

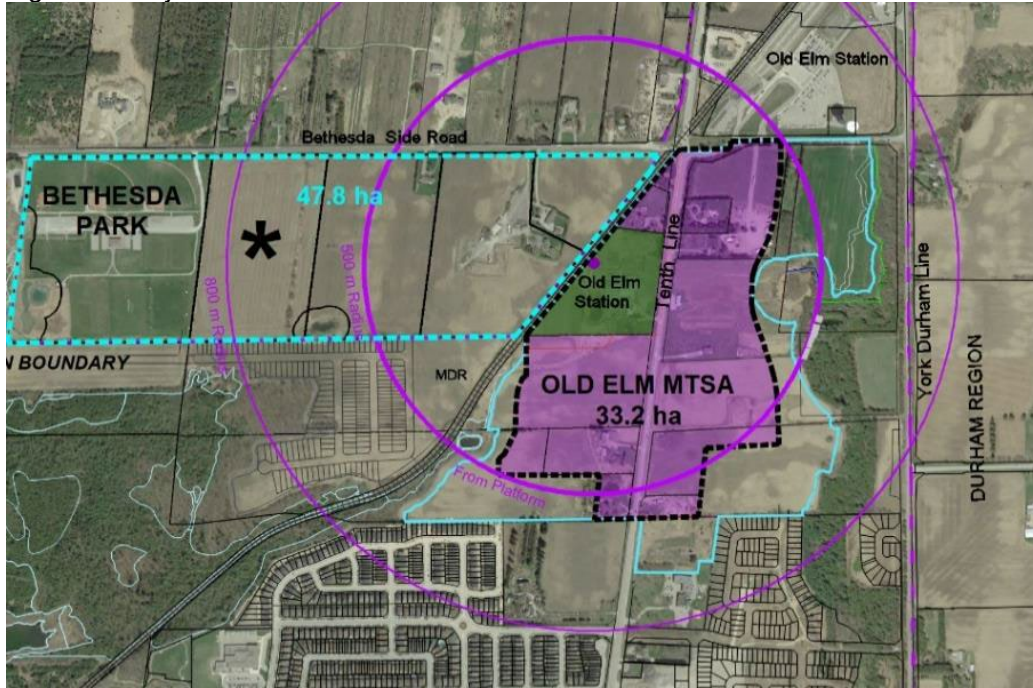
**Town of Whitchurch-Stouffville – Draft Preliminary Growth Management Strategy  
Comment and Response Matrix**

No.	Name	Date	Subject Property	Comments	Response
1.	Victoria Creese	03/14/2023	-	<p>It seems that Stouffville has many approved plans for development. Why do we need to open up a new urban area on 19th at Kennedy, Warden and Woodbine? This is agricultural land. Paving over a local food source seems short-sighted.</p> <p>Why is Stouffville's intensification percentage at 25% lower than that of Richmond Hill, Newmarket and Markham? We should increase intensification for the reasons listed in the plan – cheaper, less CO2 emissions, supports transit etc.</p>	<p>The Province's Growth Plan for the Greater Golden Horseshoe, required that York Region undertake a Municipal Comprehensive Review to allocate forecasted growth to the lower-tier municipalities and identify land needs and any required settlement area expansions to accommodate growth to 2051. The York Region Official Plan, 2022 identified these lands in the Town as New Community Areas, intended for future settlement area expansions to accommodate the forecasted growth to 2051. The lands comprise all the remaining agricultural lands that are located outside of the Provincial Greenbelt Area. The Town's new Official Plan is required to conform to and implement the York Region Official Plan, 2022. The York Region Official Plan establishes a framework for undertaking more detailed Secondary Plans to plan for these future growth areas.</p> <p>Stouffville's intensification target of 25% is established in the York Region Official Plan, 2022, and based on the Region's Municipal Comprehensive Review undertaken in accordance with the Growth Plan. The Region seeks to achieve an overall intensification target of 52% which varies amongst the lower-tier municipalities based on their potential to accommodate growth within the built-up area through intensification (i.e., community character, intensification/redevelopment opportunities, infrastructure and transit availability, among other factors).</p>
2.	Billy Tung, KLM Planning Partners Inc.	03/08/2023	11715, 11726 & 11865 Kennedy Road	<p>We received notice of the preliminary growth management strategy report being presented to Council this evening. In our very preliminary review, it struck us that the study is using the York OP population and employment forecast numbers that reflect the July 2022 LNA under the scenario of no whitebelt inclusion and the proposed greenbelt expansion. We understand the Region is supposed to update the forecast numbers to reflect the YOP as modified by the Province. Will the Town be seeking the updated numbers from the Region and the final study take this into account? In addition, it is not clear to us if the land area for the designated greenfield area lands used for calculating land need in the study is a gross area or based on an estimated developable area, per the Region's OP on how the persons and jobs rate is to be applied.