



# BOUSFIELDS INC.

October 22, 2019

Project No. 16238-7

Municipality of Clarington  
Municipal Administrative Centre  
40 Temperance Street, 2<sup>nd</sup> Floor  
Bowmanville, ON L1C 3A6

Attention: Faye Langmaid, Manager of Special Projects

Dear: Ms. Langmaid

**Re: *Official Plan Amendment for Special Policy Area F, Future Vision of the Jury Lands (PSD-041-19)***

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We are the planning consultants for Lambs Road School Property Ltd., the owners of the lands generally located north of Concession Street East on the east and west sides of Lambs Road in Bowmanville (the “subject site”).

On behalf of our client we have been monitoring the Municipality’s process associated with the planning for the lands east of Lambs Road and for the lands west of Lambs Road from Concession Street north to the CPR line, identified as Special Policy Area F. We submitted a number of letters and attended meetings with Clarington staff on this matter over the past year. We have reviewed the draft of the proposed Official Plan Amendment (“OPA”) No. 121 and the staff report prepared for the September 30, 2019 (PSD-041-19) Planning and Development Committee meeting which was deferred at the meeting. We have also reviewed the OPA and the staff report prepared for the October 22, 2019 (PSD-041-19) Planning and Development Committee meeting. We note that no changes have been made to the draft materials since the September 30, 2019 meeting. As such, we continue to have concerns with the draft OPA in its current form. These concerns with the draft OPA are described below.

The maximum total unit target of 700 units does not provide the flexibility to accommodate future growth in the plan area. We continue to request that this target be modified to provide a range and that the range be 700 to 1,100 units within the Juryvale neighbourhood based on up to 650 low and 450 medium density units.

Furthermore, the OPA permits building heights to a maximum of 6-storeys only around the intersection of Lambs Road and Concession Street. In our opinion, heights of up to 6-storeys should be permitted in other parts of the plan area, including the developable areas adjacent to Lambs Road directly the north of the

Municipal Wide Park. In support of this request, we have previously provided examples of new development in proximity to heritage features. Further, it is our opinion that the proposed OPA should be modified to permit the integration of 6 storey buildings in appropriate areas of the plan.

As stated in previous communications, we recognize the unique physical context and the need to protect and integrate the natural and cultural heritage features with the proposed development, however, there are other provincial and regional policy directions regarding, amongst other matters, intensification within the built boundary and along corridors, and the efficient use of land that the Municipality's proposed direction for the development does not address.

The Clarington Official Plan provides that Priority Intensification Areas have been identified as the primary locations to accommodate growth and the greatest mix of uses, heights and densities. Clarington Official Plan Local Corridor policies indicate that the highest densities should be located along the entire Lambs Road frontage. Corridors are approximately 100 metres deep as measured from the extent of the ultimate road allowance (Policy 10.6.5). Given that the width of the Local Corridor is approximate, and that most of that 100 metres depth along the road is a part of the Natural Heritage System or the cultural features, there should be an opportunity to capture this density in northern most development area.

Further, the limitations with respect to height and density in the developable areas, particularly in the northern most development area, means that the overall density in the property as whole is further limited. The density limitations proposed by the municipality along Lambs Road are not consistent with the Regional Official Plan policies, in particular with respect to Local Corridors that are to be planned and developed with appropriate densities to support frequent transit services, and should be a wide variety of building forms with mid-rise predominating (Policy 8A.2.10). The draft OPA limits higher densities in the plan to only mid-rise development only at the intersection of Lambs Road and Concession Street whereas the Region and Clarington Official Plan policies would permit higher densities to be located along the entire Lambs Road frontage, per the Local Corridor policies.

With vast areas proposed for protection, density that would have resulted from development across the entire property will not be achieved. Applicable policies direct that decisions regarding development need to address the efficient use of resources and land, in part, resulting from intensification and more dense development. In this regard, the strict adherence to the boundaries of the Local Corridor as well as limitations with respect to height and density in the developable areas, mean that the overall density in the property as whole is further limited. This

is of particular importance to the developable area in the north end of the plan, because this area is identified as “internal to a neighbourhood”, however, the portion in the local corridor is entirely identified as natural areas.

***Conclusions***

We request that revisions be made to the proposed OPA which recognize the uniqueness of the subject site; integrate the permissions with respect to density and units counts that are contextually sensitive and in particular increase the height permissions in the developable lands at the north end of the plan area.

As written the OPA is not consistent with the Provincial Policy Statement and does not conform to the Growth Plan. As such, it is our opinion that the proposed amendment should not be adopted in its current form.

Yours truly,

**Bousfields Inc.**



Emma West, MCIP RPP

cc. *Kaitlin Corporation*