PLANNING JUSTIFICATION REPORT

407 / BROCK ROAD / BROUGHAM NODE

APPLICATION FOR OFFICIAL PLAN AMENDMENT

DECEMBER 2025

Prepared for: TFPM Inc.

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with Keleher Planning + Economic Consulting Inc.



Table of Contents

1. IN	ITRODUCTION	1
1.1	Context	1
1.2	Purpose	1
	OLICY FRAMEWORK	
2.1	PPS	3
2.2	Envision Durham	5
2.3	City of Pickering Official Plan	6
3. RI	EVIEW AND OPINION	11
3.1	Review and Analysis	12
3.2	Opinion	14

1. INTRODUCTION

1.1 Context

Seaton TFPM Inc. is the major landowner in the Pickering Highway 407/Brock Node (Node) (See Appendix A Ownership Map). This Node and the associated lands to the northwest, are, as illustrated on Map 1, generally bounded by:

- North: Hamlet of Brougham/Highway 7;
- East: Seaton Neighbourhood 20: Thompson's Corners/Greenbelt Plan boundary;
- South: Thompson's Corners Community Node/Medium Density Area designation;
 and,
- West: Seaton Natural Heritage System.

Highway 407 runs east/west through the centre of the Node, while Brock Road, a major arterial road, runs north/south and is located on the east side of the Node. A 407 Bus Rapid Transit (BRT) station and related parking area is located in the southwest quadrant of Highway 407 and Brock Road.

South and west of the 407 BRT station development of a residential subdivision is currently underway. To the north of the 407 the lands are largely rural with the exception of the Hamlet of Brougham which has a mix of residential and commercial uses, with some public facilities (ie. park) (Map 2)

The majority of this Node is currently designated in the City Official Plan, Seaton Neighbourhood 20: Thompson's Corners Neighbourhood Plan as "Prestige Employment Node". The associated block immediately to the west north of Highway 407 is designated "Prestige Employment". (See Map 1)

1.2 Purpose

Significant changes have been made to Provincial and Regional legislation and policy in recent years. A key change is the introduction of the Provincial Planning Statement in 2024 (PPS).

The PPS includes a new definition of "employment areas". This fundamental change was made after the approval by the Province of the new Region of Durham Official Plan - Envision Durham - in September and December 2024. The change to the PPS is therefore not reflected in that Plan or in the background analysis on which it is based.

The Regional Plan pursuant to Bill 23 is now deemed to be part of the City of Pickering's Official Plan. The City (and each area municipality) may repeal or amend the

Regional Plan, meaning that the City has responsibility for the Regional Plan as it pertains to the municipality.

The change to the employment area definition requires a reconsideration of the City's community structure and the extent of lands designated for "employment" as defined in the PPS. In particular, in our opinion, the extent, function and location of the lands in the Employment Areas designation in Envision Durham in Seaton, and the Prestige Employment designation in Seaton in the City's Official Plan must be reevaluated.¹

The City is examining these matters as part of its ongoing Official Plan Review, however the final approval of the new official plan by the Province is not anticipated for some time. In the meantime, direction with respect to the development of the Node is required immediately given proposed development currently under review. Further, consideration of the role of the Node as part of the Official Plan Review has already been recommended through the background work, in particular the Growth Management Strategy, City of Pickering, Final Report, Watson & Associates, May 2025 (Watson Report) (See Section 2.4 of this Report).

The purpose of this Planning Justification Report is to provide a planning opinion with respect to an application for amendments to both Envision Durham and the City's Official Plan regarding redesignation of lands in the Node. In addition, some preliminary consideration is given to the role of the associated Prestige Employment block north of Highway 407 and west of the Hamlet of Brougham.

The report establishes the current policy framework for the Node in the context of the PPS. It then reviews the implications of the changes in the definition of "employment area" in the PPS for the Node given the location. The report also considers the applicability of the guiding principles and criteria established in the Watson Report for reviewing employment land removals and conversions. Finally, it outlines proposed changes to Envision Durham and the City's Official Plan.

¹ Note: It is recognized that the Region of Durham Official Plan designates the Seaton Prestige Employment lands as "Employment Areas" on Map 1 – Regional Structure.

2. POLICY FRAMEWORK

This section outlines the Provincial and City policy frameworks, including that of Envision Durham.

2.1 **PPS**

The previous Provincial Policy Statement defined "employment areas" very broadly as:

"means those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities."

The new PPS defines "employment area" much more narrowly, in particular it excludes institutional and commercial uses, and office uses not associated with the primary employment use, and only permits research and development associated with manufacturing, as follows:

"means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary activities. An employment area also includes areas of land described in subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above."

It should also be noted that this definition mirrors the definition in Section 1 of the *Planning Act*.

As discussed in the attached Memorandum from Keleher Planning & Economic Consulting Inc. (Appendix B), the PPS in Section 2.8, Employment, provides policy direction to ensure the appropriate range and mix of employment uses as now defined in "employment areas".

The policies make it clear in Section 2.8.2 that such employment areas are limited to manufacturing, warehousing and goods movement and associated retail and office uses and ancillary facilities. Other uses which would currently be permitted in many employment areas including commercial, public service facilities and other institutional uses, and retail and office uses not associated with the primary employment use, are prohibited, as are residential uses.

At the same time, as Mr. Keleher notes:

"Therefore, lands with land use designations that are specifically excluded from the definition of employment areas are not subject to the policies regarding the protection of employment area lands in section 2.8.2 of the 2024 PPS. The 2024 PPS provides

numerous policies encouraging a range of employment uses throughout the municipality on lands outside employment areas."

Further, as set out in Policy 2.8.2.4, the PPS directs:

"Planning authorities shall assess and update employment areas identified in official plans to ensure the designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas."

At the same time, the PPS sets out in Policy 2.8.2.5 criteria for the removal of lands from employment areas:

"Planning authorities may remove lands from employment areas only where it has been demonstrated that:

- a) there is an identified need for the removal and the land is not required for employment area uses over the long term:
- b) the proposed uses would not negatively impact the overall viability of the employment area by:
 - 1. avoiding or where avoidance is not possible, minimizing and mitigating potential impacts to existing and planned employment area uses in accordance with policy 3.5;
 - 2. maintaining access to major goods movement facilities and corridors;
- c) existing and planned infrastructure and public service facilities area available to accommodate the proposed uses; and
- d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan."

Conclusion

The new PPS defines "employment area" much more narrowly that the previous Provincial Policy Statement, 2020. In particular, the PPS excludes institutional and commercial uses, and office uses not associated with the primary employment use, and only permits research and development associated with manufacturing. At the same time, the policies recognize that other types of employment uses may be located throughout the municipality. In addition, planning authorities are directed (i.e. shall):

"shall assess and update employment areas identified in official plans to ensure the designation is appropriate to the planned function of employment areas".

This direction is, in our opinion, to be undertaken in the context of the change in the definition of "employment areas", and not in the context of the directions with respect to

conversions. The proposed assessment and update is in response to the change in the definition. The review is to determine whether the current vision for these areas, and the related permitted uses and policies, are still appropriate and if so how the vision for the area is best realized in the context of the changes to the PPS.

2.2 Envision Durham

Envision Durham designates the majority of the developable lands in the Node as "Employment Lands" (See Map 3). The permitted uses in the Employment designation reflect the previous PPS definition and are broader than would be permitted under the current PPS definition including hotels, associated retail and ancillary facilities, research and development facilities and office. In particular, specifically in Sections 5.5.8 and 5.5.9, the policies establish the following:

"5.5.8 Encourage higher density employment generating uses, such as office buildings and other prestige employment uses, to locate in high exposure locations that offer convenient access to transit and transportation options.

5.5.9 Encourage major office uses within Employment Areas where they cannot be accommodated in Strategic Growth Areas. Support major office as part of integrated campus development where manufacturing, warehousing and/or research and development uses are provided."

With respect to Seaton, Envision Durham provides in Policy 5.6.1:

"Recognize that the lands within the Seaton Urban Area are to be developed in accordance with the City of Pickering Official Plan and associated neighbourhood plans."

Conclusion

The designation of lands in the Node and the associated lands as "Employment Lands" and related policy direction in Envision Durham reflects the previous definition of "employment area" in the PPS. It is also noted that Envision Durham provides that the lands in the Seaton Urban Area are to be developed in accordance with the Pickering Official Plan and associated neighbourhood plans. Both Plans establish a vision for employment lands in Seaton, and the Node in particular, which direct that the Node should be developed for "higher density employment generating uses, such as office buildings and other prestige employment uses".

