

March 6, 2023

Envision Durham

c/o Regional Municipality of Durham
Planning and Economic Development Department
605 Rossland Road East, P.O. Box 623
Whitby, ON L1N 6A3
EnvisionDurham@durham.ca

**RE: Draft Growth Allocations and Settlement Area Boundary Expansions
6373 Country Lane, Whitby
TBG Project No. 22938**

We are the planning consultants for the owner of the lands located at 6373 Country Lane in Whitby. On behalf of our Client, Casey Todd, we would like to provide comments on the proposed Growth Allocations and Mapping as part of the Envision Durham project.

We applaud Regional Staff and their consulting team on the extensive amount of work that they have undertaken as part of this Municipal Comprehensive Review process. While we recognize that the overall Growth Numbers have been provided by the Province, we are also aware that the growth numbers provided are minimums. Our Client's property, 6373 Country Lane, was incorporated into the Urban Boundary of Whitby in 2009 and identified as Employment Area. The Official Plan Amendment that implemented this was appealed to the Ontario Municipal Board (now the Local Planning Appeal Tribunal) and continues to be on hold.

The Envision Durham project identifies the lands as Appealed Employment Area (ROP Policy 14.13.7). The lands are located on the east side Country Lane, which is currently dead-ends at Highway 407. One of the objections with these lands being designated as Employment Area is the limited road connections available to access this employment area. As per the Town of Whitby's Official Plan, there are no long-term plans to extend Country Lane over Highway 407 with an overpass, nor are there plans to create an east-west arterial road that runs along Highway 407. All road connections to this Employment Area will be via Collector Roads that run through proposed Community Lands, which will primarily be residential lands. The Whitby Official Plan does identify that an Arterial Road running east-west will be created in the middle of the block that runs between Columbus Road and Highway 407, but this will continue to require industrial traffic to travel through residential areas. It is expected that the industrial traffic will create conflicts in the residential areas, which will be unavoidable if these lands remain as Employment Area.

Although we only represent the property owner of 6373 Country Lane, the lands located on the east and west side of Country Lane that are proposed to be designated as Employment Area appear to create land use compatibility conflicts with the residential areas to the north. The proposed Employment Area at the end of Country Lane would be isolated from proposed Employment Areas to the east and west due to natural heritage features that restrict

connections, as well as the limited traffic connections as previously outlined. The limited area of this Employment Area (approximately 16 hectares) is immediately adjacent to Community Area, which will require setbacks to comply with the Province's D-Series guidelines, which will further reduce the total area available for employment development. The lands will also be reduced by setbacks that will be required from the Ministry of Transportation along the Highway 407 corridor. Although the setback would be required for Community Area lands, the D Series guidelines would not be implemented as a result of land use conflicts, thereby not reducing the total area for development.

While we recognize that any change in designation would impact the overall supply, resulting in an over supply of one land use, and an under supply of another. In this instance, the change in designation may result in an undersupply of Employment lands in the Town of Whitby. It should be noted that as part of the Envision Durham project, it was identified in the Watson & Associates report that the Town of Whitby would require approximately 192 hectares of new Employment land. The final allocation to the Town that was proposed was approximately 202 hectares, an over-supply of approximately 10 hectares. This over-supply provides some flexibility for the Region to amend the proposed Employment Area designations on lands and to identify them as Community Area instead.

While we represent the owner of 6373 Country Lane, it is our position that the proposed Employment Land designation is not appropriate given the location of the lands on a dead-end road; isolation from employment lands to the east and west; compatibility concerns with Community Lands to the north; and, lack of road connections.

Should Regional staff wish to discuss further, we would be happy to discuss.

Sincerely,

Rachelle Larocque, BES, M.Sc., MCIP, RPP
Senior Associate

cc. Casey Todd