</p>	<p>The Town's PGMS and new Official Plan are required to conform to the growth forecasts and allocations of the York Region Official Plan, 2022. Notwithstanding, in staff's view, the growth forecasts represent minimum forecasts for planning purposes, which may be exceeded, and the forecasts will also reviewed and updated periodically over the current 2051 planning horizon.</p> <p>The Town recognizes that there is a disconnect between the Region's forecast/growth allocations for the Town and the approved urban expansion areas. Based on subsequent discussions with the Region, the PGMS has been updated to reflect revised growth forecasts as identified by the Region for planning purposes. The updated forecasts reflect the Provincial modifications to the urban expansion areas within the Town. The Town is now planning to accommodate 103,500 persons and 28,400 jobs to 2051.</p> <p>The PGMS demonstrates that overall, there is sufficient urban expansion lands to meet forecasted growth.</p> <p>The land needs calculations estimate the gross developable areas, after excluding the take-outs according to Section 2.2.7 of the Growth Plan, 2020. This land area is compared to the land needed based on a target density for persons and jobs.</p>

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3.	Al Ruggero, InfoPlan	03/16/2023	11659 McCowan Rd	<p>As previously indicated in an email dated January 18 2023, while we understand that lands such as our client's will need to go through a Secondary Plan, we would encourage you to consider an appropriate land use designation at this time as part of the current OP review process. Given the fact that it is within the new urban area, has frontage on a major arterial transportation route, and is located adjacent to the MZO approved Flato lands a medium density mixed land use including commercial and residential components in our opinion, would be appropriate.</p> <p>Please advise if you would like to discuss further and if there is anything more, we can do at this time.</p>	<p>The York Region Official Plan, 2022 outlines the requirements for planning for urban development within the New Community Areas. Section 4.2 requires the preparation of comprehensive Secondary Plans for New Community Areas which include studies that address such matters as: watershed planning, infrastructure, transportation and transit, energy plans, phasing, development of complete communities, etc.</p> <p>The Town's new Official Plan proposes to identify these lands as "New Urban Area" and establish the framework for undertaking the required Secondary Plans.</p>
4.	Norm Lingard, Bell Canada	03/27/203	-	<p>Comments on Preliminary Growth Management Strategy</p> <p>Bell Canada is most interested in changes to the transportation network and/or policies and regulations relating to the direction of population growth and public infrastructure investments, heritage character, urban design, broadband and economic development related objectives and how Bell can assist Whitchurch-Souffville to be a connected community. We have reviewed the above noted document, and although we have no specific comments at this time, Bell looks forward to the Town's continued support of the provision and expansion of reliable high-speed broadband as a critical component to support the community and local economy.</p>	Comments noted.