This vision is not consistent with the new PPS definition. However, it is intended to allow for achievement of the projected employment developed in accordance the employment forecasts applicable at the time. ²

2.3 City of Pickering Official Plan

The City's current Official Plan designates the Node, the associated lands to the northwest and extensive lands north and south of Highway 407 to the west of the Node in Seaton as "Prestige Employment" (with the exception of lands in the Seaton Natural Heritage System -See Map 4). This designation is further refined and detailed policy direction provided in the Neighbourhood 20: Thompson's Corners Neighbourhood Plan for Seaton (Neighbourhood 20 Plan) (See Map 1).

The majority of the lands in the Node both north and south of Highway 407 are designated "Prestige Employment Node" in the Neighbourhhood 20 Plan. The unique character of this area is reflected in the very specific policies which are applicable to the Prestige Employment Node. The policies recognize the area as a "Node", albeit a "Prestige Employment Node" and provide policy direction which differs from those lands in the Prestige Employment General designation which is applicable to the associated lands to the northwest.

The policy direction effectively limits development to office uses as well as some limited commercial and service uses and community, cultural and recreational uses. Section 12.22 (e) (ii) of the Neighbourhood 20 Plan states with respect to the Prestige Employment Node that:

"warehousing, and light manufacturing, assembly and processing of goods shall be prohibited except in combination with a permitted use in the same building".

In reviewing Table 7 of the Official Plan which sets out the permitted uses in the Prestige Employment designation, taking into account the prohibited uses in the Seaton Prestige Employment designation as identified in Section 11.32 of the Official Plan, the permitted uses as noted are effectively limited to research and development facilities and:

"Offices, corporate office business parks, limited personal service uses serving the area, restaurants serving the area, retail sales as a minor component of an industrial operation, hotels, financial institutions serving the areas;

Community, cultural and recreational uses, and other uses with similar performance characteristics that area more appropriately located in the employment area."

² Note: Policy 2.1.2 of the PPS states that "municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning."

The lands in the Prestige Employment Node designation are bounded to the north by lands designated "Rural Hamlet" (Brougham) and to the south lands designated "Medium Density Area" and "Community Node".

With respect to the associated block designated "Prestige Employment" in the Neighbourhhood 20 Plan immediately to the west of the Hamlet, north of Highway 407, in addition to the prohibited uses in Policy 11.32, warehousing and other employment uses are prohibited.

Conclusion

The current Prestige Employment Node designation in the Neighbourhood 20 Plan is no longer consistent with the much narrower definition of "employment area" in the PPS. At the same time, the permitted uses will still generate significant employment and the general policy direction is appropriate for the location which includes a transit station. Some refinement of the terminology is required as well as to the exact boundaries of the designations and abutting designations to reflect the changes to the PPS.

The Prestige Employment designation applicable to the associated block to the west of the Hamlet, is also not consistent with the PPS definition. However, while these lands are associated with the Prestige Employment Node they were not designated as such. Their ultimate designation should be assessed as part of the overall Official Plan Review. However, to ensure the lands are evaluated on the same basis as the lands to the west the prohibition of warehousing and other employment uses is proposed to be deleted. This will ensure the lands are evaluated on the same basis as the lands to the west.

2.4 City of Pickering Official Plan Review

In May 2024, the City began a multiyear process to review and update the Official Plan. As part of the review, Watson & Associates (Watson) was retained to complete a Growth Management Review Study (GMRS) to inform the Official Plan update on how, and where, the City can accommodate population and employment growth.

As summarized in City Report PLN 16-25, June 9, 2025, key conclusions of the Watson report related to employment in Seaton, in particular, include the following:

- "From 2024 to 2051, the employment base for Pickering is forecast to increase by 50,300 employees, reaching 93,800 total jobs by 2051, which is consistent with Envision Durham,
- Employment growth is forecast to be accommodated in a broad range of sectors, with 49% in Population-Related Employment, 39% in Employment Land Employment, 12% Major Office Employment and a minor share in Rural-based Employment.

 Due to numerous broad changes to provincial planning policy and regional economic and real-estate market trends, the Seaton Employment lands must be reviewed as part of the Official Plan Review. Specifically, two Prestige Industrial Nodes, at Brock Road and Highway 407, and Whites Road and Highway 407 interchanges, will be considered to ensure the visions can be maintained while being consistent with new Provincial policy." (emphasis added)

The impacts of Provincial legislative changes on the Seaton Employment Area are then discussed as follows:

"The Seaton Employment Area has been planned to play a significant role in accommodating high quality employment opportunities in Pickering and the Region. All the employment lands in the Seaton Innovation Corridor are designated Prestige Employment in the current Pickering Official Plan.

The Prestige Employment designation requires higher performance standards, in appearance, and limits some manufacturing uses, due to the high visibility from major freeways and their proximity to residential areas and other sensitive land uses. Additionally, the Pickering Official Plan permits limited personal service uses, convenience commercial, restaurants and financial institutions, which are ancillary to, and serve, the employment area.

The Pickering Official Plan further limits the uses permitted in the Seaton Prestige Employment Area at gateway locations at Whites Road and Highway 407, and Brock Road and Highway 407 interchanges. These areas are defined as "Prestige Employment Nodes" due to the planned function as major gateways into the Seaton Employment area and the broader Pickering community. These Employment Nodes are envisioned to develop as corporate office business parks, with a focus on office uses, including free-standing major office buildings and/or employment uses which integrate office and prestige industrial operations in the same building. These lands are also supported by business employment and limited personal service uses serving the surrounding employment area.

These two Employment Nodes are located in Neighbourhood 20: Thompson's Corners and Neighborhood 21: Seaton Innovation Corridor of the Official Plan.

There are two related factors which require the long-term vision for the Seaton Employment Area to be re-examined as part of the Official Plan Review process. The first factor relates to changes to provincial planning policy with respect to the definition of Employment Area. The second factor relates to evolving non-residential real estate market conditions, specifically in the office sector, which has experienced a significant decrease in demand since the plan for Seaton was first approved.

As outlined in the Growth Management Strategy, Chapter 8, it is recommended that the Prestige Employment Node designation be further reviewed through Pickering Forward, in the context of the new provincial policy and the intent of the

planned function of the lands, specifically in relation to their proximity to residential and mixed-use developments. This may require the City to reconsider the Employment Area designation for these lands and explore options to maintain these areas as major gateways, with a range of employment uses that support both employment areas and non-employment areas."

Further, the Watson report states with respect to the Node (Section 8.6 Planning Considerations for Neighborhood 20: Thompson's Corners, Brock Road/Highway 407 Prestige Employment Node):

"....the Brock Road/Highway 407 Prestige Employment Node is a gateway location into the Seaton Employment Area and the broader Pickering community. The Pickering O.P. limits manufacturing uses in the node and permits office uses, personal service uses, convenience commercial, restaurants and financial institutions which are ancillary to and serve the employment area.

The local attributes of Brock Road/Highway 407 Prestige Employment Node support this vision and a focus away from larger-scale, stand-alone industrial development within this area given the local attributes of these lands, including:

- Direct access and visibility to Highway 407 and the Brock Road interchange;
- Smaller parcel sizes which are less marketable to industrial operations that are land extensive;
- Fragmentation of lands by the extensiveness of the designated Seaton Naturla Heritage System surrounding this area. Ultimately, this fragmentation limits opportunities for parcel consolidation, further limiting the marketability of these lands for land extensive industrial uses: and
- Limited connectivity of this area to the broader Seaton Employment Area lands and the close proximity to residential and mixed-use lands planned within Thompson's Corners."

The Watson report then goes on to conclude that:

- "Given the direct accessibility and high visibility of these landsthese lands provide the opportunity to function as a gateway designation within the eastern entrance into the Seaton Community....the Node remains a marketable location to a range of commercial and employment supportive uses."
- "Considering the recent chances in provincial planning policy direction.... Many of the permitted uses envisions (sic) for the Brock Road/Highway 407 Prestige Employment Node are no longer permitted in the definition of an Employment Area. Accordingly it is recommended that the Prestige Employment Node be further reviewed during the O.P.R. in the context of new Provincial policy limitations and the intent of the planned function of the lands, specifically

- adjacent to the residential mixed use developments. This may require the City of reconsider the Employment designation for these lands...."
- "While the G.M.S. does not provide specific land use designation recommendations, it is noted that the Province announced, in 2024, funding for a future post acute care rehabilitation hospital within Lakeridge Health in the City of Pickering.....the employment node lands at Brock Road/Highway 407 could provide an opportunity to accommodate such a use. The use would benefit from the many current objectives of the Pickering O.P., including high visibility and connectiveness to major transportation networks and allow for ancillary uses that would benefit the surrounding employment and non-employment uses in the community.:

With respect to employment land need in the Node, the Watson report indicates in Section 8.6.1 that:

"As part of this G.M.S. exercise, it has been determined that sufficient urban land has been assigned within the remaining lands in the Brock Road/Highway 407 Prestige Employment Node to accommodate land demand associated with employment supportive and other non-industrial uses identified for this area. Accordingly, it is recommended that approximately 15-20 hectares of land within Brock Road/Highway 407 Prestige Employment Node should be evaluated for removal to a non-residential use subject to an assessment of long-term need."

