
Planning Analysis for Greenbelt Consultation

Part of Lots 19 – 26 Concession 8
Whitby , ON

Prepared by:

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Prepared for:

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Executive Summary

The Subject Lands are located north and east of Brawley Road and Ashburn Road in the Town of Whitby. The lands are adjacent to, and north of the settlement area of the Brooklin Community in the Town of Whitby as shown in Figures 2 and 3. The Subject Lands are comprised of approximately 331 hectares (818 acres) across four (4) parcels. The Subject Lands are currently used for agricultural and major open space uses.

The lands are within the Provincial Greenbelt Plan and Oak Ridges Moraine Conservation Plan areas. As such, the lands are currently unavailable for urban development. However, the Subject lands, and lands between Brawley Road and the southern limit of the ORMCP were added to the Greenbelt based on the suggestion of a staff at the Central Lake Ontario Conservation Authority between the draft and final Greenbelt Plans, without any consultation with the landowners in the area, the Town, nor the Region. The rationale given by CLOCA for the inclusion was based solely on a concern (which was not supported by technical work) regarding the health of the Oshawa and Lynde Creek watersheds, it was not based on the presence of agricultural tablelands, notwithstanding that the majority of the lands are comprised of agricultural uses. With contemporary development practices, development can occur on the lands while protecting the function of the Lynde and Oshawa Creek watersheds.

It is my opinion that the Subject Lands should not have been included in the Greenbelt Plan area on this basis, particularly given that updates to the subwatershed plans had yet to be completed for these creeks. Further to correspondence and positions taken by Whitby and Durham Region Council's, a correction to remove the land from the Greenbelt should have been considered as early as 2006. This document provides an overview of the history of the Greenbelt Plan on the Subject Lands which provides the background to a request to remove the Subject Lands from the Greenbelt Plan area and to redesignate the portions of the Subject Lands within the Oak Ridges Moraine Conservation Plan that are currently designated *Protected Countryside Area to Settlement Area*.

Furthermore, this document analyses the suitability of the Subject Lands for inclusion within the adjacent settlement area of Whitby should they be removed from the Greenbelt Plan. This analysis is based primarily on the policies contained in the Provincial Policy Statement 2020 and A Place to Grow: A Growth Plan for the Greater Golden Horseshoe 2020 ('Growth Plan'). Given that a detailed development proposal has yet to be prepared, the analysis is based on high level criteria that capture the intent of the settlement expansion policies of these plans.

The Subject Lands provide for a logical extension and 'fourth' phase of development for the Brooklin community on the south side of Brawley Road, can contribute to the creation of a complete existing community and can be efficiently and cost-effectively accommodated with the extension of municipal services to this area. It is our opinion that, subject to additional work, the lands can conform to Provincial policies related to settlement area boundary expansions. Moreover, the lands are readily serviceable

through local extensions of services and can contribute to the Province's target of building 1.5 million homes in the next 10 years.

This area provides a strategic opportunity to realize the extension of a complete community (Brooklin) north of the current settlement area boundary of Whitby. It is contemplated that the Subject Lands would provide a complete range and mix of housing including 10% of units being attainable housing which include higher-density forms of housing and seniors housing. It is also anticipated that the Subject Lands would provide community uses, most notably a Town-wide serving Community Park which would provide major recreational opportunities and public service facilities for the residents of the existing north Brooklin community and the surrounding rural areas.

Significant environmental features will be protected from development. Given the location of these features, they can be incorporated into an overall recreation and active transportation network that can be utilized to extend active transportation connections to the existing Brooklin Community. In this way, the watershed function of the Lynde and Oshawa Creeks can be protected while providing much needed housing as a gateway to the rural communities and lands in the nearby Greenbelt lands.

For the reasons described in this analysis a correction to the Greenbelt Plan could be considered to remove the Subject Lands from the Greenbelt Plan Area. Should the lands be removed from the Greenbelt Plan Area, they could contribute to the creation of a complete community in North Brooklin and deliver housing in the near-term.

1.1 Subject Site and Surrounding Area

The Subject Lands are comprised of four (4) parcels of land generally bound by Myrtle Road West to the north, the municipal boundary to the east, Brawley Road to the south and Ashburn Road to the west in the Town of Whitby, as shown on Figure 1. The Subject Lands total approximately 331 hectares (818 acres) in size and are legally described in Table 1.

The Subject Lands are currently used for agricultural and major open space uses. Watercourse features are present on portions of the properties.

Figure 1: Subject Lands Location

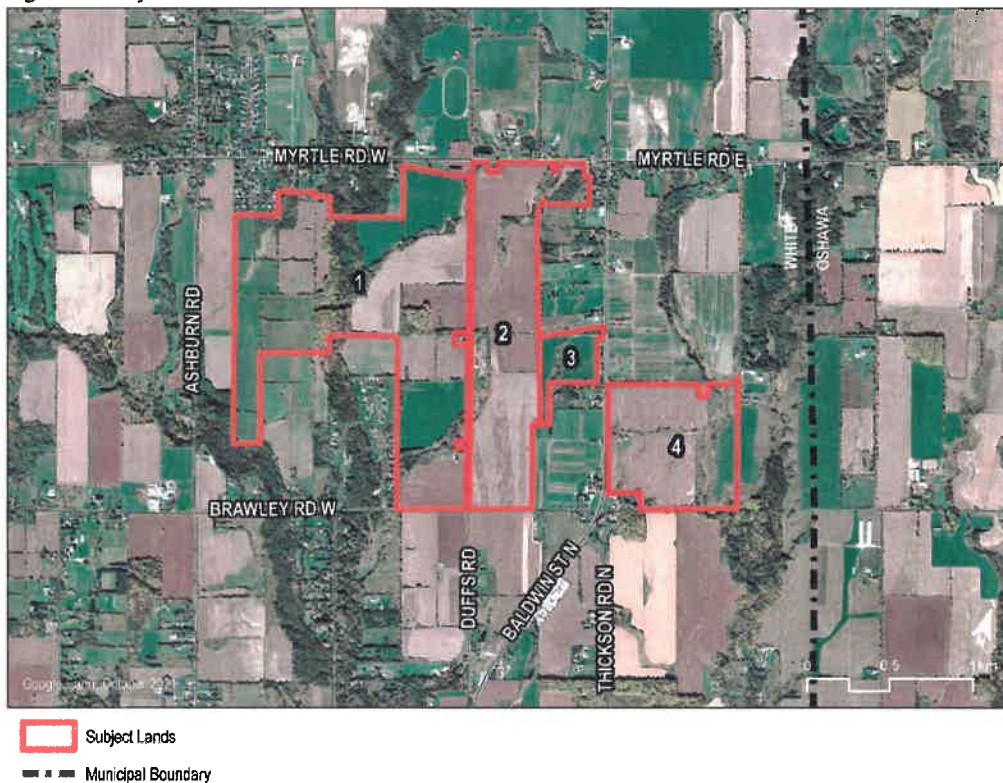


Table 1: Subject Lands Legal Description

Parcel #	Owner Name	Municipal Address	Legal Description	Area (ha)
1	GOLDEN HILL DEVELOPMENTS LTD.	N/A	PT LT 26 CON 8 TOWNSHIP OF WHITBY; PT LT 25 CON 8 TOWNSHIP OF WHITBY; PT RDAL BTN LTS 24 & 25 CON 8 TOWNSHIP OF WHITBY AS CLOSED BY BYLAW CO121825; PT LT 24 CON 8 TOWNSHIP OF WHITBY; PT LT 23 CON 8 TOWNSHIP OF WHITBY; PT LT 22 CON 8 TOWNSHIP OF WHITBY; PT RDAL BTN LT 22 & 23 CON 8 TOWNSHIP OF WHITBY AS CLOSED BY BYLAW D129022 (AKA DUFF RD) PTS 5 TO 13, 40R2280 & PTS 1 TO 4, 40R6271 EXCEPT PTS 24, 26, 27 & 28, 40R2875, PTS 1 & 2, 40R6341, PTS 1 & 2, 40R6342, PT 1, 40R3989, PT 1, 40R9532; T/W D392608; S/T D300654, WH11784, WH11791, W H11804, WH11817; WHITBY	173.7
2	GOLDEN HILL DEVELOPMENTS LTD.	N/A	PT LT 21 CON 8 TOWNSHIP OF WHITBY; PT LT 22 CON 8 TOWNSHIP OF WHITBY PTS 1, 2 & 3, 40R2279 EXCEPT PTS 5, 7 & 9, 40R2875; S/T WH11784; WHITBY	89.7
3		N/A	PT LT 21 CON 8 TOWNSHIP OF WHITBY; PT RDAL BTN LTS 20 & 21 CON 8 TOWNSHIP OF WHITBY VESTED BY CO173018 AS IN CO218608; WHITBY	12.2
4	EAST VALLEY FARMS LTD.	N/A	PART LOTS 19 AND 20 CONCESSION 8, TOWNSHIP OF WHITBY, PART 1 PLAN 40R27987 TOWN OF WHITBY	55.7

1.2 Brookvalley Request

Based on the history below as well as the details provided for in Appendix 1 through 7, Brookvalley is requesting the Province consider a correction to the Greenbelt Plan to remove the Subject Lands from the Greenbelt Plan Area. As part of the Province's latest consultation on the Greenbelt Plan, Brookvalley requests the following:

- That the Province implement the 2004 Draft Greenbelt Plan boundary in Whitby, which corresponds with the southern limit of the Oak Ridges Moraine

Conservation Plan; and,

- That the portions of the Subject Lands within the Oak Ridges Moraine Conservation Plan be redesignated from *Protected Countryside Area* to *Settlement Area*.

As outlined in Section 1.4, it is my opinion that should the lands be removed from the Greenbelt Plan, and subject to further work, the lands could be considered for inclusion within the Town of Whitby's settlement area. This analysis is primarily based on the policies contained within the Provincial Policy Statement 2020 and A Place to Grow: A Growth Plan for the Greater Golden Horseshoe (the "Growth Plan").

1.3 Policy Context

The current land uses include agricultural and major open space uses, which are reflected on the schedules to the Durham Region and Town of Whitby Official Plans as shown in Figure 2 and Figure 3, respectively.

Figure 2: Location of the Subject Lands on Schedule A Regional Structure, Durham Regional Official Plan (2021 Consolidation)

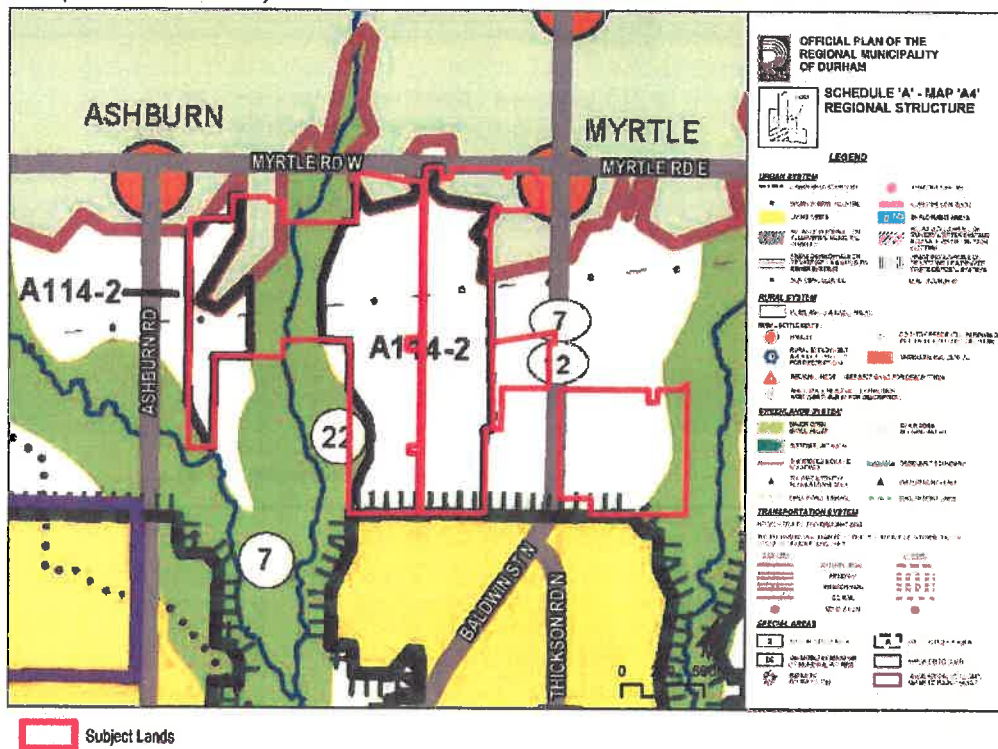
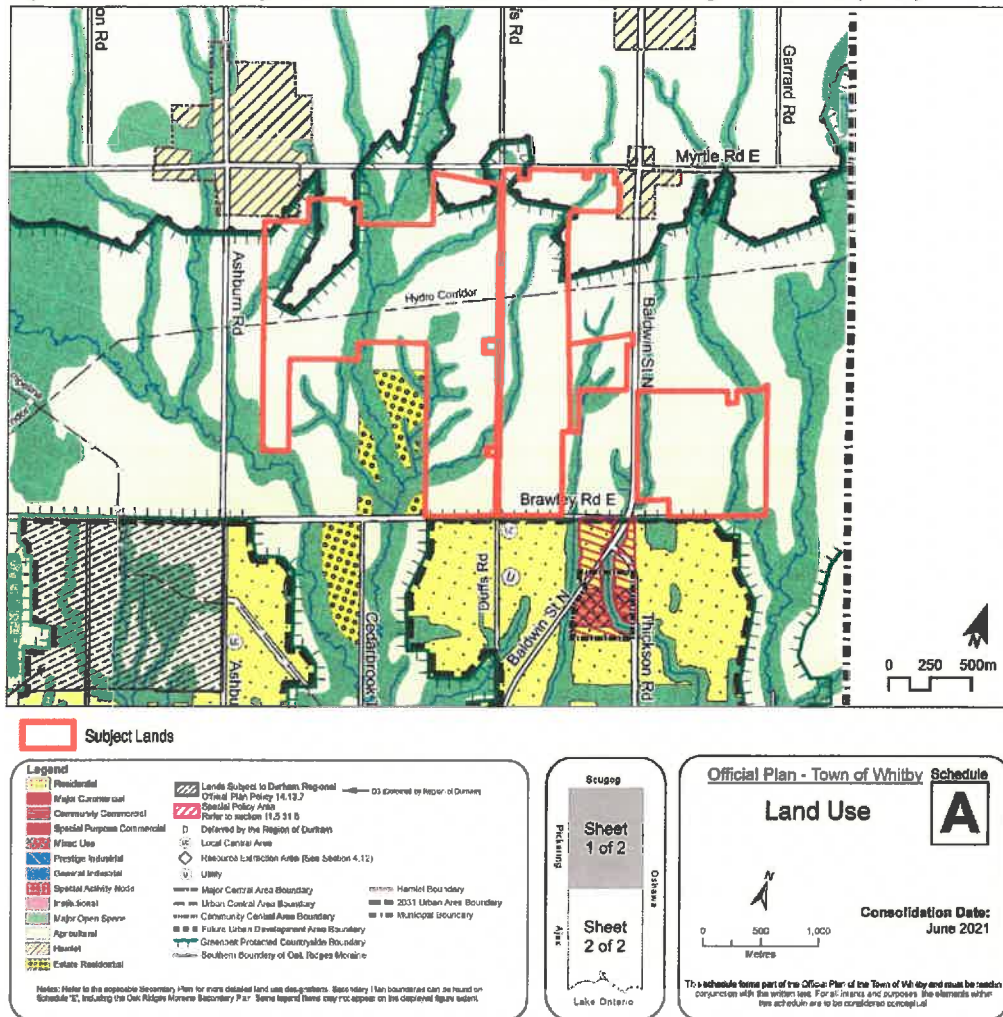


Figure 3: Location of Subject Lands on Schedule A- Land Use, Whitby Official Plan (2021)



The Subject Lands are located immediately north of the Brooklin Community in the Town of Whitby, which was included in the Settlement Area Boundary in 2009 as part of the Region’s Growing Durham Regional Official Plan review.

