

September 8, 2021

Our File No. 155273

BY EMAIL

Loralea Tulloch
Municipal Services Office - Central Ontario
777 Bay Street, 13th floor
Toronto, ON M5G 2E5Sent via submission on website url: <https://ero.ontario.ca/notice/019-4071>

Dear Ms. Tulloch:

**Re: Submission by Palermo Village Corporation
Regional Official Plan Amendment No. 48**

Aird & Berlis LLP is counsel to Palermo Village Corporation. Our client owns lands within the Town of Oakville municipally known as 3069 Dundas Street West. These lands comprise the northwest quadrant of Dundas Street West and Bronte Road within the new Palermo Village Growth Area.

Our client's holdings extend along the west side of Bronte Road all the way up to the southwest quadrant of the interchange between Highway 407 and Bronte Road – across from lands that were EA approved by the Province in 2020 for a 407 Transitway Station within the southeast quadrant of Highway 407 and Bronte Road.

As part of the public commenting process associated with the Region of Halton's adoption of Regional Official Plan Amendment No. 48 ("ROPA 48"), Palermo Village Corporation's land use planning consultant (Korsiak Urban Planning) provided a detailed submission (complete with illustrative figures) raising an issue with the boundaries of the *Employment Area* overlay being shown on ROPA 48. The issue concerns a portion of Palermo Village Corporation's lands located in the southwest quadrant of Highway 407 and Bronte Road. This portion continues to be shown as subject to the Region's *Employment Area* overlay.

The attached submission outlined in detail the land use planning reasons why the entirety of Palermo Village Corporation's lands should be excluded from the Region's *Employment Area* overlay in ROPA 48. These reasons include the lands' proximity to the Province's Bronte 407 Transitway Station and the fact that other major roads within Oakville that intersect with Highway 407 (Trafalgar Road being the prime example) do not show an *Employment Area* overlay applying to the area surrounding the interchange.

For the reasons outlined in detail in the attached submission, we request that the Minister have regard for the strategic position of our client's lands (located within appropriate walking distance to two major transit stations along two Higher Order Transit Corridors, being Bronte Road and Dundas Street West). The exclusion of a portion of our client's lands from the Palermo Village Growth Area (and its related inclusion in the Region's *Employment Area*) appears to stem from

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(a) a carry-over from Halton's ROPA 38 (which remains under site-specific appeal by our client) and (b) a lack of confidence on the part of the local and regional authorities that the Bronte 407 Transitway Station will be developed in accordance with the Province's expectations.

To ensure optimization of the public investment in the 407 Transitway project, **we ask that the Minister consider removing the *Employment Area* overlay associated with the southwest and southeast quadrants of Highway 407 and Bronte Road.** This removal would ensure these lands are planned for appropriate mixed-use growth that will support transit users that are both employees and residents. In our submission, this is a better planning outcome than allowing the *Employment Area* overlay to remain in place. Keeping the *Employment Area* overlay within the south quadrants of Highway 407 and Bronte Road could result in an employment block that is disconnected from other employment uses in the area. It would result in a clear land use planning inconsistency not only within the Bronte Road corridor itself, but also in comparison to the south quadrants of Highway 407 and Trafalgar Road.

We trust you will find the attached information both illustrative and informative in your review of Halton's ROPA 48 as adopted. Please let us know if you have any follow-up questions concerning this submission.

Yours truly,

AIRD & BERLIS LLP



Patrick J. Harrington

Encl.

PJH/np

c.c. client

Encl.

AIRD BERLIS

May 26, 2021

Mr. Curt Benson, MCIP, RPP
Director, Planning Services and Chief Planning Official
Region of Halton
1151 Bronte Road
Oakville, ON
L6M 3L1

Dear Mr. Benson:

**Re: Palermo Village Corporation
3069 Dundas Street West, Oakville
Draft Regional Official Plan Amendment (ROPA) 48**

Thank you for taking the time to meet on March 31st to discuss Palermo Village Corporation's (PVC) proposal to expand the Palermo Village Growth Area north to Highway 407 to support and strategically plan for the recently approved 407 Transitway and Bronte 407 Transitway Station. The purpose of this letter is to provide our rationale for the requested expansion to the Palermo Village Growth Area up to the 407 Transitway and, specifically, to request that the expanded Growth Area be identified as such in ROPA 48. This letter is intended to supplement comments provided by Aird & Berlis dated February 16, 2021, a copy of which is attached for your convenience.

The PVC lands (formerly referred to as Newmark Developments) are the subject of ongoing appeals to the Regional and Town Official Plans. Given the appeals, the lands remain undesignated in both Plans. Town Council recently adopted LOPA 34, which had the effect of including a portion of the PVC property within the Palermo Village Growth Area. We are generally supportive of the Town's initiative to expand the Growth Area; however, we believe that the Growth Area needs to be extended further north to support and fully optimize the use of the 407 Transitway and the Bronte 407 Transitway Station. The Environmental Assessment for both was approved by the Province in October of 2020. The approved bus rapid transitway alignment and transitway station design is shown on Figure 1: *407 Transitway EA*. Given this recent approval, it is appropriate for Regional and Local planning policy to incorporate policies to optimize its use. This is a very significant Provincial transit facility and the ongoing planning for this area needs to "catch up".

On Map 1H: Regional Urban Structure from draft ROPA 48, the PVC lands that lie within the limits of LOPA 34 are proposed to be within a "*Primary Regional Node*". The lands outside of the limits of LOPA 34 are proposed to be designated "*Employment Area*" (see Figure 2). In our opinion, the ongoing Regional Official Plan Review needs to recognize the significance of the recently approved Transitway Station and include the area outside of LOPA 34 within the "*Primary Regional Node*". The PVC lands are **not** within a Provincially Significant Employment Zone, and as shown on Map 1C: Future Strategic Employment Areas from draft ROPA 48 (Figure 3), the PVC lands are **not** within a *Future Strategic Employment Area*. Accordingly, we request that the proposed "*Employment Area*" designation be removed from the PVC lands on all Maps in draft ROPA 48.