Further, the report goes on to indicate in Sections 8.6.2 and 8.6.3 that given the

"....revised provincial planning policy direction not only presents a more restrictive framework regarding permitted non-residential uses in Employment Areas but also requires that new consideration be given to the clustering of employment supportive uses in highly visible and accessible gateway locations which are situated in Employment Areas....the physical attributes of this Employment Node continue to make this area well suited and marketable as gateway designation to the Seaton Employment Area. As a gateway designation, the Brock Road/Highway 407 Prestige Employment Node provides an opportunity to accommodate employment services with good connectivity to the Prestige Employment Area to the immediate west and ultimately allows for the creation of a more complete Employment Area in Seaton."

Finally, the Watson report, in Section 8.6.3, notes that

"An important consideration when planning for establishing Employment Areas, such as those in Seaton, is the displacement of commercial and institutional operations, including community, cultural and recreational uses, that will no longer be permitted within the Prestige Employment Area designation under the P.P.S., 2024. To address this issue, the designated Employment Nodes within Seaton can provide a potential

land base to accommodate these previously permitted uses within the Seaton Prestige Employment Area designation....Considerations could also be given to broadening the range of permitted uses with (sic) theNode pertaining to knowledge-based commercial and institutional sectors."

More generally with respect to Employment Area conversions, the Watson report notes in Section 8.5.1 that

"....as part of the Envision Durham process a set of guiding principles for were established for reviewing Employment Area removals based on provincial policy direction, and incorporating best practices for the planning, protection and development of Employment Areas...."

Building on the previous Employment Area conversion criteria established under Envision Durham, Watson then recommend updated criteria

".... to be used to evaluate submissions and to provide an indications of whether or not a site is suitable for removal as an Employment Area within the City of Pickering. The criteria evaluation, paired with a qualitative assessment, is recommended be used to form staff recommendations on requests for Employment Area removals."

3. REVIEW AND OPINION

3.1 Review and Analysis

The review of the Node, including consideration of the analysis in the Watson Report and KPEC review, indicates that:

The location/configuration of the Node would not support larger-scale, standalone industrial development within this area given the attributes of these lands As illustrated on Schedule I to the City's Official Plan (See Map 4), unlike many areas in the Prestige Employment corridor, the lands in the Node are significantly fragmented with the resulting relatively small parcels being of limited utility for manufacturing, warehousing and other similar industrial uses (See discussion in page 4 of Appendix B). This fragmentation is a result of the significant natural heritage system and the location of the highway and related interchange, as well as the Hamlet of Brougham and the 407 Bus Rapid Transit (BRT) station, all of which limit the opportunities for any consolidations. It also results in the limited connectivity of this area to the broader Seaton Employment Area lands.

Further, the proximity to sensitive uses (i.e. the residential development immediately to the south and the Hamlet of Brougham to the north (See Maps 1 and 2)) further impacts the functionality of the area for manufacturing, warehousing and other similar industrial uses.

As noted by KPEC (See discussion particularly page 7 of Appendix B) "The types of uses that are contained within the limited definition of employment area require large development sites and separation from sensitive land uses."

- The gateway location provides an opportunity to accommodate a range of employment supportive uses including commercial and institutional development As discussed in the Watson report, the very attributes that make the Node unsuitable for larger-scale, stand-alone industrial development, make it a gateway location which is well suited and marketable to accommodate employment supportive uses including commercial and institutional uses. It is ideal for such uses which provide essential employment although no longer included in the PPS definition of employment areas.
- City Official Plan already establishes a vision for this area which promotes
 employment supportive and office uses, as well as commercial and institutional
 uses which are no longer regarded as employment uses under the PPS
 In comparing the current policy framework for the Node with the new definition for
 "employment area" in the PPS, it is our opinion that the Brock/407 Node would
 not be considered as an employment area. The current very limited permitted

uses are no longer consistent with the definition of "employment area" in the PPS. Rather, it is our recommendation that the policies be refined to recognize its broader role in the community as a gateway location to the Seaton Employment Area and the broader Pickering community that should include transit-supportive development given the location of the BRT station. Further, as identified in the Watson report, evolving non-residential real estate market conditions, specifically in the office sector, which has experienced a significant decrease in demand, mean that a broader range of uses needs to be considered for this Node.

Land in the Node is not needed for employment uses as defined in the PPS
As noted in the KPEC report:

"The 2024 PPS provides direction that even with the requirement for municipalities to protect and preserve employment areas, there are allowances for employment area lands to be removed from employment areas if the amount of employment lands (a broader range of lands able to accommodate non-residential, job-generating uses) is sufficient to accommodate projected growth of the municipality to the horizon of the plan."

The Watson report determined that approximately 15 to 20 hectares of land within the Node should be evaluated for removal as it is not anticipated to have significant impact on the long-term urban land requirements for the Seaton Employment Area. This is particularly true given that the area was never planned to accommodate manufacturing, warehousing and other similar industrial uses. In fact, this change is not a removal or conversion, but a change that simply recognizes the current planned function of the area is still appropriate with some modifications and that adjustments are required to the policy framework to recognize that given the change in the PPS.

With respect to the updated Employment Area conversion criteria recommended in the Watson report, a review of the criteria indicates that they are not applicable to this situation. The proposal, in our opinion, is not a conversion in the sense of a complete change in use -removal or conversion. Rather it is a change required only because of the change in definition of employment in the PPS. The general intent and direction in the current Official Plan with respect to the role and vision – planned function - for this Node is to be maintained – that is as a Prestige Employment Node for transit supportive development including mixed use office, commercial and employment supportive uses. Further, as noted in the Watson report, the approximately 15 to 20 hectares of land within the Node is not anticipated to have significant impact on the long-term urban land requirements for the Seaton Employment Area. In other words, while uses which

generate employment are a focus for these lands, they are not required to be used only for the type of employment uses consistent with the PPS definition.

As such a "Community Node" designation which would permit a range of employment uses not permitted by the new employment area definition in the PPS and higher density mixed use development is recommended for the majority of the lands(See proposed Official Plan Amendment Appendix C).

This designation would continue to allow for office, research and development and institutional uses providing for employment albeit, as noted, not as defined in the PPS. However, the designation would also include a range of other related commercial and community facilities as well as high density residential. This mix of development would contribute to the creation of a complete community and benefit from a location which provides maximum accessibility (ie. medical facilities including a hospital, facilities for medical tests and laboratories, as well as offices, research and development, and seniors' facilities) by all travel modes.

Development would transition from the higher density mixed use in the "Community Core" around the station and north of the 407 to lower density development in the Hamlet of Brougham. South of the 407, the lands to the west of the "Community Core" should transition in density. Immediately to the west of the Community Core the lands are proposed to be designated "Medium Density". To ensure their integration with the abutting neighbourhood to the south they would be developed with a similar housing mix and density to the existing residential community. The parcel further to the west is proposed to be designated "Low Density Residential Type 1" given its isolated location and limited accessibility.

The relationship to the lands in the residential community to the south along Brock Road should also be reevaluated to ensure the appropriate integration between the two components of the community. The existing Community Node designation along the east side of Brock Road would be considered for a retail commercial focus to serve the existing residential community, while a Mixed Use Corridor Type 2 designation would be more appropriate for the adjacent lands along Brock Road and also on the west side of Brock Road based on the evolving development of the community.

