

HIGHWAY 48 STUDY - Summary of Landowner / Joint Working Group Comments

GENERAL COMMENTS			
MAPPING / FRAMEWORK PLAN			
	Reference	COMMENT	TPP RESPONSE
1	Bousfields (Flato, TORCA and Wyview)	Map 1: Extent of Greenbelt Plan with respect to NHS is incorrect; the Greenbelt plan also includes countryside areas and agricultural areas.	Map 1 combines two maps: Greenbelt Plan Maps 46 and 47 and ORMCP Map 4. The Natural Heritage System and Protected Countryside is consistent with Greenbelt Maps 46 and 47. Within the Oak Ridges Moraine Area our map reflects the land use designations identified in ORMCP Map 4.
2	Bousfields (Flato, TORCA and Wyview)	This MESP applies to a significant portion of the Framework Plan area. The first draft of the MESP was submitted in November 2021 and there have been monthly meetings with Town staff, City staff, the TRCA and the landowners. A considerable amount of work by municipal staff and the landowners has gone into the preparation of the MESP and an revised version of the report will be submitted in the coming weeks. Several components in the Highway 48 Study Framework Plan do not reflect the analysis, collaboration, consultation and studies completed as part of the ongoing MESP process. It is unclear why the Framework Plan would not integrate this work, including the limits of development, appropriate locations for roads crossing natural areas, road alignments, etc.	At the time of the Highway 48 Study, there were two different and separate processes running simultaneously - the Framework Plan and the MESP. The framework plan is intended to be a high-level plan whose purpose is not to reflect the details of the MESP but rather, to guide it through the establishment of principles for ensuring a well designed, connected and complete community with an appropriate parklands system. When the MESP is completed, it must form the basis for, or achieve all of the principles of the Framework Plan. In addition to this, further refinements will be completed through the development approvals process based on each individual application.
3	Bousfields (Flato, TORCA and Wyview)	We have several concerns regarding the actual Framework Plan as shown in 'Map 4 – Framework Plan'. These include:	
	Bousfields	<i>1. The Framework Plan delineates all lands within the Greenbelt Plan as Natural Heritage System. Refinement is needed to delineate the extent of the NHS boundary and not just the Greenbelt Plan boundary.</i>	Mapping clarification will be provided, also refer to comment #1.
	Bousfields	<i>2. Two (2) School Sites are shown in the Framework Plan. We would appreciate clarification on how the school sites were selected and the applicable correspondence with the school board regarding the need for two school sites.</i>	Both the YRDSB and YCDSB, who are part of the Joint Working Group, have suggested to show one school site each, in the Framework Plan. Schools are important elements of a complete community.
	Bousfields	<i>3. The 'Commercial Area (MZO)' category shown in light pink on does not accurately reflect the zoning permissions provided in the MZOs. This comment is further detailed in the specific comments below. This category should be change from Commercial Area to Mixed Use area as the zoning permits residential and non-residential uses.</i>	We recognize the MZO process has obviated the typical planning approvals process; the Framework Plan is intended to provide a high level understanding of how various districts within the entire study area fit together to create a well designed, connected and complete community with an appropriate parklands system. Nothing in the Framework Plan supercedes anything in an MZO however, it is crucial that the principles established in the Framework Plan be achieved.
	Bousfields	<i>4. We have several concerns with the road network shown in Map 4. While we understand that the Framework Plan is starting point for the design, it does not reflect the ongoing work with the Town, City and TRCA on the road network through the MESP. This includes detailed analysis to determine the appropriate locations for roads crossing within consideration for limiting the impacts on lands in the Greenbelt Plan area and in particular the Natural Heritage System. This analysis has taken into account locating the crossing at the narrowest point, or where there would be the least disturbance to identified Natural Heritage Systems.</i>	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. When the MESP is completed, it must form the basis for, or achieve all of the principles of the Framework Plan. TRCA is a member of the Joint Working Group and has provided comments regarding the Natural Heritage System and crossings. These comments have been reflected in the Framework Plan.
	Bousfields	<i>5. The proposed east/west road identified along the border of the Town and the City is located further north in the MESP currently being completed and would have more significant impacts.</i>	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan.

	Bousfields	<i>6. The proposed roundabout location for the northern east/west road is not accurately located based on current MESP work. The location that has been proposed through the MESP has generally been agreed to by the review agencies.</i>	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan.
	Bousfields	<i>7. It is not appropriate at this scale of plan to show local roads and they are only shown in some parts of the plan. Local roads will be determined in the plan of subdivision applications that will apply to the lands as they develop and should not be included in the Framework Plan.</i>	The Framework Plan is not statutory Secondary Plan. The purpose for showing local roads at this time is to identify and articulate the principle of connectivity at the arterial, collector and key local road scale. This plan does not establish any requirement to provide the local roads in these locations; these will be determined through subsequent development approvals processes. The Town will look forward to receiving development applications that achieve the fundamental principles established through this Framework Plan exercise.
	Bousfields	<i>8. A Community Park is depicted in the Town of Whitchurch-Stouffville however, through the MESP process and the ongoing draft plan of subdivision applications in the area, all major parks are planned to be located in the City of Markham.</i>	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan. In addition, all development in the Town needs to consider an appropriate public parkland system dedicated to the Town of Whitchurch-Stouffville which is expected to be determined and finalized through the development approvals process. Reliance on the City of Markham to provide the bulk of the parkland system is not an appropriate approach.
	Bousfields	<i>9. Sam's Way is identified as a major collector road however through the MESP process is identified as a minor collector road.</i>	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan.
4	Bousfields (Flato, TORCA and Wyview)	The Framework Plan does not seem to fully integrate the portion of the Study Area in the City of Markham...including currently permitted uses, the limits of the settlement area boundary expansion based on the Region's new Official Plan.	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. We have consulted extensively with the City of Markham and they were satisfied with what was shown.
5	Bousfields (Flato, TORCA and Wyview)	Regarding the boundary of the Natural Heritage System for lands within and outside the Greenbelt Plan are, within the MESP study area boundary, the Town, City, Region and TRCA have been working with some of the landowners to define the limits of the features and confirm the appropriate buffers. This has involved site walks and staking of limits with municipal and agency staff. Where this information is available, it should be requested that the preparation of an MESP resubmission be considered when preparing the Framework Plan.	There are two different and separate processes running simultaneously - the Framework Plan and the MESP. The framework plan is intended to be a high-level plan whose purpose is not to reflect the details of the MESP but rather, to guide it through the establishment of principles for ensuring a well designed, connected and complete community with an appropriate parklands system. When the MESP is completed, it must form the basis for, or achieve all of the principles of the Framework Plan.
6	Bousfields (Flato, TORCA and Wyview)	The Framework Plan and associated report does not seem to fully integrate the portion of the Study Area in the City of Markham. There is missing information regarding the uses that are currently permitted on the Markham lands, the limits of the settlement area boundary expansion in Markham based on the Region's new Official Plan, and descriptions in the text with respect to existing conditions and applicable policies and regulations. The Framework Plan Study includes a significant portion of lands within the City of Markham however, policy reference and mapping for lands in the City is limited.	Our work is for the Town of Whitchurch-Stouffville. As part of this Study, the City of Markham is a stakeholder and the lands within Markham have been reviewed however, the City of Markham is undergoing its own review of these lands and will need to integrate with whatever the ToWS is suggesting when they are ready to do so. We are aware that significant portions of the lands located in the City of Markham have MZOs. Further, we are also aware that the cemetery lands are subject to an OLT appeal and it would be inappropriate to make assumptions with respect to the outcome of that appeal through this study.

