

May 18, 2022

MGP File: 21-3037

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

via email: regional.clerk@york.ca & futureyork@york.ca

Dear Chairman and Members of Regional Council:

**RE: York Region Special Committee of the Whole Meeting – May 19, 2022
Item D.1 Draft Regional Official Plan Consultation Update and
Statutory Public Meeting
On behalf of Various Properties in the City of Markham Whitebelt Lands**

Malone Given Parsons Ltd. (“MGP”) is submitting this letter on behalf of the several owners listed in Appendix A who own lands in the City of Markham’s Whitebelt lands totalling approximately 282 hectares located north of Elgin Mills Road, east of Warden Avenue and west of McCowan Road (collectively referred to as the “Subject Lands”).

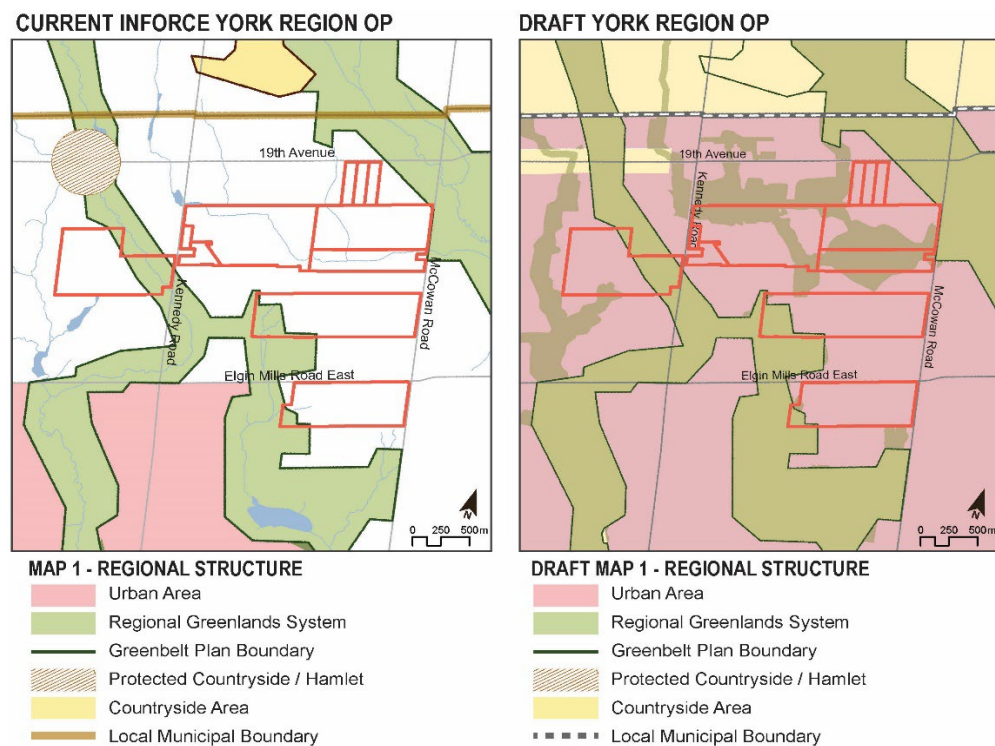
We made a previous submission (dated March 31, 2022) on behalf of the Subject lands to provide a comprehensive set of comments on the December 2021 York Region Draft Official Plan (“Draft YROP”) presented for public consultation. That submission is appended to this letter. Responses to many of our comments are included in *Attachment 1 – Comments on the Draft York Region Official Plan* and respectfully request that Regional Staff review our comments again to ensure our comments are adequately addressed.

The Draft YROP has expanded the Regional Greenlands System to include the local Greenway Systems. In the case of the Subject Lands has added approximate 62 hectares that also now encompass all woodlands mapped on Map 5. In their response, Regional Staff state that “ROP policies allow for more detailed refinement through local plans and studies”. Draft YROP Policy 3.4.2.7 does allow for portions of these woodlands to be removed through local plans and studies if the woodlands meet four criteria, one of which is that “*the woodland is located outside of the Regional Greenlands System as shown on Map 2*” (emphasis added). By expanding the Regional Greenlands System to include the local municipalities’ Greenway Systems, all woodlands will be deemed significant through Policy 3.4.2.7. ***We respectfully request that Regional Council direct staff to reflect the Regional Greenlands System as shown on the current/in-force YROP (Map 1 – Regional Structure and Map 2 – Regional Greenlands System) which does not include the local Greenway System. This solution will allow for more detailed refinements to occur at the local level, consistent with Regional staff’s response and Draft YROP Policies 3.2.2, 3.4.7, 3.4.1.5 and 3.4.2.7.***

We continue to be supportive of Draft YROP policies which permit refinements to the boundaries of the Regional Greenlands System, Key Natural Heritage Features and Key Hydrologic Features, and also permit Provincial boundary refinements or reclassification of wetlands without an amendment to the Plan, subject to approved work at the local level. The ability to refine the limits of features later into the planning process is appropriate to ensure proper outcomes of more detailed fieldwork and study, and that they will be implemented without the need for additional unnecessary process.