The Brooklin Community Secondary Plan (“the Secondary Plan”) (OPA 108) was approved by Durham Region on July 12, 2018. The Secondary Plan provides land use designations and policies for the existing Brooklin community and the expanded Brooklin area. Brooklin is planned as a community providing a range and mix of housing options and land uses that support complete communities including institutional, commercial, parks and open space and on- and off-road active transportation options.

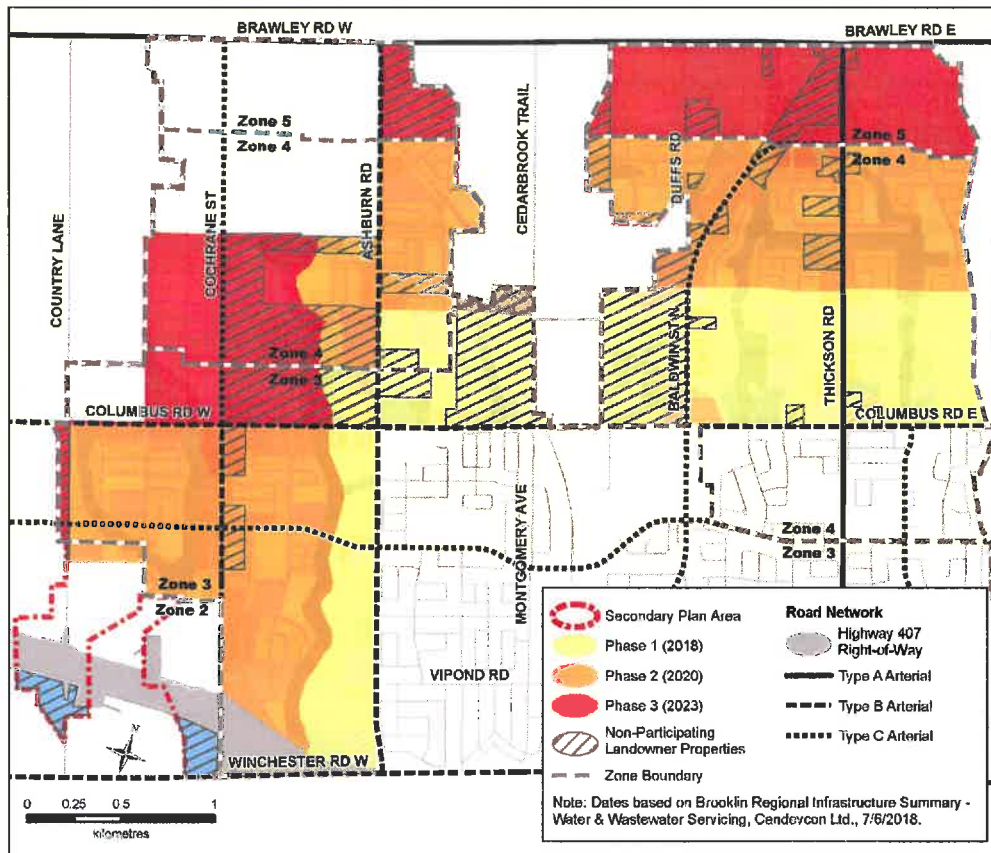
The Comprehensive Block Plan for the community has been endorsed by Council and the landowners are proceeding through the development approvals process to implement the development concept. The Comprehensive Block Plan identifies three (3) phases of development the last of which is anticipated to commence in 2023, as shown in Figure 4.

The Town is also currently preparing a community-wide Zoning By-law Amendment for new areas of the Brooklin Community Secondary Plan area in order to permit the orderly development for the Secondary Plan area.

The Subject Lands are also adjacent to the Hamlets of Ashburn and Myrtle, which are located at the intersections of Ashburn Road and Myrtle Road East and Baldwin Street North and Myrtle Road East, respectively. There is an existing estate residential community located north of Brawley Road and east of Ashburn Road.

The Subject Lands benefit from access to Brawley Road, Myrtle Road East, Duffs Road and Baldwin Street North.

Figure 4: Phasing Plan – Brooklin North Comprehensive Block Plan, dated February 2019 and Endorsed by Council June 24, 2019



1.4 History of the Subject Lands and Greenbelt Plan

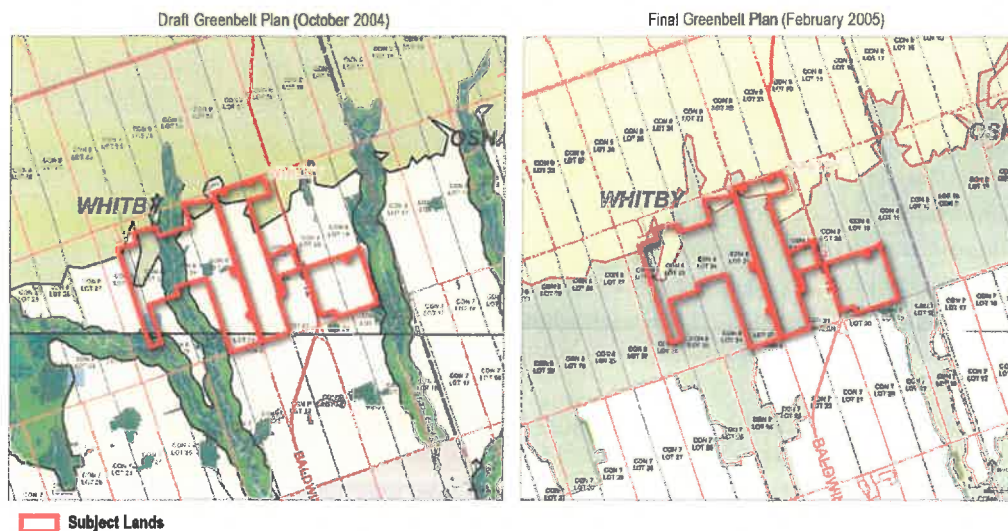
Malone Given Parsons Ltd. (“MGP”) was retained by the owners of the Subject Lands in January of 2003 to provide planning services to support the development of two 18-hole golf courses and a resort/conference centre on the Subject Lands by way of a Regional Official Plan Amendment (“ROPA”) application. At this time, preliminary background work and studies to support a ROPA application were commenced. Prior to the Region’s Official

Plan Review, the subject lands were designated Permanent Agricultural Reserve in the Regional Official Plan.

In October of 2004, the Draft Greenbelt Plan was released by the Province. The draft mapping did not include the Subject Lands within the boundary of the Greenbelt Plan nor designate it as *Protected Countryside*. The northerly portion of the Subject Lands that was previously included in the Oak Ridges Moraine Conservation Plan is shown as such on the draft mapping. From Pickering to Oshawa, the southern limit of the Greenbelt Plan generally followed the Oak Ridges Moraine boundary just south of Myrtle Road. Based on our review of the Draft Greenbelt Plan, and that the Town of Whitby was contemplating the lands for urban boundary expansion at the time, it was our opinion that no further action was warranted and the proposed ROPA application would not be affected by the proposed Greenbelt Plan. We therefore made no submissions to the Province on the Draft Greenbelt Plan.

On February 28, 2005 the Province released the final Greenbelt Plan. Upon review, the Subject Lands, along with the lands of many others were included within the Greenbelt Plan and designated as *Protected Countryside*. The southern limit of the Greenbelt Plan had generally been extended southerly to Brawley Road from Pickering to Oshawa. This modification occurred without any advisement and the owners of the Subject Lands were afforded no opportunity to comment on the final Greenbelt Plan. A comparison of the Draft and Final Greenbelt Plan mapping as it relates to the Subject Lands is shown in Figure 5.

Figure 5: Draft and Final Greenbelt Plan Mapping Comparison for the Subject Lands



After the Greenbelt Plan came into effect MGP made a submission to the Ministry of Municipal Affairs and Housing (“MMAH”) on behalf of the landowners outlining the concern over the inclusion of the lands and a request was made for an explanation of the inclusion of the Subject Lands in the Greenbelt Plan. A copy of the March 22, 2005 letter

is provided as Appendix 1. In May 2005, the (then) Mayor of Whitby also prepared a letter to the MMAH requesting that the Province reconsider the additional lands brought into the Greenbelt between the Draft and Final versions of the Greenbelt Plan. A copy of the May 9, 2005 letter is provided as Appendix 2.

MMAH provided written correspondence on April 28, 2005, indicating that in Durham Region the lands south of the Oak Ridges Moraine Conservation Plan were added to the Greenbelt Plan area at the request of the Conservation Authority. The Conservation Authority indicated in their November 17, 2005 letter that the recommendation for inclusion was based on "...our views as to the extent that urbanization of Lynde Creek and Oshawa watersheds can occur before their health is irreversibly impaired.". However, no technical basis was provided. A copy of the MMAH and Conservation Authority letters are provided as Appendix 3 and 4 respectively.

As a result of this correspondence, the only opportunity to continue with the golf course proposal on the Subject Lands was to request a *Rural* designation for the Subject Lands as part of the Region's Official Plan Review. In July of 2005, MGP, on behalf of the land owners, submitted a ROPA application requesting a *Rural* designation on the Subject Lands to permit the golf course development. However, ROPA 114 was adopted by the Region in 2006 and continued to designate the Subject Lands as *Permanent Agricultural Reserve* with a portion being designated *Major Open Space*. As per the policies of Greenbelt Plan, golf courses are only permitted within Rural Areas of the Protected Countryside. The Durham Region Official Plan does not contain a Rural Area designation, therefore the golf course application could not proceed without an amendment to the Regional Official Plan at the time of a future Municipal Comprehensive Review.

Regional Council passed a resolution on May 10, 2006, that would remove lands from the Greenbelt located in the Town of Whitby, north of Brawley Road (including the Subject Lands) to reflect the Draft Greenbelt Plan mapping. In response to this resolution, MGP provided a letter to the Region on August 25, 2006 indicating inconsistencies between the text of the Council resolution and the mapping. As part of this letter, MGP provided mapping illustrating the extent of the lands north of Brawley Road that should be removed from the Greenbelt Plan area based on the text of the Council resolution. A copy of MGP's August 25th letter are provided as Appendix 5 and 6 respectively. This inconsistency was never addressed by the Region.

In 2015, the MMAH initiated a comprehensive land use planning review of Provincial policy documents, which included review and updates to the Greenbelt Plan policies and mapping. As input to the consultation process, MGP submitted a letter detailing the history of Subject Lands and reiterating the request to remove the Subject Lands from the Greenbelt Plan and include them as part of the whitebelt to protect for long-term growth needs. A copy of MGP's May 28, 2015 letter is provided as Appendix 7. Despite our submission, when MMAH concluded its coordinated land use planning review, the Subject Lands remained as part of the Greenbelt Plan.

1.5 Building a Complete Community

The Provincial Policy Statement 2020 and Growth Plan both emphasize the need to manage and direct land uses to achieve efficient and resilient development and land use patterns. Healthy, liveable, safe and complete communities are built by promoting efficient development and land use patterns, accommodating an appropriate affordable and market-based range and mix of residential types (including single detached, multi-unit housing, affordable housing and housing for older persons). They should also accommodate institutional, recreation, parks, open space and other uses to meet long-term needs and promote the integration of land use planning, growth management, transit-supportive development, intensification, and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.

The Subject Lands could form an extension of the existing Brooklin community representing a fourth phase of development. Planning for the subject lands can proceed as an extension of the Brooklin Community Secondary Plan policy framework and extension and be accomplished in a relatively short timeframe. Moreover, municipal services and utilities will be extended through to the property as contemplated by the Brooklin Comprehensive Block Plan as early as 2023. The subject lands have the potential to achieve the Province's objectives of delivering housing in the near-term.

The following provides summary policy/criteria that must be considered, at a minimum, in assessing whether the Subject Lands could be added to the settlement area.

- 1) They are adjacent to a lower -tier municipal settlement area that:
 - a. Has a delineated built -boundary;
 - b. Has existing or planned municipal water and wastewater systems;
and,
 - c. Has no other reasonable lands to accommodate the proposed uses.

The Subject Lands are located along the periphery of the Greenbelt Plan area adjacent to the Town of Whitby's settlement area boundary. This settlement area has a delineated built-up area.

Durham Region is undertaking its Official Plan review process to update the Official Plan to the 2051 planning horizon. As part of this review, the Region has released preliminary settlement area expansion mapping for lands planned to accommodate growth to this horizon. Based on this mapping the majority of Whitby's whitebelt areas are proposed to accommodate growth to 2051. Limited areas, predominantly located along the Highway 412 corridor, are the only remaining lands to accommodate any additional growth. Given the location of these areas, the remaining whitebelt lands in the Town of Whitby are anticipated to be most suitable to accommodate employment growth over population growth.

Although the Region has identified whitebelt areas to accommodate growth to the 2051 planning horizon, the Subject Lands are located adjacent to the Brooklin community

which is anticipated to commence its final phase of development in 2023. The Subject Lands are uniquely positioned to serve as an additional phase of growth and an extension of the Brooklin Community, and could begin developing as early as 2025.

2) The lands can be cost effectively and efficiently serviced and there is sufficient capacity in existing and planned infrastructure and public service facilities.

Based on the Servicing Feasibility Memorandum dated December, 2022 prepared by Candevcon East Limited, sanitary and water servicing can be cost effectively and efficiently extended from the Brooklin Community to the Subject Lands. Further, Candevcon's analysis confirms that there is sufficient capacity to accommodate with the Subject Lands within the existing and planned infrastructure.