5.	Mark McConville, Frontdoor Developments	03/30/2023	268, 276, 284, 296, 316, 328, 340, 352, 364, 376 and 386 Cam Fella Blvd.	<p>Frontdoor Developments (Cam Fella) Inc. is supportive of the proposed Policy Directions relating to Intensification, including Staff identifying the intensification target that a minimum of 25% of residential development between 2021 to 2051 occur through intensification in order to conform to Policy 4.4.10 of York Region's Official Plan, 2022. It is our opinion that the PGMS should outline the gateway areas of the Stouffville Settlement Area, including the Gateway Area on the east and west ends, as key locations that can facilitate intensification.</p> <p>We note that Section 4.1.6 of the PGMS deals with Intensification Opportunities and 4.1.7 provides the Housing Supply Potential. The PGMS reviews the previous 2009 Intensification Strategy and denotes how many expected medium density and high density units are expected to be accommodated within the Stouffville Settlement Area through intensification. It is our opinion, the potential for medium density housing, such as townhouses, through intensification set at 224 units as the mid-point between the low and high range may be an underestimation of the potential for medium density housing. Also, there is nothing noted for total housing supply potential for low density units, such as singles and semi-detached units, in the Stouffville Settlement Area through intensification. In our opinion, this is an underestimation because for certain infill projects, a low density housing form, such as singles on a smaller lot frontage or semidetached units. may be proposed in order to provide for proper transitioning to the existing land uses that are surrounding the infill site.</p>	<p>Staff acknowledges the minimum intensification target of 25% of all dwellings to be constructed within the built-up-area to 2051, in accordance with the York Region Official Plan. The PGMS identifies the major Intensification Areas within the Town. Major Intensification Areas (Strategic Growth Areas) and gateways will be identified in the Town's New Official Plan. Notwithstanding, appropriate intensification and redevelopment is still contemplated in other areas of the Town including Residential/Neighbourhood Areas, subject to criteria.</p> <p>The estimated intensification opportunities and housing supply potential is intended to be a conservative estimate, which may be exceeded. Staff notes that the Town's intensification target is intended to be a minimum target, as such additional growth may still be accommodated within the built-up-area. The Report estimated the unit potential based on various studies and development applications at that time (May 2021).</p>

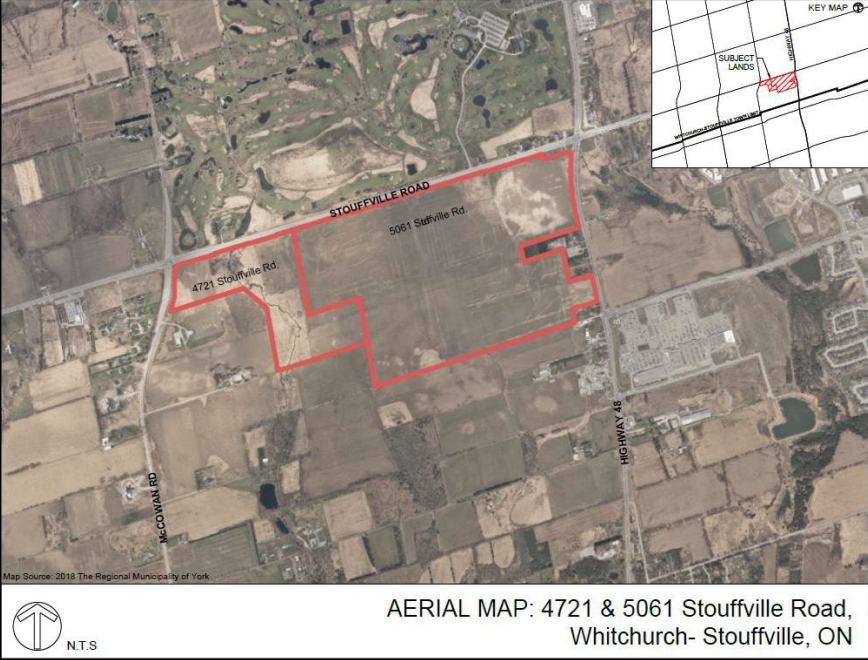
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6.	Don Given, MGP	03/31/2023	6431 Bethesda Side Road	<p>Malone Given Parsons Ltd. is the Planning Consultant for the owners of approximately 25 hectares of land at 6431 Bethesda Side Road, within the proposed urban expansion area south of Bethesda Road. The proposed urban expansion area lands (the “expansion lands”) are south of Bethesda Road, along the Town of Stouffville’s northern urban boundary between 9th Line and the railway line. The eastern boundary is adjacent to the new Old Elm GO station and lands designated by the Region as a Major Transit Station Area (“MTSA”). Approximately half of the lands are within an 800m radius of the Old Elm GO station.</p> <p>The owners are supportive of the Town’s efforts to include these lands as part of the Urban Boundary and urge Staff to plan for these lands in the Growth Management Strategy. We request that the expansion lands be considered as strategically important land and designated as “Future Major Transit Station Area” within 800 metres of the Old Elm GO Station and “Future Designated Greenfield Area” for the remaining expansion lands.