3.2 Opinion

The Brock/407 Node was never envisioned as an employment area for manufacturing, warehousing and other similar industrial uses. The existing policy framework reflects a vision of the area as an office node and effectively limits permitted uses to research and development facilities and:

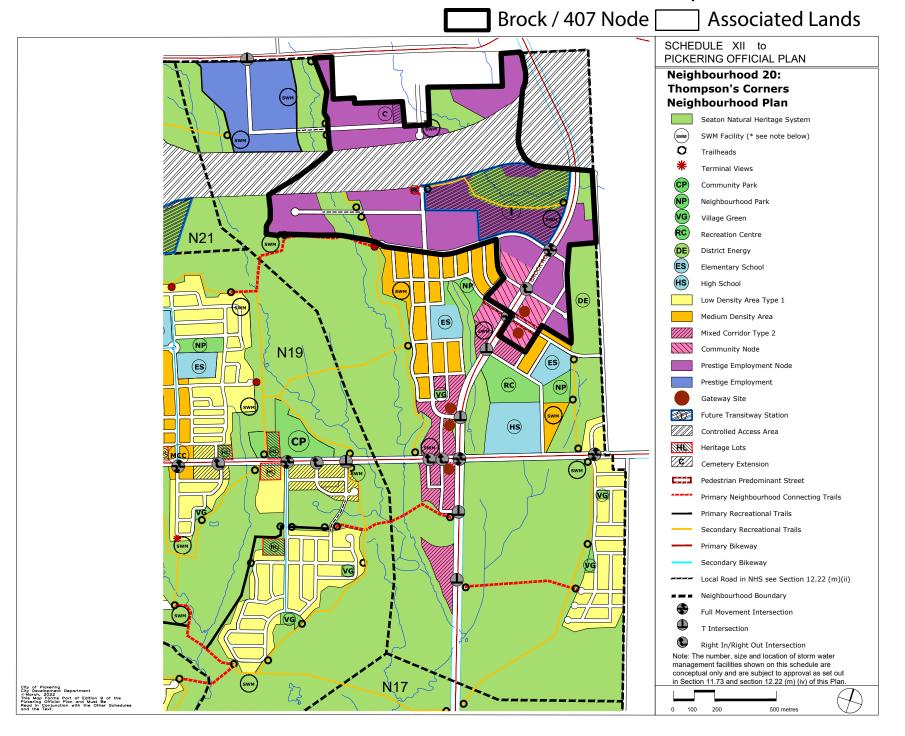
"Offices, corporate office business parks, limited personal service uses serving the area, restaurants serving the area, retail sales as a minor component of an industrial operation, hotels, financial institutions serving the areas;

Community, cultural and recreational uses, and other uses with similar performance characteristics that area more appropriately located in the employment area."

Given the changes in the PPS definition of employment, in our opinion, it is no longer appropriate to include these lands in an employment designation. The vision remains the same, but the designation and policy framework require revisions to be consistent with the current PPS. The proposed Official Plan amendment in Appendix C provides for the redesignation to Community Core, together with related revisions to the abutting designations to allow better integration with the Core.

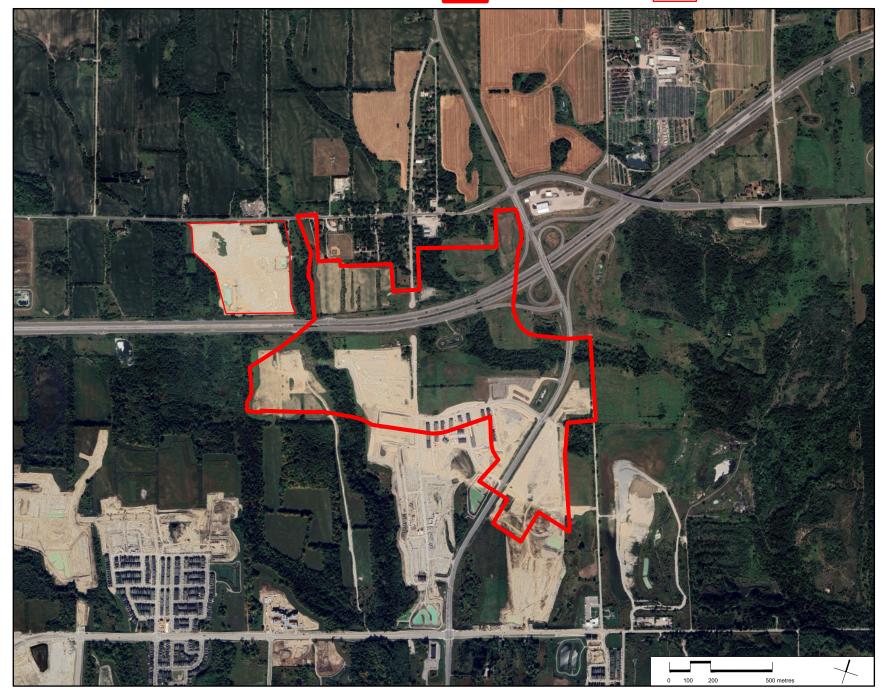
With respect to the associated lands to the west, the Prestige Employment designation is also not consistent with the PPS definition. However, while these lands are associated with the Prestige Employment Node they were not designated as such. Their ultimate designation should be assessed as part of the overall Official Plan Review. However, to ensure the lands are evaluated on the same basis as the lands to the west the deletion of the prohibition on warehousing and other employment uses is recommended as the rationale for the limits on the use of the lands is unclear.