As shown in Figures 1 and 2 below, the Draft YROP expands the Regional Greenlands System by approximately 62 hectares. This expansion is the result of the City of Markham Greenway System being included to the regional-scale Regional Greenlands System. The City of Markham Official Plan policies allow for refinements to the Greenway System with supporting studies such as a master environmental servicing plan or environmental impact study. The inclusion of all potential features within the Regional Greenlands System removes the applicability for any refinements to features, or removals of portions of woodlands that are currently permitted by the in-force YROP.

Figure 1: Comparison of In-force and Draft Map 1 – Regional Structure



As shown in Figure 3 below, the woodlands identified on Map 5 are now included in the Regional Greenlands System. This arbitrarily eliminates the policy rationale to support further refinements or removals of a portion of a woodland that are deemed not-significant based on characteristics and composition. There is now a circular policy that restricts refinements and removals based solely on the fact that the lands are now identified within the Regional Greenlands System (see Current Policies 2.2.48 & 2.2.49/Draft Policies 3.4.2.7 and 3.4.2.8). We understand Regional staff are not agreeing to remove woodlands from Map 5, as such we request the Regional Greenlands System be shown as it is in the current YROP.

Figure 2: Comparison of In-force and Draft Map 2 – Regional Greenlands System

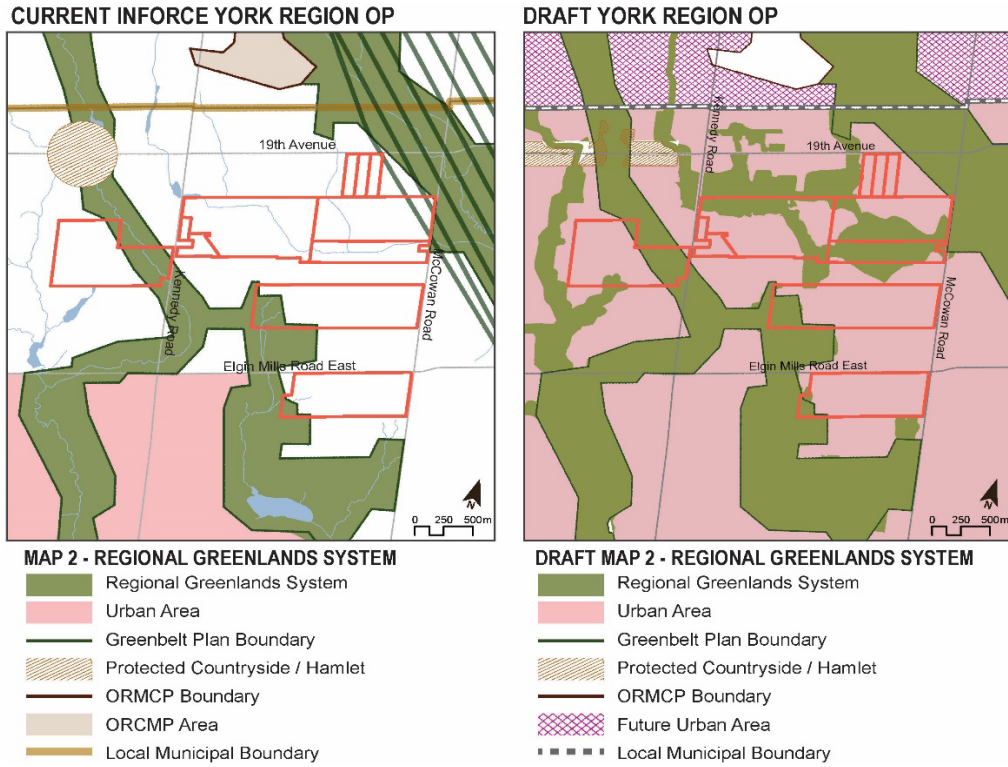
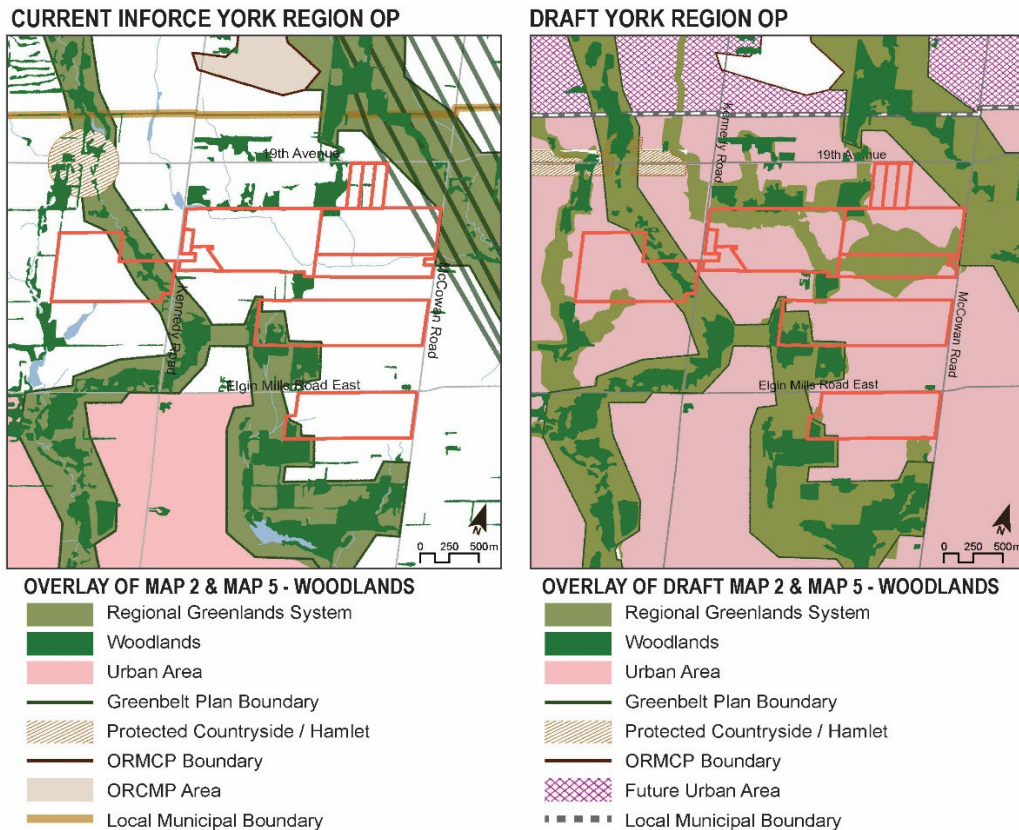