</p> <p>Figure 1: Subject Lands</p>  <p>The Growth Plan directs growth to strategic growth areas and locations with existing or planned transit, with a priority on higher order transit where it exists or is planned (Policy 2.2.1.2 c) ii) and iii)). The Growth Plan also prioritizes complete communities and a compact built form. Further, as per Growth Plan Policy 5.2.4.2, Schedule 3 population forecasts are minimum growth forecasts and may be exceeded.</p> <p>The Preliminary Growth Management Strategy recommends reserving strategically important land for future employment purposes well beyond the Town’s planning horizon. The Growth Management Strategy also recommends refining policies to enable growth,</p>	<p>Town staff concur that the Bethesda Lands are strategically important for future urban expansion. The Town has strongly supported these lands to be included as a ‘New Community Area’ within the York Region Official Plan, notwithstanding, the Provincial modifications to the York Region Official Plan, 2022, removed these lands from the New Community Area, furthermore, the Province also removed other lands that were identified for Future Urban Areas (beyond 2051) from the York Region Official Plan.</p> <p>While Town staff acknowledges that these lands are a logical area to provide higher density and more affordable housing, in staff’s view it would be premature (and in non-conformity with the York Region Official Plan and Provincial Plans) to identify these lands for “Future Major Transit Station Area” and “Future Designated Greenfield Area”, until such time as the Province were to amend the ORMCP Countryside Area designation, either through amendments to the ORMCP or through a future ERO decision.</p>

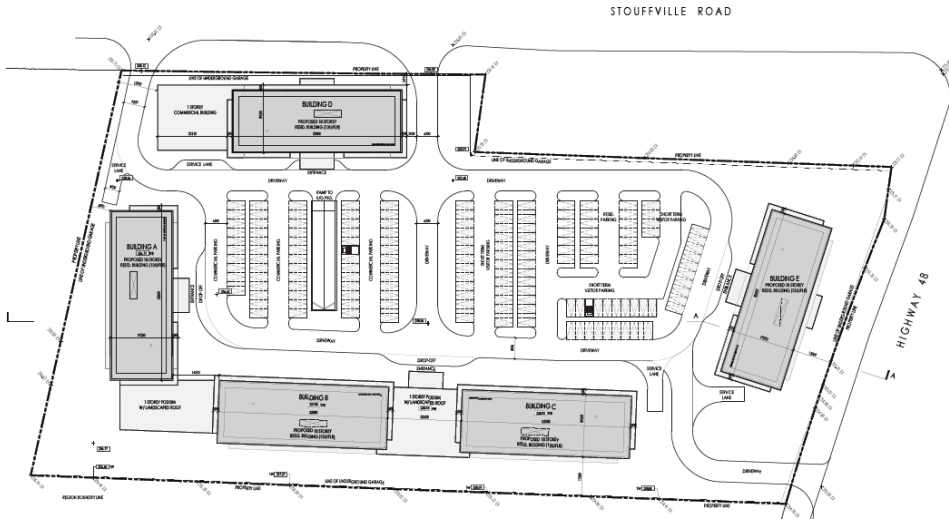
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				<p>recognizing the important roles of MTSA's and emerging growth areas in accommodating growth, achieving intensification targets, and encouraging compact built form.</p> <p>The expansion lands are well located to provide a large quantity and variety of more affordable medium and higher density housing in a compact built form next to a MTSA. Over half of the expansion lands east of the community park are within a 500m radius of the GO Station's platform. The extension of the MTSA into the expansion lands could add approximately 500 to 700 residential units to the MTSA in 10 hectares alone and another 700 + units at the Region's greenfield density of 55 persons and jobs per ha in the remaining expansion lands could be expected.</p> <p>While the Province did not choose to include the expansion lands in their November approval of the York Region Official Plan which is final and not subject to appeal, they have made changes to the ORMCP and to the Greenbelt Plan through separate decisions posted on the Environmental Registry of Ontario ("ERO") which were subject to comment up to December 4th of 2022. It is possible for these expansion lands to be subject to a similar proposal through the ERO in the future.</p> <p>The expansion lands represent strategically important land due to their proximity to the Old Elm MTSA. Given Provincial direction to direct growth to MTSA's and the Town's recommendations to protect strategically important land and enable growth in MTSA's, the expansion lands should be protected and planned for as a future Major Transit Station Area and a future Designated Greenfield Area to support the Old Elm GO Station and surrounding community. Including these lands in the Growth Management Strategy will ensure that should these lands be brought into the Urban Boundary, there will be sufficient servicing allocation.</p> <p>In my opinion, the expansion lands are a logical area to provide higher density and more affordable housing that the Town, Region, and Province are seeking to provide.</p>	