7	Bousfields (Flato, TORCA and Wyview)	Section 2.3.1 provides direction on the Natural Heritage/Open Space System. While we understand that desktop mapping was utilized to provide a high-level understanding of the existing natural environment, we are concerned with the proposed NHS mapping on most of the Maps included in the Framework Plan report, as discussed above. We are also concerned that a 30-metre buffer has been applied from core features and corridors, specifically for those outside the Greenbelt Plan and Oak Ridges Moraine Conservation Plan areas. While the 30 metre buffer may have just been used as a starting point for the desktop exercise, with more detailed work underway on the limits of development and confirmation of the appropriate buffers, 30 metres should not be applied holistically to all Natural Heritage featured. Further, we would appreciate additional information regarding this desktop study was provided earlier, specifically, the Composite Natural Heritage System identified in Map 11 of PlanB's memorandum of February 4, which was not provided previously.	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan. TRCA is a member of the Joint Working Group and has provided comments regarding the Natural Heritage System and crossings. These comments have been reflected in the Framework Plan. Through the future development approvals process, applicants will have the opportunity to further refine features based on discussions with the Conservation Authority and appropriate Town staff. At this stage and for the purposes of the Framework Plan, no further changes to the Natural Heritage System will be applied as the Framework Plan is a high-level exercise and not intended to identify such details and/or refinements.
8	Bousfields (Flato, TORCA and Wyview)	We would appreciate clarification regarding the proposed 'Pedestrian Promenade' along Sam's Way and the Sam's Way extension. The configuration of the road that this promenade runs in parallel with is not the road alignment that is contemplated in the MESP. Further, it is unclear if these lands for the promenade would be included as parkland dedication.	All of the elements of the public realm that are shown in the Framework Plan are conceptual and have no formal status, as this document is not a statutory Secondary Plan. This Framework Plan does not establish any requirement to provide any public realm elements however, the principles of this Framework Plan are to be achieved. The principles of the Framework Plan require a robust public realm network including elements of a typical suburban park system as well as an urban park system, including the potential for a pedestrian promenade, where appropriate and through subsequent development approvals processes. The Town will look forward to receiving development applications that achieve the fundamental principles established through this Framework Plan exercise.
9	Bousfields (Flato, TORCA and Wyview)	Section 3.2 identifies a planned ROW for Primary Roads of between 27 metres to 32 metres and a planned ROW for Secondary Roads of between 23 metres to 27 metres. Please provide clarify if these ROW widths are to apply to lands in Markham and Stouffville.	We are utilizing ROW widths suggested by the Town.
10	Bousfields (Flato, TORCA and Wyview)	The provisions identified in Section 3.4 'Mixed Use Areas' do not reflect the provisions established in the various MZO's within the Framework Plan study area.	We recognize the MZO process has obviated the typical planning approvals process; the Framework Plan is intended to provide a high level understanding of how various districts within the entire study area fit together to create a well designed, connected and complete community. Nothing in the Framework Plan supercedes anything in an MZO however, it is crucial that the principles established in the Framework Plan be achieved.
11	Bousfields (Flato, TORCA and Wyview)	The Framework Plan should clearly indicate that it is conceptual and that the location of infrastructure, community services and facilities, delineation of development limits and environmental features can be modified and refined without the need for Council endorsement or amendment to a subsequent plan based on the Framework Plan that is integrated into an Official Plan.	Agreed.
12	MSH (Times 4650 Inc.)	Generally, it is our view that the recommendations for the Mixed Use Gateway Area (where the Times lands are located) should be used to inform the Official Plan Review (which is being recommended) and this would go a long way to resolving a number of our comments on the Official Plan Review;	Acknowledged
13	MSH (Times 4650 Inc.)	Generally, Times supports the Highway 48 Framework Plan.	Acknowledged
14	MSH (Times 4650 Inc.)	Times supports this statement: Gateway Mixed-Use Area The Gateway Mixed-Use Area designation recognizes the prominence of the intersection of Highway 48 and Main Street, making it an ideal location for mixed-use development, including non-residential uses and medium to high density residential uses. Retail and service commercial uses are permitted as part of mixed-use development fronting onto Stouffville Road/Main Street, or as adaptive reuse of designated heritage buildings	Acknowledged
15	MSH (Times 4650 Inc.)	Further, the Framework Plan outlines for Mixed Use Areas that: Mid-rise buildings shall be between 5 and 9 storeys in height with a minimum FSI of 2.5 and maximum FSI of 4.9. High-rise buildings shall be taller than 10 storeys in height with a minimum FSI of 5.0, subject to the application of angular planes. Comment – Times supports this statement. It is our view that the building heights and FSI's outlined are consistent with Gateway and Mixed Use locations and this is consistent with our comments on the OP Review.	Acknowledged

16	Zhawd Corporation (Corebridge)	The Framework Plan looks good and takes into consideration some forward-thinking planning details that we appreciate, e.g. Urban Parkland Strategy and the extra effort in recommending some details that will help with placemaking in Stouffville.	Acknowledged
17	MSH (Times 4650 Inc.)	The mapping for the Framework Plan outlines a Significant Environmental Area, related to a wetland on the Times property, close to the intersection of Highway 48 and Stouffville Road, as shown on the Framework Plan sketch below: While there is a wetland in this area, it has been staked with the appropriate authorities and we have provided the mapping for this to the Town (it was used as part of the Official Plan Amendment on the site, which was recently approved). The mapping used for the Framework Plan is not consistent with that approved mapping. Further, there have been discussions with the Town about this wetland and options for this Gateway Area. It is our view that the wetland in this area is of low quality and low function, it does not provide significant habitat for wetland species and largely operates as a 'ditch' for the intersection of two major arterial roads. It is our view that the protection of this wetland and the application of large buffers, is counter intuitive to the goals and objectives of the Town's Gateway Area. The large buffers may serve to make some of the properties along Stouffville Road (not the Times property) unviable for development. It is our view that removal and compensation is a viable option and may provide for a net environmental benefit. We would recommend that as part of the Official Plan Review, that the Town consider the Environmental Area mapping in this area and include policies that balance the Gateway goals and objectives with potential environmental replacement policies.	We acknowledge the comments however, the Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. At this stage and for the purposes of the Framework Plan, no further changes to the Natural Heritage System will be applied as the Framework Plan is a high-level exercise and not intended to identify such details and/or refinements. Through the future development approvals process, applicants will have the opportunity to capture the detailed limits of features as agreed upon through discussions with the Conservation Authority and appropriate Town staff.
18	Willowgrove	Based on our previous comments provided on June 9 and our more detailed review and analysis of the July version of the Framework Plan and the Staff Report, we would request that the following comments and policy recommendations be considered:	
	Willowgrove	<i>1. The Framework Plan and any resulting Official Plan policies and land use schedules should include statements that the road locations and alignments shown are conceptual and not fixed.</i>	Acknowledged
	Willowgrove	<i>2. The Framework Plan and Official Plan require land use planning and transportation justification to demonstrate the need for an additional east-west arterial road to connect Highway 48 to McCowan Road in consideration of the extension of Sam's Way, Hoover Park Drive, and 19th Avenue in the City of Markham.</i>	The Framework Plan is conceptual and the mapping reflects an approach to achieve Fundamental Principles. No further justification is necessary.
	Willowgrove	<i>3. The Framework Plan and any resulting Official Plan policies should include policy statements indicating that the alignment and timing of collector roads in the vicinity of Willowgrove be determined through detailed development phasing and infrastructure planning that ensures adjacent lands are not reliant on a transportation network within Willowgrove's lands until such a time as Willowgrove proceeds with development.</i>	The Framework Plan is not a policy document, and does not propose phasing.
	Willowgrove	<i>4. The land use distribution and designations identified on Map 4 of the Framework Plan shall be revised to replace the Regional Scale Commercial designation with a Mixed-Use Commercial adjacent to McCowan Road extending easterly to the proposed road, and, that the Urban High Density Residential and Urban Medium Residential designation be included to replace the High Density and Regional Retail in order to achieve a greater degree of land use compatibility and transition (refer to Figure above).</i>	In accordance with the Council endorsed Commercial Policy Study, the Town requires additional Regional Scale Commercial development to serve its growing population.
	Willowgrove	<i>5. The Framework Plan and any resulting Official Plan policies should include policies that indicate the extent and delineation of the lands designated for Mixed Use and the various residential densities shall be considered approximate and flexible to be further defined through the subdivision review and approval process.</i>	While the Framework Plan will provide policy recommendations to the Official Plan Review, it will not result in changes to land use designations.
	Willowgrove	<i>6. The Framework Plan and any resulting Official Plan policies should include policies that allow for the flexibility of land uses within the McCowan depending on market conditions for both retail and housing needs in the future to the 2051 planning horizon, and, that both the commercial and high and medium density designations depicted on Willowgrove can be amended or replaced to reflect lower density residential without requiring an Official Plan Amendment.</i>	In accordance with the Council endorsed Commercial Policy Study, the Town requires additional Regional Scale Commercial development to serve its growing population. Further, a broad range and mix of housing types is a requirement of Provincial, Regional and Town-Wide policy. The incorporation of the Willowgrove lands into the Settlement area are dependent on the approval of York Region's Official Plan. A Secondary Plan process will still be required for the Willowgrove lands. As this is a Framework Plan and not a Secondary Plan, lands will not be redesignated through this process.
	Willowgrove	<i>7. The Framework Plan and any resulting Official Plan policies should include policies that are designed to recognize, permit and protect the ongoing operation of the Willowgrove property for agricultural institutional uses until such time the lands proceed for development.</i>	Nothing in the Framework Plan precludes ongoing, existing land uses.
	Willowgrove	<i>8. That the Framework Plan and Official Plan include phasing policies to address the timing and need for any community facilities, roads and infrastructures identified in the Framework Plan and subsequent studies shall recognize the need for Willowgrove to have full, unencumbered use of their property to support existing and continuing operations.</i>	As a high-level visioning/land-use plan the Framework Plan's purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system; identifying phasing is inappropriate at the high level. Further, nothing in the Framework Plan precludes ongoing, existing land uses.

