

January 3, 2023

MGP File: 22-3192

The Honourable Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, Ontario M5G 2E5

Dear Mr. Clark:

**RE: Comments on Wellington County Official Plan
 ERO No. 019-5635 (Ministry Reference No. 23-OP-215446)
 Elora Sands Developments Inc.
 7581 Nichol Road 15, Centre Wellington**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for Elora Sands Developments Inc. (“Elora Sands”), the owner of property municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (“Elora Sands Lands”). It should be noted that Elora Sands has been working with the landowner to the south (6583 Irvine Street) in developing a comprehensive conceptual plan. The purpose of this letter is to provide comments on the County’s Official Plan Amendment 119, as it relates to the Elora Sands Lands and the land to the south (“Subject Lands”). On behalf of our client, Elora Sands, we appreciate the opportunity to provide input into this process.

This submission continues upon our prior submission to the County including a letter dated November 17, 2022, providing comments on the County’s Land Needs Assessment (“LNA”) Report, as contained in the document PD2022-20 dated September 8, 2022, as well as additional letters submitted by Parcel Economics on behalf of our client on April 29, 2022 and May 2, 2022 commenting on earlier versions of the County LNA. A full package of previous correspondence has been provided in Appendix 1.

This letter provides additional comments regarding the County’s draft Official Plan Amendment 119 (dated July 2022) and provides a detailed response to the Settlement Expansion Area Evaluation Criteria, which comprehensively reviews the Subject Lands against the Province’s criteria for settlement area boundary expansions (see Appendix 2). Concurrent with the County’s assessment, there is a requirement for new Community Area to accommodate growth forecasted in the City to 2051 and it is our opinion that a significant proportion of this land can be accommodated in the eastern end of Elora (approximately 80 ha) through the inclusion of the Subject Lands.

With regards to the County’s consideration of growth options, it is our opinion that the inclusion of the Subject Lands, are appropriate locations for a settlement expansion as they can achieve the Province’s criteria for settlement area boundary expansion and are consistent with the *Provincial Policy Statement, 2020* (“PPS”) and conform to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the “Growth Plan”).

In this regard, a conceptual development plan has been prepared for the Subject Lands and the adjacent property that demonstrates they can provide a mix and range of housing and community uses that will result in a more complete community in Elora. Natural heritage Features on the property will be protected, and appropriate stormwater management controls can be achieved. Moreover, the property can be developed at a minimum 54 residents and jobs per hectare (excluding lands for the Natural Heritage System), which exceeds the minimum County density target of 40 residents and jobs per hectare recommended for new developments in the County LNA. The Concept Plan is shown in Appendix 3.

Response to Settlement Area Boundary Expansion Evaluation Criteria and Comment on the Draft Official Plan Amendment

The Subject Lands in Elora represent an excellent opportunity in the County to accommodate growth through the creation of innovative and complete communities, and to do so in a manner that can be serviced in a fiscally sustainable manner. In this regard, our team has reviewed the settlement expansion criteria established in the PPS and Growth Plan. With respect to the settlement area boundary expansion requests, please find attached the following supporting materials:

- Summary table of responses to each of the applicable policies derived from the PPS and the Growth Plan regarding settlement area boundary expansions (Appendix 2); and,
- The proposed mapping amendment to the County of Wellington Official Plan, which shows the revised land use designation for the requested expansion areas as “Urban Centre” (Schedule 1a), which is provided in Appendix 4.

The assessment of the evaluation criteria shows that the requested expansions are appropriate and consistent with/conforms to the applicable policies for the following reasons:

- Consistent with the conclusions of the County LNA, it is our opinion that there is a need to expand the settlement area to accommodate future residential development in Elora (up to 238 hectares), which can be partly provided by the proposed expansion areas in the eastern portion of the Elora, which totals approximately 80ha;
- The two areas for settlement expansion that represent the Subject Lands, represent logical areas for urban expansion as they have the following characteristics:
 - Due to the size, these two parcels in Elora can be planned as complete communities to accommodate the forecasted growth. These areas will provide additional and diverse housing supply abutting the existing settlement area. Moreover, they can be comprehensively developed to provide for opportunities to address climate change goals, including promoting compact and energy-saving designs, denser developments, and transit-supportive and walkable communities to lower GHG emissions from buildings and transportation.
 - The Lands are located in the Community Planning Study Area, which is an area that the County will be considering for future urban expansion of the

Fergus and Elora-Salem Urban Centres as a source of future residential, recreational, public service and institutional uses. The County notes that this area has the potential to play a significant role in community life in the future.