Our request to remove the proposed “*Employment Area*” designation and include the lands within an expanded Growth Area is supported by prevailing Provincial policy. Specifically, the guiding principles of the *Growth Plan* (2020) prioritise intensification and higher densities around existing and planned transit stations to support transit viability, and to make efficient use of land and infrastructure. The 407 Transitway meets the *Growth Plan’s* definition of a “*Higher Order Transit*” corridor as the buses will be travelling on a dedicated right-of-way. We note that the Regional Plan already identifies the area along the 407 as a “*Higher Order Transit Corridor*”, and that this designation is being carried forward in draft ROPA 48. We also note that Bronte Road is designated as a “*Higher Order Transit Corridor*” in the existing Regional Plan from Speers Road in Oakville all the way north to Main Street in Milton and is being maintained as such in draft ROPA 48. The long-term plan is to have dedicated bus lanes on Bronte Road. The Bronte 407 Transitway Station, being at the intersection of 2 designated “*Higher Order Transit Corridors*”, will fulfill a key role in providing connections between local (Oakville & Milton) and Provincial GO transit services.

The area around the Bronte 407 Transitway Station meets the *Growth Plan’s* definition of a “*Major Transit Station Area*” since it is a “*planned higher order transit station...within a settlement area.*” As you are aware, a *Major Transit Station Area* is further defined as “*the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.*” The attached Figure 4: *Planning Context*, shows that most of the PVC lands outside of the currently proposed “*Primary Regional Node*” are within an 800 metre radius of the planned Bronte 407 Transitway Station and should be considered as being within a “*Major Transit Station Area*”. Figure 4 also shows that the PVC lands are the only potentially developable lands with 800 metres of the station since the remaining lands are occupied by Glenorchy Conservation Area and the 407 corridor. We emphasize that the PVC lands will be exceptionally well serviced by transit due to its proximity to both the Bronte 407 Transitway Station and Palermo Transit Terminal. This further supports the need to take advantage of the PVC lands and plan appropriately to create a compact urban form with a diverse mix of land uses, housing types, employment, and amenities.

Section 2.2.4.8. of the *Growth Plan* requires that “*all major transit station areas will be planned and designed to be transit-supportive*”. The *Growth Plan* defines “*Transit-supportive*” as “*Relating to development that makes transit viable and improves the quality of the experience of using transit. It often refers to **compact, mixed-use development** (our emphasis) that has a high level of employment and residential densities.*” Section 2.2.4.9 of the *Growth Plan* also requires that “*Within **all** (our emphasis) major transit station areas, development will be supported, where appropriate, by... planning for a **diverse mix of uses** (our emphasis), including additional residential units and affordable housing, to support existing and planned transit service levels*”, and “*prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities.*” The *Growth Plan* clearly directs municipalities to plan and design areas around planned and existing *major transit stations* to be transit supportive. Where appropriate, they are to include a diverse mix of uses. In our opinion, planning for a diverse mix of uses is appropriate given that this area is not within a Provincially designated Significant Employment Zone and is isolated from other approved employment areas by the extensive Natural Heritage Systems associated with 14 Mile Creek and Glenorchy Conservation Area. Figure 4 shows how these lands have no connection to the employment areas and represent a logical extension of the proposed Palermo Village Growth Area.

As per ROPA 48, “*Primary Regional Nodes*” are “*intended to accommodate growth and contain a concentration of public service facilities or **transit supportive high density mixed uses** (our emphasis) or perform a regional*

transit network function at an appropriate scale for their context". Given that the Region is only identifying major transit stations along priority transit corridors, "Primary Regional Nodes" function as a different type of growth area, similar to a major transit station area, which play a key role in supporting the transit network in the Region. As the PVC lands are located within an 800 metre radius of the Bronte 407 Transitway and along two Higher Order Transit Corridors, they should be protected for transit supportive development and identified as a "Primary Regional Node".

At our meeting you posed the question as to how we could provide jobs within this area if it were included within an expanded Growth Area/Primary Regional Node. As a reminder, this area is not designated "Employment" due to the appeal of ROPA 38. Therefore, the request to include these lands within an expanded Palermo Village Growth Area **does not represent a land use conversion**. PVC is committed to pursuing the development of a diverse mix of uses on its lands (inclusive of office/employment uses) in a manner consistent with the direction provided by the *Growth Plan* to support planned transit service levels along Bronte Road and at the Bronte 407 Transitway Station. PVC's vision for their lands is to create a complete community with a mix of residential and employment uses to fully optimize the use of the 407 Transitway and create opportunities for people to live, work and play in the same neighbourhood. This is consistent with one of the findings in Strategycorp's presentation of April 21st to Regional Council on the "Changing Nature of the Economy and Employment". It was noted that the areas around major transit stations represent an opportunity to develop a "vibrant mixed-use environment with higher land use intensity... that should not be passed by".

We would also like to highlight that draft ROPA 48 proposes a new table identifying the proportion of people and jobs in "Strategic Growth Areas". These people and job targets are overly prescriptive and are not conducive to good planning as it limits local decision making. Our position is consistent with the comments provided by Local municipalities and noted previously in the comments provided by Aird & Berlis, dated February 16, 2021. The chart should be removed from ROPA to allow "Strategic Growth Areas" to be comprehensively planned for a mix of people and jobs at the local level.

The land use designations and related policies in LOPA 34 provide for a mix of uses, including those associated with the provision of jobs. To date, LOPA 34 has been focused on providing mixed-uses in the vicinity of the Palermo Transit Terminal and in the base of buildings along major roads. We are supportive of working with the Town and Region to consider how best to apply similar designations and policies providing a mix of uses, including those providing jobs, in the area nearest the Bronte 407 Transitway Station and along Bronte Road to support and make use of the significant planned transit facilities.

