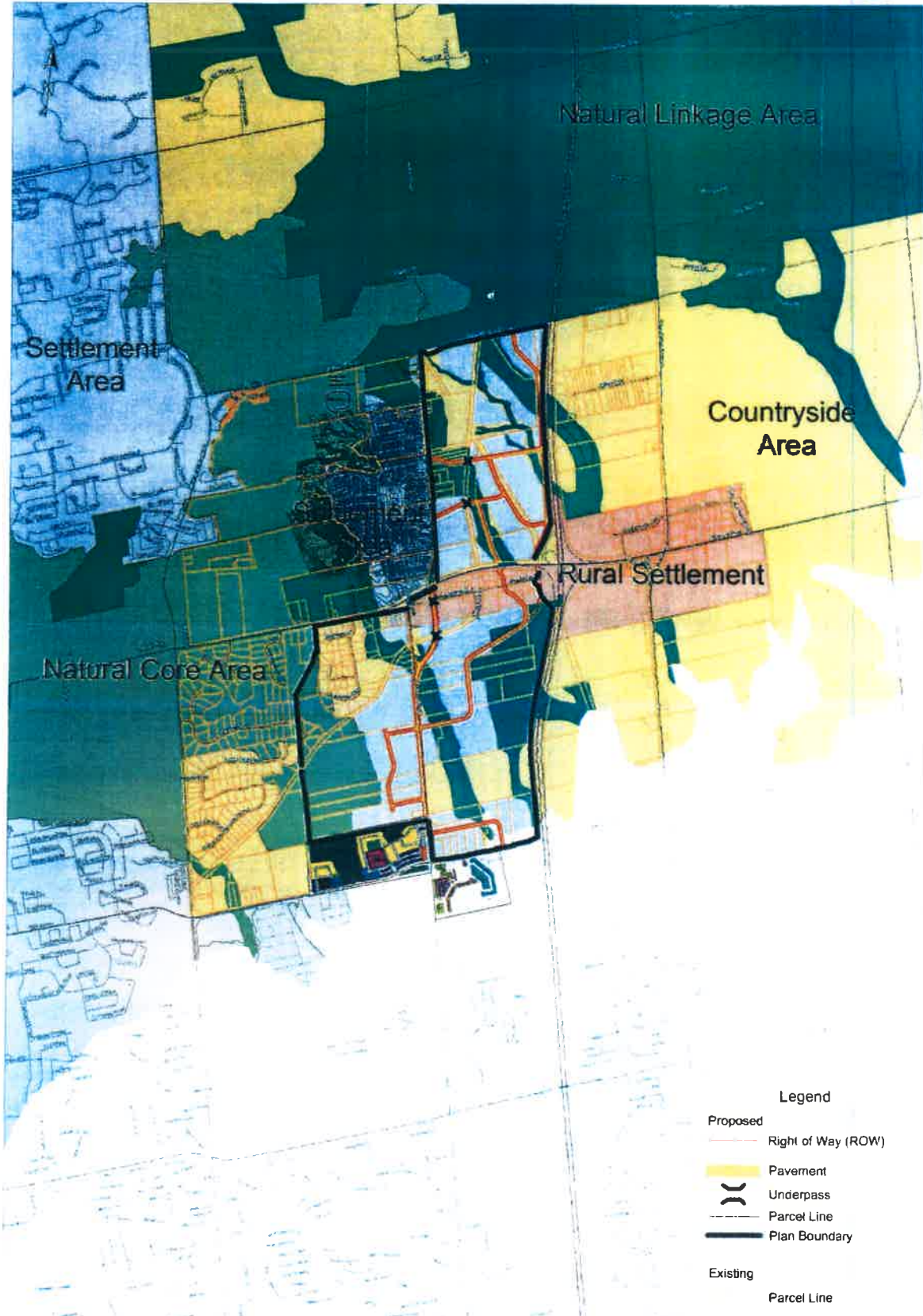


DRAFT

Community Development Plan

# Revised ORMCP Land Use Designations with Proposed Street Network

Gormley GO Station/Leslie Street and Stouffville Road Area



Plan Source: Draft Plan of Subdivision Part of Lot 1-4 (on 2) (OG Group) Township of Richmond Hill, Regional Municipality of York, Aug 21, 2015  
Parcel Source: Town of Richmond Hill Approves Residential Development Opportunity, CBRE Ltd. Feb 1, 2017 & Apr 1, 2015  
Plan Scale: 1:30,000 @ 11x17  
Print Date: November 4, 2016