	Willowgrove	<i>9. The Framework Plan and any resulting Official Plan policies and land use schedules be revised ensure that future development of Willowgrove lands not require a further Official Plan Amendment and that such development should be in accordance with the Block Plan Process discussed under Section 4.5.</i>	This is a Framework Plan with no statutory authority so there is no formal amendment process.
19	MHBC (SmartCentres)	We would like to discuss with the Town the identified rights-of-way which appear to be proposing significant increases to road right-of-ways without any commentary as to why they need to be increased so much. For example we want to ensure the Sam's Way will remain at its current right- of-way width of 27 metres, rather than being increased as suggested in the Study. We would also point out that pavement widths are proposed to be changed on existing roads that have been constructed by our client and which remain our client's obligation to maintain until assumption by the Town.	We are utilizing ROW widths suggested by the Town.
20	TRCA (Michelle Bates)	TRCA is supportive of including a trails network throughout the Study Area. Further to page 30 of the report, werecommend that trails be located either outside of or at the outer limit of buffers to natural features and natural hazards in order to avoid or minimize impacts to the Natural Heritage System.	Acknowledged
21	TRCA (Michelle Bates)	TRCA is supportive of the requirement for a Block Plan for lands within the Highway 48 Study Area. Werecommend for a Block Plan and comprehensive studies such as Master Environmental Servicing Plan for the newurban areas (e.g., west side of McCowan Road) if / when approved.	Acknowledged
22	YRDSB (Jordan Cook)	At this time, the Board requires at least one designated elementary school site within the Highway 48 Framework Plan in the block south of Stouffville Road and west of Highway 48 based on previously shared unit totals from development applications and unit mix. The Board may require a second designated elementary school site west of Highway 48 and centrally located to the majority of residential units once population targets have been finalized and shared with the Board. The Board is generally satisfied with the location of the west school site and the current proposed land use (ground related dwelling units) in proximity to the school site. The Board's elementary school site requirements are attached for your reference. Additionally, the Board request confirmation from the Town and the land-owners/developer group that the elementary school sites as indicated in the Highway 48 Framework Plan are located on lands permitting elementary schools uses, and not subject to any Minister's Zoning Order which may prevent the development of a public elementary school. Please note there is currently insufficient capacity in existing local area schools, and existing designated school sites will be required to serve students from other new developments in Stouffville. Therefore, any students generated within Highway 48 Framework Plan area may need to be accommodated outside the Stouffville community until sufficient pupil spaces are available.	Acknowledged. Both school sites (YRDSB and YCDSB) are located within MZO lands, in principle, where the planned population is located. Further, schools are important elements of a complete community.
23	MTO (Margaret Mikolajczak)	To be consistent with our comments for the other development proposals in the area, we offer the following comments. MTO has a capital project at the intersection of Highway 48 and Main Street/Stouffville Road this year (2022) which includes realigning the creek (with red side dace recovery habitat) at the SE quadrant. The red side dace habitat would limit the development potential and what is currently shown as "gateway mixed-use". It should also be noted that Highway 48 is a provincial arterial highway with regulatory posted speed of 80 km/h (unless signed otherwise) and design speed of 100 km/h. Any development/gateway proposals fronting Highway 48 should consider the design requirements of this road classification as permitting will be subject to this design criteria.	Acknowledged

IMPLEMENTATION

	Reference	COMMENT	RESPONSE
24	Bousfields (Flato, TORCA and Wyview)	Section 2.2 of the Framework Plan identifies the intended process for the implementation of the Framework Plan from the evolution of the Emerging Preferred and Landowners' Plans towards a Framework / Community Structure Plan. It is noted that while stakeholders, landowners and the joint working group had the opportunity to review concepts, we were not provided with any background information regarding the reports/studies completed to guide these concepts (specifically NHS background information) until this report for Council was released. The MESP process that the Town, City and TRCA are actively participating in should be identified as one of the key inputs to this process.	Map 1 combines two maps: Greenbelt Plan Maps 46 and 47 and ORMCP Map 4. The Natural Heritage System and Protected Countryside is consistent with Greenbelt Maps 46 and 47 however we note that the 'Settlement Areas Outside the Greenbelt' is missing and will add. Within the Oak Ridges Moraine Area our map reflects the land use designations identified in ORMCP Map 4.
25	Bousfields (Flato, TORCA and Wyview)	Section 2.3.3 refers to 'The McCowan Corridor' as depicted in the Town's Commercial Study. We have not been made aware of this study and its implications of the west end of the Highway 48 Framework Plan. We would appreciate being advised on the status of the Town's Commercial Study and its implications on the Highway 48 Framework Plan moving forward.	The Commercial Policy Study was undertaken as part of the Town's Official Plan Review. The project webpage and relevant documents can be found on the Town's website: https://www.cometogetherws.ca/cps

26	Bousfields (Flato, TORCA and Wyview)	Section 4.1 makes reference to the outcomes of the Visioning Exercise as a way to inform the Town's new Official Plan but there is no reference made with respect to how the Framework Plan will be used by the City of Markham and if it will be integrated into their new Official Plan.	Our work is for the Town of Whitchurch-Stouffville. The City of Markham is a Joint Working Group member and the lands within Markham have been reviewed however, the City of Markham is undergoing its own review of these lands and will need to integrate with whatever the ToWS is suggesting when they are ready to do so. We are aware that significant portions of the lands located in the City of Markham have MZOs and have been identified by the Region as 'Preliminary Recommended Locations for Urban Expansion'. Further, we are also aware that the cemetery lands are subject to an OLT appeal and it would be inappropriate to predetermine the outcome of that appeal through this study.
27	Bousfields (Flato, TORCA and Wyview)	We would appreciate additional clarification on Section 4.3.1 of the Framework Plan regarding an area-specific Development Charge, updated Development Charge By-law, Community Benefits By-law, Parkland Dedication By-law and/or the use of Section 42 or Section 51 of the Planning Act regarding lands subject to MZOs and if these instruments will be used by the City as well as the Town.	These are financial and planning act instruments that need to be considered by the Town of Whitchurch-Stouffville and by the City of Markham at the development planning stage of any application. The Framework Plan is not the avenue for these discussions.
28	Bousfields (Flato, TORCA and Wyview)	Section 4.5 outlines a Block Plan process that will be applied and needs to be completed before any development applications can proceed. Given the size of the study area, this requirement is not appropriate. It would impact smaller sites that already have as of right permission for development, including properties east of Highway 48. There is already an MESP underway for the lands to the west of Highway 48 and the MESP includes a concept plan for the entire block that addresses many of the matters listed as requirements for the Block Plan process. Given the number of landowners that would be involved in such as process across this diverse study area for the Framework Plan, it is unclear how one landowner would coordinate such a process. Based on the foregoing, we request that this requirement for a Block Plan be deleted.	Given that the typical planning process has been fundamentally circumnavigated, a block plan process provides the appropriate opportunity to ensure a well designed, connected and complete community and will assist the Town in considering subsequent development applications/approvals. When the MESP is completed, it should substantially form the basis for, or achieve all of the required elements of the identified Block Plan process.
29	Willowgrove	Through discussions with Town staff and their consultants on May 18th and June 3rd, it was noted that the Framework Plan would be used to as input into the New Official Plan. Based on the Framework Plan's purpose, the Framework Plan functions similar to a Secondary Plan, which would be a part of the public planning process. The Official Plan review process is a public planning process and if the Framework Plan is to ultimately be put into the New Official Plan, public input into this process is vital in ensuring that the Framework Plan reflects the vision of the Town residents and public.	The recommendations of the Highway 48 Framework Plan will be considered in the Official Plan Review. Further, development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies).
30	Willowgrove	Section 4.3.2 (McCowan Corridor) of the Framework Plan seems to imply that the lands be planned comprehensively through an Official Plan Amendment process and specifically a Secondary Plan. It is recommended that this policy approach apply only to the Future Urban Lands west of McCowan and that an Official Plan Amendment not be required for any part of the Willowgrove property. As with the MZO lands, it is recommended that the reasonable policy approach would be that the Willowgrove lands be developed in accordance with ZBLA, Draft Plan of Subdivision and Site Plan which conform with the Block Plan referenced in Section 4.5.	The Framework Plan is not a statutory planning document; development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies). The lands west of McCowan Road will also be subject a further MCR to bring them into the settlement area (to be confirmed with Town).
31	MHBC (SmartCentres)	A Block Plan may not be required in every instance to establish the parameters set out in Recommendation 31. We therefore request that flexibility be provided for, rather than force a Block Plan process where it may not be warranted.	The goal of the Block Plan process is to promote comprehensive planning and to ensure that development sites are appropriately integrated, well designed, connected and contain an appropriate parklands system. The need for a Block Plan process will be determined through subsequent stages of development and subject to the location, size and context of the development application, as well as coordination with respect to servicing and infrastructure, roads coordination, public parks and open space distribution / connectivity, phasing etc.... The Block Plan process can also be subdivided into smaller areas.
32	TRCA (Michelle Bates)	We appreciate that much of TRCA's comments regarding Framework Plan have been addressed. There are still some opportunities for refinements to new developments and infrastructure to minimize impacts to the Natural System. However, it is my understanding that this study process provides a high-level land use vision for the Study Area and there will be refinements and confirmation of various matters such as the Natural Heritage System (including natural features, natural hazards, and appropriate buffers/setbacks), road patterns (or removal of roads if appropriate), limits of development, and trail networks as properties within the Study Area advance through the planning process and complete necessary studies in accordance with relevant provincial, municipal and TRCA policies.	Acknowledged
33	Evans Planning	Section 4.5 – Block Plan Process Given the status of the Applications, and the supporting materials that have been historically provided for review by Staff, we request confirmation that any future requirements for a Block Plan would not be applicable. Alternatively, that past materials may be considered sufficient to satisfy this requirement for the purposes of obtaining Council Endorsement and forming the basis for a Developers Group/Cost Sharing Agreement.	The policy recommendations of the Highway 48 Study will be considered through the Official Plan Review, including the recommendation for a Block Plan Process. Confirmation of any future requirements in this regard shall be determined at a later date.