7.	Nick Pileggi, MSH	03/31/2023	4721 and 5061 Stouffville Road, Times Group Corporation	<p>Times Group Corporation ('Times') own the property at 4721 and 5061 Stouffville Road, which is located between McCowan Road and Highway 48. The 'subject lands' have frontage along Stouffville Road, McCowan Road and Highway 48 and are shown on the Aerial Photo below. The lands are largely vacant (but for a dwelling along Stouffville Road) and are used for agricultural purposes.</p>	<p><b>5061 Stouffville Road (7 acres)</b></p> <p>The portion of this property located at the corner of Highway 48 and Stouffville Road is located within the settlement area and has been designated Gateway Mixed Use Area in the new Draft Official Plan, as shown on Schedule D-3.</p> <p>The PGMS has anticipated that these lands will accommodate Community Area uses, however, the extent of development remains uncertain at this time, and will be subject to future planning applications.</p> <p><b>4721 and 5061 Stouffville Road (Remaining portion)</b></p> <p>The balance of the subject lands are largely within the ORMCP and Greenbelt Plan Area, which would require either removal from the Greenbelt Area and a settlement area boundary expansion to accommodate employment uses on these lands. Staff concur, that assuming these lands could be removed from the ORMCP/Greenbelt Plan Area they could assist in addressing the Town's employment area land deficit.</p>

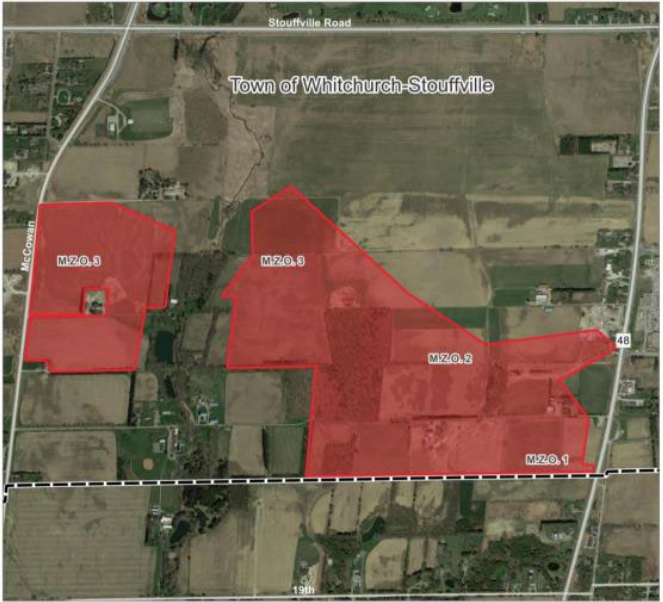
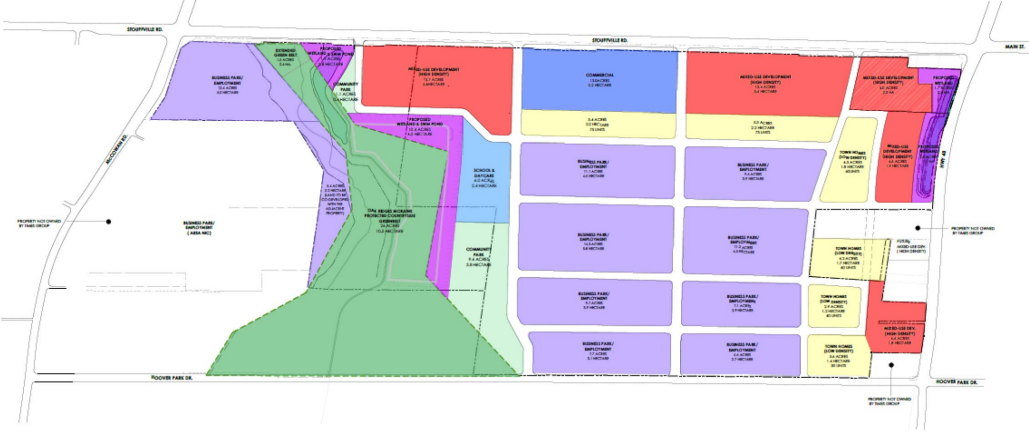
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			<p>Aerial Photo</p>  <p>Map Source: 2018 The Regional Municipality of York</p> <p>AERIAL MAP: 4721 &amp; 5061 Stouffville Road, Whitchurch- Stouffville, ON</p> <p>The approximately 7 acre parcel at the south-west corner of Highway 48 and Stouffville Road is located within the Urban Area (“corner parcel”). Macaulay Shiomi Howson Ltd. are planning consultants for Times, who have an interest in the Official Plan review process. We have previously provided comments on the Official Plan review and the Highway 48 Framework Plan. We would like to thank staff and the consulting team for releasing the Preliminary Growth Management Strategy (PGMS) for comment.</p> <p>The corner property is located within the Community of Stouffville Planning Area and is proposed to be designated “Gateway Mixed Use”. Times is satisfied with the proposed designation.</p> <p>We have reviewed the PGMS and it is not clear that the corner property has been included in the analysis. Times did apply for and attend a Pre-Application Consultation Meeting which included the plan below:</p> <p>Concept Plan – Corner Property</p>	<p>In staff’s view it would be premature (and in non-conformity with the York Region Official Plan and Provincial Plans) to consider these lands for employment uses, until such time as the Province were to amend the Provincial Plans.</p> <p>It is noted that the PGMS has been updated to reflect the revised growth forecasts as provided by the Region (May 2023).</p>
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				 <p>The proposed concept plan can accommodate significant density, of 1,000 units or more, at a Community Gateway site. Figure 15 of the PGMS outlines 2,095 high-density units in 'proposed' development approvals processes. Section 4.1.2 of the PGMS outlines that the existing designated lands in the Community of Stouffville (including the Phase 3 lands) can accommodate 2,114 housing units.</p> <p>While Times does not have a concern with the overall results of the PGMS, it is not clear, and unlikely, in our view, that the potential for housing units includes the Times corner parcel. We would ask that staff and the consultants review and make any necessary adjustments to the PGMS.