In conclusion, the policies of the *Growth Plan* need to be implemented through the Region's Official Plan Review by removing the proposed "Employment Area" designation from the PVC lands in all maps in draft ROPA 48 and identifying the remaining portion of the PVC lands as being within the "Primary Regional Node" for the Palermo Village Growth Area on draft Map 1H: Regional Urban Structure.

Thank you for your consideration. As always, we are available to discuss our comments at your convenience.

Yours truly,

KORSIAK URBAN PLANNING



Terry Korsiak, MA, RPP

Copy: Neil Garbe, Gabe Charles – Town of Oakville

Kevin Singh, Adrian Marsili, Argo/PVC

Patrick Harrington, Aird & Berlis LLP

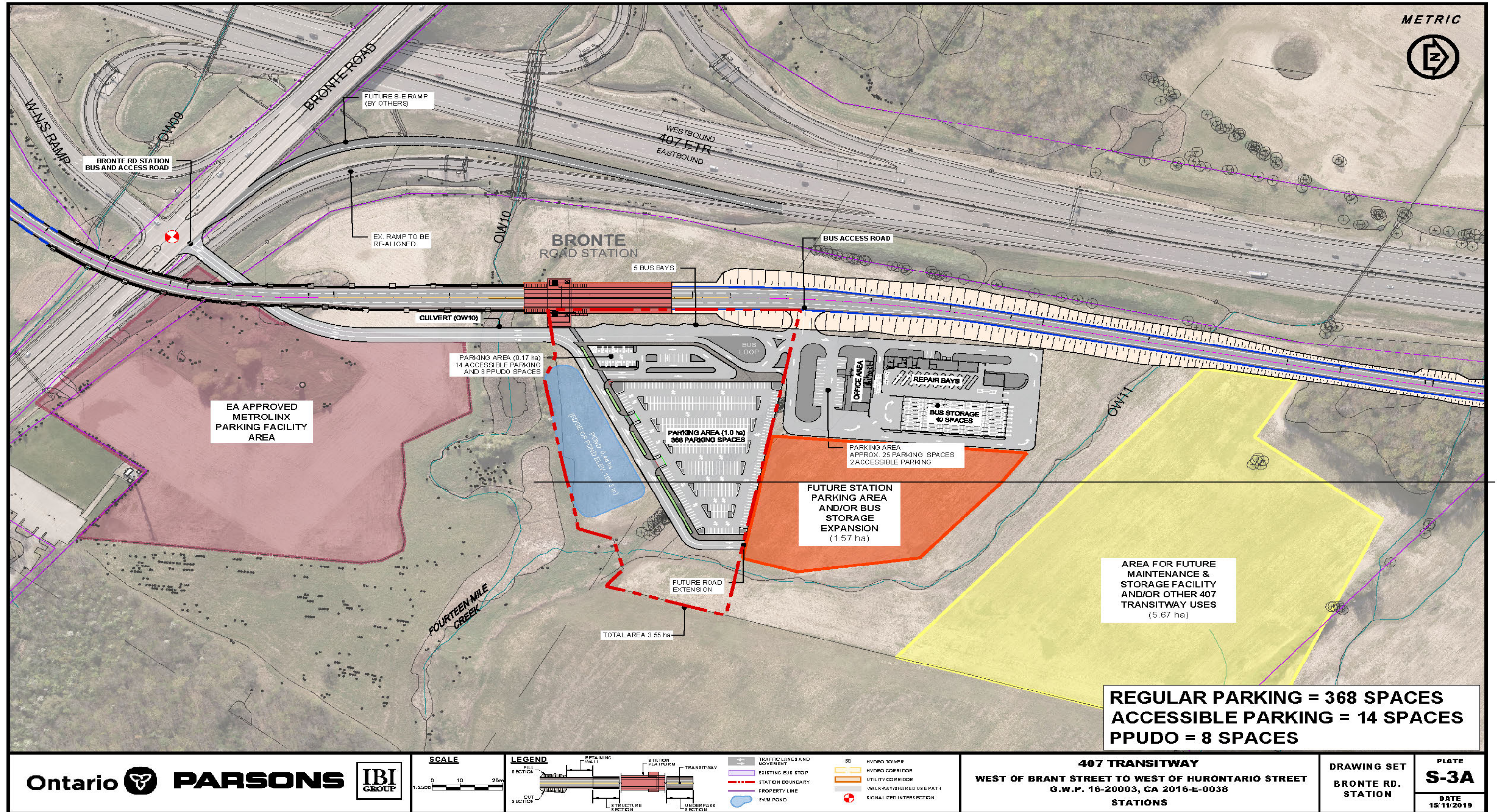


FIGURE 1: Bronte/407 Transitway Station

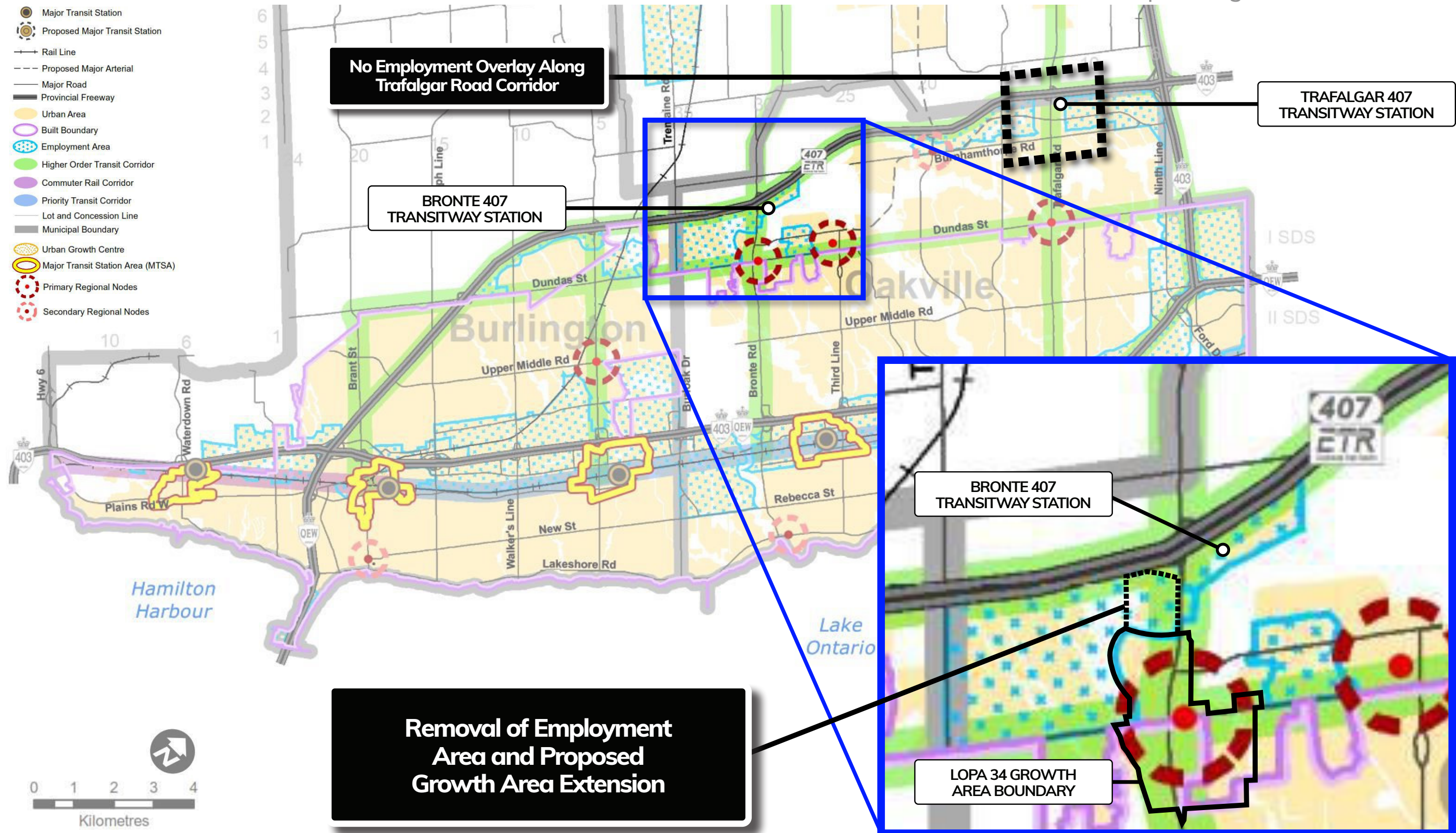


FIGURE 2: ROPA 48 Map 1H: Regional Urban Structure

Draft ROPA 48

Map 1c Future Strategic Employment Areas