SPECIFIC COMMENTS			
Flato - 11621 Highway 48, City of Markham			
	Reference	COMMENT	RESPONSE
34	Bousfields	A plan of subdivision application for 11621 Highway 48 was approved by the City of Markham. These lands include a north-south right of way for a future public street and a public park. This road and park that have been secured through the approval of the plan of subdivision are not reflected in the Framework Plan. The City required the north-south right of way to allow for a future connection to the lands to the south of this property with the potential to connect to lands further south and east. This road network on the Markham lands is not included in the Framework Plan.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. The Framework Plan does not show that level of detail and nothing in the Framework Plan supercedes anything in an MZO.
Flato - 5474 and 5662 19th Avenue, City of Markham			
	Reference	COMMENT	RESPONSE
35	Bousfields	O. Reg. 172/21 identifies that the Residential Four (R4) Zone applies to the far west portion of the lands adjacent to McCowan Road in the City of Markham. The permitted zoning provisions for high density development are not accurately reflected in the land use categories in the Framework Plan.	We recognize the MZO process has obviated the typical planning approvals process; the Framework Plan is intended to provide a high level understanding of how various districts within the entire study area fit together to create a rational and complete community. Nothing in the Framework Plan supercedes anything in an MZO
36	Bousfields	The boundaries of the Natural Heritage System outside of the Greenbelt Plan area on these properties, particularly on the east part of the Flato lands appear to be substantially greater than the limits that have been defined through the plan of subdivision application that is under review with the City. Further, the road that has been proposed in the plan of subdivision and MESP on the east side of this property has not been included in the Framework Plan but instead a road is located further west.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. We are using mapping sources which are suitable for the conceptual nature of this Framework Plan. Map 1 combines two maps: Greenbelt Plan Maps 46 and 47 and ORMCP Map 4. The Natural Heritage System and Protected Countryside is consistent with Greenbelt Maps 46 and 47 however we note that the 'Settlement Areas Outside the Greenbelt' is missing and will add. Within the Oak Ridges Moraine Area our map reflects the land use designations identified in ORMCP Map 4. We have not received any alternate mapping that is approved by the Town or accepted by the Conservation Authority that changes these mapping sources.
Flato - 5241, 5223 and 5211 Stouffville Road			
	Reference	COMMENT	RESPONSE
37	Bousfields	We have concerns with Section 4.5 'Block Plan Process'. As of right permissions have been approved for these lands in the Gateway Mixed Use area. Triggering the need for a Block Plan that would apply to all of the lands in the Framework Plan area would be an onerous process for the development of such a small site with as of right permission to develop today.	The goal of the Block Plan process is to promote comprehensive planning and to ensure that development sites are appropriately integrated, well designed, connected and contain an appropriate parklands system. The recommendation for a Block Plan Process will be considered in the Official Plan Review; the need for a Block Plan will be determined through subsequent stages of development and subject to the location, size and context of the development application, as well as coordination with respect to servicing and infrastructure, roads coordination, public parks and open space distribution / connectivity, phasing etc... The Block Plan process can also be subdivided into smaller areas.
TORCA I Inc, TORCA II Inc. and 2743903 Ontario Inc. ('TORCA')			
	Reference	COMMENT	RESPONSE
38	Bousfields	The 'Commercial Area (MZO)' category shown in Map 4 – Framework Plan does not reflect the provisions in the MZO. O. Reg. 770/21 which provides split zoning categories for the lands identified as 'Commercial Area (MZO)'. This split zone allows residential and non-residential uses. We request that the references on Map 4 – Framework Plan be updated to better reflect the permitted uses in the MZO and that the category be changed to a Mixed Use designation with permissions that reflect the permissions in the MZO.	Nothing in the Framework Plan supercedes anything in an MZO.
39	Bousfields	Map 4 – Framework Plan identifies a School Site located east of McCowan Road, south of the proposed northern east/west road. A school site has not been contemplated on these lands to date nor has it been discussed with the landowner. Additional clarification is required from the Town and/or school board regarding the location of this school site.	Both the YRDSB and YCDSB, who are part of the Joint Working Group, have suggested to show one school site each, in the Framework Plan. Schools are important elements of a complete community.
40	Bousfields	The 'Natural Heritage System' designation that is incorrectly shown in the Greenbelt Plan area on most of the Maps in the Framework Plan report needs to be corrected. This is particularly important because it would not allow for the proposed creation of on-farm diversified uses in the Greenbelt Plan that have been proposed in the draft plan of subdivision application for TORCA's lands that was derived from Council direction to provide agriculture related uses on the non-developable portions of the site. The plan of subdivision would provide a farmer's market/farm-to-table restaurant and other uses in the Greenbelt Plan area outside of the Natural Heritage System that is a part of but not the entire limit of the Greenbelt Plan area.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. The Framework Plan does not show that level of detail and nothing in the Framework Plan supercedes anything in an MZO. Based on further discussions with the applicant during the development approvals process, staff will refine further.

Wyview - 11776, 11822 and 11882 Highway 48			
REF	SOURCE	COMMENT	RESPONSE
41	Bousfields	The pedestrian promenade location does not align with the road network and configuration of blocks in the ongoing work on the MESP that the Town, City and TRCA have been participating in and clarification is required regarding whether the promenade would be included parkland dedication.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. All development in the Town needs to consider an appropriate parkland system (suburban and urban parkland) to be dedicated to the Town of Whitchurch-Stouffville.
42	Bousfields	The road network within the area does not reflect the road network currently being established through the MESP process.	The Framework Plan is a high-level visioning/land-use plan; its purpose is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Further refinements, including the road network, will be reflected in the MESP which, when completed, must form the basis for, or achieve all of the principles of the Framework Plan. Through the future development approvals process, applicants will have the opportunity to further refine the road network based on discussions with Town staff.
43	Bousfields	A Community Park is identified in Map 4 – Framework Plan in the Whitchurch- Stouffville portion of the Framework Plan. Through the MESP process and approved/ongoing draft plan applications in the area, all major parks are planned to be located in the City of Markham.	All development in the Town needs to consider an appropriate parkland system to be dedicated to the Town of Whitchurch-Stouffville. Notwithstanding that there are parks planned through the Flato lands (MZO 2) and the ORCA lands within the Town of Stouffville, one of the principles established in the Framework Plan is for a central community park associated with the central woodland feature. Through subsequent development approvals processes, the Town would like to work with the applicants to ensure an appropriate hierarchy and distribution of parkland.
44	Bousfields	The Mixed Use area permissions do not align with the provisions of the MZO for the lands.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. The Framework Plan does not show that level of detail and nothing in the Framework Plan supercedes anything in an MZO.
Times 4750 Inc. - 4721 and 5061 Stouffville Road			
Reference	COMMENT		RESPONSE
45	MSH	The Framework Plan recommends the following for the Gateway Mixed Use Area: It is recommended that the policies contained in Section 12.7.11 of the Community of Stouffville Secondary Plan for the Gateway Mixed Use Area as shown on Map 4, be amended as follows: > That the Town include increased height and density provisions through the ongoing Official Plan Review process; and, > To require retail and service commercial uses at-grade in mixed use buildings to enhance the GFA potential for retail and service commercial uses in concert with higher density residential built forms. It is recommended that the Parkland Strategy within the Gateway Mixed Use Area be based on the Town's Official Plan and Parkland Dedication By-law (By-law Number 2002-118-FI) and shall include a requirement on sites greater than 1,500 square metres for a 5% minimum parkland contribution (if the site includes any residential development). Lands subject to the 5% requirement may be: > Fee simple parkland dedicated to the Town; > A strata park to the benefit of the Town; or, > A Privately Owned Publicly Accessible Space (POPS) where legal agreements are in place to ensure appropriate design, maintenance, and public access. Comment – Times supports this recommendation and agrees that these recommendations should inform the Official Plan Review.	Acknowledged. The Framework Plan does not provide planning policy but concepts for consideration in the ongoing Official Plan Review process and/or for the Town to utilized in their review of subsequent development approvals processes.