</p> <p>Employment Lands                      The PGMS outlines the following land deficit for Employment Areas to 2051:</p> <table border="1" data-bbox="854 1300 1787 1391"> <tbody> <tr> <td><b>Employment Area Deficit (net hectares)</b></td> <td><b>68</b></td> </tr> <tr> <td><b>Employment Area Deficit (gross hectares)</b></td> <td><b>95</b></td> </tr> </tbody> </table> <p>As staff and the consultant are aware, the Times lands are located within the block that was subject to multiple Minister's Zoning Orders, as outlined on Figure 23 of the PGMS:</p>	<b>Employment Area Deficit (net hectares)</b>	<b>68</b>	<b>Employment Area Deficit (gross hectares)</b>	<b>95</b>	
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				<p style="text-align: center;">Figure 23 Town of Whitchurch-Stouffville Minister's Zoning Order (M.Z.O.) Lands</p>  <p>While the Times lands are currently within the Oak Ridges Moraine, it is our view that while 2/3 of the block will eventually be urban uses, that the remainder of the block, including the Times lands, could serve to create a complete community and, at the same time, be a part of the solution for delivering on the deficit of employment lands, as outlined in the PGMS.</p> <p>Times prepared several concept plans for the lands, one of which included largely employment lands, as outlined below:</p> <p>Overall Concept Plan – Employment</p> 	

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				<p>We would request that the PGMS consider the potential for the Times lands to deliver upon the deficit of employment lands to 2051, assuming they can be removed from the Oak Ridges Moraine Plan. It is our view that the lands are ideally suited to deliver on this deficit and create a complete community, especially considering the lands to the south will be developed for urban uses (largely residential).</p>	
8.	Don Given, MGP	03/31/2023	Stouffville Phase 3 East Landowners Group	<p>Malone Given Parsons Ltd. is the Planning Consultant for the Stouffville Phase 3 East Landowners Group (the "Landowners Group"), the members of which own approximately 49 hectares of land in and around the Old Elm GO Station Major Transit Station Area. We have reviewed the Preliminary Growth Management Study from the perspective of the Landowners Group and this letter is a request to change the expected number of units allocated to the area.</p> <p>Official Plan Amendment 155 ("OPA 155") was adopted by Council on February 1, 2023, which provides land use policies for the Old Elm Major Transit Station Area and surrounding lands. As specified on page 37 of the Preliminary Growth Management Strategy, the yields for the Old Elm GO (formerly Lincolnville GO) outlined in Figure 19 were determined using Concept Plans 2 and 3 from the September 2020 Lincolnville GO Station Land Use Study. Footnote 36 states the Land Use Study was revised in April 2022 from the September 2020 study and the change to the overall unit yield potential is minimal.</p> <p>The density ranges adopted in OPA 155 include significant increases to those within the earlier Land Use Studies. OPA 155 also includes policies to permit exceedances to the maximum densities, subject to satisfying certain criteria.</p> <p>Figure 19 of the Growth Management Strategy identifies the minimum number of units for this area as 2,039 and the maximum number as 2,286 units. Based on the density ranges in OPA 155, we estimate that a minimum of 2,330 units and up to 14,770 units are permitted within the Old Elm Area. These unit estimates equate to approximately 6,000 to 32,000 people and jobs and will impact the Town's required allocation.</p> <p>As Figure 19 predates the increased density ranges adopted in OPA 155, we request that Section 4.1.3, Figure 19, and Figure 26 of the Preliminary Growth Management Strategy be updated to ensure the appropriate amount of growth is being planned for.