Figure 3: Comparison Overlay of Map 2 – Regional Greenlands System and Map 5 - Woodlands



We value public consultation and thank you for the opportunity to provide comments during the MCR process. An essential component of meaningful consultation is consideration of comments received and thoughtful responses to avoid unintended consequences. We'd like to opportunity to discuss this further with staff to find an appropriate resolution such as reverting to the current/in-force mapping and allowing refinements to take place at the local level, as done today.

Should you have any questions or wish to discuss further, please contact me at any time.

Yours very truly,

Malone Given Parsons Ltd.



Don Given, MCIP, RPP

*att Attachment A – Location of the Subject Lands
Attachment B – Comments on the December 2021 Draft Regional Official Plan (dated March 31, 2022) made on behalf of Various Properties in the City of Markham*

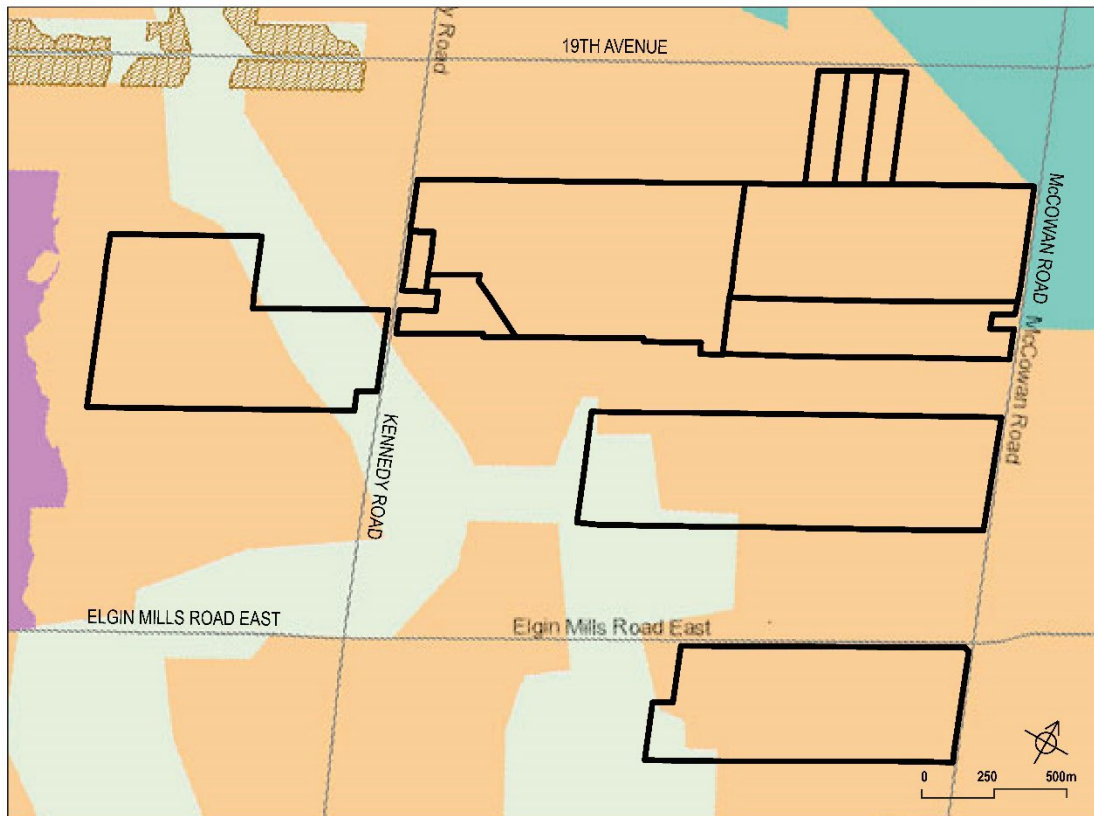
*cc Paul Freeman, York Region
Sandra Malcic, York Region
Augustine Ko, York Region
Arvin Prasad, City of Markham
Biju Karumanchery, City of Markham
Clients*