The Subject Lands benefit from proximity to the Brooklin Community which is planned to include public service facilities, such as schools, parks and commercial uses. The lands can be connected to existing and planned development via road, trail and active transportation network extensions. Furthermore, the Subject Lands could also provide public services facilities such as a Community Park and seniors housing, that would provide and overall benefit to the surrounding communities including Brooklin, Ashburn and Myrtle.

3) The lands will be developed at a minimum density that supports the achievement of minimum density targets of the up per- or single -tier municipality.

The Subject Lands can be developed at a density that exceeds the minimum designated greenfield area density established in the Durham Region and Town of Whitby Official Plans. The lands can also be planned to provide a range and mix of housing, including the provision of a minimum of 10% attainable housing.

4) Significant natural heritage and hydrological features will be protected.

Significant natural heritage and hydrologic features on the Subject Lands can be protected, including the provision of appropriate buffers to these features.

5) The lands can comply with the minimum distance separation formulae.

Additional work will be undertaken to demonstrate the Subject Lands will comply with the MDS formulae.

- 6) They will support the achievement of complete communities for the lower tier municipality by:
- a. Featuring a diverse mix of land uses including residential and/or employment uses;
 - b. Having convenient access to:
 - i. A range of transportation options including transit and active transportation;
 - ii. Public service facilities;
 - iii. An appropriate supply of open spaces, parks, trails, and other recreational facilities; and,
 - iv. Healthy and affordable food options, including urban agriculture.
 - c. Providing a range and mix of housing options, including additional residential units and affordable housing.

The Subject Lands can provide an appropriate range and mix of uses that will contribute to the creation of a complete community, particularly in providing for a range of housing types including 10% of units being attainable housing which would include higher-density forms of housing and seniors housing as well as providing a Community Park that will round out the Brooklin Community.

The Subject Lands are well served by Brawley Road and Baldwin Street North, which are Type A Arterial Roads, Myrtle Road which is a Type B Arterial Road, and Duffs Road which is a local road. In accordance with the recommended active transportation network identified in the Whitby Active Transportation Plan, there is an existing active transportation network along Myrtle Road, proposed multi-use path along Brawley Road, and a proposed signed route along Duffs Road. It is expected that as the Brooklin Community develops, transit will be expanded and the Subject Lands can be serviced by transit.

The Brooklin Community is planned to accommodate a range of park types and sizes that will facilitate varying recreational facilities. An off-road trail system is planned throughout the Natural Heritage System and the Trans Canada Pipeline Corridor in the Brooklin Community. Through the Subject Lands, the off-road trail system could be similarly accommodated in the Natural Heritage System and along the hydro corridor to connect to the Brooklin Community. It is expected that a number of public service facilities will be accommodated within the Brooklin Community which could serve the population anticipated by the development of the Subject Lands. Furthermore, a Community Park is anticipated to be accommodated on the Subject Lands which would round out the public service facilities planned for in the Brooklin Community.

A full range and mix of housing options can be provided on the Subject Lands, including attainable forms of housing (e.g. townhouses of all forms, secondary units, apartments and seniors housing).

7) The lands have the characteristics that would enable housing to be built in the near -term.

The Subject Lands are located adjacent to the developing Brooklin Community, of which the last phase of development is anticipated to occur in 2023. Given the Subject Lands proximity, it is expected that they will serve as a fourth phase of development and an extension of the Brooklin Community. The Subject Lands can utilize the existing vision, guiding principles, policies and practices already established in the Brooklin Community Secondary Plan and Comprehensive Block Plan to expedite the land use planning for the area. Based on the Servicing Feasibility Memorandum dated December, 2022 prepared by Candevcon East Limited, it is also understood that infrastructure can be cost-effectively and efficiently extended to the Subject Lands. Should the Subject Lands be removed from the Greenbelt Plan area, they could take advantage of existing policies and infrastructure and therefore have the characteristics that would enable housing to be built in the near-term, with development starting as early as 2025.



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E-mail: mgpgen@mgp.ca

March 22, 2005

Honourable John Gerretsen
Minister of Municipal Affairs & Housing
777 Bay Street, 17th Floor
Toronto, Ontario
M5G 2E5

04:1340

Honourable Minister:

I am a consulting planner and I represent Brooklin Golf Club Limited who own over 500 acres north of Brawley Road in north Whitby. The Greenbelt Plan has included this area as part of the "Protected Countryside", although the lands were not included in the draft Greenbelt Plan.

Your Ministry and the Legislative Committee received considerable input on the draft Greenbelt Plan. Since my client's lands were not included, he did not feel that it was necessary to provide comments during these two consultation processes. My client was also aware that Whitby was considering these lands for inclusion in their urban boundary and believed that the Town's research by the consulting firm "Hemson" would be respected by your Ministry especially since Hemson are also retained by the Ministry of Public Infrastructure and Renewal to provide the growth forecasts used in the Province's draft Growth Plan. A copy of the Town's staff report detailing their research and logic is attached.

My client was shocked when I showed him the final Greenbelt boundary that included his land. There was no forewarning, or consultation that would have allowed representation on my client's behalf nor is there any rationale provided by your Ministry explaining why this area was included in the Greenbelt.

As a planner with over thirty years of experience, I have been trained to follow a decision making process that requires public dialogue and reasoned decisions made in a public forum. This is known as "due process" and clearly did not happen in this instance.

I recall that one of your government's campaign promises included "transparency" in decision making; however, your actions in North Whitby could not be less transparent or more arbitrary. Such actions would not be possible by a municipal or regional council and it is very disturbing that a legislator, without notice or reasoning can determine that laws and conventional practices should not apply to themselves and that you can dictate such decisions. Your arbitrary decision will unduly restrict Whitby's options for growth and creates significant limitations on my client's ability to use his land.

On behalf of my client, I request that you rescind the Greenbelt in this area and use the southern limit of the Oak Ridges Moraine as the Greenbelt limit, as proposed to the public in your draft Greenbelt Plan.

Yours very truly,
MALONE GIVEN PARSONS LTD.

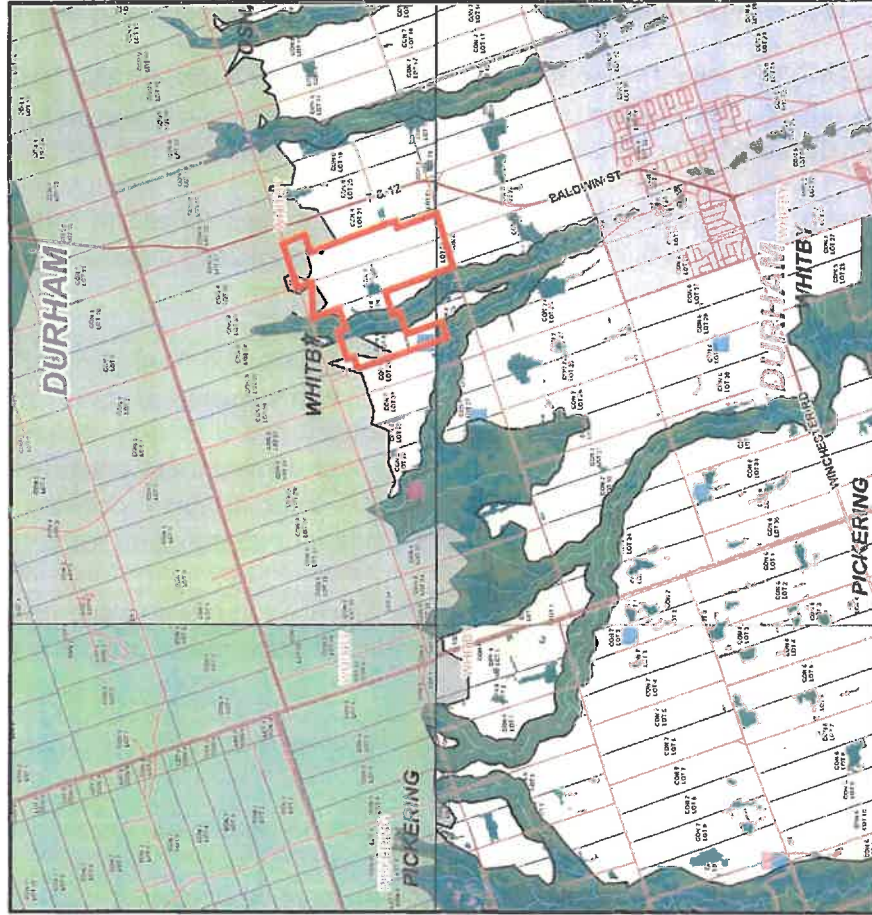

Don F. Given, MCIP, RPP
President

cc. Brooklin Golf Club Limited, Fax: 905-669-3840

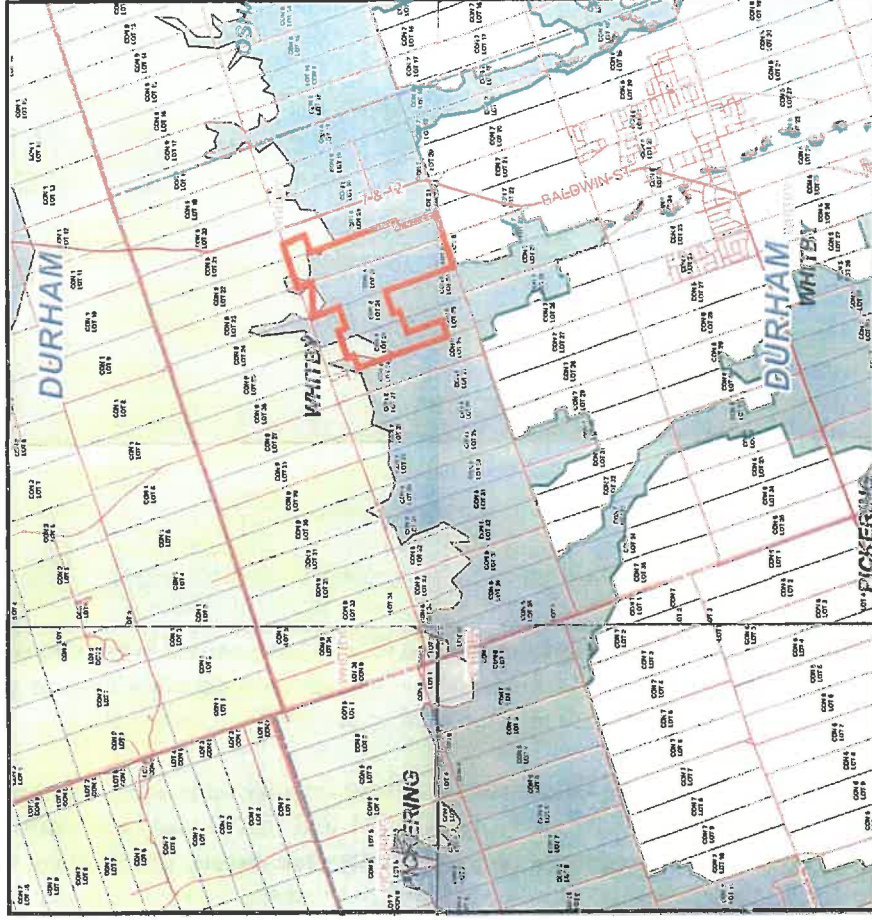
Attachments

NORTH WHITBY LANDS

Draft Greenbelt Plan-October 2004



Greenbelt Plan-February 2005



 Property Owned by Nick Cortellucci

May 9, 2005

John Gerretsen, Minister
Municipal Affairs & Housing
17th Floor, 777 Bay Street
Toronto, ON M5G 2E5

RE: DISPOSITION OF THE GREENBELT

Mr. Minister, on Tuesday, February 1, 2005 you invited me and other area Municipal Mayors and Senior Officials to overview our comments regarding the Greenbelt and ultimately the proposed legislation. At this meeting I took time to support your Ministry's initiatives as supported by Whitby Council and as per my letter to you in December, 2004.

During this meeting you had indicated that the Greenbelt was being defined by your land surveyors and that the plan is being finalized and was not available for the meeting. It was indicated it would be finalized in the near future.

It was with great dismay and concern that the Town of Whitby learned only after the fact that there was a major amendment to the Draft Greenbelt which brought all lands north of Brawley Road into the designation; an area of approximately 784 hectares. Mr. Minister, there was absolutely no pre-consultation with this Municipality about, what I suggest, were very significant changes and not merely definition of the lines established in the draft plan.

Further, no scientific reason or rationale has been supplied to explain the changes being made. Mr. Minister, full disclosure and public consultation is a cornerstone in the municipal planning approval process across Ontario. These rules are established, as you know, by the Province of Ontario.

It is my view that the consultation process, particularly with such major changes being proposed, has undermined a fundamental rule in terms of fair and full public consultation. It is my request that your Ministry take action to immediately review and provide the opportunity for the reconsideration of those lands brought into the Greenbelt Plan, located north of Brawley Road, and not found in the Draft Greenbelt Plan.

As a former Mayor you must know how it feels to have to make decisions and then have the province turn around and make them for you.

I look forward to your response.

Yours Truly,

Marcel L. Brunelle
MAYOR

**Minister of Municipal Affairs
and Housing**

Minister Responsible for Seniors

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April 28, 2005

Mr. Don F. Given
President
Malone Given Parsons Ltd.
140 Renfrew Drive
Suite 201
Markham ON L3R 6B3

Dear Mr. Given:

Thank you for your letter of March 22, 2005, with accompanying documentation, in which you convey your concerns about the inclusion of your client's property in the Greenbelt.

Our Greenbelt will improve the lives of millions of Ontarians and create a legacy for future generations. We want our children to be able to enjoy greenspaces and we want farmland to be protected for farming.

The Greenbelt Area was developed with the recognition that a balance must be struck between the need to protect environmentally sensitive and agricultural lands and the needs of growing communities, to ensure the permanence of the greenbelt. This was achieved through a systems approach, a combination of scientific and land use planning policy analysis to identify areas for permanent protection.

The Greenbelt Task Force identified the major river valleys connecting Lake Ontario to the Oak Ridges Moraine and the Niagara Escarpment as significant natural areas that should be protected. The 28 river valley connections in the Greenbelt Plan, including a number of north-south river corridors identified in the Oak Ridges Moraine Conservation Plan, connect the river systems in the urban areas with their headwater areas in the Oak Ridges Moraine and the Niagara Escarpment.

The draft Greenbelt Area boundary was reviewed based on what the government heard in consultations and was revised where requested changes were consistent with the goals and objectives of the *Greenbelt Act, 2005*. The Greenbelt Area includes lands that are environmentally sensitive and that form part of the Natural Heritage System identified in the Greenbelt Plan. In Durham, to protect the Lynde and Oshawa Creek Watersheds, the Greenbelt Area includes additional lands below the Oak Ridges Moraine. The inclusion of these lands in the Greenbelt was recommended during consultations by the Central Lake Ontario Conservation Authority.

