

May 16, 2023

MGP File: 21-2954

Planning and Economic Development
605 Rossland Road East
Whitby, ON L1N 6A3

via email: EnvisionDurham@durham.ca

Attention: Envision Durham

**RE: Employment Conversion Request for 6483 and 6523 Country Lane, Town of Whitby
Envision Durham – Recommendations on the new Regional Official Plan (Report #2023-P-15)**


Malone Given Parsons Ltd. (“MGP”) are the planning consultants for 6523 Country Lane Developments Limited and 6483 Country Lane Developments Limited (the “Client”), the owner of the lands located north of Highway 407 and east of Country Lane, municipally known as 6483 and 6523 Country Lane in the Town of Whitby (the “Subject Lands”), and as shown in Figure 1 and legally described in Table 1.

Table 1: Legal Description

Owner Name	Municipal Address	Legal Description
6483 COUNTRY LANE DEVELOPMENTS LIMITED	6483 Country Lane	PT LT 30 CON 6 TOWNSHIP OF WHITBY AS IN D505336; WHITBY
6523 COUNTRY LANE DEVELOPMENTS LIMITED	6523 Country Lane	PT LT 30 CON 6 TOWNSHIP OF WHITBY AS IN D307003; WHITBY

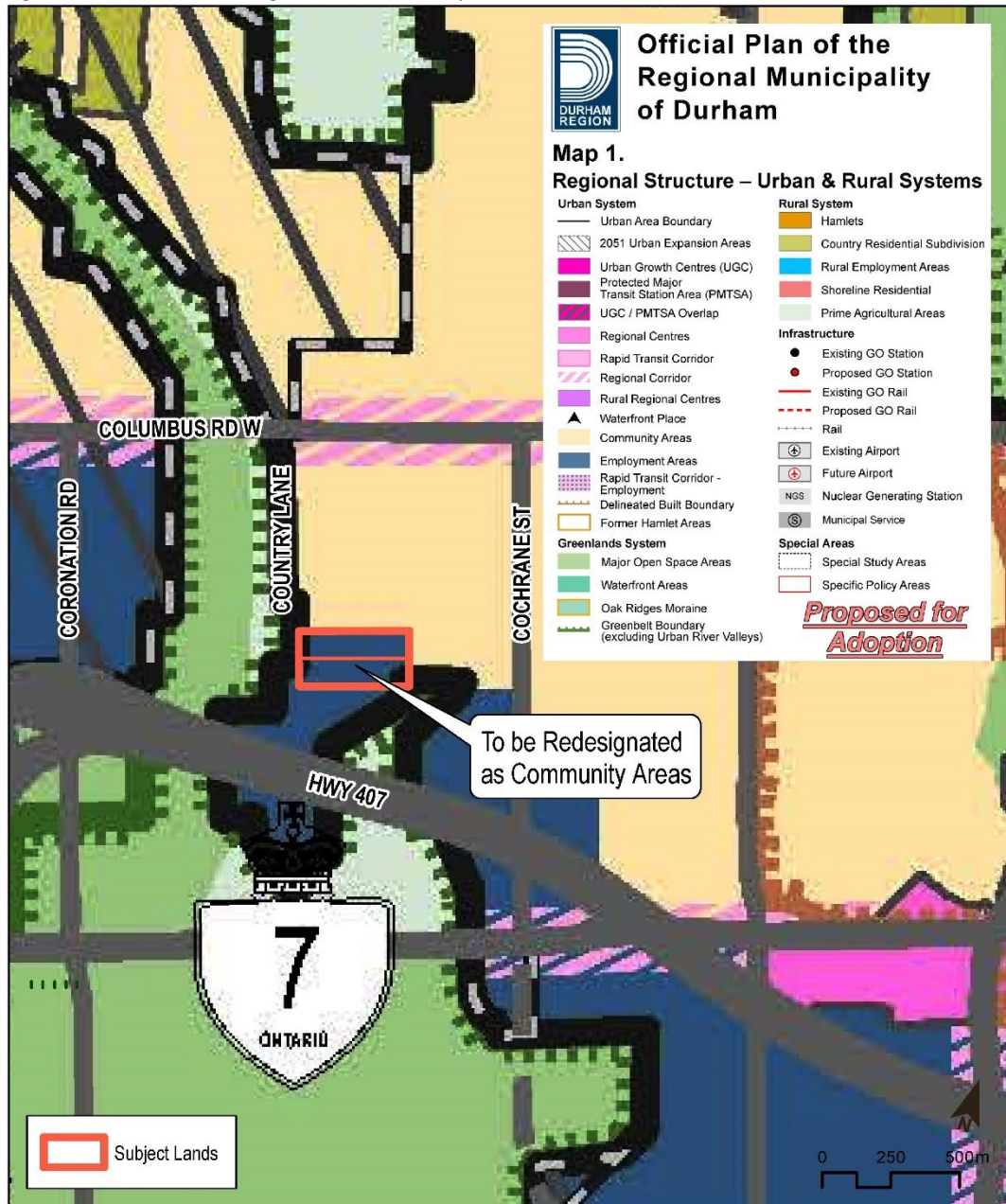
Figure 1: Subject Lands



 Subject Lands - 6483 to 6523 Country Lane

We previously submitted a request for these lands, along with the other previously deferred Employment Lands north of Highway 407, to be included in the Settlement Area Boundary as Living Areas as part of the consultation process for Settlement Area Boundary Expansion Requests on May 31, 2021 and as comment on the Draft Settlement Area Boundary Expansions and Area Municipal Growth Allocations Report (#2022-INFO-91). We have reviewed the Recommended Regional Official Plan and the responses from staff regarding our request, however, we continue to request that the Subject Lands, in addition to the adjacent lands north of Highway 407, be re-designated as Community Areas, as shown on Figure 2.

Figure 2: Lands to be Re-designated to Community Areas



It is our opinion that employment uses in this area are incompatible with the surrounding uses and it would be more appropriate to designate the lands as “Community Areas” prior to Council’s adoption of the Recommended Durham Region Official Plan. The Subject Lands are adjacent to a Draft Plan of Subdivision and Zoning By-law Amendment application submitted by the Client and currently under review by the Town of Whitby (DEV-30-22).

