

GRACISON DEVELOPMENTS INCORPORATED

Planning and Project Management

Brian Bridgeman, MCIP, RPP, PLE
Commissioner of Planning and Economic Development
c/o Envision Durham
605 Rossland Road East
Box 623
Whitby, Ontario
L1N 6A3

Tuesday May 16, 2023

Dear Mr. Brian Bridgeman,

**RE: Envision Durham – Recommendations on the new Regional Official Plan
Regional File: D12-01
Decision Report #2023-P-15**

This letter is on behalf of our client, The Noor Family, regarding three parcel holdings that are unaddressed but legally described below within the Beaverton area of the Township of Brock and are subject to the Region's Municipal Comprehensive Review (MCR):

- Concession 6, North Part Lot 12 – "Parcel 1"
- Concession 6, South Part Lot 12 – "Parcel 2"
- Concession 5, North Part Lot 12 – "Parcel 3"

Attached to this letter is a map identifying the location of all three parcels.

Background Information

As noted above, the there are the family owns three parcels that are of interest to the current MCR process. Two of these (Parcels 2 and 3) are the subject of previous requests submitted by M. A. Noor through the MCR process for the following:

- An employment conversion request for Parcel 3 to allow for residential uses dated December 7, 2020; and,
- A Settlement Boundary expansion request for Parcel 2 to include the lands within the Urban Area Boundary with permission for residential uses was submitted in June, 2022.

A response to the first request was issued by the Township of Brock in their Report 2021-CO-02 dated January 18, 2021 refusing the employment conversion request for Parcel 3. The report indicated the Township wanted to preserve the existing employment area designation.

Region of Durham Report #2022-INFO-91 dated November 10, 2022 included a response to the Settlement Boundary expansion request submitted in June, 2022 for Parcel 2 which is referenced as "BER-78". In the Report, BER-78 was granted a partial Settlement Boundary expansion but was limited by the Growth Plan to a 10ha maximum due to the lands being within the Protected Countryside in the Greenbelt Plan. However, the Region recommended these lands be proposed as Employment Area instead of residential as requested. There was no discussion between Mr. M.A Noor and the Region of Durham regarding this request prior to the November 2022 report. In speaking to Regional staff, it is our understanding that there was no outreach from the Region to discuss the request and the typical process

is to inform applicants through the process and report only. Unfortunately, Mr. M.A. Noor was not aware of the report as he had health issues during the fall of 2022 and subsequently passed in February 2023. Consequently, this letter is being submitted formally to outline their intentions for the subject properties.

SUBMISSION WITH RESPECT TO THE THREE PARCELS

Parcel 1

This parcel is approximately 94 acres and is situated at the southeast corner of Regional Road No. 23 and Concession 7B. It is designated as Prime Agricultural land in the Regional Official Plan (ROP), outside of the Urban Area as an Assessment Parcel in the Town's Official Plan and zoned RU (Rural), with EP (Environmental Protection) area at the south end of the property, in the Town's Zoning By-law No. 287-78-PL.

This site is not currently proposed to be included (in whole or in part) in the urban area although it is appropriate to consider it a long-term prospect for the same as it presents potential as a future employment area given its proximity to Regional Road No. 12 (Trans-Canada Highway).

Parcel 2

This parcel is approximately 39 acres and is situated south of Parcel 1, on the north side of Main Street East. It is designated as Prime Agricultural land in the ROP, outside of the Urban Area as an Assessment Parcel in the Town's Official Plan and zoned RB (Rural Buffer), with EP (Environmental Protection) area at the north end of the property, in the Town's Zoning By-law No. 287-78-PL. To the immediate east and west of Parcel 2 are residential lands. The lands south (across Main Street) include Parcel 3, as well as residential lands to the southwest.

As previously mentioned, the proposed ROP recommends a partial Settlement Boundary expansion on Parcel 3 for employment uses extending northerly from Main Street East at the south end of the property. While the intention of the private request was to extend the Settlement Boundary to the full extent of the property, or at least to the EP zone, we recognize the restriction of the Growth Plan on this property given its designation as Protected Countryside in the Greenbelt Plan and support the partial expansion at this time.

The original request was also to allow for residential uses which related contextually given the existing residential uses on either side of this property, and the potential compatibility issues with introducing employment area in proximity to adjacent sensitive land uses (i. e. residential).

Evolving provincial policy increases these potential compatibility concerns given the restricted definition of employment that has been proposed in Bill 97 and the proposed Provincial Planning Statement. As a result of these proposed changes, and Ontario's ongoing housing supply issues, we suggest there may be merit in considering whether the Land Needs Assessment by Watson & Associates Economists Ltd. should be reconsidered to account for the reduced variety of uses that would be permitted in employment areas should Bill 97 and the new draft Provincial Planning Statement come into effect, and the impact of this change on the amount of employment land required for the planning horizon.

Parcel 3

This parcel is approximately 38.5 acres and is situated south of Parcel 2 on the south side of Main Street East. It is designated as Employment Area and within the Urban Area Boundary in both the ROP and Township of Brock Official Plan, and zoned RB (Rural Buffer) in the Town's Zoning By-law No. 287-78-PL. Immediately to the west of Parcel 3 are lands designated as residential.

As previously mentioned, an Employment Conversion request was submitted for this property to allow for residential uses. This request was denied by the municipality to preserve the employment area given potential road connections to the site but the report did acknowledge the conversion would be compatible with adjacent residential and natural heritage lands uses. It is our understanding that the road connections referenced in that report have not materialized. Also, as a reference, this property borders Community Areas in the ROP and Residential Area in the Town's OP and a Draft Plan of Subdivision application was approved to the west of the site. Consequently, the potential of this property as employment area would also be limited by the existence of surrounding sensitive land uses such as the residential uses. The same evolving policy context and housing issues identified with respect to Parcel 2 would also apply to Parcel 3.

This property is unique from Parcels 1 and 2 given it is already located within the Urban Boundary and therefore represents an opportunity to provide a natural extension of Community Area given the existing context.

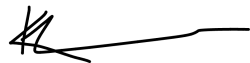
Conclusion

We recognize that extensive work has been undertaken through the MCR process and appreciate this opportunity to comment on the proposed ROP. However, it is important to realize that this work has been completed during a time of significant change in the planning policy regime with further changes being considered by the Provincial government. It is uncertain whether any of these changes will affect the Land Needs Assessment, in particular the reduced variety of uses that would be permitted in employment areas should Bill 97 and the new Provincial Planning Statement come into effect, and the impact of this change on the amount of employment land required for the planning horizon.

Parcels 2 and 3 are both bordered by existing residential uses and could provide a proactive opportunity to supplying residential and/or institutional uses to Beaverton that is contextually appropriate.

In summary, we support the partial Settlement Boundary expansion on Parcel 2 at this time and suggest reconsideration of the request for Parcels 2 and 3 as Community Area.

Thanking you in advance for your consideration,



Kim Harrison-McMillan, MCIP, RPP
President

Copy: Andrew Jeanrie, Bennett Jones LLP
Colin Meharchand
Jennifer McGlashan

- Residential
- Commercial
- Farm
- Industrial
- Institutional
- Vacant
- Others



North 1/2 Lot 12, Con 6

Parcel 1

440R-14222
40R-11438

Parcel 2

/South 1/2 Lot 12, Con 6

Plan 675

40R-30743

40R-2992

By Instrument #

Parcel 3

Thorah Central Public School

Beaverton

Holy Family Catholic School