Willowgrove. - xxx McCowan Road			
REF	SOURCE	COMMENT	RESPONSE
46	Willowgrove	As Willowgrove has previously indicated, the short- to medium- term objectives of the ownership is to continue with the valuable educational and agricultural-related services. We note that the existing Official Plan policies and zoning for Willowgrove both recognize and permit the institutional agricultural and commercial recreational use of the lands including recognition of such existing and continued uses within the central Greenbelt area associated with Willowgrove Creek. Section 1.3 of the Framework Plan and Map 2 includes a description of the existing land uses within the land use study area. Specifically, the Willowgrove Farm has been identified as a day camp/nature school. We support the acknowledgement of Willowgrove's existing operations and land use permissions and reiterate that such permissions be protected and carried forward in the Framework Plan and the New Official Plan. Despite the changes to our land use designations, we plan to continue these practices and expect that our active farm and recreation work will reflect in the implementing policies. As an additional implementation strategy, we would request that for future residential development, the Willowgrove operations be clearly reflected on title (such as through warning clauses, etc.) to any surrounding homes being sold.	Acknowledged
47		The May Preliminary Framework Plan initially circulated identified a significant amount of Mixed Use land use designations for the Willowgrove property along the McCowan corridor. We note that the current Framework Plan identifies these areas as Regional Retail Area as well as High and Medium Density Residential. While we acknowledge that there has been an adjustment for low density residential on the eastern portion of the Willowgrove lands, the west portion of the property along McCowan Road identified as a Regional Retail Area which implies large format box stores designed to serve a market area beyond the community of Stouffville. Willowgrove reiterates our initial position that Highway 48 corridor should be the focus of Regional Retail and we do not support the proposal for regional scale retail in the McCowan Corridor and the west portion of the Willowgrove property in particular. Willowgrove takes the position that there does not appear to adequate justification for the extent of regional scale retail at this location. Further, this form of development does not support the general land use planning objective to create pedestrian-friendly development and more complete and connected communities.	While the Framework Plan will provide policy recommendations to the Official Plan Review, it will not result in changes to land use designations, particularly on lands that are subject to Secondary Plan processes.
48	Willowgrove	We submit that a combination of Mixed-Use Commercial would be more appropriate along the frontage of McCowan Road (similar to the Orca MZO lands to the north). In terms of residential, a gradation of massing of the residential areas to the east of the McCowan Road commercial and mixed-use area up to the Willowgrove Creek valley system. The transition from higher density residential uses to lower density residential would produce a more compatible land use and neighbourhood design. It is noted that the both the staff report and Framework Plan references the proposed Regional Retail areas as "required to meet the Town's growing need for retail and service commercial uses to 2051 and beyond". We would suggest that a more flexible approach to the ultimate land use in this area be subject to further review or a policy approach which is flexible to respond to market demand and needs in the future.	While the Framework Plan will provide policy recommendations to the Official Plan Review, it will not result in changes to land use designations, particularly on lands that are subject to Secondary Plan processes.
49	Willowgrove	The Framework Plan continues to show north-south secondary roads and an east-west primary arterial road along the south boundary entirely on the Willowgrove lands. Section 3.2 of the Framework Plan document discusses Primary Roads within the study area but has not specifically identified the 19th Avenue in the City of Markham. It is suggested that the 19th Avenue be identified and shown as a primary road for the purpose of the Block Plan and the timing and widening improvements for the 19th Avenue be discussed and coordinated with the City of Markham. Once the improved and widened 19th Avenue is considered, we suggest that the need for an additional continuous east-west collector road to connect Highway 48 and McCowan be reconsidered from a transportation and land use planning perspective. As we have previously advised, the ownership of Willowgrove does not have any immediate plans to develop the property and wishes to continue with the existing operations and institutional recreational educational farm programs. The proposed road network depicted on Map 4 of the Framework Plan se roads would greatly negatively impact our programming, cutting through our baseball diamond, laneway, dining hall, and apple orchard. Therefore, until such a time as Willowgrove chooses to proceed with development, the Town should not rely on Willowgrove's lands to support these roads, and subsequent studies should recognize the need for Willowgrove to have full, unencumbered use of our property to support existing and continuing operations. We request that the alignment and timing of roads in the vicinity of Willowgrove be clearly identified in the Framework Plan, and that these transportation routes are required be determined through detailed development phasing and infrastructure planning. This will help to ensure adjacent lands are not reliant on a transportation network within Willowgrove's lands.	The purpose of the Framework Plan is to establish a vision and principles for the Highway 48 Study area. Development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies).

50	Willowgrove	Appendix B to the draft Framework Plan includes a Natural Heritage overview prepared by Plan B Natural Heritage. It is noted that the NHS mapping identifies a Natural Heritage System Enhancement Opportunity for the table land portions of the Willowgrove Farm east of Willowgrove Creek. There appears to be little justification for identifying this enhancement area that do not also exist for the table land hedgerows and open fields lands north and south of Willowgrove Farm. It is unclear how the enhancement opportunity identification translates into land use policies and what the implications are to Willowgrove in terms of future development. Willowgrove recognizes that the proposed Framework Plan does not include the Natural Heritage System Enhancement Opportunity designation as implied in the Plan B work and we support the Residential designation as currently shown on Map 4 of the Framework Plan. It is recommended that Natural Heritage System enhancement opportunities not be identified on a site-specific basis and the implementation policies should be general in nature and provide for enhancement throughout the entirety of the lands e within the study area boundaries.	As the PlanB memorandum states 'Enhancement opportunities to protect, restore and enhance the NHS for the long-term are shown on Figure 11. The enhancement opportunities are associated with tableland hedgerows and open fields that provide a connection between core features such as woodlands and valleylands'. The confirmation/refinement ('justification') of the NHS and the determination of appropriate NHS feature buffers will be determined through subsequent phases of the planning and/or development approval process, in consultation with the TRCA, the Region and the Town.
REF	SOURCE	COMMENT	RESPONSE
51	John Magnante - 12046 Highway 48	Thanks for your time last week in regards to the highway 48 Study framework. I was surprised to see the revised framework plan (map 4) in comparison to the previous (3) frameworks that we had a forum back in early 2020. I own the property at 12046 Hwy 48 since 1988 and purchased this with the potential of building a commercial building. I was told back then that highway 48 corridor would be developed and the west and east side would allow 600 feet to possibly zoned mixed use/retail/commercial/industrial. Can you explain how come the two parcels at the south west corner and north west corner is allocated mixed use and the rest is ORMCP. Just curious wouldn't the soil composite be similar from the rest of the area to be of the same therefore shouldn't it be included as ORMCP. I feel that the property owners along the south corridor are being discriminated and handcuff and not fair. I understand that we must protect the environment and land and wildlife but I feel that if we were to exclude the property south of highway 48 to mirror the east side at the Hoover park business it would look esthetically appealing and be the true gateway from Markham to Stouffville. I also understand we need to protect the ORM lands from the past planning where they allowed to build/develop all the lands in Oakridge's/King City that were on the ORM. I think that if we were to allow the same depth you have at the southwest corner Stouffville and Main all along the south to Hoover park it would be fair.	Refer to Map 1 for the study area delineation. Following the initial stages of the study (2020) which produced the 3 preliminary concepts, further direction was provided by the Town to exclude the ORM lands from the study concepts.
SmartCentres - Area 1 Regional Retail Area			
	Reference	COMMENT	RESPONSE
52	MHBC	We appreciate the recognition that this area may evolve over time and as such the Mixed Use Areas urban design directions will be applied (Section 3.6 – Page 27). Having said, how will this be implemented in the draft Official Plan? Will this direction be provided for without need for an Official Plan Amendment?	The Framework Plan is not a statutory planning document; development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies).
53	MHBC	We agree with the location of the tallest and densest development being located in proximity to the Potential Transit Hub on our clients lands. Further discussions, however, are required to implement a Transit Hub in this location including design, funding and ownership of the lands of the Transit Hub.	Acknowledged
54	MHBC	We do not disagree with the design directions provided for the Regional Retail Areas, however, acknowledgement of tenant requirements and lease obligations should be noted in the commentary and that a balance between design and these requirements / obligations should be achieved.	The Framework Plan is not a statutory planning document; development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies). The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system.
55	MHBC	As per our submission on the Draft Official Plan, we requested that the restricted uses and size restrictions applied to the Regional Retail Area be removed as recommended by the Town's consultant. This would ensure that the Regional Retail Area maintains its planned function by allowing the full range of retail and service commercial uses, which appear to have been provided for in the Mixed Use Area designation. This recommendation should be included in this Study in our opinion.	The policy recommendations of this study will be considered in the Official Plan Review, with appropriate policies incorporated (the details of which need further refinement).
56	MHBC	Recommendation 12 in Section 4.2.3 introduces the permission of residential uses into the Regional Retail Area. We agree with this recommendation. However, the third bullet appears to require retail functions being required at grade – we feel this should be encouraged but not required, as it may be inappropriate to locate retail at grade in certain areas of the development. It is unclear why stand-alone residential buildings should not be permitted. The objective is to create a mixed-use neighbourhood that caters to the widest range of needs of the community. That should not narrowly be interpreted as being a collection of mixed-use buildings.	This is a recommendation for consideration from the recently completed, Council adopted Commercial Study.