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Mr. Don F. Given

The Greenbelt Plan balances the protection of greenspace with support for vibrant rural communities in the Greenbelt. Settlement Areas within the Greenbelt remain available for development and are subject to the normal municipal planning processes. Development under the *Planning Act* allows for the principles of community planning and appropriate land use to be considered. The Plan contains provisions for a wide range of uses, including the permission for existing uses to continue and expand, as the Plan allows.

The Places to Grow draft growth plan lays out the government's vision for growth in the Greater Golden Horseshoe over the next 30 years. It builds on and is complementary to the Greenbelt Plan in that it proposes to direct growth to urban centres. Between the Oak Ridges Moraine and existing Settlement Areas, as well as in other parts of the Golden Horseshoe, substantial areas have been set aside from the Greenbelt, that are intended to allow municipalities to accommodate growth over the long term.

The *Greenbelt Act, 2005* is now law and the Greenbelt Plan is now in place. However, I still appreciate hearing from stakeholders and members of the public on the government's approach to permanent greenbelt protection.

I would like to thank you for your interest as we work with municipalities, stakeholders and the public to implement this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Gerretsen', is written over the word 'Sincerely,'. The signature is stylized and somewhat abstract, with a large loop at the end.

John Gerretsen
Minister



**Central
Lake Ontario
Conservation**

Member of Conservation Ontario
November 17, 2005

100 Whiting Avenue
Oshawa, Ontario
L1H 3T3
Tel: (905) 579-0411
Fax: (905) 579-0994

Web: www.cloca.com
Email: mail@cloca.com

Mr. Donald F. Given, President
Malone Given Parsons Ltd.
140 Renfrew Drive, Suite 201
Markham, ON L3R 6B3

Dear Mr. Given:

**Subject: Brooklin Golf Course Regional Official Plan Amendment
Durham Regional File No. OPA 2005-011
Lots 21-25, Concession 8, Town of Whitby
CLOCA File No.: OPA 2005-011 – CLOCA IMS File: POFG594**

This will acknowledge receipt of your letter of November 10, 2005 concerning the Brooklin Golf Course proposal; I have the following comments.

1. Your view of the mandate and commenting role of CLOCA – the protection of watercourses and their associated vegetation – differs substantially from our own. In our role as watershed resource managers, we have ongoing programs in, and regularly comment upon, the following areas.

Groundwater: Quantity and Quality
Source Protection

Surface Water: Quantity and Quality

Flood Forecasting, Monitoring and Protection

Erosion Control

Natural Heritage: Valleylands
Woodlands
Wetlands
Wildlife Habitat
Species at Risk

Storm Water Management

Fisheries

Environmental Education

What we do on the land is mirrored in the water

Mr. Donald F. Given, President
Malone Given Parsons Ltd.

November 17, 2005
Page 2

Watershed Planning and Implementation

Conservation Areas: Acquisition and Management

Private Land Stewardship

In terms of our discussions with Ministry of Municipal Affairs and Housing officials during the Greenbelt consultation period, the emphasis was on the substantial body of knowledge that has been accumulated for the watersheds under CLOCA jurisdiction and our views as to the extent that urbanization of the Lynde Creek and Oshawa Creek watersheds can occur before their health is irreversibly impaired. To that end, it was our recommendation that the Greenbelt line in the Town of Whitby be drawn at Columbus Road, not further north at Brawley Road as was ultimately decided by the Province.

To the best of my recall, the subject of agricultural tablelands never came up.

Yours truly,



J.R. Powell,
Chief Administrative Officer
JRP/klt

cc Hon. John Gerretsen, Minister, Ministry of Municipal Affairs and Housing
cc John Burke, Deputy Minister, Ministry of Municipal Affairs and Housing
cc Audrey Bennett, Director, Provincial Planning and Environmental Services Branch,
Ministry of Municipal Affairs and Housing
cc Roger Anderson, Chair, Regional Municipality of Durham
cc G. O'Connor, Chair, Regional Municipality of Durham Planning Committee
cc A.L. Georgieff, Commissioner of Planning, Regional Municipality of Durham
cc M. Brunelle, Mayor, Town of Whitby
cc R. Short, Director of Planning, Town of Whitby
cc Chair and Members, CLOCA Board of Directors

s:\russ\Donald Given Nov17-05

2. MONITORING OF LAND DIVISION COMMITTEE DECISIONS OF APRIL 10, 2006 MEETING, FILE: 2.1.1.8 (2006-P-36)
RECOMMENDATIONS TO COUNCIL
- a) THAT Council concurs with the Land Division Committee's decisions of April 10, 2006; and
 - b) THAT the Land Division Committee be forwarded a copy of Report #2006-P-36 of the Commissioner of Planning and be advised of the decision.
3. QUARTERLY REPORT ON PLANNING ACTIVITIES (JANUARY 1, 2006 – MARCH 31, 2006), FILE: 1.2.7.19 (2006-P-37)
RECOMMENDATION TO COUNCIL
- THAT Report #2006-P-37 of the Commissioner of Planning be received for information.
4. CONSIDERATION OF ISSUES RELATED TO THE IMPLEMENTATION OF THE GREENBELT ACT, 2005 AND THE GREENBELT PLAN, FILE: L14-03-06 (2006-P-33) (2006-P-38)
RECOMMENDATIONS TO COUNCIL (REVISED)
- a) THAT staff be directed to forward a submission to the Minister of Municipal Affairs and Housing and the Greenbelt Council that incorporates the Region's issues with the Greenbelt Plan, as identified in Report #2006-P-33 of the Commissioner of Planning, and the following issues as set out in parts b) through e);
 - b) THAT the lands located between Audley Road/Lakeridge Road from Highway 401 to Taunton Road, in the Town of Ajax be designated future development area subject to the final alignment of the 401/407 Link and subject to removal from the Greenbelt Plan;
 - c) THAT the lands located in the Townline Road area of the Municipality of Clarington which are bounded by Townline Road, Pebblestone Road and the existing Courtice Urban Area Boundary also be designated future development area subject to removal from the Greenbelt Plan;

- d) THAT the lands located on the north east corner of Nash Road and Hancock Road, in the Municipality of Clarington also be designated future development area subject to removal from the Greenbelt Plan; and
- e) THAT the lands located north of Brawley Road, in the Town of Whitby, be removed from the Greenbelt Plan to reflect the draft Greenbelt Plan area as shown in Attachment #5 to Report #2006-P-38 of the Commissioner of Planning.

Respectfully submitted,
 J. Schell, Vice-Chair
 Planning Committee

MOVED by Councillor Schell, SECONDED by Councillor McMillen,
 (236) "THAT the recommendations contained in Items 1 to 3 inclusive of the Sixth Report of the Planning Committee be adopted."
 CARRIED

MOVED by Councillor Schell, SECONDED by Councillor McMillen,
 (237) "THAT the recommendations contained in Item 4 of the Sixth Report of the Planning Committee be adopted."
 CARRIED
 ON THE FOLLOWING RECORDED VOTE:

	COUNCILLORS	<u>YES</u>	<u>NO</u>
		Brenner	Johnson
		Brunelle	Jordan
		Clarke	Kolodzie
<u>Members Absent</u>		Crawford	Lutczyk
Gray		Cullen	O'Connor, L.
Nicholson		Drumm	Parish
G. O'Connor		Emm	Pidwerbecki
Mutton		McLean	Trim
		McMillen	
		Neal	
		Pearce	
		Perkins	
		Ryan	
		Schell	
		Self	
		Shier	

August 25, 2006

140 Renfrew Drive, Suite 201, Markham, Ontario,
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E-mail: dgiven@mgp.ca

www.mgp.ca

Mr. Alexander L. Georgieff, M.C.I.P., R.P.P.
Commissioner of Planning
Durham Region Planning Department
Durham Regional Headquarters, 4th Floor
605 Rossland Road East
P.O. Box 623
Whitby, Ontario
L1N 6A3

04-1340

Dear Mr. Georgieff:

**Re: August 29, 2006 Planning Committee Meeting
Item #2 a) - Commissioner's Planning Report 2006-P-60
Attachment #6 - Land to be Removed from the Greenbelt in Whitby**

In my previous correspondence to you on behalf of Brooklin Golf Club Limited who have submitted a Regional OPA application for a Golf Course north of Brawley Road, I have requested that the lands south of the Oak Ridges Moraine, and north of Brawley Road in Whitby be designated as 'Rural' or removed from the Greenbelt Area during your Greenbelt conformity exercise, in accordance with the Greenbelt Plan boundary shown in the draft Greenbelt Plan mapping of October 2004.

I was pleased to see that as part of your Official Plan Review Regional Council passed a resolution on May 10, 2006, that would remove lands from the Greenbelt located north of Brawley Road, in the Town of Whitby, to reflect the draft Greenbelt Plan area. This resolution is quoted below:

- a) "THAT staff be directed to forward a submission to the Minister of Municipal Affairs and Housing and the Greenbelt Council that incorporates the Region's issues with the Greenbelt Plan, as identified in Report #2006-P-33 of the Commissioner of Planning, and the following issues as set out in parts b) through e);
- b) THAT the lands located between Audley Road/Lakeridge Road from Highway 401 to Taunton Road, in the Town of Ajax be designated future development area subject to the final alignment of the 401/407 Link and subject to removal from the Greenbelt Plan;
- c) THAT the lands located in the Townline Road area of the Municipality of Clarington which are bounded by Townline Road, Pebblestone Road and the existing Courtice Urban Area Boundary also be designated future development area subject to removal from the Greenbelt Plan;
- d) THAT the lands located on the north east corner of Nash Road and Hancock Road, in the Municipality of Clarington also be designated future development area subject to removal from the Greenbelt Plan; and
- e) **THAT the lands located north of Brawley Road, in the Town of Whitby, be removed from the Greenbelt Plan to reflect the draft Greenbelt Plan area as shown in Attachment #5 to Report #2006-P-38 of the Commissioner of Planning.**

August 25, 2006

In review of Supplemental Attachment #6, item e), to Commissioner's report 2006-P-60, I note that it is the Region intent to continue to pursue these changes to the Greenbelt. However, I was concerned to see a mapping error in the Illustration #1 to this attachment, where only a small portion of the lands to be removed north of Brawley Road towards the eastern municipal boundary of the Town of Whitby are shown as being requested to be removed from the Greenbelt.

I have attached, as Figure 1 to this letter, a corrected version of Illustration #1 of Attachment #6 to Commissioner's report 2006-P-60, showing the areas to be requested removed from the Greenbelt in accordance with Regional Council's resolution. Furthermore, attached as Figure 2 to this letter, I have shown the same areas on Attachment #5 to Commissioner's report 2006-P-38, which is the draft Greenbelt Plan mapping.

I am requesting that Planning Committee correct the mapping area on Illustration 1, of Attachment 6 to Commissioner's report 2006-P-60, as depicted on the attached Figure 1 to this letter to show the total area to be removed from the Greenbelt in Whitby, reflecting the change from the Draft Greenbelt Plan to the Final, in accordance with Regional Council's direction on this matter.

Yours truly,
Malone Given Parsons Ltd

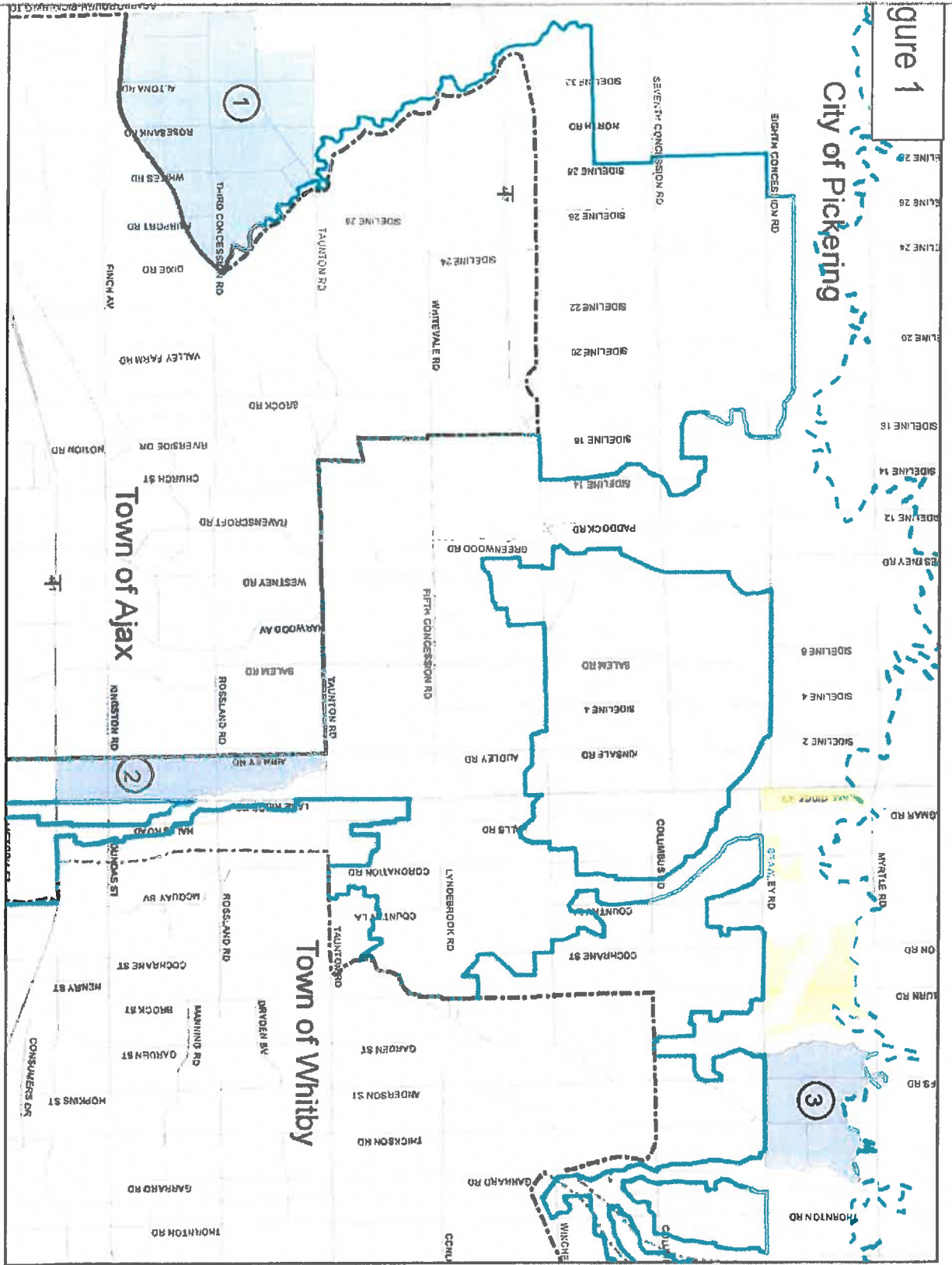


Donald P. Given, MCIP, RPP
President

cc. *Madame Chair and Member of Durham Regional Planning Committee*
R. Anderson – Chair, Region of Durham
Client