- The lands are located adjacent to the Elora Settlement Area and are strategically located to provide a portion of the required Community Area land needs. Servicing infrastructure either exists or can be extended to the lands in a timely and efficient manner as outlined in the MTE memo entitled Elora Sands and Keating Lands - Serviceability Assessment dated December 16, 2022 (see Appendix 5)
- The development of the Subject Lands will continue the orderly development pattern of the Elora Settlement Area and as such, will help utilize existing public facilities including public elementary and secondary schools, Elora & District Community Centre, a fire station, public parks (including Elora Quarry) and libraries.
- The proposed expansion lands, as well as any required infrastructure and services, will be planned in a financially and environmentally sustainable manner over their full life cycle through robust technical studies in accordance with Provincial and local planning policies. The two areas in Elora benefit from the location or expansion of existing infrastructure.
- There are no specialty crop areas in the proposed expansion areas.
- The proposed expansions are located outside of the Greenbelt.

The two settlement areas represent an opportunity to create complete communities and provide for an appropriate mix of housing and jobs. We believe these areas are a logical and optimal location to accommodate a portion of the required settlement area expansion needed to achieve the growth forecasted in the County to 2051.

Expanding the settlement area to include the Subject Lands is essential to realizing a contiguous settlement structure that are bounded by arterial roads and surrounded by existing or planned residential neighbourhoods to the south and west.

Additional work has already been undertaken by the Elora Sands consultant team to identify the existing conditions and demonstrate the feasibility of the inclusion of Subject Lands into the settlement area boundary, including:

- Sanitary Servicing Overview for the Gibson Farm and Keating Farm Memo prepared by MTE dated February 9, 2022
- Comprehensive Stormwater Management Strategy Assessment prepared by MTE dated July 20, 2022
- Elora Sands and Keating Lands - Serviceability Assessment prepared by MTE dated December 16, 2022

These preliminary studies, which are provided in Appendix 5, have informed the responses to the evaluation criteria contained in Appendix 2 attached. Further studies will be completed through a future development review process. Moreover, inclusion of these lands can conform to the policies of the Provincial Policy Statement and Growth Plan.

We trust that this background work and these responses to the settlement area expansion criteria are helpful to the Province in its preparation and consideration of growth scenarios and demonstrates both the feasibility and priority for inclusion of the two areas for settlement expansion in Elora into the Urban Area boundary.

Moreover, in the Province's review of the Draft Official Plan Amendment 119, it is our opinion that it would be appropriate to consider an additional policy amendment to permit infrastructure, such as stormwater ponds, outside the settlement area boundary, which would make more efficient use of land within the settlement area boundary and contributes to the fulfilling of population targets, while not impacting the overall goals and objectives of the Official Plan to locate growth within the urban boundary. The amended policy could read:

Notwithstanding the policies of this Official Plan, public infrastructure uses related to urban development, such as stormwater management ponds, are permitted in all designations in both the urban and rural areas.

Conclusion

We are pleased to see that the County has recognized through its work that a balanced approach to accommodating growth is required, including providing a sufficient land supply to accommodate ground-related housing options.

As such, we are requesting that given that there is proven insufficient land to accommodate the allocated population to 2051, that the Province, include the Subject Lands within the urban settlement area as we believe these lands represent the most logical area for new residential use.

In conclusion, we thank you for the opportunity to provide input into the County's MCR process. If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.

Yours very truly,
Malone Given Parsons Ltd.


Matthew Cory, MCIP, RPP, PLE, PMP
Principal, Planner, Land Economist, Project Manager

cc: *Hannah Evans, Assistant Deputy Minister*

Atth: *Appendices*