# Gormley GO Station

## Community Development Area Secondary Plan

### City of Richmond Hill



Orthophoto Source: York Region WMS (Year 2018)  
 Plan Source: Draft Plan of Subdivision, Part of Lot 1-4, Con. 2 (DG Group) Town of Richmond Hill (Regional Municipality of York, Aug 21, 2015)  
 198 Avenue & Leslie Street, Richmond Hill (Approved Residential Development Opportunity) CBRE Ltd. Feb 1, 2017 & Apr 11, 2015  
 Proposed Provincially Significant Employment Zone, Town of Whitchurch-Stouffville, Feb. 2015  
 Plan Source: Town of Richmond Hill Zoning Map, Block 5, (2004) 6 (2016) 11 (2016) and 12 (2005)  
 Plot Scale: 1:16,000 @ 11x17"  
 Print Date: September 27, 2019 @ 12:45 pm



**Legend**

	Proposed Right of Way (ROW)
	Proposed Grading Limit
	Proposed Active Transportation
	Proposed Pavement
	Proposed Underpass
	Proposed Plan Boundary
	Proposed Rcao
	Existing Parcel Line

# ATTACHMENT 3

# John Doner Limited

PO Box 72 Gormley, Ontario, L0H 1G0

Tel: 905-887-5027 Fax: 905-887-3636 e-mail: johndoner@johndonerlimited.ca

November 16, 2020

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

Honourable Minister Clarke,

Discussions are occurring, at various levels of government, regarding opening the Oak Ridges Moraine/Greenbelt lands in York Region along the 400 series highways for development purposes. Information is being presented and statements being made about this land, much of which is misleading and/or completely wrong. As not only a York Region farmer, but **the** primary farmer in the 404 corridor through the Oak Ridges Moraine, we feel it is prudent for us to voice our opinion on this politically sensitive topic.

Blanket statements about the "400 series highways" are useless. There are several 400 series highways that cross through the Oak Ridges Moraine and/or Greenbelt, each with their own unique qualities and issues to address. There is no one-size fits all solution for these highways and should not be treated as such. Each area must be addressed individually with their pros and cons weighed to determine what is the best approach for protecting or developing the lands in question. It is short-sighted to make any decision for or against development without actually doing research. As we farm in the 404 corridor, all of my comments will be focused on that specific section of the Oak Ridges Moraine.

We are in favour of allowing development on these lands; despite the fact that it will force us to relocate our business out of this community. Please note that our position is in complete contradiction to the position of the York Federation of Agriculture. The Ontario Federation of Agriculture and their local branches such as York seem to approach farmland protection with blinders on, failing to realize that not all farmland need be, or should be, protected. Their position fails to realize the difference between farming in the city and farming in rural communities. The OFA and York Federations are primarily comprised of farmers from rural areas that have no clue about what us urban farmers face every day with our farm operation. Safety of our staff and the public is our main concern, and it is no longer safe to move machinery on the roads in this area. Construction, high-speed trains, increased traffic pressure, road design, and proximity to our urban neighbours make farming in the city increasingly difficult and in some cases impossible.

Relocating is the best possible course of action for us. Agriculture in the City of Richmond Hill, and Town of Whitchurch-Stouffville, like our business is in a state of decline. The infrastructure, needed for agriculture, no longer



exists in York Region. For example, fifty years ago there were eleven local mills, they are all gone. The Case tractor dealership in Stouffville shutdown in 2019, meaning that for Case parts one has to go to either Port Perry or Barrie. The local Kioti dealer in Vandorf has also closed their doors and the Kybota dealer in Stouffville sells primarily construction equipment. There is only one seed dealer left in York Region, the majority of their business comes from Durham. Due to the demise of these agricultural support companies growing food in York Region is becoming impractical. We need to be forward thinking in transitioning this land out of agriculture.