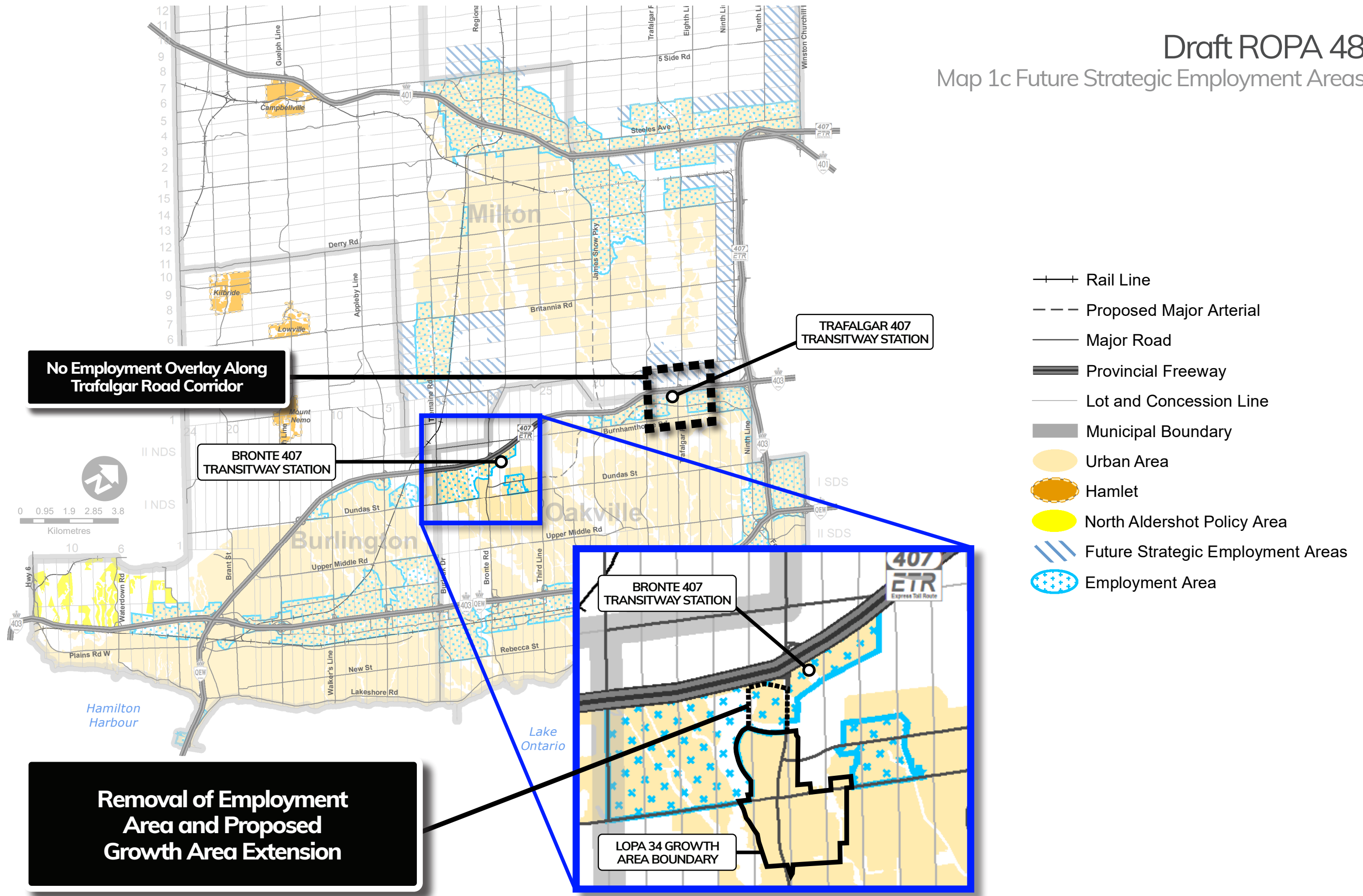


FIGURE 3: ROPA 48 Map 1C: Future Strategic Employment Areas

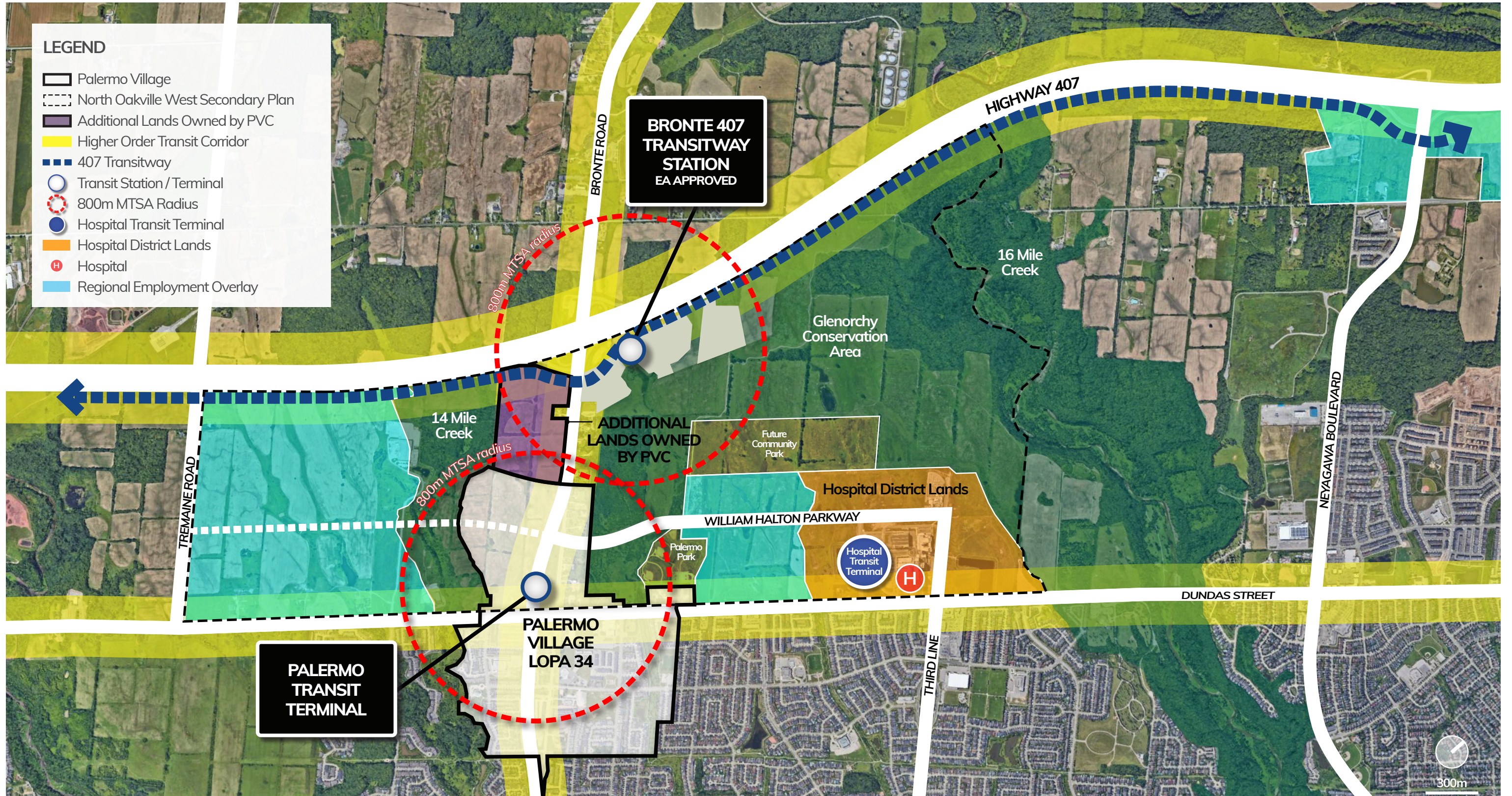


FIGURE 4: Planning Context

AIRD & BERLIS LLP

Barristers and Solicitors

Patrick J. Harrington
Direct: 416.865.3424
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February 16, 2021

BY EMAIL

Our File No. 104079

Attn. Curt Benson
Director Planning Services and Chief Planning Official
Region of Halton, Planning Department
1151 Bronte Road
Oakville, Ontario
L6M 3L1

Sent via email: ropr@halton.ca

Dear Mr. Benson:

**Re: Submission by Palermo Village Corporation
3069 Dundas Street West, Oakville
Draft Regional Official Plan Amendment No. 48**

As you are aware, our firm acts on behalf of Argo Developments and Newmark Developments (collectively now known as "Palermo Village Corporation"). Palermo Village Corporation owns lands known municipally as 3069 Dundas Street West in the Town of Oakville, which generally comprises the majority of the northwest quadrant of the intersection of Bronte Road and Dundas Street West, extending up to (and beyond) Highway 407 (the "PVC Lands"). The location of the PVC Lands is outlined in Attachment A to this letter.

Our firm wrote to you on October 30, 2020, to provide our client's comments respecting the Region's Official Plan Review – specifically pertaining to the PVC Lands. We are now in receipt of Draft Regional Official Plan Amendment No. 48 ("ROPA 48"), which is scheduled to be considered by Regional Council on Wednesday, February 17. The purpose of ROPA 48 is to "*implement components of the Regional Urban Structure that establishes a hierarchy of strategic growth areas in the Regional Official Plan.*" We are writing to provide our client's comments respecting ROPA 48's proposed effect on the PVC Lands.