APPENDIX A – LOCATION OF THE SUBJECT LANDS

Eleven properties located in the City of Markham’s Whitebelt lands, north of Elgin Mills Road, east of Warden Avenue and west of McCowan Road are collectively referred to as the “Subject Lands” as shown on Figure A below:

- McCowan Elgin Developments Inc. – 10690 McCowan Road
- Kennedy Elgin Developments Limited – 11162 Kennedy Road
- Nine Iron South East Developments Limited – 10982 McCowan Road
- WFS Developments Limited - 11142 McCowan Road
- Nine Iron East Developments Limited – 11270 McCowan Road
- Nine Iron Developments Limited – 11207 Kennedy Road
- Four Putt Developments Limited - 11181 Kennedy Road
- Snowman Developments Limited – 11155 Kennedy Road
- 5101 19th Developments Limited – 5101 19th Avenue
- 5079 19th Developments Limited – 5079 19th Avenue
- 5057 19th Developments Limited – 5057 19th Avenue

Figure A: Location of Subject Lands in the City of Markham



NEW COMMUNITY AREA LANDS North Markham Lands, City of Markham

Urban System	Agricultural System
Community Area	Agricultural Area
Employment Area	Rural Area
	Hamlet



Don Given
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March 31, 2022

MGP File: 21-3037

The Regional Municipality of York
17250 Yonge Street
Newmarket, ON L3Y 6Z1

via email: sandra.malcic@york.ca & futureyork@york.ca

Attention: Ms. Sandra Malcic
Director, Long Range Planning

Dear Ms. Malcic:

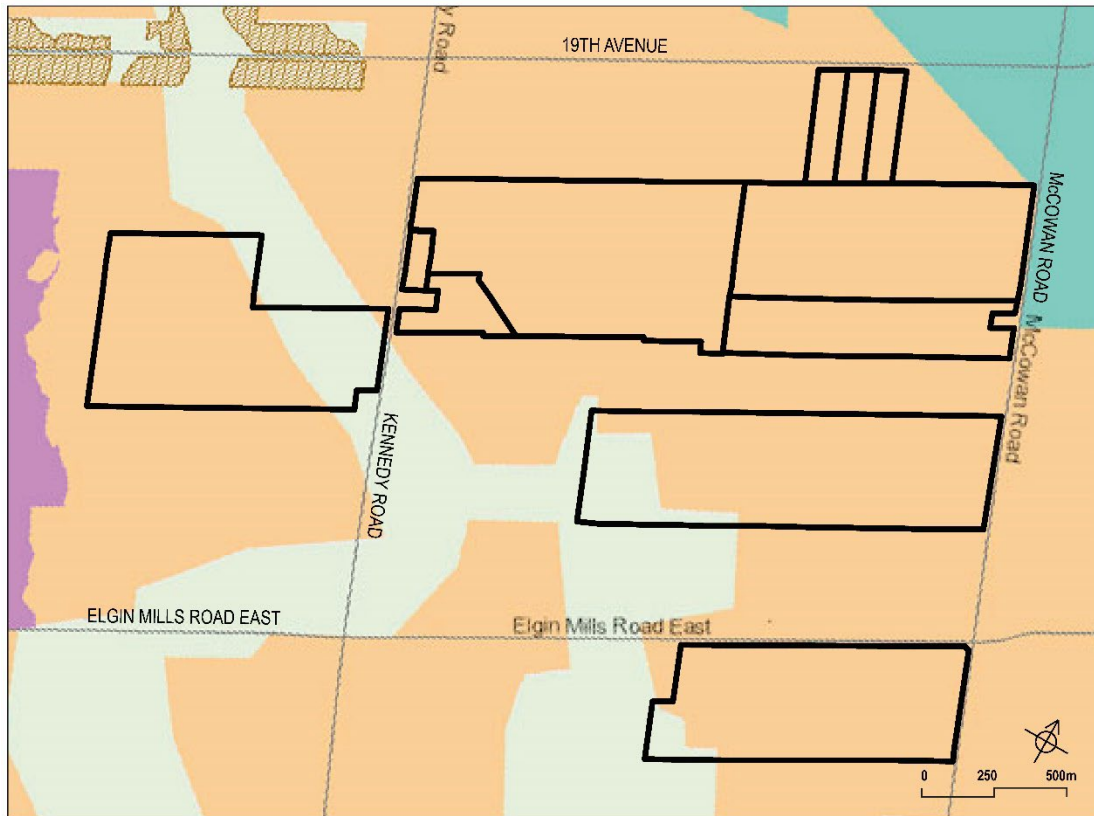
**RE: Comments on the 2021 Draft Regional Official Plan
Various Properties in City of Markham Whitebelt Lands**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for a number of properties located in the City of Markham’s Whitebelt lands (“Subject Lands”). The Subject Lands totalling approximately 282.1 hectares are located north of Elgin Mills Road, east of Warden Avenue, and west of McCowan Road include the following properties (see Figure 1):