Many interest groups, individuals, organizations and politicians are offering opinions with regards to this area, but not one of those parties have visited the lands in question. Allow me to extend an invitation to you or anyone, either for or against development, to visit our farm and see firsthand the challenges we face farming in this community. Our farm is located at 12119 Leslie Street, in the City of Richmond Hill and I would welcome the opportunity to educate and enlighten as to why developing this particular part of the Oak Ridges Moraine might benefit the Province, City and the agricultural industry.

Let me address some of the arguments put forth against development. It has been said that: *York Region's agriculture and agri-food sector contribute \$2.7 Billion in annual GDP and 57,000 jobs in York Region, development would jeopardize these numbers.* Impressive figures, but entirely misleading. This argument would have you believe that the protected lands are solely responsible for this achievement, which is false. A large quantity of land in York Region is not within the boundary of the greenbelt, and the bulk of the jobs and GDP mentioned is in the food sector not solely agriculture. The food sector includes: restaurants, food processors, and grocery stores, as opposed to agriculture which is producers. Development of the 404 corridor would actually increase the number of jobs in the food sector and resulting GDP. This would be the case because there would be a need for restaurants and grocery stores to accommodate the additional people coming to the area for housing and employment purposes. One new Tim Hortons or Starbucks will employ more people than any individual farm operation in York Region.

Another argument against development that we have heard is *"The lands identified for potential conversion to employment land are mostly prime agricultural areas."* Simply put this is false or no longer true of the area in question. OMAFRA, describes on their website, the characteristics of prime agricultural areas as follows:

"Prime agricultural areas represent large, generally contiguous blocks of land that enable current and future opportunities for agriculture. They are characterized by the presence of:

- Prime agricultural land, defined as specialty crop areas and/or areas with Canada Land Inventory (CLI) Classes 1-3 lands;
- Other areas associated with prime agricultural land including CLI Classes 4-7 lands and additional areas with a local concentration of farms with characteristics of ongoing agriculture; and
- Agricultural areas with organic soil (not part of CLI classification system)"

Let's look further at these characteristics. "Prime agricultural areas represent large, generally contiguous blocks of land that enable current and future opportunities for agriculture." The 404 corridor lands are no longer "large, contiguous blocks of land." The agricultural land is fragmented by areas of concentrated development. The following two photos

are examples provided on the OMAFRA website to show the difference between “Prime agricultural areas” and “rural



**Prime agricultural areas: more uniform land use, higher-capability land**



**Rural lands: more fragmented land uses, lower-capability land**

lands.”

This photo is of the 404 corridor from 19th Avenue to Bethesda Sideroad, which is far more fragmented than either of the above photos.



The next point, “enable current and future opportunities for agriculture.” There is no future for agriculture in this area. No young farmer can afford to buy the land to continue farming the area. Many of the current farmers in the area have already sold and relocated to other areas of the province, leaving very few farmers in this geographic region. Those remaining farmers are approaching retirement age, which does not bode well for “future opportunities for agriculture.” With regards to the CLI soil type there are only 7 classes, ranging from 1 (most suitable) to 7 (not suitable) for agriculture. The classification of this soil is at best class 3, as it is mainly clay which would make it only average soil for agricultural activities.

York Region does have some “prime” farmland such as the Holland Marsh area, but the 404 corridor is very different soil and can not be considered “Prime.” To me “prime” means excellent, superior, or top quality. Our family has been farming some of the land in question for more than 200 years and the vast majority for the past 40 years. I believe that this gives me the historical background and experience to make the assertion that this land is **not** “prime.” To support my position, consider the following: in 2018 Ontario’s 10-year provincial average corn yield was 170 bushels/acre.; our farm’s 10-year average corn yield is 143 bushels/acre. The 10-year provincial average soybean yield was 45 bushels/acre; our farm’s 10-average soybean yield is 39.9 bushels/acre. How can something be considered “prime” when it consistently yields below average results? Additionally, if we are to believe that this “prime” land is essential for food production, explain why our farming operation alone has lost over 350 acres to the Toronto Region Conservation Authority (TRCA). The TRCA planted trees on this so called “prime” agricultural land thereby taking it out of food production forever. A blanket statement that this is a “prime” agricultural area or that it is required for food production has been proven false for the specific lands in question.