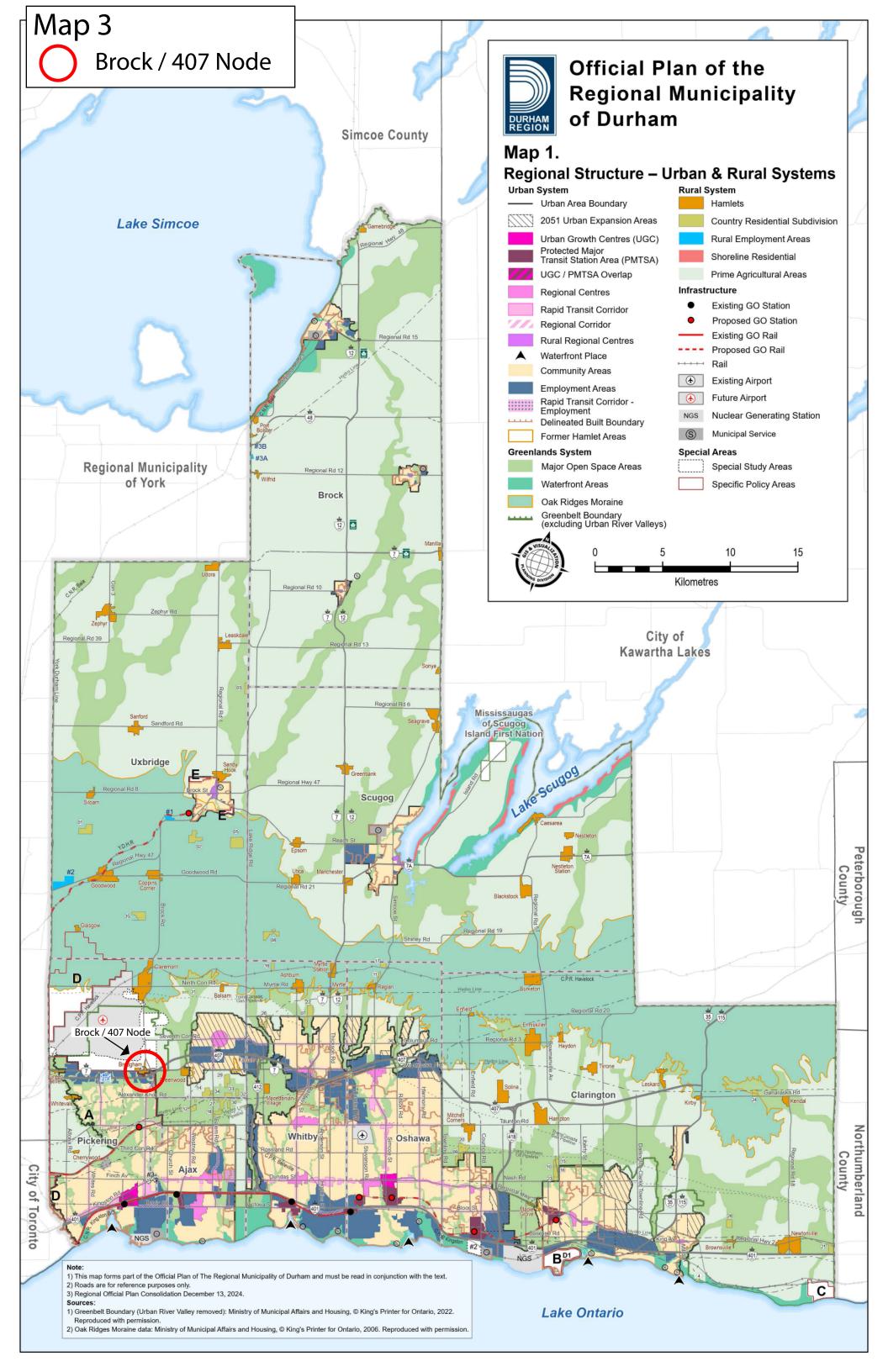
Map 1

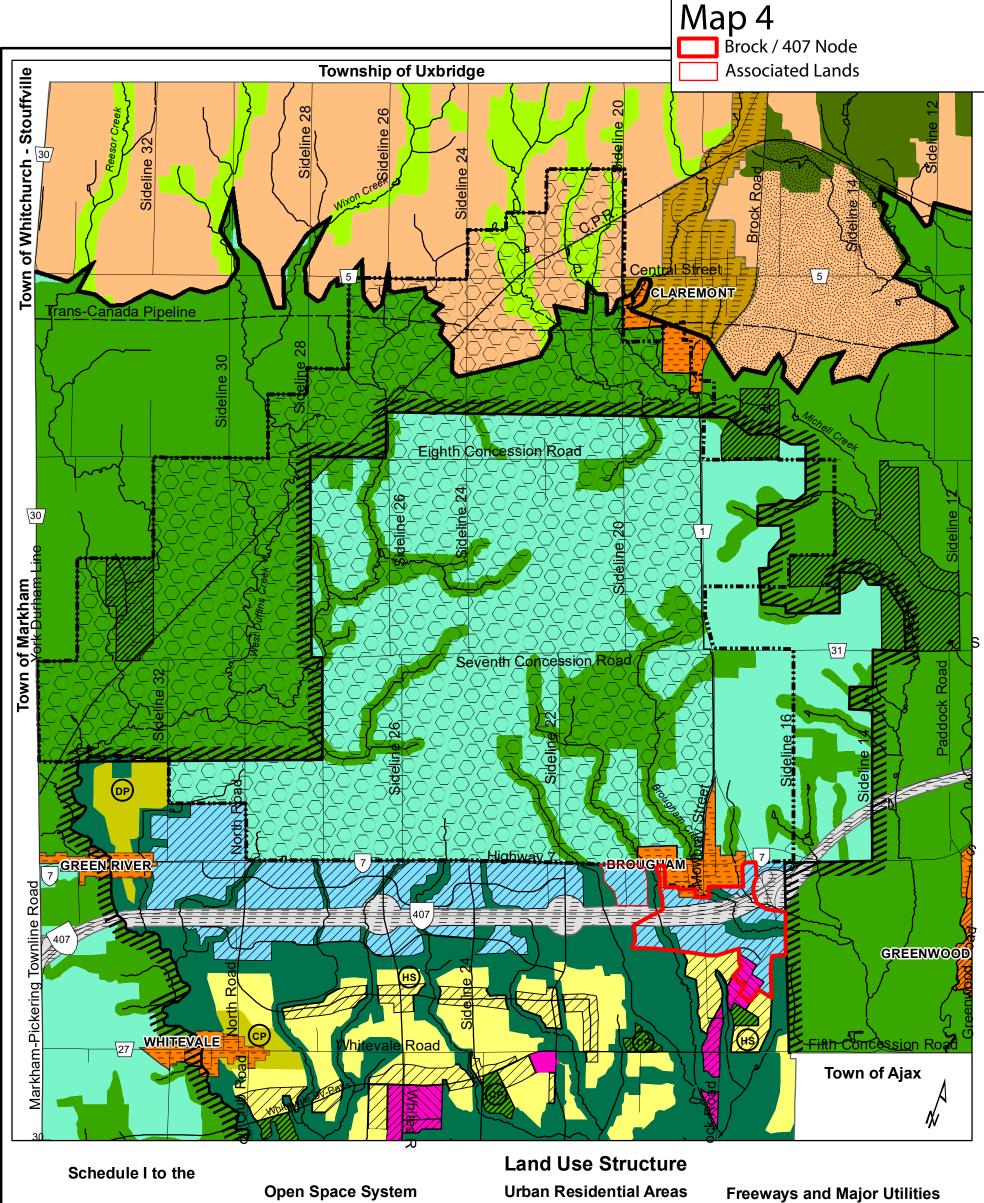


Map 2

Brock / 407 Node Associated Lands







Pickering Official Plan

Edition 9



Sheet 2 of 3

City of Pickering
City Development Department
(Search, 2022
This Map Forms Part of March, 2022
This Map Forms Part of Edition 9 of the Pickering Official Plan and
Must Be Read in Conjunction with the Other Schedulies and the Text.