For purposes of the public record, we ask that our letter dated October 30 form part of our submission to Regional Council on ROPA 48. A copy of our October 30 letter is attached for ease of reference. We will attempt to refrain from repeating the submissions contained in that letter.

Our client's concerns with Draft ROPA 48 primarily arise from the proposed maps. As indicated in Map 1, the PVC Lands are within the Regional Urban Area, though a portion of the site continues to be identified as Regional Natural Heritage System. Our submissions respecting the Region's NHS mapping are included in our October 30 letter. We remind the Region that the NHS currently shown on the PVC Lands is subject to Policy 116.3 of the Region's existing Official Plan, which specifically reserves the delineation of the

Regional NHS on land within the North Oakville West Secondary Plan Area to the determination of Newmark Development's ongoing appeal of OPA 289. We are hopeful of resolving this issue directly with the Town through its Palermo Village Growth Area Review process. For now, Draft ROPA 48 will need to continue to reserve the delineation of the Regional NHS on the PVC Lands.

Maps 1C and 1H to Draft ROPA 48 indicate a proposed *Employment Area* overlay on the northern portion of the PVC Lands (see Attachment A to this letter). This *Employment Area* overlay is continuous between the lands to the immediate west of the PVC Lands along the south side of Highway 407. For all of the reasons outlined in our October 30 letter, Palermo Village Corporation submits that this overlay does not constitute good planning and ought to be removed. These reasons include:

1. The PVC Lands constitute the northwest quadrant of a Primary Regional Node.
2. The PVC Lands are bounded by two Major Arterial Roads that are also designated as Higher Order Transit Corridors, being Bronte Road and Dundas Street West.
3. A bus transit station is proposed to be located near the south portion of the PVC Lands.
4. A 407 Transitway station is proposed to be located near the north portion of the PVC Lands.
5. The PVC Lands lie outside of any Provincially Significant Employment Zones.
6. The PVC Lands are immediately adjacent to the Built Boundary, are easily serviceable and are not encumbered by any significant landforms or features that would limit their development potential.

The foregoing confirms that the PVC Lands are ideally situated for higher-density, mixed-use development. To restrict the north portion of the PVC Lands through the use of an *Employment Area* overlay would significantly reduce the potential to create an effective *complete community* that is walking distance to multiple modes of Provincial, Regional and Local transit.

For comparison, we ask that Regional Council refer to the areas surrounding the intersection of Trafalgar Road and Burnhamthorpe Road (see again, Maps 1C and 1H). This area contains a similar Primary Regional Node at the intersection of two Major Arterial Roads that are also Higher Order Transit Corridors. Tracing Trafalgar Road north from Burnhamthorpe Road to Highway 407, the draft mapping shows a "break" in the proposed *Employment Area* overlay. This "break" will allow both sides of Trafalgar Road to appropriately develop for transit-supportive mixed-used development within a *complete community*.

Palermo Village Corporation submits that Bronte Road north of Dundas Street West should receive similar treatment by having the proposed *Employment Area* overlay "break" across Bronte Road near Highway 407, thereby excluding the north portion of the PVC Lands. **Our client's requested revision is shown on Attachment B to this letter.**

Our client also notes that Draft ROPA 48 proposes a new table (Table 2b – See Item 13 to Draft ROPA 48) that proposes to prescribe targets for the “*proportion of residents & jobs*” for various strategic growth areas within the Region. Included in this table is a proposed *60% residents to 40% jobs* requirement for Palermo Village in Oakville. With respect, these types of prescriptive proportions in a Regional-level Official Plan are not conducive to good planning, particularly when the proportions serve as a limitation on local decision-making. These proportions lead to planning-by-numbers approaches to community design and create unnecessary complications, particularly in areas that will develop over time. Accordingly, our client encourages the Region to either not adopt Table 2b or to include policy language confirming that the proportions shown in the table (including the 60/40 split for Palermo Village) represent a goal or objective of the Region that will not function as a directive or limitation on the ability of local municipalities (like Oakville) to plan for and approve their complete communities.

Please ensure our office is notified of any further opportunities to provide input to the current Regional Official Plan Review, including Draft ROPA 48. Our request at this time is that all decisions on Draft ROPA 48 be deferred to allow our client the opportunity to (a) complete its consultation process with the Town of Oakville concerning the Palermo Growth Area Review and (b) discuss directly with Regional Staff the issues raised in this letter and in our October 30 letter. To date, no direct discussions between Regional Staff and consultants on behalf of Palermo Village Corporation have taken place.