- McCowan Elgin Developments Inc. – 10690 McCowan Road
- Kennedy Elgin Developments Limited – 11162 Kennedy Road
- Nine Iron South East Developments Limited – 10982 McCowan Road
- WFS Developments Limited - 11142 McCowan Road
- Nine Iron East Developments Limited – 11270 McCowan Road
- Nine Iron Developments Limited – 11207 Kennedy Road
- Four Putt Developments Limited - 11181 Kennedy Road
- Snowman Developments Limited – 11155 Kennedy Road
- 5101 19th Developments Limited – 5101 19th Avenue
- 5079 19th Developments Limited – 5079 19th Avenue
- 5057 19th Developments Limited – 5057 19th Avenue

On behalf of the Subject Lands, we have reviewed the 2021 York Region Draft Official Plan (“2021 Draft YROP”) presented for public consultation, dated December 1, 2021. We recognize and commend the effort that Region staff have put into the preparation of the 2021 Draft YROP and are grateful for the opportunity to provide comments. In the role as professional planners, we are practitioners actively involved in the implementation of the York Region Official Plan on behalf of the development community and offer the following comments in regard to 2021 Draft YROP. We provide this letter with our comments on the key policy matters. As we advance further discussions with staff on the 2021 Draft YROP, we reserve the right to provide additional comments.

Figure 1: Location of Subject Lands in the City of Markham



NEW COMMUNITY AREA LANDS
North Markham Lands, City of Markham

- | | |
|---------------------|----------------------------|
| Urban System | Agricultural System |
| Community Area | Agricultural Area |
| Employment Area | Rural Area |
| | Hamlet |

Prepared for
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Date: March 30, 2022 Job No: 252427

GENERAL COMMENTS

In general, there are many laudable goals and objectives outlined in the draft Official Plan, reflecting contemporary directions in good planning. However, we are concerned that there is a lack of clarity and specificity in key policy areas. Generally, we are concerned that prescriptive policies with unclear implementation outcomes will present significant challenges to realizing the goals of the Plan. To effectively implement the Plan, the development community needs to understand what is required when planning and designing buildings and communities, be assured that the requirements are achievable and reasonable, and clearly understand the specific outcomes that achieve the goals of the Region. As such, for those policies where universal application throughout the Region is not possible, or where specific outcomes are unclear, ***we recommend that policy framing of “hard” requirements currently using the words ‘shall’ or ‘must’ be softened to ‘should’ or ‘may.’***

Also, we note several policies are numbered the same and find the policy numbering system thus confusing. For example, Policy 3.4.2 Natural Features Policies on Page 48 is the same policy number as Policy 3.4.2 Woodlands Policies on Page 56. ***We request the Region***

review the policy numbering approach to increase clarity and eliminate all instances where policies are numbered the same.

ENVIRONMENTAL POLICIES

We are supportive of Policies 3.2.2, 3.4.7, and 3.4.1.5, which permit refinements to the boundaries of the Regional Greenlands System, Key Natural Heritage Features and Key Hydrologic Features, and also permit Provincial boundary refinements or reclassification of wetlands without an amendment to the Plan, subject to approved work at the local level. The ability to refine the limits of features later into the planning process is appropriate to ensure proper outcomes of more detailed fieldwork and study, and that they will be implemented without the need for additional unnecessary process.

The inclusion of ALL potential features within the Regional Greenlands System identified on Map 1 and Map 2 removes the applicability for any refinements to features, or removals of portions of woodlands that are currently permitted by the in-force York Region OP. For example, the woodlands identified on Map 5 are now included in the Regional Greenlands System mapped on Map 1 and Map 2. This haphazardly eliminates the policy rationale to support further refinements or removals of a portion of a woodland that are deemed not-significant based on its characteristics and composition. There is now a circular policy that would restrict these refinements and removals based solely on the fact that the lands are now identified within the Regional Greenlands System (refer to Draft Policies 3.4.2.7 and 3.4.2.8 / Current Policies 2.2.48 & 2.2.49). ***We request that the Region remove the woodlands identified on Map 5 from the Regional Greenlands System on Map 1 and Map 2.***

GROWTH MANAGEMENT POLICIES

“Section 2.2: Integrated Growth Management” states that the Plan provides for a comprehensive approach to growth management that fully integrates infrastructure and financial planning with land use planning, while promoting the equitable distribution of costs and ensuring that the funds required to provide the necessary services for growth are provided by the proponents of growth on an equitable basis. We support these directions in principle; however, we believe that several policies in this section provide contradictory direction.