</p> <p>Based on our calculations, we recommend a minimum of 2,300 units and a reasonable estimate of an upper limit for the OPA 155 lands. It would be very helpful if the Town made the detailed calculations and assumptions used to determine the unit counts in Figure 19 available to the Group and other stakeholders, including the public.</p> <p>We recognize the importance of the Growth Management Strategy in ensuring the Town's long-term growth objectives are met and believe that planning for the appropriate amount of growth in the Strategy is essential to ensuring that servicing and other factors influencing growth are also planned for appropriately.</p>	<p>The Landowners Group estimates that a minimum of 2,330 units and up to 14,770 units are permitted within the Old Elm Area. Whereas the PGMS previously assumed the minimum number of units for this area as 2,039 and the maximum number as 2,286 units, based on the September 2020 Land Use Concept Report for Old Elm.</p> <p>The anticipated growth for these lands has now been updated in the PGMS to more closely reflect the development permissions provided for in OPA 155, which is now anticipated to accommodate in the order of 2,530 units at a density of 168 persons and jobs per hectare within the MTSA. It should be noted that these are minimum targets which may be exceeded.</p>

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9.	Steven McIntyre, MGP	03/31/2023	Bethesda Road, Phase 3 Landowners	<p>Malone Given Parsons Ltd. is the Planning Consultant for the Bethesda Road Developments Limited property located at 5731 Bethesda Road, and TH Stouffville (Bethesda) Developments (BT) Inc.'s properties located at 5481 and 5551 Bethesda Road. The properties are located within the Phase 3 lands on the south side of Bethesda Road, east of Highway 48 and represent a significant portion of Phase 3's undeveloped land outside of the Old Elm Secondary Plan area. See attachment.</p> <p>We have reviewed the Preliminary Growth Management Strategy (the report) on behalf of our clients. As the report has been prepared to support the Draft Official Plan and is labeled "Preliminary," it is unclear if the report will be updated.</p> <p>Figures 15 and 16 provide an overview of the Town's potential to accommodate future housing within its designated settlement areas. It would be helpful to have the estimated area and units by property used to prepare the figures provided within the report or in an appendix. Without this information, it is difficult to determine which lands are included and if an accurate estimate has been made for our clients' lands, which now have more accurate environmental limits and contain stormwater management, school and park blocks.</p> <p>Should the report be updated, we provide the following information by property based on anticipated revisions to our clients' applications which were submitted after May 2021:</p> <p>5731 Bethesda Road (Revised)      Gross developable area: 20.2 ha  Net developable area: 15.1 ha  Proposed units (incl. part lots share): 376  Net density: 24.9 uph</p> <p>5481 and 5551 Bethesda Road (Revised*)      Gross developable area: 10.3 ha  Net developable area: 8.8 ha  Proposed units (incl. part lots share): 260  Net density: 29.5 uph</p> <p><i>*Note: Includes units from proposed Site Plan application for High/Medium Density lands (~120 units)</i></p> <p>We recognize the importance of the Growth Management Strategy in ensuring the Town's long-term growth objectives are met and believe that providing the most accurate number of units actively within the development process will help to provide the most informative Growth Management Strategy possible.</p>	<p>Lands that are designated community areas are included in the total land area and associated unit yield according to Figure 16. The date of supply is referenced in the Report, and in staff's view the impact would be negligible compared to the DGA housing growth.</p>
