

January 4, 2023

469-23

**Via Digital Upload**

Attn: Honourable Steve Clark,  
Minister of Municipal Affairs and Housing

c/o

Mr. Tyler Shantz  
Municipal Services Office – Western Ontario  
659 Exeter Road, Floor 2  
London, ON N6E 1L3

**RE: Request to Facilitate Inclusion of Lands into the Rockwood Urban Centre  
5149 Wellington Road 27, Rockwood, Guelph-Eramosa, County of Wellington  
ERO No. 019-5635**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of 808826 Ontario Inc. c/o The Crown Group Developments Inc., owner of the Subject Property municipally known as 5149 Wellington Road 27, Rockwood, Guelph-Eramosa, in the County of Wellington.

On December 5<sup>th</sup>, 2022, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on the proposed amendments to the County of Wellington Official Plan via Official Plan Amendment No. 119 to define and identify a County Growth Structure as Phase 1 of the County's Municipal Comprehensive Review. The commenting period is established through to today's date, January 4, 2023. The Subject Property and Subject Lands described below are well suited for future growth as will be outlined through the remainder of this letter. The submission will conclude with specific changes recommended to OPA No. 119 to better align with the goals and objectives of the Province.

**Site & Neighbourhood Context**

The Subject Property abuts the northern boundary of the Rockwood Urban Centre and has frontage on Wellington Road 27. The vacant parcel is comprised of approximately 21.73 acres (8.80 hectares) with a portion of the lands being ploughed and farmed as part of cash-crop agricultural operation. There are no farm dwellings or buildings on the site.

In taking a comprehensive approach to the planning matters associated with this submission, the Subject Lands represent a broadened version include the Subject Property described above to also include 5153 and 8409 Wellington Road 27. Together, 5153 and 8409 Wellington Road 27 have a land area of approximately 5.8 hectares.

In total, the Subject Lands, inclusive of 5149, 5153 and 8409, illustrated below are comprised of approximately 14.6 hectares.

The land uses surrounding the subject lands vary. To the south, institutional uses including an Ontario Provincial Police office and Fire Station abutting the site together with low-density single detached dwellings and the David Masson Park. To the west, Sacred Heart Catholic School opened in 2016 while construction commenced on the Rockwell Estates Draft Plan of Subdivision in 2017 and is now complete and comprised of single detached dwellings and townhouse dwellings. More recently, 51 townhouse dwellings have been proposed directly west of the Subject Lands. Rural agricultural uses are located to the north and east of the Subject Lands.



## **Existing Planning Framework**

### Province of Ontario

To address current housing supply concerns, the Province of Ontario has established the Housing Supply Action Plan and the *More Homes Built Faster Act* has been given Royal Assent. This plan is part of a long-term strategy to help building more homes and make life more affordable for Ontario families.

### Growth Plan for the Greater Golden Horseshoe

Being in Wellington County, the Subject Lands are subject to the Growth Plan for the Greater Golden Horseshoe, wherein Schedule 3 of this Plan prescribes a residential population target of 160,000 for the County by 2051.

### Wellington County Official Plan

The Subject Lands are considered part of the Rural System on both the County Growth Structure – Schedule A and on County Growth Structure-Guelph/Eramosa – Schedule A3 of the Wellington County Official Plan. The Subject Lands are designated as ‘Prime Agricultural’ in the Guelph-Eramosa Land Use Plan – Schedule A3(B3) of the Wellington County Official Plan.

### Township of Guelph/Eramosa Comprehensive Zoning By-law No. 40/2016.

The Subject Lands are in the Agricultural Zone of the Township of Guelph/Eramosa Comprehensive Zoning By-law No. 40/2016.

## **Concept Plan**

A preliminary Site Plan, prepared by Jonathan Weizel Architect, dated January 3, 2023 is contained in Appendix A of this Letter. The Plan demonstrates how the Subject Property could be built out with 381 townhouse dwelling units, seamlessly integrated into the surrounding built form, should the lands be redesignated for urban uses in the County Official Plan. As proposed, the 381 residential units would aid the County in achieving the population target of 160,000 people established in Schedule 3 of the Growth Plan for the Greater Golden Horseshoe. Such a proposal can be implemented promptly as the property is in proximity to municipal infrastructure including servicing, schools, fire and police services and other community uses within Rockwood.

## **Background Studies**

Terrastory Environmental Consulting Inc. was retained to complete a Preliminary Natural Heritage Constraints Analysis dated January 3, 2023 contained in Appendix B.

The report concludes the Subject Property lacks natural heritage value. The meadow marsh located in the north and rear corner of the property contains the invasive Reed-canary Grass and no Endangered Threatened species or Significant Wildlife Habitat were confirmed during the site assessment. Should

develop permissions be granted, a future Environmental Impact Study will be completed in the normal fashion as part of the required *Planning Act* applications.

### **Planning Merit**

OPA No. 119 was presented in the May 12, 2022 Wellington County Staff Recommendation Report No. PD2022-14 and approved by County Council on May 26, 2022. While it is recognized that OPA No. 119 represents Phase 1 of the County's process towards planning and managing growth, it does not plan to the year 2051 as required by the Growth Plan. The County intends on completing the growth exercise to 2051 through future phases of the Municipal Comprehensive Review (MCR) process.