Figure 1

City of Pickering



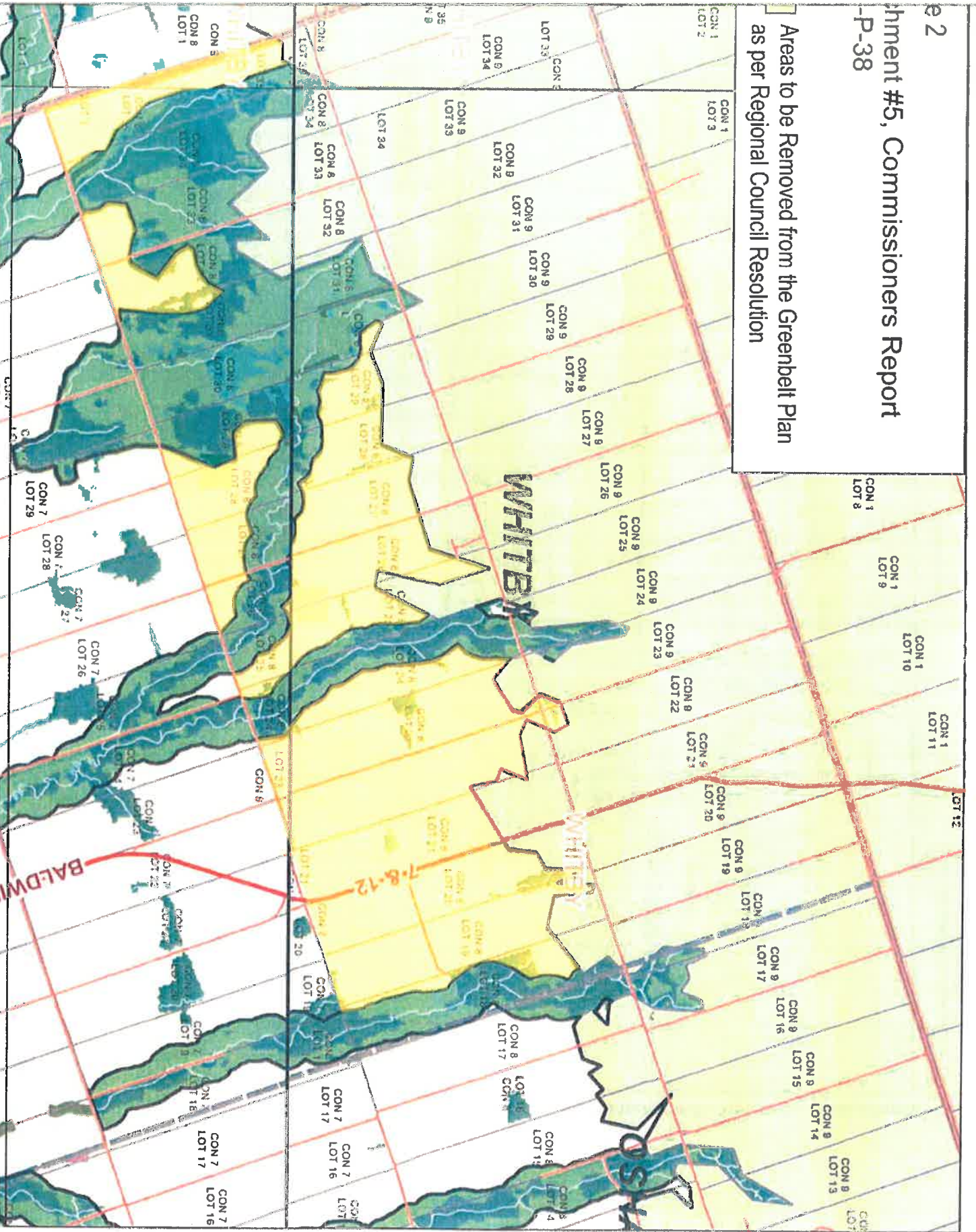
Supplemental Attachment 1 - Illustration 1

- Areas Requested to be Removed from the Greenbelt Plan Area
- Urban Area Boundary
- Urban Area Deferred Boundary
- Greenbelt Boundary
- Municipal Boundary
- Road
- Areas to be Removed from the Greenbelt Plan as per Regional Council Resolution



Attachment #5, Commissioners Report
-P-38

Areas to be Removed from the Greenbelt Plan
as per Regional Council Resolution



May 28, 2015

Mr. David Crombie and Panel Members
Advisory Panel - Coordinated Land Use Planning Review
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay St. Suite 425 (4th Floor)
Toronto, ON
M5G 2E5

*MGP File: 04 - 1340*Via email to landuseplanningreview@ontario.ca

Dear Messrs. and Madame:

**RE: Provincial Coordinated Review of Land Use Plans
Request of Removal of Greenbelt Designation
Golden Hill Developments Inc. and East Valley Farms Ltd.
Town of Whitby**

This letter is submitted on behalf of **Golden Hill Developments Inc. and East Valley Farms Ltd.** ("Brooklin North") who owns lands generally bound by Myrtle Road to the north, Baldwin Street to the east, Brawley Road to the south and Ashburn Road to the West (the "subject lands", (see *Figure 1*)). We are writing to request that the subject lands be removed from the Greenbelt, which were added after the Draft Greenbelt Plan was released in 2004. We continue our previous requests to the Durham Region Planning Department on April 7, 2014 (see *Appendix I*), pertaining to Greenbelt removal and, in addition, we respectfully request that the subject lands be included in the Whitebelt to protect for long term growth needs as part of the Provincial Coordinated Review.

Requests

For the reasons outlined in this letter, we have the following requests regarding the Greenbelt Plan review:

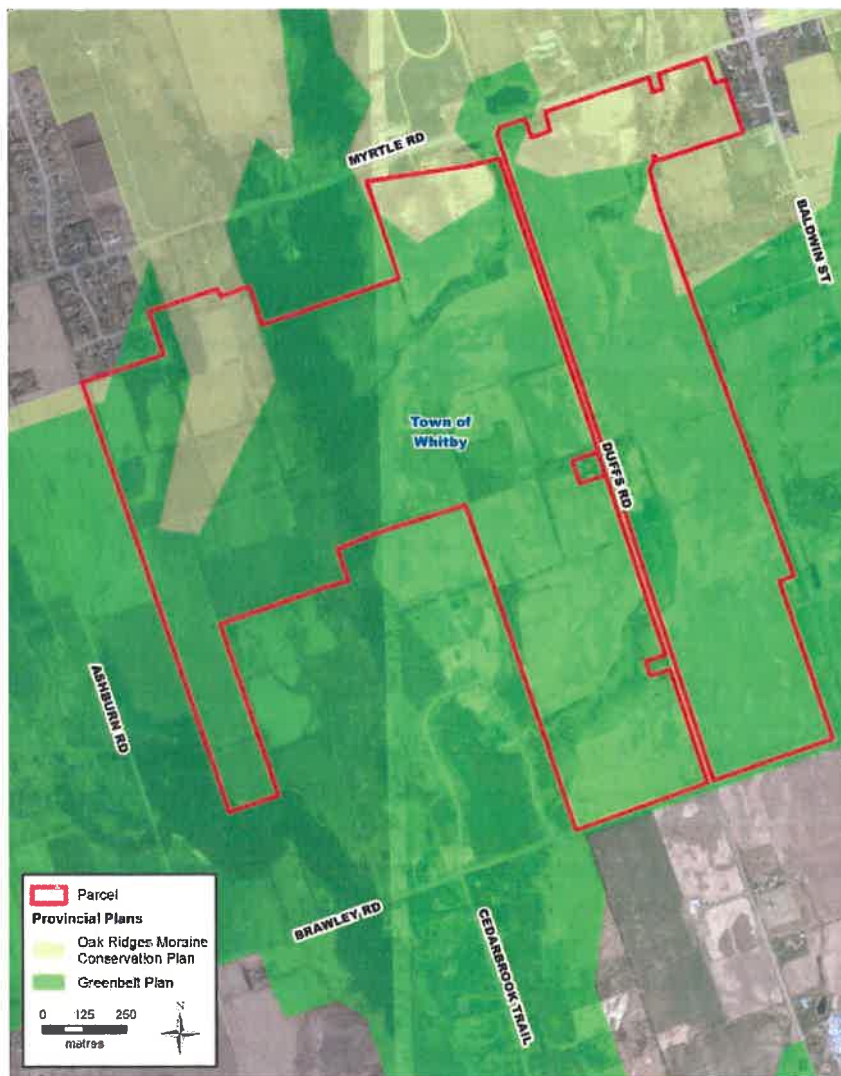
- 1) Remove all lands from the Greenbelt that were added after the Draft Greenbelt Plan was released;
- 2) Expand the opportunity for major recreation throughout the Greenbelt by allowing approval authorities the flexibility to evaluate proposals based on criteria that recognizes the benefits to the community of active recreational facilities including golf courses and ski areas. This will require an amendment to the Greenbelt Plan, which prohibits most non-agricultural uses including major recreation within Prime Agricultural Areas;
- 3) Establish an amendment process with appeal provisions that allows municipalities to consider applications that would seek to amend the Greenbelt Plan outside of the 10-year review period; and,
- 4) That the Province remove the policy restricting amendments from reducing the total land area (net loss) of the Greenbelt Plan.

The removal of the subject lands from the Greenbelt Plan would permit the proposed golf course development subject to the ROPA application submitted by Brooklin North.

Background

Detailed background information is provided in the April 17, 2014 letter submitted to the Region and attached as *Appendix 1*. In summary, the subject property was not included in the Draft Greenbelt Plan released by the Province in October 2004, however, upon review of the final Greenbelt Plan released on February 28, 2005, the subject lands, along with the lands of many others were included within the Greenbelt Plan and designated as *Protected Countryside*. This modification occurred without any advisement and Brooklin North was afforded no opportunity to challenge the final Greenbelt Plan. *Figure 2* shows a comparison of the Draft and Final Greenbelt Plan mapping.

Figure 1 Site Location



Source: Malone Given Parsons (2015)

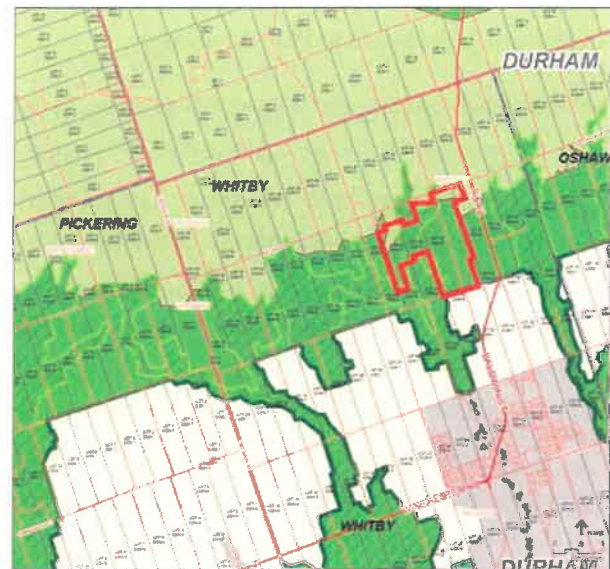
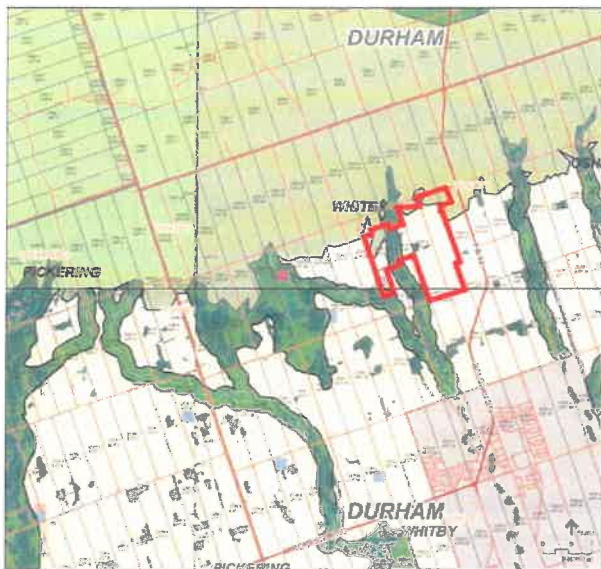
Figure 2 Draft to Final Greenbelt Plan

ATTACHMENT #1

Malone Given Parsons Ltd.

Draft Greenbelt Plan (October 2004)

Final Greenbelt Plan (February 2005)



Source: Malone Given Parsons (2015)

The subject lands are designated *Permanent Agricultural Reserve*, and does not allow non-agricultural uses (i.e. golf courses), as *per* the Greenbelt Plan. To overcome this limitation, Brookline North submitted a ROPA application to request a *Rural* designation for the subject lands as part of the Region's Official Plan Review. However, ROPA 114 was adopted by the Region in 2006 and continued to designate the subject lands as *Permanent Agricultural Reserve* and with a portion being *Major Open Space*. On October 18, 2006 Brooklin North appealed ROPA 114.

Regional Council passed a resolution on May 10, 2006, that would remove lands from the Greenbelt located north of Brawley Road, in the Town of Whitby, to reflect the draft Greenbelt Plan area. Our August 25, 2006 letter to the Region indicated a mapping omission inconsistent with the text of the Council resolution. We provided mapping illustrating the extent of the lands north of Brawley Road that should be included in the Council resolution. A copy of this letter is attached for your reference (*Attachment 2 of Appendix 1*).