10.	Jeff Thompson, TRCA	03/31/23	-	<p>1. Intensification is highlighted as an opportunity for the Town to accommodate future housing and employment growth to 2051. We recommend that the revised PGMS (e.g., Section 4.1 – Housing Supply Potential) note that new development, including intensification, is to be directed outside of natural hazards, in accordance with section 3.1 of the Provincial Policy Statement.</p> <p>2. The Study references "environmental take-outs" for employment lands "based on the land use plans for each Secondary Plan", and where "encroached by environmentally sensitive lands identified as Natural Resources/Environment in the Official Plan..." Outside these areas of employment lands within applicable secondary plans and OP</p>	<p>1. The Town's Official Plan and Zoning By-law are the primary tools for directing development and intensification to lands located outside natural hazards as well as significant natural heritage features and hydrologic features. This comment is addressed through the new draft Official Plan.</p> <p>2. The environmental takeouts are based on the Growth Plan assumptions and have been noted and described in the revised report.</p> <p>3. A note has been included in the revised PGMS to address these estimates/assumptions, pending further detailed study.</p>

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				<p>mapping, it is unclear if and how other environmental take-outs were considered, particularly regarding those affecting Community Land Needs Analysis. We suggest the revised PGMS expand on the rationale and methodology for environmental take-outs, including the data, mapping and policy considerations used to delineate them - for example, avoidance or netting-out of lands subject to natural hazards associated with natural heritage feature such as flooding and erosion, where development and intensification may be restricted or prohibited due to local or provincial policy requirements and/or CA regulation. This could be incorporated into subsection 1.6 (Planning Considerations) or included as a subsection in Section 2 (Broad Factors Influencing Whitchurch Stouffville's Long-Term Population and Employment Growth Potential).</p> <p>3. Section 4.1.5 (Minister's Zoning Orders for Proposed Residential Developments) – this section factors in development of a proposed number of residential units and housing density types in consideration of housing supply potential, while noting that planning approvals are underway. However, a precise hectarage amount of “developable” land “outside of the natural heritage features” is noted. Please be advised that technical studies are ongoing to determine the developable area for the second and third MZO developments (i.e., Wyview's lands at 11776 &amp; 11882 Highway 48 and Orca Equity Ltd.'s lands at 11861 &amp; 12045 McCowan Road). Until these studies are approved, and precise “environmental take-outs” are determined, the amount/hectarage of developable land stated in this document cannot be confirmed. This should be noted, unless a precise quantum of developable land is determined through the planning approvals process prior to release of the revised PGMS.</p> <p>4. The Study speaks to the need for available servicing to facilitate settlement area boundary expansion. While it is unclear whether servicing studies will be undertaken in support of forecasted growth, TRCA would welcome engagement on any such studies, pursuant to our natural hazard and regulatory interests.</p>	<p>4. The Town's settlement expansion areas will be subject to future servicing studies in accordance with the York Region Official Plan requirements, and the Town will engage with the TRCA.</p>