For example, Policy 2.2.5 requires that Regional infrastructure required to support growth be phased based on the achievement of intensification and density targets of the Plan, among other principles. Achieving intensification and density targets should not be related to the phasing of infrastructure, as discussed in Section 1.8 of this letter. Infrastructure needs to be planned, financed, and constructed (in phases) in advance of planned growth in order to respond to demand for housing to ensure that there is an adequate supply available to meet the demonstrated demand. In addition, achieving the intensification and density targets are not related to infrastructure and financial planning. This connection between infrastructure phasing and achievement of intensification targets is reiterated in Policy 2.2.6.

Policy 2.2.16 ensures that “development proponents provide the funds required to deliver the additional services and costs related to growth consistent with Regional plans and policies”. This policy makes no mention of development charges and related credits for

development proponents who provide funds for services. There is also no reference to the Region's ability to issue debt. Placing the burden on development proponents to fund services with no related relief does not match the direction to provide funds on an equitable basis, nor does it support the provision of affordable housing as is prioritized throughout the 2021 Draft YROP. We request that specific language be added to this section regarding Development Charges and the recovery of costs for development proponents who provide funding for necessary services.

COMPLETE COMMUNITIES POLICIES

"Section 2.3: Supporting Complete Communities" is a new section containing an array of requirements. It states that "a community could be a local neighbourhood, a municipality, or a social group; it is the place where people belong and shape their identity." This extremely broad definition means that a community is any association of people, at any scale in the Region.

The policies of Section 2.3 describe how all communities should be planned and designed without any differentiation in this broad conceptualization of community. Do these policies apply to local neighbourhoods, municipalities, or the Region at large? Or do they apply at all levels? ***The requirements of this section need to be differentiated by the type and level of community.***

This section also introduces many new requirements and components of what comprises a complete community; if required in all instances these requirements would result in competing priorities. We are challenged to foresee how conformity with these policies can be achieved with the lack of a clear policy hierarchy, and differentiation of which scales the Region would expect to see certain components realized.

While only illustrative, the Figure under Policy 2.3.2 demonstrates very clearly that the Region's ambitions for complete communities contain a global set of components that could only all be achieved across the entire Region, not at a smaller scale.

We are also concerned with mandatory requirements being applied across all scales. There appears to be no background work which provides an explanation to support the appropriateness of these requirements. To maintain the structure and aspirational policy intent of this section of the 2021 Draft YROP, ***these policies should be revised to use language such as 'should' rather than 'shall' and should include 'where appropriate' to provide direction without being overly prescriptive.*** In addition, ***the policies of this section need to have clear outcomes and should be supported by background work.***

For example, Policy 2.3.10 requires "that communities shall be designed to provide an integrated open space network that contributes to a sense of place and identity, promotes physical activity and social inclusion, to include:

- a. active recreational facilities, programmed parks and passive parks for year-round use;
- b. connections by sidewalk and/or trails;
- c. meeting places, informal gathering spaces and central squares that incorporate art, culture and heritage;

- d. opportunities for urban agriculture; and
- e. connections to the Regional Greenlands System, where appropriate”.

Not all developments will be able to provide all of these components of the open space network, yet given the broad definition of community, it would seem as though almost any development would be required to provide these components. To ensure the policy is universally applicable across the Region, our suggested wording is as follows:

“2.3.10 That communities at the neighbourhood level **should** be designed to provide an integrated open space network that contributes to a sense of place and identity, promotes physical activity and social inclusion, to include, **where possible**:

- a. active recreational facilities, programmed parks, and/or passive parks for year-round use;
- b. connections by sidewalk and/or trails;
- c. meeting places, informal gathering spaces and central squares that incorporate art and/or culture and heritage;
- d. opportunities for urban agriculture; and
- e. connections to the Regional Greenlands System, where appropriate.”

AFFORDABLE HOUSING POLICIES

We are generally supportive of the goals and objectives identified in the 2021 Draft YROP to address affordable housing needs.

However, we believe that a successful approach to addressing housing affordability must be realistic and implementable through partnerships between the public and private sectors. As such, **a detailed framework and realistic targets should be provided to stakeholders for comment on their feasibility and appropriateness.**

We would like to highlight that the *Affordable Housing in York Region – 2020 Measuring and Monitoring Report* that went to Committee of the Whole on June 10, 2021 concluded that the existing Region Official Plan affordability targets have not been met for the third year in a row.

In addition, the in-force policies reference intrinsically-affordable townhouse and apartment units, second suites, and designated land for high density residential development among other opportunities for achieving the 25% and 35% Housing Affordability Targets. By contrast, the Draft OP provides no such guidance and appears to rely on its more generic definition of affordable housing.