Yours truly,

AIRD & BERLIS LLP

Original signed by P.J. Harrington

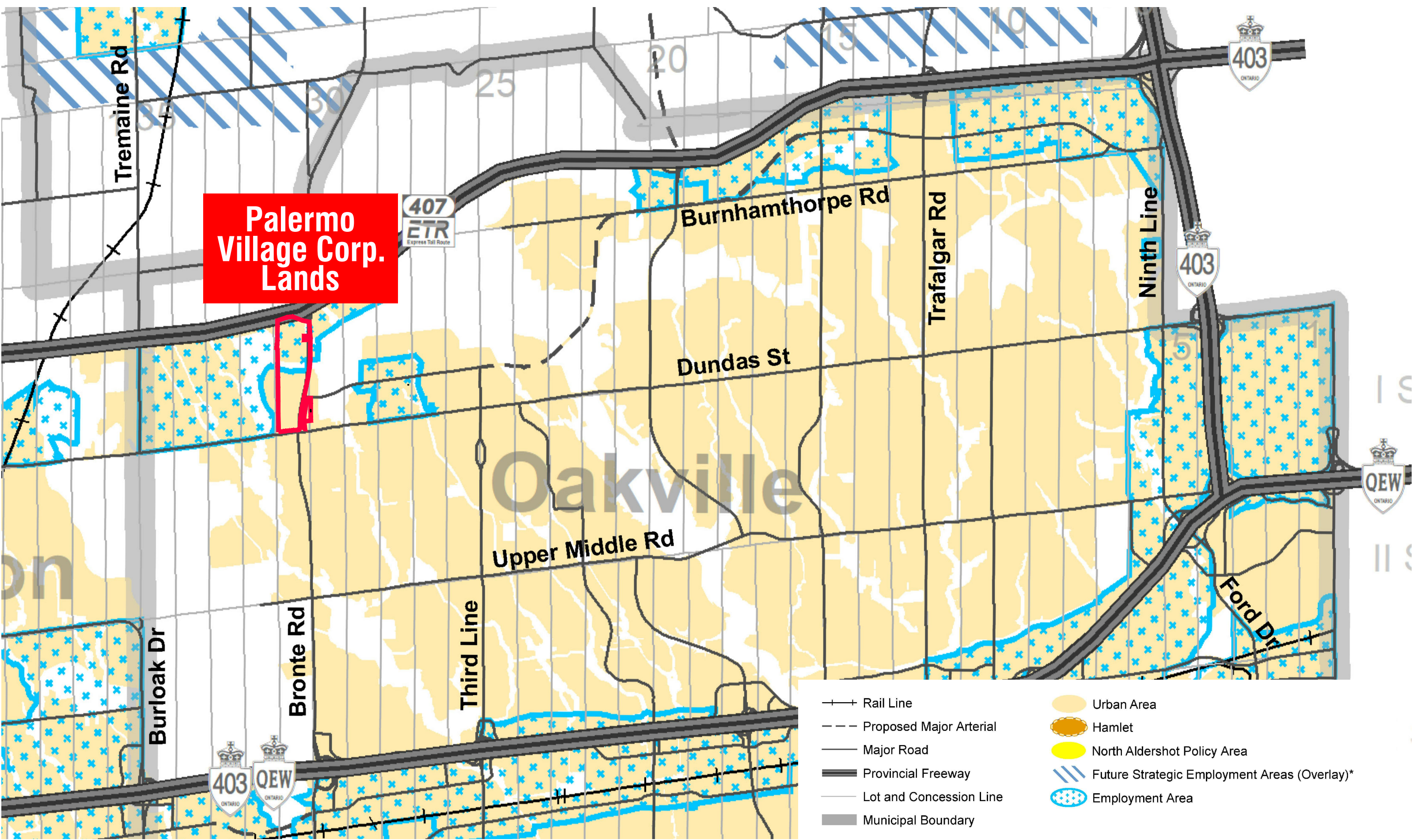
Patrick J. Harrington

PJH/np

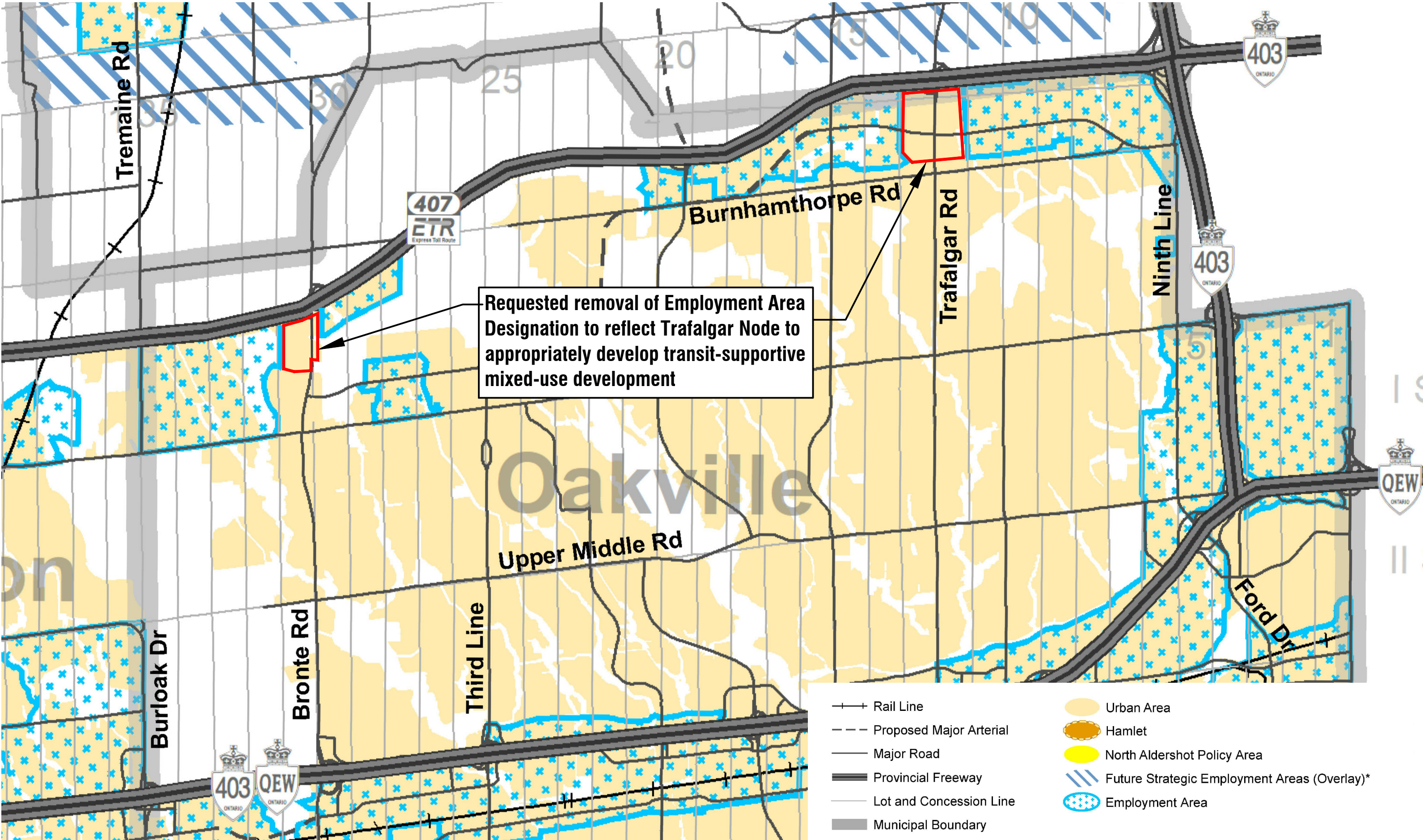
Includes Attachments

cc: Clerk, Region of Halton
K. Singh, Argo Developments
M. Shapira, Newmark Developments Ltd.
T. Korsiak, Korsiak Urban Planning