57	MHBC	Further Recommendation 12 in Section 4.2.3 introduces a requirement of 400 square feet of non-residential per residential unit factor for all new development. This concept was applied to the Conversion Lands through the conversion process, which introduced residential and other permitted uses while retaining part of the original employment objectives. Thus our client was accepting of this requirement on the Conversion Lands. Introducing this requirement on the Regional Retail Area establishes a new and unwarranted requirement on Regional Retail Areas which will be difficult to manage and ensure it occurs as envisioned by the recommendation. We therefore request that this requirement be deleted from the recommended approach for Area 1.	This is from Town staff reports on conversion lands.
58	MHBC	Recommendation 13 in Section 4.2.3 states that a policy should be included requiring no net loss of Gross Floor Area. This is simply not a practical policy response given ever changing market conditions in the retail marketplace and store formats. We therefore request that Council not implement this recommendation.	This is a recommendation for consideration from the recently completed, Council adopted Commercial Study.
SmartCentres - Area 2 Conversion Lands			
REF	SOURCE	COMMENT	RESPONSE
59	MHBC	It is unclear why Area 2 is identified as Regional Retail Area, when all correspondence over the last three years on the Conversion Lands was to develop the lands for Mixed Use purposes. We respectfully disagree with this approach and request that these lands be designated Mixed Use Areas as has always been contemplated in our numerous submissions to the Town and which has been applied to the Corebridge and Schlegel lands. As noted above, these lands were shown on the draft Framework Plan shown to our client as Mixed Use Area, not Regional Retail Area. There was no discussion with our clients regarding this approach and we respectfully request that Recommendation 16 not be implemented.	The proposed revisions to the Regional Retail Area provides mixed use development. That recommendation will need to be integrated into the Official Plan Review process.
SmartCentres - Area 3 Business Park Area			
Reference		COMMENT	RESPONSE
60	MHBC	It is unclear from the draft Highway 48 Study as to the implementation of the Promenade and what it entails. The information we received from staff earlier this month, suggests that the Promenade is substantially smaller than the examples provided for and contained within the existing right-of-way width. Further clarification is required. We have significant concerns with the introduction of a "Promenade" on the south side of Sam's Way. While we appreciate the connectivity between various stream corridors in this area of the Town, introducing this feature will undermine the Business Park uses proposed for this area. Other options should be investigated, perhaps locating the Promenade along Hoover Park Drive within the Town's existing right-of-way where the focus of pedestrian activity should be directed. Further, we have concerns with the design directions provided for the Promenade (Page 29) which appear to further restrict the design of the Business Park lands which will not assist in attracting business park and industrial users in our client's opinion. We believe in order for the business park lands to be successful in attracting employment uses, the lands need to have superior access and good visibility from primary roads, ideally with a signature gateway.	The Framework Plan establishes the concept for a Promenade to achieve a number of important principles including 1) connection between the east and west sides of Highway 48, 2) transition between the employment uses on the south side of Sam's Way and future mixed uses on the north side, and 3) promoting a 'green' character for the community. The linear green space / pedestrian amenity may be used for recreation, active transportation and serve as an amenity for the mixed use and employment areas. Employment areas, especially those located in urbanized areas, must provide innovative designs and amenities not only to attract users and serve employees but also to support use in the community, after business hours; the concept of the pedestrian promenade is consistent with this approach. Further, the presence of the Promenade does not preclude access to nor the ability to market / brand the adjacent sites; rather, it ensures that a well-designed, consistent, landscaped edge that forms the front face of the employment area and provides a screen to any loading / storage areas that may be visible from the public realm. These details should be addressed at the site plan stage of development.
61	MHBC	The road network shown in this area (south of Sam's Way) should not be depicted in this area. Flexibility should be provided for to accommodate employment user requirements. In our client's opinion, even though it is a conceptual road network, it should not be shown on Map 4 and instead should be determined through detailed approvals processes, including a Plan of Subdivision application for which our client has had a pre-application consultation with staff.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system.
62	MHBC	We have no concerns with the general design direction provided for this area.	Acknowledged
11821 McCowan Road			
Reference		COMMENT	RESPONSE
63	Lora Papaikononmou (Emilio and Concetta Saccucci)	There was a Draft Plan Map of the development area forwarded to the owners that classified their property as "Mixed Use (Commercial Required)". The owners were not accepting of this land use classification for the subject lands nor were they content with the scale of the development that would be surrounding them in the future. The owners coordinated meetings with Town Staff and their Ward Councillor and brought forward their concerns and were advised that a new draft map was being completed in the coming weeks and that certain planning processes would enable them to have their issues heard. Shown below (identified as MAP 4 in the Draft Report) is the revised Draft Plan Map of the development area that was received by the owners on July 14, 2022 (just 6 days prior to this council meeting). As is shown, the subject lands have now been reclassified to a "Regional Retail" land use designation within the McCowan Road Corridor. The owners are not content with this land use designation nor are they content with many of the proposed elements within this draft planning draft concept plan. These issues will be listed and itemized below:	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system AND mix of uses, including commercial/retail uses. Map 4 conceptually identifies these lands as 'Regional Retail', which is consistent with the recommendations of the Commercial Study, represents good planning and does not preclude the current use of these lands from continuing indefinitely. Comprehensive planning seeks the best overall outcomes for the community as a whole, not the interests of any one individual.