If we define the 404 corridor as Leslie Street to Woodbine Avenue with the 404 cutting through the middle we can do further analysis. The Oak Ridges Moraine map indicates that it stretches from 19<sup>th</sup> Avenue to Aurora Road along this corridor. Do you know how many farmers produce food in this area? Do you know how many acres of farmland are contained in this corridor? People need to **STOP** claiming that the greenbelt is to protect farming. There are only 670 acres approximately of land being worked (430 acres by John Doner Limited) by 5 farmers in this corridor. Of those 5 farmers only one, John Doner Limited, owns a parcel of land in this area, the rest of this farmland is owned by non-farm individuals and corporations. Only two of these farmers (John Doner Limited and Holcrest Farms) farm more than 100 acres of the land in question. Holcrest, based out of Keswick, is the second largest farming operation in York Region based on total acres worked, a loss of the 108 acres they work in the Vandorf area would not significantly hurt them. The 430 acres we work is a significant portion of our land base but considering that more than 900 acres of our 1,800 acre land base lies outside of the Greenbelt lands and those acres will be developed, our long-term viability in this community is already determined.

Continuing with the thought that the Greenbelt does **not** protect agriculture, consider what has actually occurred with development since the Greenbelt was established. Has development stopped? No! Is there more agricultural land in Ontario since the Greenbelt was enacted? No! What has occurred in this area is that developers have leap-frogged over the protected lands and built on farmland in other more rural communities such as Bradford, Keswick and Innisfil. For every acre not developed in the protected area we have lost an acre in our outlying communities. Consider Langford Grain Service, a local grain elevator located near Highway 400 & Highway 88. This elevator will be closing down in August 2021. The property has been sold for development. It is hard to fathom the impact of the loss of this elevator as it served many farmers throughout the area. It has a large agricultural base to draw from around the Bradford area, but it has been forced out of the community due to the impact of the Greenbelt.

An important fact that must be realized is that land values in this area are exceptionally high. No agricultural activity can generate enough revenue to pay for the financing costs of purchasing land in York Region. A new agricultural start-up is economically impossible in this area due to the financial barrier to entry. What happens when a grain or vegetable farmer quits or their operation becomes unviable? Who are the potential buyers? Not farmers (too expensive), not developers (no development allowed), without development opportunities you eliminate all potential buyers. What happens to this land when there are no farmers left to farm it?

Farming in the 404 corridor is nothing like farming in other areas of York Region and should not be treated as such. The proposed lands for designation change are no longer rural areas they are in urban areas, and simply put; urban agriculture does not work! Have the Greenbelt maps been updated in the past 20 years to reflect the change in this community? Do they still accurately show a need to protect this land? Concern about water sources, rivers and streams through this area was originally cited as a reason to protect this land. With the construction of the sewer along

Leslie street is there still a concern regarding the water sources. I would assume that getting away from septic tanks and hooking up to the sewer would eliminate some concern for contamination, but has anyone looked into this? Concern has been raised about fragmentation of agricultural lands, but what about fragmentation of the development that already exists? Do we want a small pocket of agriculture isolated in the city; causing traffic congestion with their slow-moving vehicles; causing foul smells with their fertilizer; and spraying pesticides in close proximity to homes and schools? I think not!

In conclusion, although these thoughts are specific to the 404 corridor; I suspect that many of the same arguments can be made for other areas. I would suggest meeting personally with the farmers directly impacted by proposed changes for their thoughts rather than assuming to know what they want. I also wish to point out that the Greenbelt was enacted for the good of the public, but the land is held in private ownership. If the government refuses to allow landowners to develop their lands, restricting the buyer base for these properties, then the only fair thing to do is for the government to purchase the land at the market value developers would have paid. Earlier in this letter I extended an invitation to anyone involved in the decision-making process regarding these lands to visit our farm located at 12119 Leslie Street in Richmond Hill. I will take those parties on a tour of our lands and show first-hand the difficulties we face and why developing is the only real option for these lands. You can reach me at our farm office 905-887-5027 or on my cell at 416-543-8493 to schedule your farm visit. I look forward to hearing from you.

Sincerely,

**Paul Doner**

Paul Doner  
Business Manager  
John Doner Limited

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