With respect to “affordable housing”, we would like to emphasize the difference between **subsidized or assisted housing** and affordable housing that is available on the free market, which has become referred to as **attainable housing**. The latter may contain a number of building and unit types (stacked townhouses, back-to-back townhouses, secondary suites etc.) that are more affordable in the ownership housing spectrum but not commonly considered in government programming and subsidies. These types of market-based housing options contribute to providing a range of housing options for various income levels and maintain the potential for residents of the region to attain housing ownership. We believe the

Plan can clarify that ***the development community's role is to produce attainable housing, whereas the role of municipalities and other agencies is to provide subsidized or assisted housing, in partnership with the development community where appropriate.***

New communities allow for the opportunity to design innovative and modern solutions that are accessible, inclusive of additional dwelling units, appropriately zoned (for building types and parking requirements), and flexible to adapt to various housing and living space needs. ***The development approvals process for these new communities should be streamlined to bring housing into the market sooner.***

Providing for both assisted and attainable housing provides the best long-term strategy for ensuring there is a significant stock of affordable housing in the Region and the establishment of achievable targets. However, without financial incentives or broadening what is considered affordable it is unlikely that these targets will be met. This is particularly the case under current market conditions where almost no form of ownership housing can meet Provincial and Regional definitions of affordability.

We suggest that ***the policies of the draft Official Plan be modified so that hard targets (Policies 2.3.2.2 and 2.3.2.3) for the provision of affordable housing should apply to York Region Community Housing, not to the development industry at large*** as there are limits to what private developers can realistically achieve.

Targets that apply to all development in the Region should allow flexibility to include attainable ownership housing and be required 'to the extent possible' to reflect the limits of what can be provided by the market (which can and will vary over time). In general, medium and high-density housing forms, as well as secondary suites associated with lower-density housing forms, are the most market-attainable affordable homes in the housing spectrum. ***These forms of housing should be identified in the Region's definitions as counting towards the creation of affordable housing stock in the Region*** and providing a full mix and range of housing over the next 30 years.

CLIMATE CHANGE POLICIES

We support the Region's direction to include policies regarding planning for and mitigating climate change and appreciate that the policies in the 2021 Draft YROP are informed by the *York Region Climate Change Action Plan*.

To be realized, the policies must be realistic and implementable through clear requirements. We do not believe the policies in the 2021 Draft YROP currently provide clear requirements, which will result in delays and uncertainty during the local municipal implementation and development processes.

For example, Policy 2.3.1.10 states that:

“appropriate mitigation measures to reduce and prevent exposure to air pollutants will be incorporated in community, building and site design of communities located near significant known air emissions sources such as 400-series highways.”

This policy does not provide specific direction as to appropriate mitigation measure, nor does it specify any other 'significant known air emissions sources', nor does it identify what it

means to be near an emissions source. Without an implementation framework, these new policies will result in confusion and uncertainty for lower-tier municipal interpretation, as well as an inability for development proponents to determine that any given application conforms to the Official Plan.

We are also concerned with how these policies will work with other policies of the Plan. All policies must be read together, yet some of the climate change policies are in direct conflict with the priorities of other policies of the 2021 Draft YROP. The policies should be amended to specify which take priority and make clear the specific outcomes that are sought to be achieved.

We note that there is also a lack of publicly-available background work supporting this policy section. We request that such work be made available to outline the strategies and means by which the Region would like to see climate change addressed in the land use planning process to assist in the review of the final Official Plan.

Additional clarity from the Region in supporting explanatory work and a more clear policy hierarchy would help to improve the climate change policies.

ACTIVE TRANSPORTATION POLICIES

Similar to the previous sections, we support the inclusion of robust active transportation policies, yet the 2021 Draft YROP policies lack clear expectations and requirements and there is no differentiation between what applies at the Regional level, the local level, the subdivision level, or the small-scale development level.

For example, Policy 2.3.17 requires development to be supported by a mobility plan that prioritizes active transportation and transit and assesses the impacts on the Region's transportation system, infrastructure, and surrounding land uses. What constitutes an acceptable mobility plan?

In addition, Table 7 requires a Transportation Mobility Plan only for Regional Official Plan Amendments, yet the definition says that a mobility plan is required to support all development applications in York Region that have potential impacts on Regional and local transportation systems. It is likely that ALL development will have an impact on the Regional or local transportation system, however, not all developments will have a significant impact.

We request clarification that only major development (those outside of Province Plans that are larger than 50,000 sq. m.) will require a mobility plan.

NEW COMMUNITY AREAS POLICIES

We agree that an array of policies is required to plan new community areas in an appropriate manner. However, we believe that the current policies in this section of the 2021 Draft YROP are generally unclear and overly burdensome, factors that will result in the delay of housing delivery. ***These policies need to have demonstrable outcomes that will result in communities that align with the Official Plan's vision.***

In particular, the phasing of new community areas in the Plan should be based only on the requirement that sufficient infrastructure and servicing capacity is available prior to

development. Tying the planning of new community areas to the achievement of discrete targets at a Regional scale will result in a significant delay in the provision of housing. To meet housing demand, it is essential that all areas within the Region be allowed to advance as they are able (once they can be serviced.)