Seaton Natural Heritage System

Natural Areas

Active Recreational Areas

Oak Ridges Moraine
Natural Linkage Areas
Hamlet Heritage

Open Space
Oak Ridges Moraine
Natural Core Areas

Rural Settlements

Rural Clusters

Rural Hamlets

Oak Ridges Moraine
Rural Hamlets

Low Density Areas

Medium Density Areas

Mixed Use Areas

Local Nodes

Community Nodes

Mixed Corridors

Employment Areas Prestige Employee

Prestige Employment

Seaton Symbols

DP District Park

© Community Park

(HS) High School

Controlled Access Areas

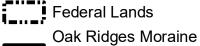
Other Designations

Prime Agricultural Areas

Prime Agricultural Areas
On The Oak Ridges Moraine

Oak Ridges Moraine Countryside Areas

Rural Study Area

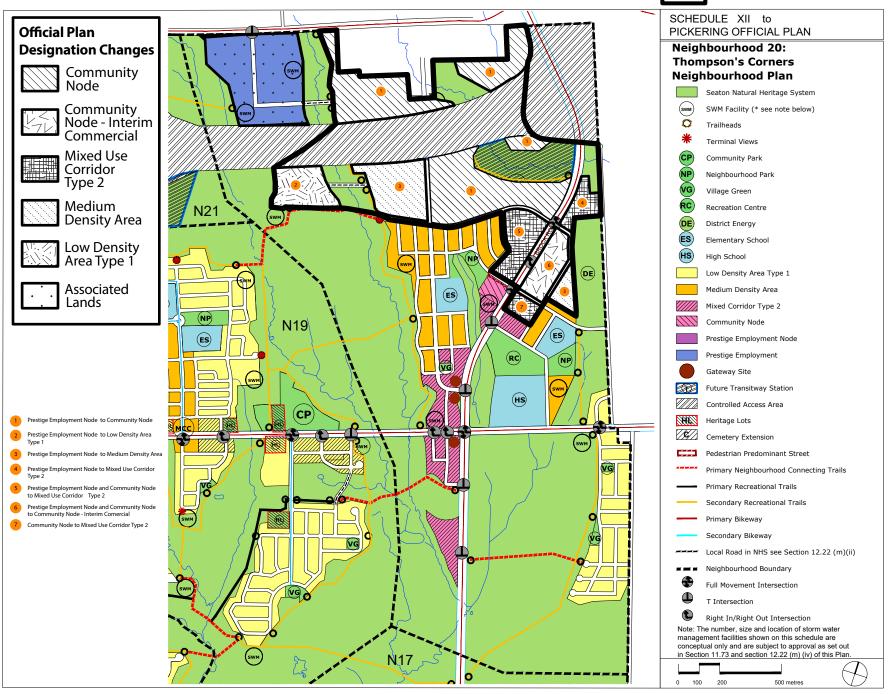


Boundary

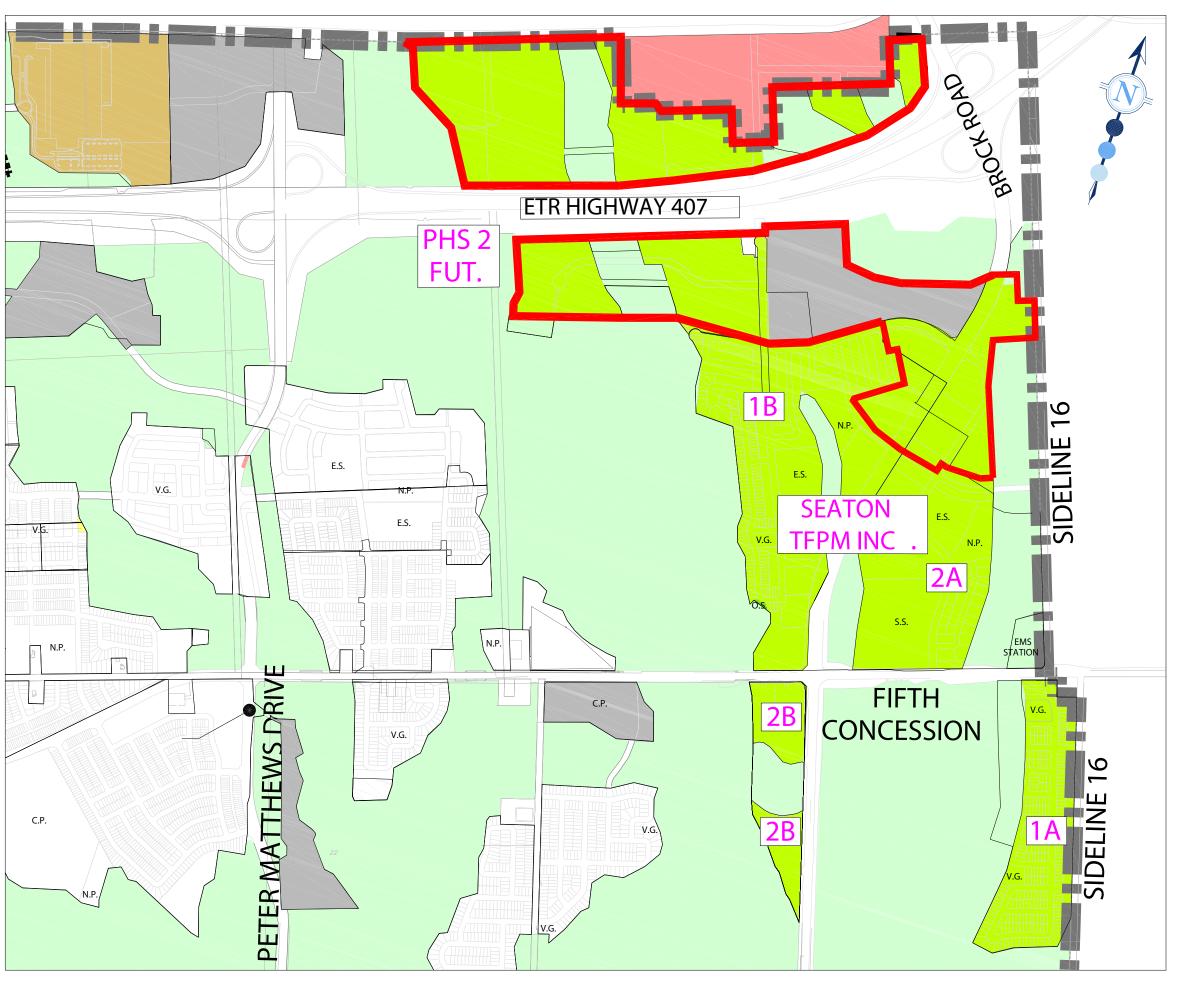
Greenbelt Boundary

Map 5

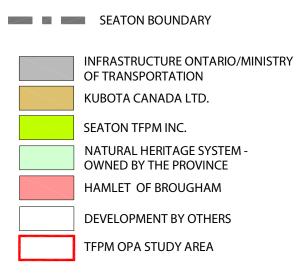
Brock / 407 Node



Appendix A Ownership Map



Appendix A



Appendix B KPEC Economic Analysis



December 10, 2025

Memorandum to: Elizabeth Howson

Macaulay Shiomi Howson Ltd

From: Daryl Keleher, MCIP, RPP, Principal

Keleher Planning & Economic Consulting Inc.

Re: Brock/407 Node, City of Pickering – Land Use Review

Our File: P1236

Keleher Planning & Economic Consulting Inc. was retained by Seaton TFPM Inc. to undertake research and analysis into issues related to the redesignation of lands for employment uses in the vicinity of Highway 407 and Brock Road in the City of Pickering.

2024 Provincial Planning Statement

Section 2.8 of the 2024 Provincial Planning Statement ("2024 PPS") speaks to policy direction for planning authorities regarding ensuring an appropriate range and mix of employment uses.

- 2.8 Employment
- 2.8.1 Supporting a Modern Economy
- 1. Planning authorities shall promote economic development and competitiveness by:
 - a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;
 - b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;
 - c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment:
 - d) encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and
 - e) addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.
- 2. Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of employment areas.
- 3. In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the longterm



economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.

4. Major office and major institutional development should be directed to major transit station areas or other strategic growth areas where frequent transit service is available.

The 2024 PPS defines "Employment Area" as follows, and excludes lands with uses such as institutional, commercial, retail and office from employment areas:

Employment area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.

Section 2.8.2 of the 2024 PPS sets out the requirement for municipalities to protect and preserve lands defined as "employment areas" for current and future uses. Where lands have permitted uses that result in them being excluded from employment areas, they would not be required to be protected and preserved for current and future uses, and uses such as residential, commercial, public service facilities and other institutional uses, retail and office uses not associated with the primary employment uses would be prohibited on employment area lands.

2.8.2 Employment Areas

- 1. Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.
- 2. Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.
- 3. Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:
 - a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;
 - b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;
 - c) prohibiting retail and office uses that are not associated with the primary employment use;
 - d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and
 - e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.

Policy 2.8.2.4 states that municipalities are to assess and update employment areas identified in Ops to ensure that the designation is appropriate to the 'planned function' of employment areas



- 4. Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.
- 5. Planning authorities may remove lands from employment areas only where it has been demonstrated that:
 - a) there is an identified need for the removal and the land is not required for employment area uses over the long term;
 - b) the proposed uses would not negatively impact the overall viability of the employment area by:
 - 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5.
 - 2. maintaining access to major goods movement facilities and corridors;
 - c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and
 - d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.

Therefore, lands with land use designations that are specifically excluded from the definition of employment areas are not subject to the policies regarding protection of employment area lands in section 2.8.2 of the 2024 PPS. The 2024 PPS provides numerous policies encouraging a range of employment uses throughout the municipality on lands outside of employment areas. This includes section 2.1.6 with respect to achievement of complete communities and section 2.8.1 Supporting a Modern Economy, including section 2.8.1.1:

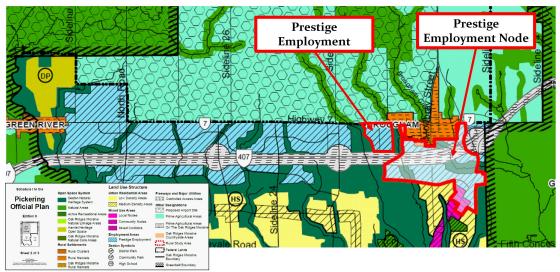
- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities, including market-ready sites, and seeking to address potential barriers to investment...."

City of Pickering Official Plan

The subject lands are within the Seaton Prestige Employment Area (SPEA), which includes lands north and south of the Highway 407 corridor designated as Prestige Employment. The subject lands include lands which are designated "Prestige Employment Node" in the Pickering Official Plan Neighbourhood 20 – Thompson Corner's Plan. An associated block designated Prestige Employment is located immediately to the west designated as "Hamlet" and "Prestige Employment Node".

Figure 1

Land Use Structure and Brock 407 Node



Source: City of Pickering Official Plan



Within the SPEA, the lands in the Brock 407 node are fragmented and consist of several small parcels, with the parcel fabric affected by the highway, the natural and open space lands and the hamlet, each of which create constraints to the types of large, unencumbered parcels preferred by the types of large, land-intensive uses contemplated in the 2024 PPS and Planning Act as business and economic uses. The associated block of land is between natural heritage system lands, with the area of the NHS to the west particularly large. Across the NHS lands to the east is the hamlet.

The lands are bordered by lands designated Rural Hamlet to the north (Brougham) and lands designated both Medium Density (Residential) Areas and Community Nodes south of the Highway 407 on either side of Brock Road.

Prestige Employment Designation

The City OP sets out that the City's urban community will accommodate 30,500 jobs by 2031 and be planned to accommodate 35,000 jobs through long-term intensification. The employment shall be provided, according to the policy 2.13b)i) in "office, manufacturing and service industries in the Prestige Employment designation"

. 2.13 City Council supports:

(a) the development of an urban community that will accommodate 61,000 people by 2031 and be planned to accommodate up to 70,000 people through long-term intensification. This population is based on the policy direction for compact development, higher densities and the direction to use land and services more efficiently. The Community Nodes and to a lesser extent the Mixed Corridors may develop first with primarily commercial uses and intensify over time with a broader



mix of uses, which will contribute to long-term intensification. The 2031 population by Neighbourhood, within the Seaton Urban Area, is set out in Table 1B;

- (b) the development of an urban community that will accommodate 30,500 jobs by 2031 and be planned to accommodate 35,000 jobs through long-term intensification. This employment shall be provided:
 - (i) in office, manufacturing and service industries in the Prestige Employment designation;
 - (ii) in office, retail and service industries in the Community Node and Mixed Corridor designations and in small commercial stores in the neighbourhood nodes;
 - (iii) in institutional and recreational facilities throughout the residential designations and mixed use designations; and
 - (iv) as home occupations in all residential and mixed use designations.