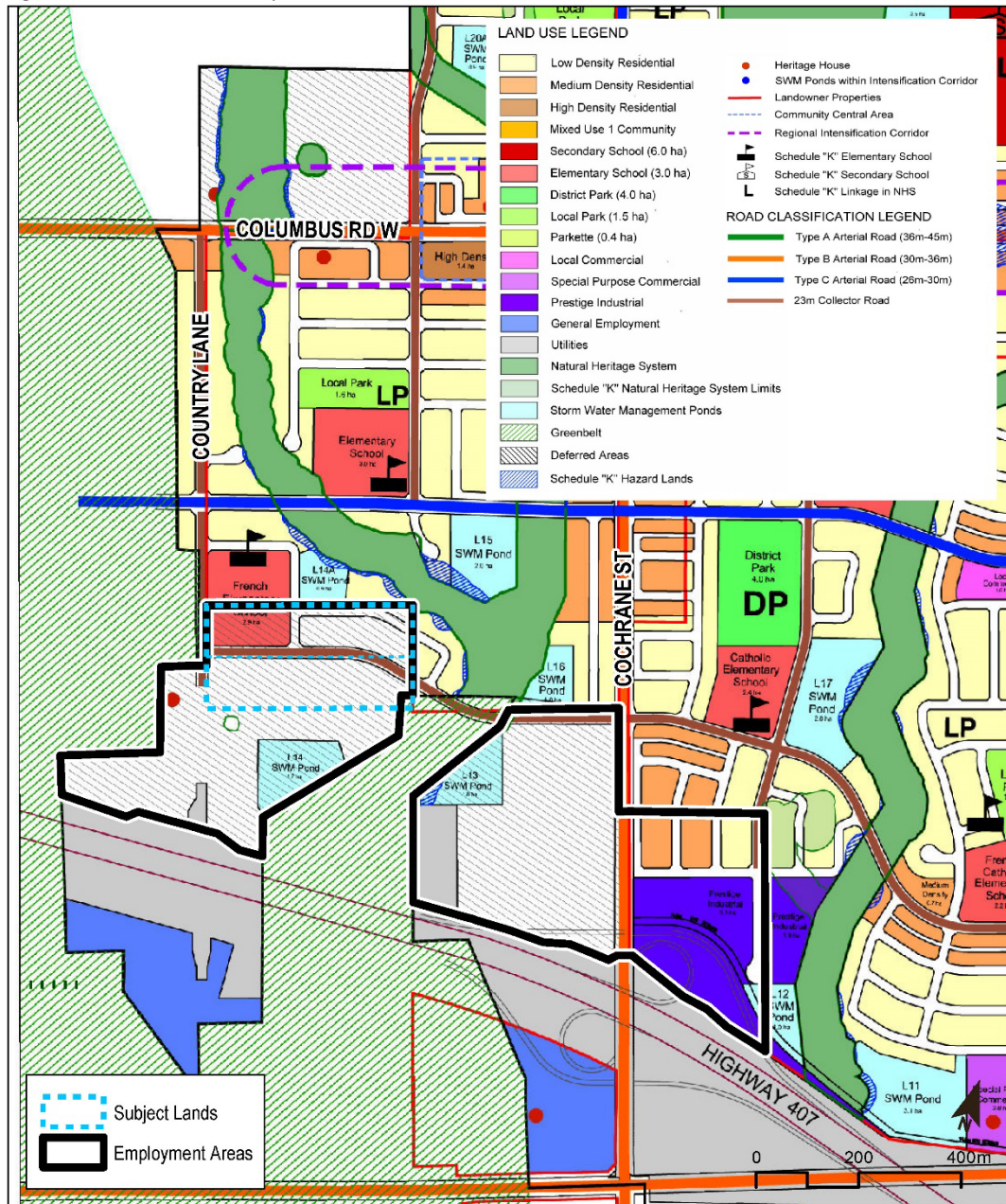
The uses contemplated immediately to the north of the Subject Lands include an Elementary School and low density residential uses, in accordance with the approved Brooklin Community Secondary Plan and Council adopted North Brooklin Comprehensive Block Plan. Given its adjacency to the planned residential community to the north and the Natural Heritage System

to the east and west, the Subject Lands should not be utilized for such industrial uses that require heavy truck or strategic goods movement. Should the Subject Lands be designated as Community Area, they would provide a logical extension to the planned residential uses to accommodate the projected Durham population to 2051.

The properties do not have optimal access to transportation corridors such as Highway 407 and will have a lack of visibility for employment users from the highway. Although there is a proposed interchange at Highway 407 and Cochrane Street, as shown on Figure 3 below, this proposed interchange does not provide direct access to the employment area and would require trucks and goods movement to use the street network through the planned residential neighbourhood to the north to access the employment lands. Moreover, Highway 407 is below the grade of the properties such that any employment users will have limited visibility from the highway.

Furthermore, these Employment Areas are isolated from one another and are inadequately sized for traditional employment uses, which impacts the functionality of the lands for employment uses. The province has released a proposed Provincial Planning Statement and changes to the *Planning Act* which define Employment Areas as “areas designated in an official plan for clusters of business and economic activities including, manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.” Should these lands be contemplated for the uses described in the Employment Areas definition of the PPS, these lands are not suitably sized or located for such heavy industrial uses, given its proximity to sensitive land uses including residential and school uses. Other employment uses such as retail and office uses do not meet the proposed definition for Employment Area under the proposed PPS and should not be designated as such in the Regional Official Plan.

Figure 3: Brooklin North Comprehensive Block Plan



It is our opinion that these Employment Areas north of Highway 407 are inappropriately located and sized which impacts the functionality of the lands for employment uses. There are more appropriate opportunities to bring Employment Areas into the settlement area boundary in Durham Region. These Employment Areas are not compatible with the interface of Community Area, with respect to our client's lands. As such, these Employment Areas would be more appropriately designated as Community Areas.

Should you have any additional questions regarding our request, please do not hesitate to contact the undersigned.

Yours very truly,
Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP

cc. *Russel White, client*

Roger Saunders, Commissioner of Planning, Town of Whitby