Lora Papaikononmou (Emilio and Concetta Saccucci)	<i>1. Land Use Designation: The owner's current property is zoned Residential. They are requesting that the subject lands' future land use designation be changed to and remain as "Residential"- as denoted by the pale yellow colour in the map above. The lands to the east of the subject lands are designated to be a "Residential" land use in the future. The request by the owners is appropriate and in keeping with the consistency of a "Residential" zoning designation along the eastern flankages of the proposed road running east from the subject lands and will enable for a more consistent build form in this planning area to be achieved.</i>	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system AND mix of uses, including commercial/retail uses. Map 4 conceptually identifies these lands as 'Regional Retail', which is consistent with the recommendations of the Commercial Study, represents good planning and does not preclude the current use of these lands from continuing indefinitely. Comprehensive planning seeks the best overall outcomes for the community as a whole, not the interests of any one individual.
Lora Papaikononmou (Emilio and Concetta Saccucci)	<i>2. School and Park Locations: The owners are not in support of the proposed future School and Park location to the east of their property. As there are other lands in this development that can easily accommodate the future School and Park blocks, the owners are requesting that these facilities are relocated due to the additional traffic and noise conditions that would be generated from these facilities on a daily basis.</i>	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system AND schools. Map 4 conceptually identifies parks and schools in the most centrally accessible location to the most number of residents, as possible (this principle is also consistent with the School Boards' criteria). Comprehensive planning seeks the best overall outcomes for the community as a whole, not the interests of any one individual. Further, the exact location of schools will be determined through the development application process.
Lora Papaikononmou (Emilio and Concetta Saccucci)	<i>3. Local Road Size: The owners are not content with the placement of the proposed road flanking the north side of their property but understand that the road network is required to develop the planning area accordingly. What they are seeking is that this proposed road be sized and built as a local road (ie: smallest public road widths allowable) to limit the volume of traffic travelling directly beside their home on a daily basis.</i>	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. This plan does not establish any requirement to provide the local roads in these locations; these will be determined through subsequent development approvals processes.
Lora Papaikononmou (Emilio and Concetta Saccucci)	<i>4. Intersection Signalled: The owners are not content with the placement of the proposed intersection at the front north side of their property. They are seeking a non-signalised intersection and would support a 4 way stop intersection. A 4-way stop intersection will encourage a more calming entry into the more local road network. There are also signalised intersections directly to the north and south of the subject lands proposed on McCowan Road. They would also prefer that the western road connection at this intersection be eliminated so as to not have a high volume of traffic overflow from the future westerly development lands-currently being designated as Regional Retail in the McCowan Road Corridor.</i>	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. The plan does not establish any requirement to provide the local roads or signalized intersections in these locations; these will be determined through subsequent development approvals processes, including technical studies.
Lora Papaikononmou (Emilio and Concetta Saccucci)	<i>5. Direct Impacts on Subject Lands</i> <i>a.) Alterations due to construction</i> <i>The owners are seeking that any and all physical changes that are required to be undertaken by the developer(s) to develop the area surrounding the subject lands; in terms of infrastructure, road widening, other- that will directly alter the owners current functioning facilities and or enjoyment of the property (ie: landscaping, plantings, septic systems, well water, hard surfaces/driveways, etc), will be reinstated by the developer by way of conditions in documents issued by the Town for such required works, and will be at no cost to the owners. The conditions will also capture the need to complete all alterations in a timely and workmanlike manner.</i> <i>b.) Private Well Volumes/Quality/Monitoring</i> <i>Given that the owners are currently on a private well that is relatively shallow in depth (~ 20 feet), there will likely be impacts to the well during the development activities. The owners are requesting that the developer be held accountable to monitor this private well at their sole cost and to remedy any safety and volume concerns that may arise due to their development activities- throughout the lifecycle of their activities and until the Town assumes the development.</i> <i>c.) Public Service Connections</i> <i>Due to the owners inheriting a significant amount of permanent inconveniences and disturbances caused by this large-scale development, the owners are requesting that the developer services the subject lands with public infrastructure at no cost to the owner when the infrastructure is installed in the public roadways built by the developer so that the owner can get off their private septic and well services.</i> <i>d.) Acoustical Fencing- north side</i> <i>Given that the new proposed road network will flank the north property line of the subject lands, the owners are requesting that the developer, as a condition to their approvals, installs an acoustical grade wood fence to the Town's specifications, along the north flanking property line of the subject lands, and at no cost to the owners. Timing of the installation will be determined by the Town and when the boulevard works are being completed.</i>	These are detailed requests that may be considered by the Town through subsequent planning approval processes. They are not appropriate considerations for this Framework Plan.
	<i>6. Heights of Commercial Land Use</i> <i>The owners would like to recommend that the heights of the commercial developments located to the north of the subject lands be limited in height (when zoning is defined) and that a stepped transition of those heights is implemented to create a more fitting appearance at this entryway into the community.</i>	These are detailed requests that may be considered by the Town through subsequent planning approval processes. They are not appropriate considerations for this Framework Plan.

2440332 Ontario Inc. - 5262, 5270, 5286 and 5318 Main Street and 12371 Highway 48			
	Reference	COMMENT	RESPONSE
64	Evans Planning	While we are generally supportive and are pleased to see progress being made, we wish to offer the following comments for your consideration:	Acknowledged
65	Evans Planning	Recognizing the Gateway Study Policies (OPA 145) In May 2018 the Town of Whitchurch-Stouffville adopted Official Plan Amendment 145 (OPA No. 145) as a means of providing detailed policy direction with respect to the 'Gateway Mixed Use Area' located at the intersection of Highway 48 and Main Street, including the subject property. The related amendments to the Community of Stouffville Secondary Plan are one component of a detailed implementation strategy being developed to advance the preferred land use and urban design concept plan. This implementation strategy includes a Precinct Plan which forms part of Urban Design Guidelines for the Gateway area, in addition to a Transportation Concept Plan and Environmental Management Plan. OPA No. 145 was subsequently approved by the Region of York on July 24, 2018 and is now in force and effect. OPA No. 145 had the effect of amending the land use designation of the subject property to Mixed Use Area for the portion of the lands fronting onto Main Street, and Urban Medium and High Density Residential, and Greenland Area for the balance of the lands. The Owner was also an active participant in the development of OPA 145. The submission of the Applications during the background study period associated with the Study were intended to assist the Town by providing an indication of the Owner's development interest, as well as providing extensive detailed technical information which shaped the form of the proposed redevelopment, and hence will provide substantive background data for use by the Study Consultants. The materials provided in support of the Applications represent a period of background review and study spanning over five years during which time the Owner, in partnership with the Town, also attempted to form a functional working relationship with the adjacent property owners within the quadrant. Accordingly, we wish to ensure that the policy framework established through this process, and which continues to evolve through the continued review of the Applications, remains intact.	Acknowledged
66	Evans Planning	2.3.1 – Natural Heritage/Open Space System As referenced above, a great deal of technical analysis and study has been undertaken for the subject property in order to appropriately delineate the limits of natural features and associated buffers. These development limits have been reviewed by the Town and circulated review agencies, including TRCA and the Region of York. As part of the Applications, a large open space/environmental protection block is to ultimately be conveyed to public ownership to ensure the long-term protection of the features contained therein. We wish to ensure that the Framework Plan, or any policies which may be developed in the future, recognize the advanced nature of this work and the development limits which have been determined with respect to the subject property. Further, we note that the vision is to include a potential recreational trails network within natural features and buffer zones to provide linkages to future parks and open space. We support the potential for this system, and suggest that as the vision of the Study seeks to achieve a more urban and intensive built form, the provision of trails should be eligible for credit with respect to required parkland conveyance.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. We are using mapping sources which are suitable for the conceptual nature of this Framework Plan. Map 1 combines two maps: Greenbelt Plan Maps 46 and 47 and ORMCP Map 4. The Natural Heritage System and Protected Countryside is consistent with Greenbelt Maps 46 and 47 however we note that the 'Settlement Areas Outside the Greenbelt' is missing and will add. Within the Oak Ridges Moraine Area our map reflects the land use designations identified in ORMCP Map 4. We have not received any alternate mapping that is approved by the Town or accepted by the Conservation Authority that changes these mapping sources.
67	Evans Planning	2.3.2 – Transportation Network The Applications propose the creation of new streets on the subject property to increase connectivity within the quadrant, and to establish a more fine-grained street/pedestrian network. The proposed new streets are not reflected on the Framework Plan (Map 4), nor on any of the concept options. Accordingly, we would request confirmation that the proposed street network has been considered in the context of the recommended options. Further, we support the notion of Highway 48 being transformed into lower-speed, pedestrian corridors.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Details of the street network shall be addressed through subsequent stages of development approvals.
68	Evans Planning	2.3.3 – Land Uses and Built Form In general, we support the notion that streets should line major streets which high-rise buildings should mark prominent gateways, corners, and intersections. Notwithstanding this, we request clarification with respect to what would be considered a 'mid-rise' or 'high-rise' building for the purposes of the Study? Are the general descriptions of 5-9 storeys for mid-rise, and taller than 10-storeys for high-rise applicable to all lands within the study area, or only for those within the Mixed Use Areas/Main Street West? Per our comments above, we wish to ensure that the land use provisions enacted through OPA 145 are not altered through this process, and that the status of the Applications are appropriately considered given their status.	Acknowledged
69	Evans Planning	Section 3.2 – Roads/Streets The new streets proposed by the Applications have been designed in accordance with the requirements provided by Town Staff. We wish to confirm that the road widths specified within the Framework Plan are not applicable.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Details of the street network shall be addressed through subsequent stages of development approvals.