Basis for Request

In addition to the fact that the Greenbelt Plan was finalized without any advisement or opportunity for Brooklin North to understand the rationale for the boundary and no appeals were permitted, the following summarizes the basis for our request to be removed from the Greenbelt Plan and to implement the original Draft Greenbelt Plan boundary:

- The process for creation of the Greenbelt boundary remains unclear, particularly as to how the boundaries were established and against what measures (scientific, community request, expert opinion, political decision). These measures should be clearly articulated for the purposes of considering alterations to the boundaries.
- In an April 28, 2005 letter, the Minister of Municipal Affairs and Housing explained that the inclusion of lands south of the Oak Ridges Moraine was recommended by CLOCA. In a November 17, 2005 letter, CLOCA advised that their recommendation was based on "...our views as to the extent that that urbanization of the Lynde Creek and Oshawa Creek watersheds can occur before their health is irreversibly impaired." In our opinion, these views of CLOCA do not constitute sufficient justification for major changes to the Greenbelt boundary. Throughout the ROPA and subsequent site plan and zoning approval processes, the onus is on Brooklin North to ensure there are no unacceptable impacts on environmental features through an EIS satisfactory to CLOCA, the Region and Town. This decision by MMAH did not take into account any detailed environmental study, which would be completed on behalf of Brooklin North to permit the golf course use.
- The Final Greenbelt boundary does not reflect the limits endorsed by the Greenbelt Advisory Committee nor the Draft Greenbelt Plan posted on the Environmental Bill of Rights Registry.
- A net of approximately 4,025 hectares were added to the Greenbelt in Durham Region in the final Greenbelt Plan that were not included in the Draft. *Attachment #3 of Appendix 1* shows the differences between the Draft and Final Greenbelt Plans across the Region of Durham with lands added shown in orange. *Attachment #4 of Appendix 1* shows the differences between the Draft and Final Greenbelt Plans across the Golden Horseshoe with lands added in the Final shown in red and lands removed shown in blue. In comparison to Durham, other Regions in the GTA each had an overall net loss of lands in the Greenbelt including York (-130 ha), Peel (-58 ha) and Halton (-1,588 ha).
- At their May 19, 2015 meeting, the Region of Durham Planning & Economic Development Committee endorsed amendment to the Greenbelt Plan to provide municipalities, and conservation authorities in consultation with municipalities, the authority to confirm the presence, nature and extent of natural heritage features, and identify a simple process to correct designations and mapping within the boundaries of the Greenbelt Plan Area. The Committee also endorsed the establishment of a clearly defined process to consider minor adjustments to the boundaries of the Greenbelt Plan Area at the site or localized level, under strict criteria.

-
- Other Regions have raised concerns over a need for a review of the Greenbelt Plan and ORMCP area and designation boundaries. York Region, for example in their May 21, 2015 Staff Report, note that in some instances draft mapping varied significantly from final mapping and recommends that the province develop a process to confirm or correct boundaries associated with the Provincial Plans.
 - Approximately 80% of all land in Durham Region is included in the Greenbelt Plan and Oak Ridges Moraine Conservation Plan – the most of any Region in the GTA. This, in combination with the lack of a Rural designation, precludes opportunities for recreational and other non-agricultural uses throughout the majority of the Region.
 - Preliminary hydrogeologic and environmental work was completed on behalf of Brooklin North in 2005 and preliminary conclusions stated that the proposal could be continued while maintaining ground water quantity and while respecting the environmental features.
 - The removal of the subject lands from the *Permanent Agricultural Reserve* designation would be minor, as the subject lands amount to 0.3% of the total agricultural lands in the Region.
 - On behalf of Brooklin North, a preliminary Agricultural Assessment was completed. The study stated that agricultural field sizes on the subject lands are small and disconnected due to the Lynde Creek system traversing the site. The assessment identified some prime soils, however the rural residential development to the south and villages of Myrtle and Ashburn contribute to fragmented agriculture. Also, the agricultural use of the subject lands has been limited. Based on this preliminary assessment, it is our opinion that the subject lands would be appropriately designated within a *Rural* designation.
 - It is our opinion that insufficient lands are available in the *Major Open Space* system to serve the recreational needs of the Region to 2031. This opinion is premised on the assumption that *Major Open Space* lands, which typically include significant environmental features, are subject to increased environmental standards under the PPS that will further restrict or prohibit golf courses.
 - Section 1.1.4.1 of the 2014 PPS (in effect date: April 30, 2014) provides more latitude and policy direction for rural areas as it applies to development, recreation, tourism and job creation:
“Healthy, integrated and viable rural areas should be supported by:
 - a) building upon rural character, and leveraging rural amenities and assets;*
 - b) promoting regeneration, including the redevelopment of brownfield sites;*
 - c) accommodating an appropriate range and mix of housing in rural settlement areas;*
 - d) encouraging the conservation and redevelopment of existing rural housing stock on rural lands;*
 - e) using rural infrastructure and public service facilities efficiently;*
 - f) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*
 - g) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;*
 - h) conserving biodiversity and considering the ecological benefits provided by nature;*
 - and,*
 - i) providing opportunities for economic activities in prime agricultural areas, in*

accordance with policy 2.3.”

- Section 1.1.5.3 of the 2014 PPS states that “Recreational, tourism and other economic opportunities should be promoted.” This policy is also included in the current PPS (2005) under Section 1.1.4.1g). .
- Section 2.3.6.b) of the 2014 PPS has criteria for non-agricultural uses in prime agricultural areas: *“Planning authorities may only permit non-agricultural uses in prime agricultural areas for:*
 - b) limited non-residential uses, provided that all of the following are demonstrated:*
 - 1. the land does not comprise a specialty crop area;*
 - 2. the proposed use complies with the minimum distance separation formulae;*
 - 3. there is an identified need within the planning horizon provided for in policy 1.1.2 for additional land to be designated to accommodate the proposed use; and*
 - 4. alternative locations have been evaluated, and*
 - i) there are no reasonable alternative locations which avoid prime agricultural areas; and*
 - ii) there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.”*

Similar criteria is included in the current PPS (2005). In our opinion, the proposed golf course is consistent with these policies as the lands are not a specialty crop area, the minimum distance separation formulae can be met, the Region has shown a need for new golf courses (outlined below) and the MGP assessment shows no reasonable alternatives for new golf courses in non-prime agricultural lands.

- The background report (2003) to the Region’s Official Plan review estimated the demand for new golf courses in the Region to be in the range of 18 to 44 new courses to the year 2021. The pressure to urbanize lands south of the Greenbelt may result in golf courses converting to urban uses, which could drive the demand for more courses beyond the estimated range. Based on this report, there is a need for new golf courses in the Region.
- In our opinion, there is insufficient land outside the Greenbelt for recreational uses to meet this estimated demand, as growth forecasts in the Growth Plan need to be met.
- The Region’s Official Plan is not typical of other Regional Official Plans subject to the Greenbelt Plan as there is no specific rural designation. This results in the majority of lands included in the Greenbelt being designated with an agricultural designation. This structure results in implementation of the Greenbelt Plan that is more restrictive than other Regions in the GTA, as they have rural areas allowing for a full range of recreational uses.
- Different from other upper-tier municipalities in the GTA, Durham Region does not have a corresponding Rural designation in its Official Plan. During implementation, the Region used the *Major Open Space* designation as a surrogate for a Rural designation. Most of the *Major Open Space* policies correspond to environmental features and areas and consequently, there are limited opportunities to provide major recreational uses in this designation.

-
- The lack of a Rural designation in the Regional Official Plan undermines the ability of the Region to achieve the Settlement Area goals of the Greenbelt Plan. Section 1.2.2.4 of the Greenbelt Plan outlines Settlement Area goals as follows:
 - a) *Support for a strong rural economy by allowing for the social, economic and service functions through the residential, institutional and commercial/industrial uses needed by the current and future population within the Greenbelt, particularly within settlements; and,*
 - b) *Sustaining the character of the countryside and rural communities.*
 - In our opinion, recreational opportunities in the Region are restricted by Regional policies that are weighted towards protection of agricultural and environmental throughout most of the Region without planning appropriately for recreation as required in the PPS. The restrictions on recreation and golf courses should be lifted for areas on the edge of the Greenbelt.
 - In our opinion, areas on the southern edge of the Greenbelt are ideal locations for major recreational uses and would provide a transition between future urban areas to the south and agricultural uses to the north within the Greenbelt.
 - Greater flexibility to permit new or expanded cultural, recreational, and tourism uses has been endorsed by the Durham Regional Planning & Economic Development Committee at their meeting on May 19, 2015.
 - The policies of the Greenbelt Plan in the Protected Countryside anticipate a distinction between Prime Agricultural Areas and Rural Areas, to be determined by municipalities only at the time of implementation of the Greenbelt Plan. This differs from the policies of the Oak Ridges Moraine Conservation Plan which allows municipalities to determine Prime Agricultural Areas/Rural Areas at any time. This approach should be permitted in the Greenbelt Plan.

Based on the above, it is our opinion that the subject lands should be removed from the Greenbelt Plan. We continue to request that the Province implement the Draft Greenbelt Plan boundary and in addition, we request that the Province consider the following:

- 1) an amendment to the Greenbelt Plan to allow non-agricultural uses (including recreational uses) within "Prime Agricultural Areas" based on criteria in the PPS;
- 2) establishment of an amendment process that allows municipalities to consider applications amending the Greenbelt Plan outside of the 10-year review period; and,
- 3) an amendment to the Greenbelt Plan removing the restriction to amendments reducing the total land area (net loss).

Comments on the Growth Plan

Overall, the Whitebelt is required to accommodate long term growth needs. There is approximately 1.1 million hectares of agricultural land in the GGH, or 36% of the land base of 3.1 million hectares. The Growth Plan plans for the GGH to accommodate 13.5 million people by 2041, which would result in a ratio of agricultural land at 0.08 ha per capita. The GTAH Whitebelt is approximately 40,950 ha – its use for urban uses would not result in a significant change in the per capita rate, where agricultural land per capita would remain at 0.08 ha per capita. In land terms, the total Built Up, Designated Greenfield Areas, Expansion Areas, and Whitebelt lands (which cumulatively could comprise the Settlement Area in total in the GGH to 2051) is 524,000 ha – with development of the accumulation of these lands, there would still remain a ratio of 2 agricultural ha for every 1 ha of settlement area in the GGH for the foreseeable future.

In contrast, preclusion of the Whitebelt from growth for the region would not be good planning for the following reasons:

- 1) It would result in a housing supply and mix in the existing urban areas that does not match the forecasted demography, thereby frustrating the achievement of growth targets of the Growth Plan;
- 2) It would not use existing and planned infrastructure effectively; squandering the existing and future investment in water, waste water, transit, roads, community facilities, and planning to accommodate growth;
- 3) It would result in a fragmented road pattern on the edge of urban areas that would make transit delivery on the periphery of the GTAH difficult or unachievable in the foreseeable future; and,
- 4) It would preclude any new land required to accommodate growth in the next 50 years from being provided contiguous to the largest urban communities – this would increase pressures to displace growth to other parts of the GGH, the Province, and beyond.

The Whitebelt should be planned and phased appropriately against minimum intensification targets in its entirety, and in concert with infrastructure master planning, to ensure communities are comprehensively planned and that there is a clear vision for growth in the GTAH for the lifespan of the Growth Plan.

Currently, the Growth Plan's lack of direction for planning new community areas results in incremental and fragmented planning of these areas; while the focus on intensification and guidance on infill development has greatly assisted municipalities in focusing as much growth as feasible into the Built Boundary and in intensifying Greenfield Areas, the lack of foresight in anticipating and providing a strategy for new community areas has resulted in uncoordinated settlement expansions within and between upper-tier municipalities. It has also meant that there are severe challenges to providing and funding new infrastructure. We recommend that the Growth Plan clearly identify the Whitebelt as a long-

term growth area, provide direction as to the planning of communities and infrastructure in this area, and make recommendations as part of the Big Move to create a web of transit that connects the northern portions of the GTAH with each other and to the south.

The lack of policy direction for the Whitebelt has forced municipalities to implement the forecasted growth through incremental planning, although the goal of the Growth Plan was to encourage comprehensive planning. Without a standard land budgeting methodology, municipalities have embarked on planning exercises with vastly different community results. Some communities are planned at 50 people and jobs per hectare and others at 70 or higher, often when preceding abutting development is occurring at much lower densities. In effort to assign growth to multiple communities to encourage them to develop as completely as possible, growth is occurring in small portions, often under a threshold that would result in a complete community and where customized road and servicing infrastructure is required that will need to be expanded when additional growth occurs.

The Growth Plan should be amended to identify the Whitebelt as a future growth area and protected for long term growth needs. Planning of new growth areas should be aligned in timeframes for planning infrastructure investment, which would result in a 50 year planning horizon for both, or a 2056 time horizon.

Thank you for the opportunity to provide comments. Should you have any questions or comments or wish to set up a meeting, please do not hesitate to contact us.

Yours very truly,
MALONE GIVEN PARSONS LTD.



Don Given, MCIP, RPP
President
dgiven@mgp.ca

Att: Appendix 1 – April 17, 2014 Letter to Durham Region

cc: Chair Roger Anderson and Members of Durham Region Council
Mayor Don Mitchell and Members of Whitby Town Council
Mr. R. Saunders, Durham Region
Mr. R. Short, Town of Whitby
Client

April 17, 2014

Mr. Jonah Kelly
Durham Region Planning Department
Durham Regional Headquarters, 4th Floor
605 Rossland Road East
P.O. Box 623
Whitby, Ontario
L1N 6A3

MGP File: 04-1340

Dear Mr. Kelly:

**RE: Durham Region Greenbelt Plan Review
Brooklin North Golf Course Inc.
Town of Whitby**

We are the planning consultants for Brooklin North Golf Course Inc. ("Brooklin North"), the owner of 263 hectares (650 acres) located on the south side of Myrtle Road extending southerly to Brawley Road and just west of Highway 12 in the Town of Whitby. These lands are shown on *Attachment #1* to this letter.

The purpose of this letter is to provide input to the Durham Region Greenbelt Plan Review.

Requests

For the reasons outlined in this letter, we have the following requests:

- 1) Remove all lands from the Greenbelt that were added after the Draft Greenbelt Plan was released;
- 2) The Region support an amendment to its Official Plan to designate the subject lands for a *Rural* land use;
- 3) Expand the opportunity for major recreation throughout the Greenbelt by allowing approval authorities the flexibility to evaluate proposals based on criteria that recognizes the benefits to the community of active recreational facilities including golf courses and ski areas. This will require an amendment to the Greenbelt Plan, which prohibits most non-agricultural uses including major recreation within Prime Agricultural Areas;
- 4) Establish an amendment process with appeal provisions that allows municipalities to consider applications that would seek to amend the Greenbelt Plan outside of the 10-year review period; and,
- 5) That the Province remove the policy restricting amendments from reducing the total land area (net loss) of the Greenbelt Plan.

The removal of the subject lands from the Greenbelt Plan would permit the proposed golf course development subject to the ROPA application submitted by Brooklin North. Alternatively, we ask that the Region support amendments to the Regional Official Plan through the Greenbelt Review process, specifically designating the subject lands for a *Rural* land use, which would permit the proposed golf course development.

Background

Malone Given Parsons Ltd. ("MGP") was retained by Brooklin North in January of 2003 to provide planning services to support the development of two 18 hole golf courses and a resort/conference centre on the subject lands by way of a ROPA application. At this time, preliminary background work and studies to support a ROPA application were commenced. Prior to the Region's Official Plan Review, the subject lands were designated *Permanent Agricultural Reserve* in the Regional Official Plan.