As an example, given that Table 1 does not project a population of 1.5 million until between 2031 and 2041, Policy 4.2.2.4.c alone will halt the planning of new community areas for a decade, and will create unnecessary supply constraints and unrealistic growth rates in the latter portion of the planning period.

We request that the phasing policies be revised to require only the availability of infrastructure prior to permitting growth in new community areas which is the primary concern of the Region.

In terms of more detailed phasing policies, it is the lower-tier municipalities who should determine the appropriate phasing policies within their new community areas to ensure the logical and cost-effective extension of infrastructure, and the creation of complete neighbourhoods in a financially sustainable manner. The policies of the Regional Official Plan should seek to ensure that growth management and financial objectives are met locally, through local phasing policies. ***The policies for new communities should require that lower-tier municipalities establish appropriate phasing policies when considering approval of new secondary plans.***

IMPLEMENTATION AND STUDY REQUIREMENTS

The 2021 Draft YROP contains a number of study requirements to support development throughout the Plan including those listed in policy 7.3.11 that include by are not limited to:

1. Affordable Housing Contribution Plans
2. Archaeological Assessments
3. Agricultural Impact Assessments
4. Contaminant Management Plans
5. Environmental Impact Study or Earth Science Heritage Evaluation
6. Landform Conservation Plan
7. Aggregate Study
8. Subwatershed Study or Equivalent
9. Planning Justification Report
10. Section 59 Notice and Source Water Impact Assessment and Migration Plan
11. Community Energy Plans
12. Health, Environmental and Air Quality Impact Studies
13. Transportation Mobility Plans
14. Master Environmental Servicing Plans or Water and Wastewater Servicing Plans

These study requirements are further amplified by local study requirements and detailed site planning and design that have resulted, perhaps inadvertently, from Regional and Local policy an overly onerous, redundant, and costly development approval process. The development approval process and these study requirements have a cumulative effect that requires significant time to study, prepare, review and revise which delays bringing housing to the market further compounds the affordability crisis. The 2021 Draft YROP's current approach

to studies is to use absolute requirements, and to require many studies in all development processes.

Currently it takes not only years but decades to work through the development approvals process with these ambiguous and redundant study requirements. For example, secondary plans and draft plans of subdivision for the New Community Areas brought in through Regional OPA No. 3 2 and Regional OPA No. 3 were intended to be fully build by 2031 but have only recently been approved and in some cases, are still in process despite being brought into the Urban Area in the 2010. **Requiring additional and redundant studies will further delay the approvals process.**

In accordance with the Report of the Ontario Housing Affordability Task Force recently released in February of this year, we need to build more homes to meet the needs of the growing population (demand) or housing prices will continue to rise. Recommendation 1 and 2 suggest adding 1.5 million homes in Ontario over the next 10 years and updating planning process to prioritize this.

We request additional policy direction in the 2021 Draft YROP to specify the circumstances in which specific studies will be required, with an emphasis on requiring studies only where necessary. Development studies should only be required where necessary to achieve identified goals. Generally, requiring all studies for all development applications will result in wasted time and energy. In addition, it is unclear what status the various non-legislated plans required by the Draft YROP; there should also be a clear process for third parties to comment on these plans.

For example, Policy 6.5.4 requires the preparation of comprehensive master environmental servicing plans (“MESP”), or appropriate technical studies, as a component of secondary plans and major development. As “major development” is defined as the creation of four or more lots or the construction of a building with a ground floor area of 500 m² or more, this would require the completion of such studies for a small supermarket, single business, or a minor variance to permit the construction of two homes. A comprehensive master environmental servicing plan would be required for the majority of development applications, even if a single property owner was proposing a development with no integration required with others. The requirement will unnecessarily burden and slow down development in the Region. **More specificity is required in terms of which appropriate technical studies are required in different development contexts and scales.**

CONCLUSION

We and our clients recognize how challenging it is to review and craft new Official Plan policy and recognize the extensive work York Region Planning staff have undertaken in producing the draft Official Plan. We look forward to working with Staff to ensure that the final Official Plan contains the best policies to guide the development of complete communities in the Region.

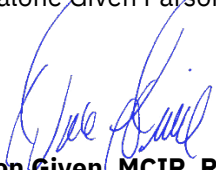
We value public consultation and thank you for the opportunity to provide comments during the MCR process. An essential component of meaningful consultation is acknowledgement of comments received and the provision of a response to comments in writing. As such, we request that the final Official Plan be supported by a comment-response matrix for all

comments received throughout the MCR process (including these from this group). In any case, we request a written response to the comments provided in this letter.

Should you have any questions or wish to discuss potential responses to our comments, please contact me at any time.

Yours very truly,

Malone Given Parsons Ltd.



Don Given, MCIP, RPP

cc *Paul Freeman, York Region*
 Sandra Malcic, York Region
 Augustine Ko, York Region
 Arvin Prasad, City of Markham
 Biju Karumanchery, City of Markham
 Clients