43498509.3



APPENDIX A



Requested removal of Employment Area Designation to reflect Trafalgar Node to appropriately develop transit-supportive mixed-use development

- +— Rail Line
- - - Proposed Major Arterial
- Major Road
- Provincial Freeway
- Lot and Concession Line
- Municipal Boundary
- Urban Area
- Hamlet
- North Aldershot Policy Area
- Future Strategic Employment Areas (Overlay)*
- Employment Area

APPENDIX B

AIRD & BERLIS LLP

Barristers and Solicitors

Patrick J. Harrington
Direct: 416.865.3424
E-mail: pharrington@airdberlis.com

October 30, 2020

BY EMAIL

Our File No. 104079

Attn. Curt Benson
Director Planning Services and Chief Planning Official
Region of Halton, Planning Department
1151 Bronte Road
Oakville, Ontario
L6M 3L1

Sent via email: ropr@halton.ca

Dear Mr. Benson:

**Re: Submission by Argo Developments / Newmark Developments Ltd.
3069 Dundas Street West, Oakville
Region of Halton Official Plan Review**

We act on behalf of Argo Developments and Newmark Developments (collectively, "Newmark"). Newmark owns lands known municipally as 3069 Dundas Street West in the Town of Oakville, which generally comprises the majority of the northwest quadrant of the intersection of Bronte Road and Dundas Street West, extending up to (and beyond) Highway 407 (the "Newmark Lands").

Newmark remains a site-specific appellant of OPA 289 (North Oakville West Secondary Plan), OPA 306 (Palermo Village North Urban Core Area) and ROPA 38 (Sustainable Halton). All of these appeals are currently adjourned *sine die* before the LPAT to allow Newmark to consult directly with the Town of Oakville regarding the development potential of the Newmark Lands.

Further information pertaining to the Newmark Lands are available to the Region through the Town's ongoing Palermo Village Growth Area Review. Our firm provided our client's written submission respecting that Review. A copy of that submission, dated February 18, 2020, is attached for your convenience.

With respect to the Regional Official Plan Review, we note that the Regional Urban Structure Discussion Paper speaks to the evaluation of potential Major Transit Station Areas ("MTSAs"). It is noted that MTSAs are to be directed toward strategic growth areas that offer connections to higher-order transit, including inter-regional transit.

We also note that the Region is generally evaluating MTSAs almost exclusively along its GO Transit lines. With respect, there is nothing in the Province's policies and directions concerning MTSAs specifying that these unique designations should be limited to areas that surround GO Transit stations.

To this end, we submit that the Newmark Lands are uniquely situated to operate as an MTSA. In fact, the Town's Urban Structure Map already identifies a "Proposed Regional Transit Node" at Palermo Village within the Newmark Lands. "Regional Transit Nodes" are defined to be key locations that integrate with the town-wide transportation system and provide a focus for transit-supportive development that facilitates first mile-last mile connections and solutions. Broadening this Transit Node designation to an MTSA would appropriately support future development on the Newmark Lands and ensure Provincial, Regional and Town investment in transit and transportation infrastructure along both Dundas Street West and Bronte Road is optimized.

A review of the relevant definitions prescribed by the 2019 Growth Plan further supports consideration of the Newmark Lands for an MTSA designation:

Major Transit Station Area: The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.

The majority of the Newmark Lands fits this definition pursuant to the Town's Urban Structure and pursuant to the proposed mapping and policy under the Town's Palermo Village Growth Area Review.

Higher Order Transit: Transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. Higher order transit can include heavy rail (such as subways and inter-city rail), light rail, and buses in dedicated rights-of-way.

The Newmark Lands are at the intersection of two Regional corridors proposed to be served by higher order transit (primarily bus rapid transit). The north portion of the Newmark Lands is also immediately proximate to the future 407 Transitway. In terms of transit options, the site will provide both speed and interchangeability for future transit users.

Strategic Growth Areas: Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.

For the reasons identified in our submission on the Palermo Village Growth Area Review, the Newmark Lands exhibit all of the key hallmarks for a strategic growth area.

Accordingly, we request that Regional Staff include Palermo Village generally, and the Newmark Lands specifically, as a candidate location for an MTSA designation.

October 30, 2020

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Regional Natural Heritage System

In addition to the foregoing, the Newmark Lands exhibit little in the way of constraints to future urban development for low, medium and high-densities. As previously submitted by our client, there are no land forms, functions or features on the Newmark Lands that warrant inclusion or protection under the Regional NHS.

On this point, staff should note that Policy 116.3 of the Region's Official Plan (ROPA 38) specifically reserves the delineation of the Regional NHS on land within the North Oakville West Secondary Plan Area to the determination of our client's ongoing appeal of OPA 289. We request that any Regional NHS mapping appropriately reflect the Region's policy text and not indicate the presence of Regional NHS on the Newmark Lands. Instead, the relevant map(s) should include a notation simply referring the reader to Policy 116.3.

Please ensure our office is notified of any further opportunities to provide input to the current Regional Official Plan Review. Please also ensure the undersigned receives notice of any reports to Committee or Council concerning the Review.

Yours truly,

AIRD & BERLIS LLP

Original signed by P.J. Harrington

Patrick J. Harrington
PJH/np

cc M. Shapira, Newmark Developments Ltd.

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