In October of 2004, the Draft Greenbelt Plan was released by the Province. The draft mapping did not include the subject lands within the boundary of the Greenbelt Plan nor designate it as *Protected Countryside*. The northerly portion of the subject lands that was previously included in the Oak Ridges Moraine Conservation Plan was shown as such on the draft mapping. From Pickering to Oshawa, the southern limit of the Greenbelt Plan generally followed the Oak Ridges Moraine boundary just south of Myrtle Road. Based on our review of the Draft Greenbelt Plan, it was our opinion that no further action was warranted and the proposed ROPA application would be not be affected by the proposed Greenbelt Plan. We therefore made no submissions to the Province on the Draft Greenbelt Plan.

On February 28, 2005 the Province released the final Greenbelt Plan. Upon review, my client's lands, along with the lands of many others were included within the Greenbelt Plan and designated as *Protected Countryside*. The southern limit of the Greenbelt Plan had generally been extended southerly to Brawley Road from Pickering to Oshawa. This modification occurred without any advisement and Brooklin North was afforded no opportunity to challenge the final Greenbelt Plan. **Attachment #1** shows a comparison of the Draft and Final Greenbelt Plan mapping as it relates to the subject lands (shown in red).

Section 4.1.1 of the Greenbelt Plan does not permit non-agricultural uses (i.e. golf courses) on lands designated Prime Agricultural Areas in the Official Plans. As such, the only opportunity to continue with the golf course proposal was to request a *Rural* designation for the subject lands as part of the Region's Official Plan Review. In July of 2005, MGP submitted a ROPA application on behalf of Brooklin North to permit the golf course development.

Section 5.3 of the Greenbelt Plan permits municipalities to amend the designation of prime agricultural areas and/or rural areas when brought into conformity with the Greenbelt Plan by way of a comprehensive review, subject to the rationalizing of boundaries to be minor. The Region did not re-designate the subject lands to a *Rural* during their comprehensive review.

ROPA 114 was adopted by the Region in 2006 and continued to designate the subject lands as *Permanent*

Agricultural Reserve and with a portion being *Major Open Space*. On October 18, 2006 Brooklin North appealed ROPA 114.

Regional Council passed a resolution on May 10, 2006, that would remove lands from the Greenbelt located north of Brawley Road, in the Town of Whitby, to reflect the draft Greenbelt Plan area. This resolution is quoted below:

- a) “THAT staff be directed to forward a submission to the Minister of Municipal Affairs and Housing and the Greenbelt Council that incorporates the Region's issues with the Greenbelt Plan, as identified in Report #2006-P-33 of the Commissioner of Planning, and the following issues as set out in parts b) through e);
- b) THAT the lands located between Audley Road/Lakeridge Road from Highway 401 to Taunton Road, in the Town of Ajax be designated future development area subject to the final alignment of the 401/407 Link and subject to removal from the Greenbelt Plan;
- c) THAT the lands located in the Townline Road area of the Municipality of Clarington which are bounded by Townline Road, Pebblestone Road and the existing Courtice Urban Area Boundary also be designated future development area subject to removal from the Greenbelt Plan;
- d) THAT the lands located on the north east corner of Nash Road and Hancock Road, in the Municipality of Clarington also be designated future development area subject to removal from the Greenbelt Plan; and
- e) **THAT the lands located north of Brawley Road, in the Town of Whitby, be removed from the Greenbelt Plan to reflect the draft Greenbelt Plan area as shown in Attachment #5 to Report #2006-P-38 of the Commissioner of Planning.”**

Our August 25, 2006 letter to the Region indicated a mapping omission inconsistent with the text of the Council resolution. We provided mapping illustrating the extent of the lands north of Brawley Road that should be included in the Council resolution. A copy of this letter is attached for your reference (*Attachment #2*).

Basis for Request

In addition to the fact that the Greenbelt Plan was finalized without any advisement or opportunity for Brooklin North to understand the rationale for the boundary and no appeals were permitted, the following summarizes the basis for our request to remove from the Greenbelt Plan and to support the original Draft Greenbelt Plan boundary:

- The process for creation of the Greenbelt boundary remains unclear, particularly as to how the boundaries were established and against what measures (scientific, community request, expert

- opinion, political decision). These measures should be clearly articulated for the purposes of considering alterations to the boundaries.
- In an April 28, 2005 letter, the Minister of Municipal Affairs and Housing explained that the inclusion of lands south of the Oak Ridges Moraine was recommended by CLOCA. In a November 17, 2005 letter, CLOCA advised that their recommendation was based on "...our views as to the extent that that urbanization of the Lynde Creek and Oshawa Creek watersheds can occur before their health is irreversibly impaired." In our opinion, these views of CLOCA do not constitute sufficient justification for major changes to the Greenbelt boundary. Throughout the ROPA and subsequent site plan and zoning approval processes, the onus is on Brooklin North to ensure there are no unacceptable impacts on environmental features through an EIS satisfactory to CLOCA, the Region and Town. This decision by MMAH did not take into account any detailed environmental study, which would be completed on behalf of Brooklin North to permit the golf course use.
 - The Final Greenbelt boundary does not reflect the limits endorsed by the Greenbelt Advisory Committee nor the Draft Greenbelt Plan posted on the Environmental Bill of Rights Registry.
 - A net of approximately 4,025 hectares were added to the Greenbelt in Durham Region in the final Greenbelt Plan that were not included in the Draft. *Attachment #3* shows the differences between the Draft and Final Greenbelt Plans across the Region of Durham with lands added shown in orange. *Attachment #4* shows the differences between the Draft and Final Greenbelt Plans across the Golden Horseshoe with lands added in the Final shown in red and lands removed shown in blue. In comparison to Durham, other Regions in the GTA each had an overall net loss of lands in the Greenbelt including York (-130 ha), Peel (-58 ha) and Halton (-1,588 ha).
 - Approximately 80% of all land in Durham Region is included in the Greenbelt Plan and Oak Ridges Moraine Conservation Plan – the most of any Region in the GTA. This, in combination with the lack of a Rural designation, precludes opportunities for recreational and other non-agricultural uses throughout the majority of the Region.
 - Preliminary hydrogeologic and environmental work was completed on behalf of Brooklin North in 2005 and preliminary conclusions stated that the proposal could be continued while maintaining ground water quantity and while respecting the environmental features.
 - The removal of the subject lands from the *Permanent Agricultural Reserve* designation would be minor, as the subject lands amount to 0.3% of the total agricultural lands in the Region.
 - On behalf of Brooklin North, a preliminary Agricultural Assessment was completed. The study stated that agricultural field sizes on the subject lands are small and disconnected due to the Lynde Creek system traversing the site. The assessment identified some prime soils, however the rural residential development to the south and villages of Myrtle and Ashburn contribute to fragmented agriculture. Also, the agricultural use of the subject lands has been limited. Based on this preliminary assessment, it is our opinion that the subject lands would be appropriately designated within a *Rural* designation.
 - It is our opinion that insufficient lands are available in the *Major Open Space* system to serve the recreational needs of the Region to 2031. This opinion is premised on the assumption that *Major*

Open Space lands, which typically include significant environmental features, are subject to increased environmental standards under the PPS that will further restrict or prohibit golf courses.

- Section 1.1.4.1 of the 2014 PPS (in effect date: April 30, 2014) provides more latitude and policy direction for rural areas as it applies to development, recreation, tourism and job creation:

“Healthy, integrated and viable rural areas should be supported by:

- a) building upon rural character, and leveraging rural amenities and assets;*
 - b) promoting regeneration, including the redevelopment of brownfield sites;*
 - c) accommodating an appropriate range and mix of housing in rural settlement areas;*
 - d) encouraging the conservation and redevelopment of existing rural housing stock on rural lands;*
 - e) using rural infrastructure and public service facilities efficiently;*
 - f) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*
 - g) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;*
 - h) conserving biodiversity and considering the ecological benefits provided by nature;*
- and,*
- i) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 2.3.”*

- Section 1.1.5.3 of the 2014 PPS states that “Recreational, tourism and other economic opportunities should be promoted.” This policy is also included in the current PPS (2005) under Section 1.1.4.1g).
- Section 2.3.6.b) of the 2014 PPS has criteria for non-agricultural uses in prime agricultural areas:
“Planning authorities may only permit non-agricultural uses in prime agricultural areas for:
 - b) limited non-residential uses, provided that all of the following are demonstrated:*
 - 1. the land does not comprise a specialty crop area;*
 - 2. the proposed use complies with the minimum distance separation formulae;*
 - 3. there is an identified need within the planning horizon provided for in policy 1.1.2 for additional land to be designated to accommodate the proposed use; and*
 - 4. alternative locations have been evaluated, and*
 - i) there are no reasonable alternative locations which avoid prime agricultural areas; and*
 - ii) there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.”*

Similar criteria is included in the current PPS (2005). In our opinion, the proposed golf course is consistent with these policies as the lands are not a specialty crop area, the minimum distance separation formulae can be met, the Region has shown a need for new golf courses (outlined below) and the MGP assessment shows no reasonable alternatives for new golf courses in non-prime agricultural lands.

- The background report (2003) to the Region’s Official Plan review estimated the demand for new golf courses in the Region to be in the range of 18 to 44 new courses to the year 2021. The pressure to urbanize lands south of the Greenbelt may result in golf courses converting to urban

uses, which could drive the demand for more courses beyond the estimated range. Based on this report, there is a need for new golf courses in the Region.

- In our opinion, there is insufficient land outside the Greenbelt for recreational uses to meet this estimated demand, as growth forecasts in the Growth Plan need to be met.
- The Region's Official Plan is not typical of other Regional Official Plans subject to the Greenbelt Plan as there is no specific rural designation. This results in the majority of lands included in the Greenbelt being designated with an agricultural designation. This structure results in implementation of the Greenbelt Plan that is more restrictive than other Regions in the GTA, as they have rural areas allowing for a full range of recreational uses.
- Different from other upper-tier municipalities in the GTA, Durham Region does not have a corresponding Rural designation in its Official Plan. During implementation, the Region used the *Major Open Space* designation as a surrogate for a Rural designation. Most of the *Major Open Space* policies correspond to environmental features and areas and consequently, there are limited opportunities to provide major recreational uses in this designation.
- The lack of a Rural designation in the Regional Official Plan undermines the ability of the Region to achieve the Settlement Area goals of the Greenbelt Plan. Section 1.2.2.4 of the Greenbelt Plan outlines Settlement Area goals as follows:
 - a) *Support for a strong rural economy by allowing for the social, economic and service functions through the residential, institutional and commercial/industrial uses needed by the current and future population within the Greenbelt, particularly within settlements; and,*
 - b) *Sustaining the character of the countryside and rural communities.*
- In our opinion, recreational opportunities in the Region are restricted by Regional policies that are weighted towards protection of agricultural and environmental throughout most of the Region without planning appropriately for recreation as required in the PPS. The restrictions on recreation and golf courses should be lifted for areas on the edge of the Greenbelt.
- In our opinion, areas on the southern edge of the Greenbelt are ideal locations for major recreational uses and would provide a transition between future urban areas to the south and agricultural uses to the north within the Greenbelt.
- The policies of the Greenbelt Plan in the Protected Countryside anticipate a distinction between Prime Agricultural Areas and Rural Areas, to be determined by municipalities only at the time of implementation of the Greenbelt Plan. This differs from the policies of the Oak Ridges Moraine Conservation Plan which allows municipalities to determine Prime Agricultural Areas/Rural Areas at any time. This approach should be permitted in the Greenbelt Plan.

Based on the above, it is our opinion that the subject lands should be removed from the Greenbelt Plan. We continue to request that the Region support the Draft Greenbelt Plan boundary and alternatively, amend the Regional Official Plan to a designate the subject lands for *Rural* land uses.

In addition, we request that the Region support:

- 1) an amendment to the Greenbelt Plan to allow non-agricultural uses (including recreational uses) within "Prime Agricultural Areas" based on criteria in the PPS;
- 2) establishment of an amendment process that allows municipalities to consider applications amending the Greenbelt Plan outside of the 10-year review period; and,
- 3) an amendment to the Greenbelt Plan removing the restriction to amendments reducing the total land area (net loss).

Thank you for the opportunity to provide comments. Should you have any questions or comments or wish to set up a meeting, please do not hesitate to contact us. We look forward to working with Regional staff throughout this process.

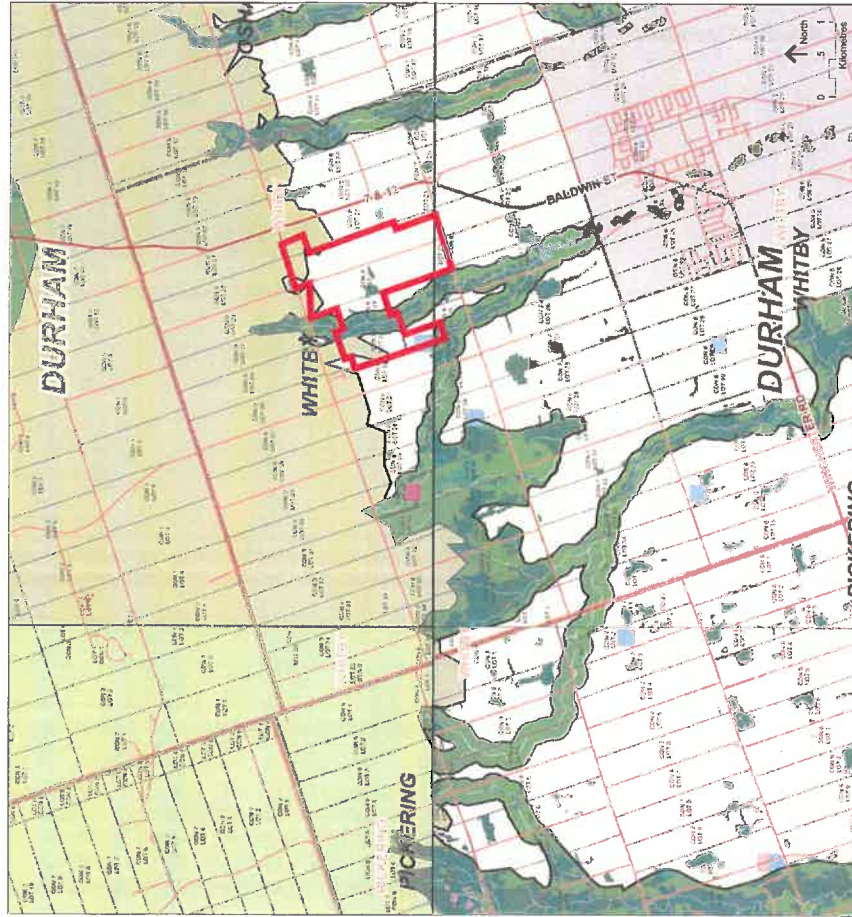
Yours truly,
MALONE GIVEN PARSONS LTD.