Table 2 of the Pickering OP states that the City's "Employment Areas" include lands designated General Employment, Prestige Employment and Mixed Employment.

Table 7 shows the Permissible Uses in each Employment Area designation, and the uses for Prestige Employment includes permissions for light manufacturing, offices, corporate office business parks, and community/cultural and recreational uses that are best located in employment areas.

The General Employment designation permits offices, but limits those to those that are a 'minor component of an industrial operation'



Figure 2 – Table 7 from Pickering Official Plan

Table 7: Employment Areas: Permissible Uses by Subcategory

Table 7		
Employment Areas Subcategory	Permissible Uses (Restrictions and limitations on the uses permissible, arising from other policies of this Plan, will be detailed in zoning by-laws.)	
General Employment	Manufacturing, assembly, processing of goods, service industries, research and development facilities, warehousing, storage of goods and materials, waste transfer and recycling, waste processing, freight transfer, transportation facilities, automotive and vehicle sales and repair;	
	Offices as a minor component of an industrial operation or serving the area, limited personal service uses serving the area, retail sales as a minor component of an industrial operation;	
	Community, cultural and recreational uses, and other uses with similar performance characteristics that are more appropriately located in the employment area.	
Prestige Employment	Light manufacturing, assembly and processing of goods, light service industries, research and development facilities, warehousing, equipment and vehicle suppliers, automotive and vehicle sales and repair;	
	Offices, corporate office business parks, limited personal service uses serving the area, restaurants serving the area, retail sales as a minor component of an industrial operation, hotels, financial institutions serving the area;	
	Community, cultural and recreational uses, and other uses with similar performance characteristics that are more appropriately located in the employment area.	
Mixed Employment	All uses permissible in prestige employment areas; Limited retailing of goods and services serving the area.	

Employment Lands vs. Employment Areas

As discussed earlier in this memo, lands that include designations for retail, office and other commercial uses, or institutional uses, would specifically be excluded from the definition of employment areas in the 2024 PPS. The 2024 PPS provides a specifically limited definition for 'employment areas', but provides for a broader range of employment uses to locate in other lands throughout a municipality beyond 'employment areas'.

Employment uses are not limited to lands within employment areas, however only employment areas are identified as being protected under the 2024 PPS.

The 2024 PPS provides direction that even with the requirement for municipalities to plan to protect and preserve employment areas, there are allowances for employment area lands to be removed from employment areas if the amount of employment lands (a broader range of lands able to accommodate non-residential, job-generating uses) is sufficient to accommodate projected growth of the municipality to the horizon of the plan.

Planning Act

The definition of area of employment in the *Planning Act* mirrors that of the 'employment area' definition in the 2024 PPS:



"area of employment" means an area of land designated in an official plan for clusters of business and economic uses, those being uses that meet the following criteria:

- 1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:
 - i. Manufacturing uses.
 - ii. Uses related to research and development in connection with manufacturing anything.
 - iii. Warehousing uses, including uses related to the movement of goods.
 - iv. Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.
 - v. Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.
 - vi. Any other prescribed business and economic uses.
- 2. The uses are not any of the following uses:
 - i. Institutional uses.
 - ii. Commercial uses, including retail and office uses not referred to in subparagraph 1 iv; ("zone d'emploi")

The site is not an Area of Employment under the *Planning Act*. Generally, an 'area of employment' would be lands designated in an OP for 'clusters' of uses limited to specific uses manufacturing (and associated R&D), warehousing, and retail/office uses "associated with" manufacturing and warehousing uses, as well as other ancillary uses.

Areas of employment would not include lands designated in an Official Plan for, among other things, institutional and commercial uses - lands designated for these uses are specifically excluded from the definition. In cases where lands are designated for institutional and/or commercial uses, one of the two criteria for a parcel to be classified as an 'area of employment'.

Conclusions and Opinion

Based on the fragmented nature of the lands within the Brock 407 Node being bisected by the highway and framed by lands designated medium-density residential and Rural Hamlet and Community Nodes, the lands are surrounded by prospective sensitive land uses which would conflict with the types of land uses contemplated for employment areas, and are not marketable to the types of uses targeted by the Province for employment area lands including industrial, manufacturing and warehousing uses, due to the lack of large parcels.

The types of uses that are contained within the limited definition of employment areas require large development sites and separation from sensitive land uses.

The area should not be considered an employment area that is to be protected and preserved for the narrow set of land uses specified in the PPS and Planning Act definitions.

Appendix C Official Plan Amendment



Amendment __ to the Pickering Official Plan

Purpose:

The purpose of this Amendment is threefold. First to add additional policy direction to Section 9.2.1 Specific Policy Area A – Seaton Urban Area & Duffins Rouge Agricultural Preserve with respect to the lands in the Brock/407 Node designated as "Employment Area" on Map 1 of the Official Plan of the Regional Municipality of Durham. Second to amend Schedule I to the Pickering Official Plan to redesignate the lands in the Brock/407 Node from "Prestige Employment" to "Community Node", "Medium Density Area" and "Low Density Area". Third to amend Schedule XII to the Pickering Official Plan to redesignate the lands in the Brock/407 Node from "Prestige Employment Node" and "Community Node" to "Community Node", "Mixed Use Corridor Type 2", "Community Node – Interim Commercial", "Medium Density Area" and "Low Density Area Type 1".

Location: This Amendment affects lands in the Brock/407 Node generally bounded by:

- North: Hamlet of Brougham/Highway 7;
- East: Seaton Neighbourhood 20: Thompson's Corners/Greenbelt Plan boundary;
- South: Thompson's Corners Community Node/Medium Density Area designation; and
- West: Seaton Natural Heritage System.

Highway 407 runs east/west through the centre of the Node, while Brock Road, a major arterial road, runs north/south and is located on the east side of the Node. A 407 Bus Rapid Transit station is located in the south/west quadrant of Highway 407 and Brock Road.

Basis:

The Brock/407 Prestige Employment Node was never envisioned as an employment area for manufacturing and similar uses. The existing policy framework reflects a vision of the area as an office node and effectively limits permitted uses to research and development facilities and:

"Offices, corporate office business parks, limited personal service uses serving the area, restaurants serving the area, retail sales as a minor component of an industrial operation, hotels, financial institutions serving the areas:

Community, cultural and recreational uses, and other uses with similar performance characteristics that area more appropriately located in the employment area."

Given the changes in the PPS definition of employment, it is no longer appropriate to include these lands in an employment designation. The vision remains the same, but the designation and policy framework require revisions to be consistent with the current PPS. It is proposed to redesignate to Community Core, together with related revisions to the abutting designations to allow better integration with the surrounding community. In addition, the associated lands to the west north of the 407 which are designated "Prestige Employment" will be evaluated separately but the prohibition of warehousing and other employment uses is proposed to be deleted. This will ensure the lands are evaluated on the same basis as the lands to the west.

Actual

Amendment: The Region of Durham Official Plan is hereby amended by:

 By adding the following new policy, 9.2.7, to Section 9.2.1, Specific Policy Area A-Seaton Urban Areas & Duffins Rouge Agricultural Preserve:

"Within the lands designated "Employment Areas" in the Brock/407 Node, the designations and policies of the Pickering Official Plan, Neighbourhood 20: Thompson's Corners Neighbourhood Plan shall apply."

The City of Pickering Official Plan is hereby amended by:

Schedules

- 1. By modifying Schedule I, Land Use Structure, as shown on Schedule "A" to this Amendment to redesignate the Subject Lands "Community Node", "Mixed Corridor", "Medium Density Area" and "Low Density Area"; and,
- 2. By modifying Schedule XII, Neighbourhood 20: Thompson's Corners Neighbourhood Plan as shown on Schedule "B" to redesignate the Subject Lands "Community Node", "Community Node Interim Commercial", "Mixed Corridor Type 2", "Medium Density Area" and "Low Density Area Type 1".