70	Evans Planning	Section 3.4 – Mixed Use Areas While we support the notion of a mix of mid- and high-rise buildings within the Mixed Use Areas, we suggest that the application of angular planes may inhibit the flexibility required to meet the intended vision if the policies governing same are not carefully and sensitively developed. Specifically, any policies should maximize flexibility to accommodate changes in grade, location of features, and the depth/size of development parcels.	The Framework Plan is not a statutory planning document and does not include policies. The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system.
71	Evans Planning	Section 3.8 – Public Realm We suggest that alternative/innovative forms of parkland should be encouraged, and credit provided, to support this vision. Additionally, we would suggest that the Town consider implementing a ‘cap’ on the maximum proportion of a property that can be conveyed as parkland, and/or a fixed rate per unit for high-density development proposals. Considering that such forms of development are required to include on-site amenity spaces, it is reasonable to conclude that there is less of a need or impact on parkland.	To be more fully explored through a Parks Plan, revised Official Plan and a new Parkland Dedication By-law, where determined appropriate by the Town.
72	Evans Planning	Section 4.2.1 – The Gateway Mixed-Use Area Recommendation 2 - Generally, we support the recommendation for increased height and density within the Gateway Study area, as this has already been reflected in the evolution of Applications. Considering this recommendation as an indication that greater height and density is desirable and appropriate for the Study Area, we would also suggest that an exemption should be incorporated into any future Community Benefits Charge by-laws.	Exemptions to any Community Benefits Charge (CBC) By-law is not part of the Framework Plan. To be considered through the preparation of the CBC By-law.
73	Evans Planning	Recommendations 3 and 4 - Given our above comments, we support the recommendation that lands dedicated for parks purposes may include strata parks or privately owned publicly accessible space (POPS). We would further suggest that any trails or connection created through a development proposal should be considered for parkland credit. Notwithstanding this, we would still suggest that parkland dedication rates should be carefully considered to ensure that high-density built form is not unfairly burdened or potentially dis-incentivized. We note that the Planning Act establishes that the maximum contribution of parkland is 2% for commercial/industrial development, and 5% for all other cases (i.e. residential development). We would thus question why the recommendation is for a minimum of 5%. We also feel that consideration for a lesser alternative parkland dedication rate, as provided for in the Act, should be included within any policy framework for the Study Area in recognition of the envisioned high-density built form and uses. Finally, we would suggest that the Town consider implementing a ‘cap’ on the maximum proportion or value of a property that can be considered for parkland, and/or a fixed rate per unit for high-density development proposals.	To be more fully explored through a Parks Plan, revised Official Plan and a new Parkland Dedication By-law, where determined appropriate by the Town.

Zhawd Corporation - Corebridge

Reference	COMMENT	RESPONSE
74	Bousfields Question regarding the intent for the Potential Transit Hub that is shown on the Corebridge site. Section 3.3 is intended to address the Transit Hub. While this section speaks to the urban design direction, which we note is generally consistent with the site-specific OPA policies (OPA 151) that Town Council adopted for the Corebridge lands. However, the framework plan does not explain what the Transit Hub is intended to be, i.e. an integrated facility within a mixed use building, a surface lot with several bus bays, or a number of bus stops within the public ROW. A surface bus station with several bays within the Site would certainly be an issue and conflict with the Town and Owner’s vision for the Site for a higher density transit supportive landmark location. It would be helpful to know if the Town has had any discussions with YRT or Metrolinx regarding any type of transit hub in this location and/or what is envisioned to service the area.	Acknowledged. Further study, in consultation with YRT and Metrolinx, will be required to determine the location, form and function of the potential Transit Hub.
75	Bousfields 2. Section 4.2.4 speaks specifically to the Zhawd lands and includes a recommendation. As drafted, Recommendation #16 appears to deal with lands south of Hoover Park Drive (as identified on Map 3) and not the Zhawd lands (which are north of Hoover Park Drive). I.e. the Employment Lands Conversion Area does not relate to the Zhawd site on Map 3. Further, the Region and Town have already adopted Official Plan Amendments in support of the conversion so we would suggest Recommendation #16 be amended to the following: “It is recommended that the Map’s designations reflect the Region of York’s approval of Employment Land Conversions and the Town’s approved OPA 151.”	Acknowledged and revised.
76	Bousfields Map 4 (Framework Plan) illustrates a road network including Primary Roads, Secondary Roads, and Local Roads (unlabelled on the Map). Understanding that a future Official Plan Amendment would implement the Framework Plan, we do not believe it’s necessary to illustrate the location of local roads on the plan, as the need and location of these roads will be confirmed by detailed study through development applications.	The purpose of the Framework Plan is to establish the principles for ensuring a well designed, connected and complete community with an appropriate parklands system. Details of the street network shall be addressed through subsequent stages of development approvals.

Walmart

Reference	COMMENT	RESPONSE
77	Urban Strategies We note that Map 4 – Framework Plan does not identify Highway 48 / Hoover Park Mixed Use Areas, a designation that appears in the legend. Please confirm this designation is not intended to be applied to lands south of Hoover Park Drive, specifically the Walmart property, the entirety of which we assume is proposed to be designated Regional Retail Area.	Map 4 has been updated to show all 'Mixed Use' areas in the same colour, without distinction between the various areas of mixed use.

78	Urban Strategies	Please clarify how the Urban Design Directions in Section 3.0 of the report are intended to be implemented. How will they “enhance and augment” the Town’s other urban design guidelines? We note that Section 4.5 states that Block Plans are to form the basis for urban design guidelines. We agree that block planning is the appropriate stage to develop area-specific guidelines. (See comment 8 below regarding Block Plans.)	The Town’s approved Main Street Urban Design and Built Form Guidelines and Community of Stouffville Urban Design Guidelines shall be applied to the Highway 48 Study area. In addition, the Urban Design Directions speak more specifically to some of the elements of the future Highway 48 community that may not addressed in these two existing documents.
79	Urban Strategies	The Urban Design Directions applicable to the Regional Retail Area, in Section 3.6, assume future redevelopment of the area in a mixed-use form. Although it is appropriate to anticipate and enable mixed-use redevelopment in the area, Walmart currently have no development plans for their property. They may wish to make alterations to their existing store; in which case, we assume the guidelines in Section 3.6 would not apply. Please confirm.	The Framework Plan is not a statutory planning document; development approvals on these lands will require further statutory planning work that may include an OPA / Secondary Plan (including appropriate planning justification, environmental and engineering studies).
80	Urban Strategies	Regarding the policy recommendations in Section 4.0, we support permitting higher density forms of residential development in the Regional Retail Area.	Acknowledged
81	Urban Strategies	While we support the goal to increase the amount of retail in the Regional Retail Area, we view the recommended requirement for a minimum of 400 square feet of non-residential space per residential unit as unjustified and impractical. No rationale is provided for this ratio in either the Draft Framework Plan report or the Phase 2 Commercial Policy Study undertaken for the OP Review. The ratio fails to consider that retail growth is driven by several factors, including population growth in the broader community served by the retail node, as well as the demographics of the community. Other policy approaches should be considered to ensure the area expands as a regional retail node. For example, an appropriate range or target for the optimal amount of retail space within the Regional Retail Area could be determined in consultation with landowners; a Block Plan and phasing plans could be required to show how the target will be achieved.	The recommendations put forth in the Framework Plan will be considered in the Official Plan Review. Where appropriate, and subject to policy refinements, these may be incorporated into the new OP.
82	Urban Strategies	Further to the above concern, the strategy to expand retail in the Regional Retail Area by requiring all future residential development to be in the form of mixed-use buildings with retail at grade is also not justified. Except in the very densest parts of major cities, in our experience, requiring retail on the ground floors of every building over an area as large as the Regional Retail Area will result in much of the retail being unviable. A better approach is to identify, through a Block Plan for the area, the most appropriate locations for big boxes (either standalone or within the podiums of mixed-use buildings) and the existing and future streets (public or private) where smaller-format retail should be concentrated.	This is a recommendation for consideration from the recently completed, Council adopted Commercial Study.
83	Urban Strategies	Recommendation 13 in the Draft Framework Plan, suggesting a requirement that retail space lost through redevelopment be replaced on-site or elsewhere in the Regional Retail Area, is not recognizing current and emerging retail trends and not providing the flexibility needed to encourage mixed-use intensification. The area is likely to experience additional stand-alone retail development before significant redevelopment occurs. When the redevelopment and “reformatting” of existing stores takes place, more likely than not their floor area will be reduced through efficiencies and in response to retail trends at the time, yet they will continue to function as regional retail. The Walmart store, among the largest in the GTA, is a case in point: if and when it is replaced, the new store almost certainly will be smaller. As noted above, using the block planning process to identify an optimal supply and distribution of retail in the area would be a more effective growth and intensification strategy.	This is a recommendation for consideration from the recently completed, Council adopted Commercial Study.
84	Urban Strategies	As noted above, we support a block planning approach to developing a redevelopment framework for the Regional Retail Area that provides more detailed direction regarding land use, infrastructure, open spaces, community services, built form, etc. However, such a process should not be required for the approval of additional retail development in the area. This should be acknowledged in any future Official Plan policy based on Recommendation 31, which is more relevant to greenfield lands west of Highway 48.	The goal of the Block Plan process is to promote comprehensive planning and to ensure that development sites are appropriately integrated, well designed, connected and contain an appropriate parklands system. The recommendation for a Block Plan Process will be considered in the Official Plan Review; the need for a Block Plan will be determined through subsequent stages of development and subject to the location, size and context of the development application, as well as coordination with respect to servicing and infrastructure, roads coordination, public parks and open space distribution / connectivity, phasing etc... The Block Plan process can also be subdivided into smaller areas.