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October 6, 2009

By E-mail to *denis.kelly@york.ca*

Denis Kelly, Regional Clerk
The Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Dear Mr. Kelly:

**Re: Draft York Region Official Plan
Submissions on Behalf of Daraban Holdings Limited**

We are counsel to Daraban Holdings Limited, the owner of lands municipally known as 17125 Regional Road 27, within the Community of Schomberg, in the Township of King.

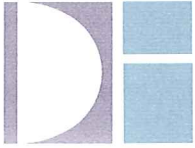
We have reviewed the draft York Region Official Plan, dated June 2009, and write to express specific concerns our client has with respect to the proposed policies in Section 4.3 – Protecting Employment Lands.

In particular, proposed policy 4.3.1 indicates that "the detailed employment land employment forecasts in the Region's land budget studies be used as the basis for planning for employment lands". Further, proposed policy 4.3.13 also references the "land budgets of the ... Region".

In our view, these references to the Region's land budget studies are problematic for a number of reasons.

First, the proposed policies appear to be attempting to elevate to official plan policy status documents that may be prepared by the Region outside of the public planning process.

In addition, the proposed policies are ambiguous in that they generically make reference to "land budgets" or "land budget studies", but fail to provide any specific document reference that could be used to properly identify the document(s). Likewise, it is unclear whether the policy only intends to apply to land budget studies that have already been completed, or whether they would also include further amendments and/or new land budget studies to be carried out following adoption of the Official Plan.



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Finally, our client's consultants have reviewed the Region's land budget prepared earlier this year, particularly in the context of King Township's employment land needs, and have identified a number of questionable assumptions that were used by the Region. The effect of these assumptions would be to alter, potentially in a significant manner, the amount of employment lands required in King Township to meet the long-range employment forecasts. In this regard, our client's consultants have arranged to meet with Regional staff later this week in order to review their concerns.

We trust that the Region will take these submissions into account as the Planning and Economic Development Committee considers this matter at its meeting on October 7, 2009.

Kindly ensure that we receive notice of all future meetings regarding the Region's draft Official Plan and that we are notified of any decisions made by Regional Council pertaining to this item.

Yours truly,

DAVIES HOWE PARTNERS

Devi Panday

for:

Mark R. Flowers

copy: Karin Price, Planning Committee Coordinator, York Region
Client

Alan Young, Weston Consulting Group Inc.

Frank Clayton, Altus Group Economic Consulting