Policies

1. By modifying Section 12.22 (e) in Chapter 11 Seaton Urban Area, Neighbourhood 20: Thompsons Corners, Section 12.22, as follows with new underlined and deleted text shown as strike out text and retained is shown as unchanged text:

- (e) shall provide greater direction on employment uses and densities in the
 Prestige Employment designation by applying two subcategories to the
 Prestige Employment land use category set out in Tables 2 and 7 as follows:
 - (i) Prestige Employment General:
 - (A) In addition to the prohibited uses in Section 11.32, warehousing, and light manufacturing, assembly and processing of goods shall be prohibited except in combination with a permitted use in the same building; and
 - (ii) Prestige Employment Node:
 - (A) In addition to the prohibited uses in Sectio 11.32, warehousing and light manufacturing, assembly and processing of goods shall be prohibited existing in combination with a permitted use in the same building; and

(B)

shall, in the Prestige Employment General designation prohibit only the uses in Section 11.32 and in the Community Node designation shall permit:

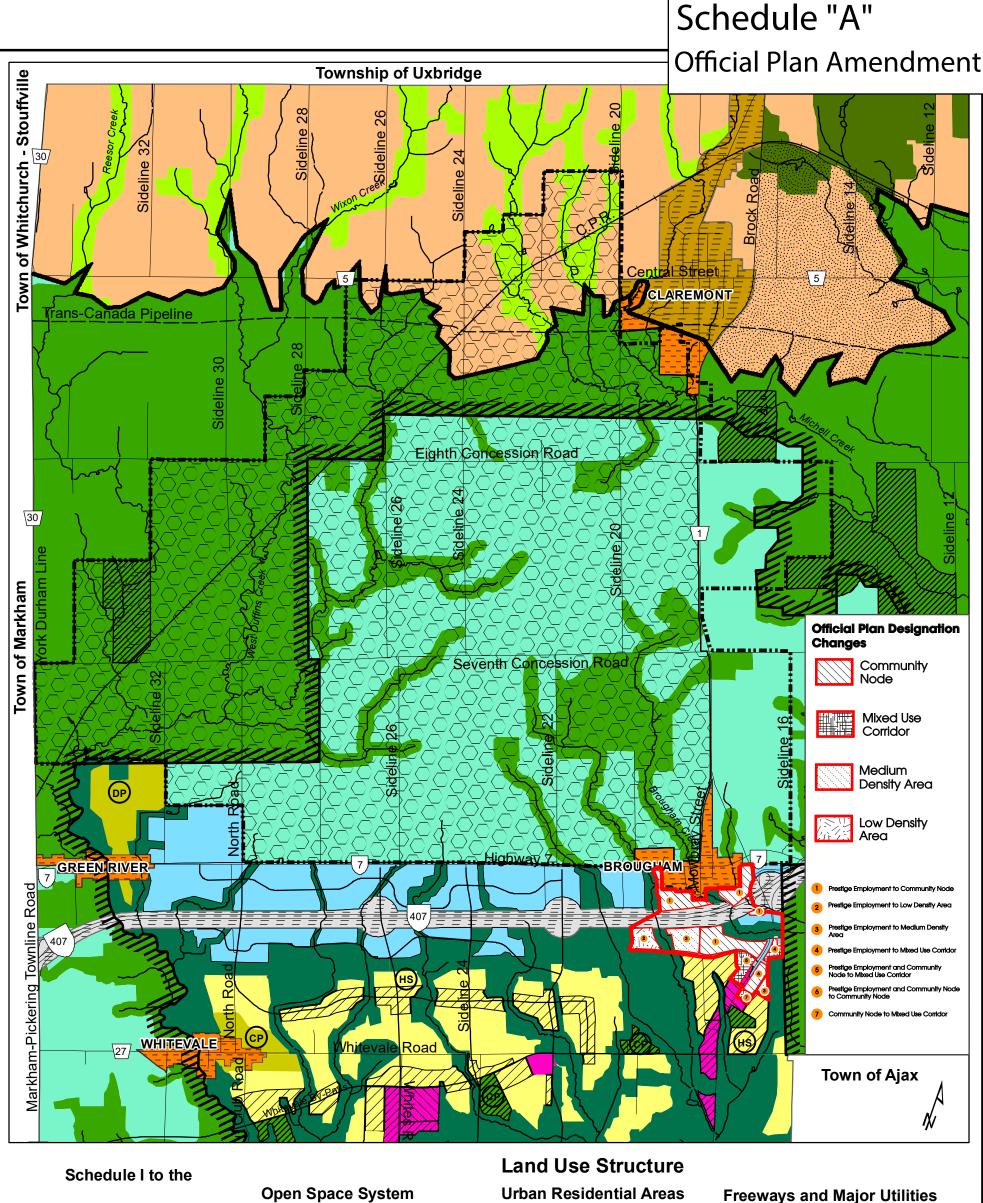
- (i) <u>freestanding office, hotels, and mixed use buildings with</u> a minimum density of 2.0 FSI shall be required for freestanding office buildings which shall be directed to locate close to the <u>407</u> interchanges within the Prestige Employment Node. The maximum height and density to be determined at the site plan approval stage. However, interim development of no less than 0.5 FSI maybe permitted provided a development concept and intensification plan is submitted demonstrating how the property can be intensified including:.....
- (ii) community, cultural and recreational uses, as well as institutional development and other public and related facilities such as hospitals, facilities for medical tests and laboratories with maximum height and density to be determined at site plan approval stage;
- (iii) <u>high density residential, retailing of goods and services, offices and restaurants as part of mixed use development; and,</u>
- (iv) <u>light manufacturing, assembly and processing of goods, distribution</u> <u>facilities, and light service industries as well as the retailing of goods</u> and services and restaurants in freestanding buildings on the lands in

the Community Node designation west of the Hamlet of Brougham, in addition to the uses permitted in subsections (i) and (ii).

- (f) shall require appropriate transitional design, compatibility and buffering from the Prestige Employment Community Node designation to the Hamlet of Brougham and its existing character through the implementing draft plan of subdivision, zoning by-law and site plan approval. The implementing draft plan of subdivision shall also provide for adequate road and pedestrian connections between Brougham and the surrounding Prestige Employment Community Node lands;
- (g) shall facilitate the long-term intensification of Highway 407 ETR/Transitway Station located at Brock Road and Highway 407 ETR/Transitway based on the Underlying land use of the Prestige Employment Community Node;"

Implementation: The provisions set forth in the City of Pickering Official Plan, as Amended, regarding the implementation of the Plan shall apply to this Amendment.

Interpretation: The provisions set forth the City of Pickering Official Plan, as amended. regarding the interpretation of the Plan shall apply in regard to this Amendment.



Pickering Official Plan

Edition 9



Sheet 2 of 3

Seaton Natural Heritage System

Natural Areas

Active Recreational Areas

Oak Ridges Moraine Natural Linkage Areas Hamlet Heritage

Open Space Oak Ridges Moraine

Natural Core Areas Rural Settlements

Rural Clusters

Rural Hamlets

Oak Ridges Moraine **Rural Hamlets**

Low Density Areas

Medium Density Areas

Mixed Use Areas

Local Nodes Community Nodes

Mixed Corridors

Employment Areas

Prestige Employment

Seaton Symbols

(DP) District Park

(CP)

Community Park

High School

Freeways and Major Utilities

Controlled Access Areas

Other Designations

△△│ Proposed Airport Site Prime Agricultural Areas

Prime Agricultural Areas On The Oak Ridges Moraine

Oak Ridges Moraine

Countryside Areas Rural Study Area

Federal Lands

Oak Ridges Moraine Boundary

Greenbelt Boundary

Schedule B Brock / 407 Node SCHEDULE XII to Official Plan PICKERING OFFICIAL PLAN **Designation Changes** Neighbourhood 20: **Thompson's Corners** Community Node **Neighbourhood Plan** Seaton Natural Heritage System SWM Facility (* see note below) Community 0 Trailheads Node - Interim Terminal Views Commercial Community Park Mixed Use Neighbourhood Park Corridor VG Village Green Type 2 RC Recreation Centre DE District Energy ES Medium Elementary School Density Area HS High School Low Density Area Type 1 Low Density Area Type 1 Medium Density Area Mixed Corridor Type 2 (NP) Community Node N19 ES (ES) Prestige Employment Node Prestige Employment (RC) Gateway Site Future Transitway Station HS Controlled Access Area Prestige Employment Node to Community Node **/444**/ Heritage Lots 2 Prestige Employment Node to Low Density Area **©** Cemetery Extension Pedestrian Predominant Street Prestige Employment Node to Medium Density Area Primary Neighbourhood Connecting Trails

N17

Primary Recreational Trails

Primary Bikeway

0 100

200

Secondary Bikeway

Neighbourhood Boundary Full Movement Intersection T Intersection

Right In/Right Out Intersection Note: The number, size and location of storm water management facilities shown on this schedule are conceptual only and are subject to approval as set out in Section 11.73 and section 12.22 (m) (iv) of this Plan

Secondary Recreational Trails

Local Road in NHS see Section 12.22 (m)(ii)

500 metres

Prestige Employment Node to Mixed Use Corridor

Prestige Employment Node and Community Node to Mixed Use Corridor Type 2

Prestige Employment Node and Community Node to Community Node - Interim Comercial

7 Community Node to Mixed Use Corridor Type 2