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29 June 2022

VIA EMAIL

The Regional Municipality of York Council York Region Administrative Centre 17250 Yonge Street Newmarket ON L3Y 6Z1 Attention: Regional Clerk

RE: Committee of the Whole Item H.2.1 – 2022 York Region Official Plan Adoption

Dear Members of Regional Council,

The Greenbelt Foundation is aware that the Regional Council will be considering an amendment to the draft Regional Official Plan (ROP) that would remove protected lands from the Greenbelt and Oak Ridges Moraine.

The Greenbelt Foundation generally avoids taking a position or commenting publicly on local land use planning matters. However, we feel obligated to once again express our serious concern about the proposals below given that they would fundamentally affect the integrity of the Oak Ridges Moraine and Greenbelt:

- "Council adopt an overlay Schedule identifying lands in the Town of Whitchurch-Stouffville requested to be designated as Provincially Significant Employment Zones as Future Strategic Employment Lands"
- 3. Should the Minister amend O. Reg. 140/02: Oak Ridges Moraine Conservation Plan under the Oak Ridges Moraine Act to permit the Council endorsed and requested urban expansion in the Town of Whitchurch-Stouffville, the Minister be requested to modify the adopted ROP to reflect the following:
 - a. Settlement area expansion for the Stouffville Bethesda Community Area lands as shown on the Maps of Attachment 1 and as outlined in Attachment 3; and
 - b. Settlement area expansion of the South Gormley Employment Area lands as shown on the Maps of Attachment 1 and as outlined in Attachment 3.
- 4. Should the Minister choose not to amend O. Reg. 140/02: Oak Ridges Moraine Conservation Plan under the Oak Ridges Moraine Conservation Act to permit the Council endorsed urban expansion on the Oak Ridges Moraine in the Town of Whitchurch-Stouffville, the Minister be requested to modify the adopted ROP to reflect the urban expansion on the remaining Whitchurch-Stouffville Whitebelt lands.

As advised by York Region staff in their report, this de-designation would run contrary to the Oak Ridges Moraine Conservation Plan:

"Council has requested that the Minister of Municipal Affairs and Housing (Minister) amend O. Reg 140/02: Oak Ridges Moraine Conservation Plan (ORMCP) under the Oak Ridges Moraine Conservation Act (ORMCA) to permit the Council endorsed urban expansion. The requested amendment must occur prior to adoption, as any decision by Council to adopt the ROP must conform to the ORMCP."

We are also aware that this action is being taken while the Region awaits a response from the Ministry of Municipal Affairs and Housing to your request for direction on whether the urban expansion would be permitted. The Provincial Government has, however, repeatedly affirmed that it is committed to protecting the Greenbelt for future generations including its existing boundaries and policies.

We have serious concerns about the proposals in amendments 2, 3 and 4. They would undermine the certainty of protection the Greenbelt boundary provides for developers and municipal planners and fail to recognize the Greenbelt Plan as a critical regional framework that protects natural, water resource and agricultural systems in Ontario. Amendments of this nature would inevitably lead to similar requests from other municipalities resulting in a fundamental erosion of the integrity of the Greenbelt.

We respect the role of Regional Council in planning for anticipated growth in conformity with Provincial projections. It is clear, however, that regional growth can be accommodated without resorting to development on sensitive natural areas within the Oak Ridges Moraine, which will be irreversible once development takes place. York Region staff analysis throughout the planning process has confirmed this.

Protecting agricultural lands in the Greenbelt and Oak Ridges Moraine is critical for the local economy and food access. The Region's own reports indicate that it is responsible for \$2.7 billion in annual GDP and 57,000 local jobs. We also know from the 2021 Census of Agriculture that Ontario is losing 319 acres of farmland daily, and that rate is increasing. Our research shows that these losses are not currently occurring in the Greenbelt because of its effective protections.

As you consider York Region's Official Plan, we ask that you continue to protect the agricultural land and natural systems of the Greenbelt and Oak Ridges Moraine.

Sincerely,

Edward McDonnell Chief Executive Officer

cc: Minister Steve Clark, MMAH