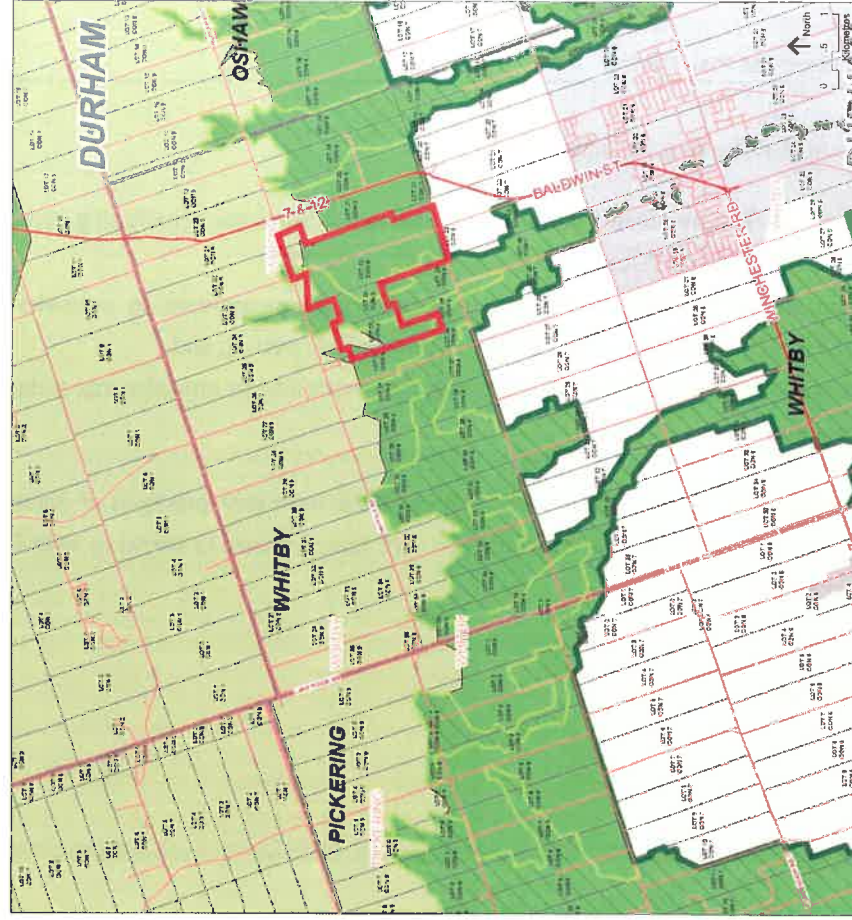
Don Given, MCIP, RPP
President

cc. R. Anderson – Chair, Region of Durham
N. Cortellucci
P. Mondell

Draft Greenbelt Plan (October 2004)



Final Greenbelt Plan (February 2005)



ATTACHMENT #2



August 25, 2006

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Commissioner of Planning
Durham Region Planning Department
Durham Regional Headquarters, 4th Floor
605 Rossland Road East
P.O. Box 623
Whitby, Ontario
L1N 6A3

04-1340

Dear Mr. Georgieff:

**Re: August 29, 2006 Planning Committee Meeting
Item #2 a) - Commissioner's Planning Report 2006-P-60
Attachment #6 - Land to be Removed from the Greenbelt in Whitby**

In my previous correspondence to you on behalf of Brooklin Golf Club Limited who have submitted a Regional OPA application for a Golf Course north of Brawley Road, I have requested that the lands south of the Oak Ridges Moraine, and north of Brawley Road in Whitby be designated as 'Rural' or removed from the Greenbelt Area during your Greenbelt conformity exercise, in accordance with the Greenbelt Plan boundary shown in the draft Greenbelt Plan mapping of October 2004.

I was pleased to see that as part of your Official Plan Review Regional Council passed a resolution on May 10, 2006, that would remove lands from the Greenbelt located north of Brawley Road, in the Town of Whitby, to reflect the draft Greenbelt Plan area. This resolution is quoted below:

- a) "THAT staff be directed to forward a submission to the Minister of Municipal Affairs and Housing and the Greenbelt Council that incorporates the Region's issues with the Greenbelt Plan, as identified in Report #2006-P-33 of the Commissioner of Planning, and the following issues as set out in parts b) through e);
- b) THAT the lands located between Audley Road/Lakeridge Road from Highway 401 to Taunton Road, in the Town of Ajax be designated future development area subject to the final alignment of the 401/407 Link and subject to removal from the Greenbelt Plan;
- c) THAT the lands located in the Townline Road area of the Municipality of Clarington which are bounded by Townline Road, Pebblestone Road and the existing Courtice Urban Area Boundary also be designated future development area subject to removal from the Greenbelt Plan;
- d) THAT the lands located on the north east corner of Nash Road and Hancock Road, in the Municipality of Clarington also be designated future development area subject to removal from the Greenbelt Plan; and
- e) **THAT the lands located north of Brawley Road, in the Town of Whitby, be removed from the Greenbelt Plan to reflect the draft Greenbelt Plan area as shown in Attachment #5 to Report #2006-P-38 of the Commissioner of Planning.**

In review of Supplemental Attachment #6, item e), to Commissioner's report 2006-P-60, I note that it is the Region intent to continue to pursue these changes to the Greenbelt. However, I was concerned to see a mapping error in the Illustration #1 to this attachment, where only a small portion of the lands to be removed north of Brawley Road towards the eastern municipal boundary of the Town of Whitby are shown as being requested to be removed from the Greenbelt.

I have attached, as Figure 1 to this letter, a corrected version of Illustration #1 of Attachment #6 to Commissioner's report 2006-P-60, showing the areas to be requested removed from the Greenbelt in accordance with Regional Council's resolution. Furthermore, attached as Figure 2 to this letter, I have shown the same areas on Attachment #5 to Commissioner's report 2006-P-38, which is the draft Greenbelt Plan mapping.

I am requesting that Planning Committee correct the mapping area on Illustration 1, of Attachment 6 to Commissioner's report 2006-P-60, as depicted on the attached Figure 1 to this letter to show the total area to be removed from the Greenbelt in Whitby, reflecting the change from the Draft Greenbelt Plan to the Final, in accordance with Regional Council's direction on this matter.

Yours truly,
Malone Given Parsons Ltd



Donald F. Given, MCIP, RPP
President

cc. *Madame Chair and Member of Durham Regional Planning Committee*
R. Anderson – Chair, Region of Durham
Client

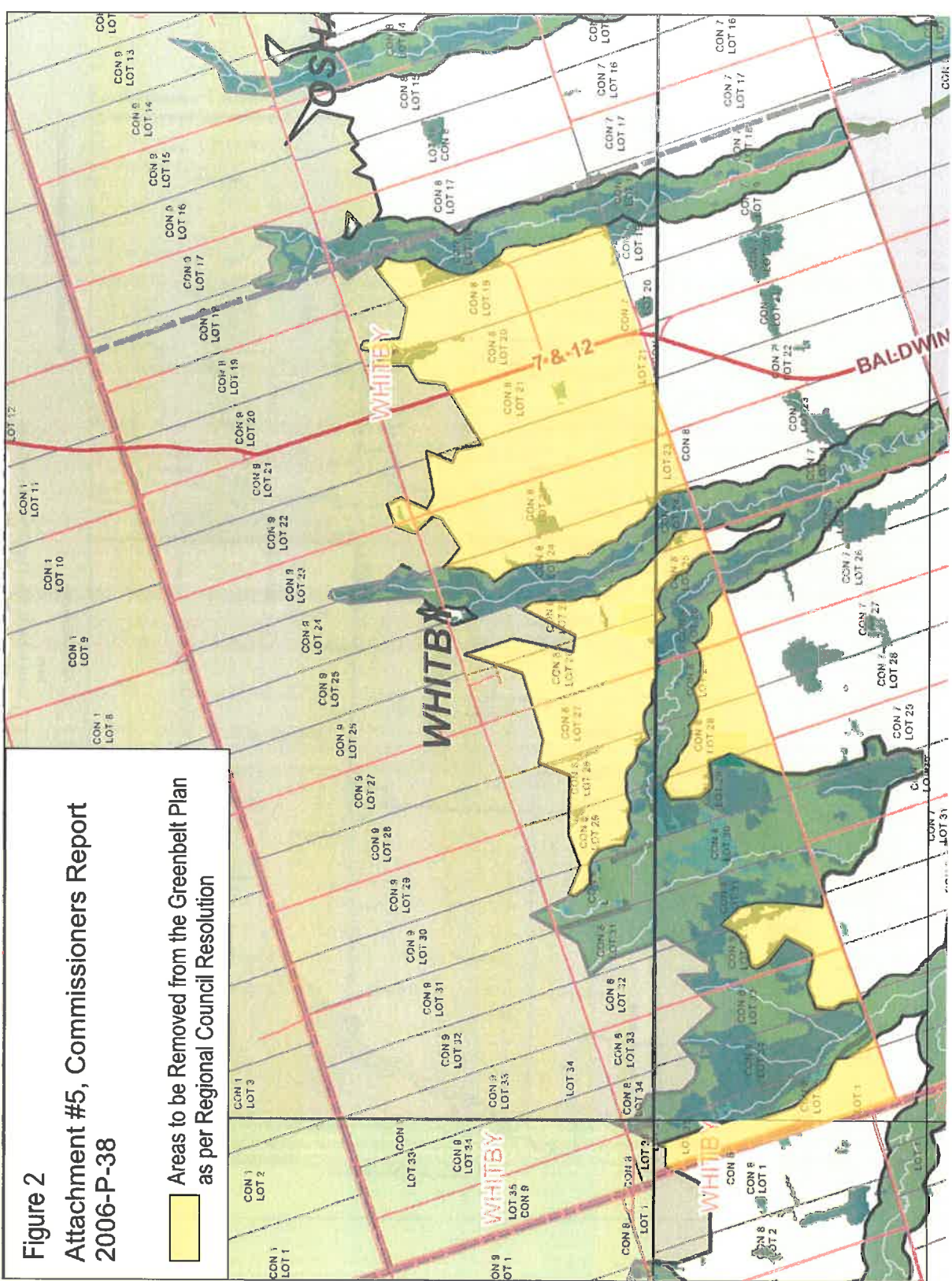
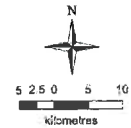
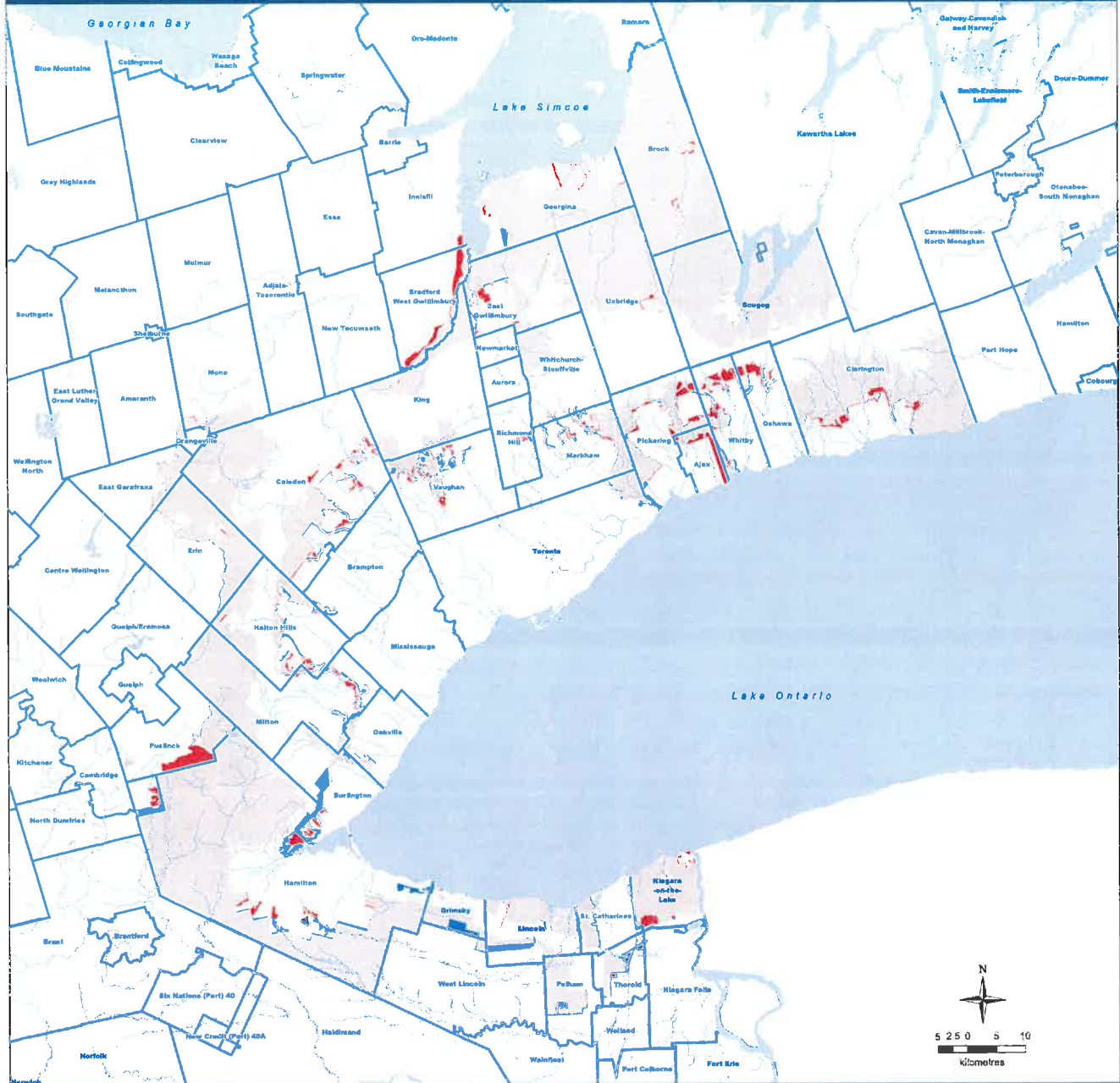


Figure 2
Attachment #5, Commissioners Report
2006-P-38

Areas to be Removed from the Greenbelt Plan
 as per Regional Council Resolution

GREENBELT COMPARISON



GREATER GOLDEN HORSESHOE AREA

Provincial Plans

- 2004 Draft Greenbelt Plan
- 2005 Approved Greenbelt Plan
- Area Consistent to both 2004 Draft and 2005 Approved Greenbelt Plans

Region	Draft Greenbelt Plan - Total Greenbelt Area (ha)	Draft Greenbelt Plan - Total Greenbelt Area (ha)	Change from Draft to Final (ha)
Durham	143,430	147,456	4,026
York	58,902	58,772	-130
Peel	25,865	25,807	-58
Halton	30,063	28,475	-1,588

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