Following Council approval of OPA No. 119, Watson & Associates completed the Phase 2 MCR Report: Urban Land Needs Assessment dated August 29, 2022 on behalf of Wellington County. This report concludes the County has an overall shortfall of designated Community Area land totalling approximately 501 gross hectares to 2051. The Report highlights the expansion of Urban Settlement Area boundaries, like the one surrounding Rockwood, can be limited through an appropriate intensification strategy and key strategic employment conversions. In doing so, a total of 299 additional hectares are required to be added to the Urban Settlement Area boundaries. The inclusion of 14.6 hectares within the Rockwood Settlement Area Boundary provides a balanced distribution of the required Urban Community Area land amounts Centre Wellington, Erin, Wellington North, Mapleton, Minto and Rockwood (Guelph-Eramosa).

In keeping with the Provincial Housing Supply Action Plan, ERO No. 19-5635 presents an opportunity to further revise the County Official Plan by adding the Subject Lands to the Urban Centre designation. While the County is proceeding with the second phase of the MCR, as noted in Staff Recommendation Report PD2022-14, the second phase will require consultation with the local municipalities, including Guelph/Eramosa Township and it is expected to be a lengthy and prolonged process. Making this change now, through this ERO, is important in efforts to aid in achieving the goal of getting 1.5 million homes built over the next 10 years.

In considering Settlement Area Boundaries, Section 4.8.2 of the existing Wellington County Official Plan contains the following criteria for Urban Centre expansion. These criteria are noted below and each is followed by a *Planning Comment*:

- a) sufficient opportunities to accommodate the population and employment forecasts for the County of Wellington, through intensification and in designated greenfield areas, using the intensification target and greenfield density targets, are not available;
  - i) within the regional market area; and
  - ii) within the applicable lower-tier municipality to accommodate the growth allocated to the municipality;
- b) the expansion makes available sufficient lands for a time horizon not exceeding 20 years, based on the analysis provided for in a);
- c) the timing of the expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the intensification target and density targets set out in Section 3.3.1 as approved by the Province, and the other policies of this Plan;

*Planning Comment*

The inclusion of the Subject Lands satisfies the Settlement Area expansion criteria of Section 4.8.2 of the County Official Plan as it will contribute to accommodating the growth targets established by the Growth Plan and the County. The need for the expansion has been confirmed by the Watson & Associates completed the Phase 2 MCR Report: Urban Land Needs Assessment which addresses criteria a), b) and c) above.

- d) where applicable, the proposed expansion will meet the requirements of the Greenbelt Plan;

*Planning Comment*

The Subject Lands are not subject to the Greenbelt Plan.

- e) the existing or planned infrastructure required to accommodate the proposed expansion can be provided in a financially and environmentally sustainable manner;

*Planning Comment*

The Subject Lands have direct access to existing infrastructure.

- f) in prime agricultural areas, there are no reasonable alternatives that avoid prime agricultural areas, and there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;
- g) impacts on agricultural operations which are adjacent to or close to the urban centre or hamlet are mitigated to the extent feasible;

*Planning Comment*

In addressing criteria f) and g) above, the Subject Lands are currently growing corn as a cash-crop and do not contain any farm housing or farm buildings. Inclusion of the Subject Lands within the Settlement Boundary represents a logical extension of the existing community, allowing for a new firm urban boundary to further preserve the rural lands within the County. Similar to the adjacent residential areas, the proposed development is compatible with the agricultural operations close to the urban centre.

- h) in determining the most appropriate direction and location for expansion, the following are addressed:
  - i) the existing development pattern in the community;
  - ii) the potential impacts on people;

*Planning Comment*

In response to i) and ii), the inclusion Subject Lands within the Settlement Area boundary is logical extension to the existing development pattern and is compatible with the existing people of Rockwood.

- iii) the need to avoid mineral aggregate areas or where it is unavoidable to use lands of lower quality aggregate resources;

*Planning Comment*

The Subject Lands are not identified as an aggregate area on Schedule C – Mineral Aggregate Resource Overlay of the County Official Plan.

- iv) the impacts on natural heritage systems and features;

*Planning Comment*

The Terrastory Environmental Consulting Inc. Preliminary Natural Heritage Constraints Analysis dated January 3, 2023 contained in Appendix B addresses the natural features of the Subject Property. Further, no Provincial Significant Wetlands are shown on or in the vicinity of the Subject Lands on Appendix 3 – Provincial Significant Wetlands of the County Official Plan. Finally, impacts considered via future analysis associated with future *Planning Act* application for the development proposal.

- v) the impacts on groundwater and surface water;
- vi) the impacts on the safety and efficiency of existing or planned infrastructure;
- vii) the impacts on archaeology, cultural heritage landscapes, and built heritage resources;

*Planning Comment*

In response to v), vi) and vii), further consideration of groundwater, surface water, infrastructure, archaeology, cultural heritage landscapes, and built heritage resources will occur in the normal fashion through the review of the future *Planning Act* applications.

- viii) logical boundaries based on existing property lines or recognized physical features where possible; and
- ix) other planning criteria considered appropriate in the circumstances.

*Planning Comment*

In consideration of viii) and ix), the inclusion of the Subject Lands, rather than just the Subject Property demonstrates a more comprehensive approach to the Settlement Boundary expansion.

- i) the County and local municipalities will plan to maintain or move significantly towards a minimum of one full-time job per three residents within or in the immediate vicinity of the urban centre or hamlet.

*Planning Comment*

The additional residents accommodated by the proposed Settlement Boundary expansion will further support and strengthen the existing commercial and employment opportunities within Rockwood.

## Planning Merit Conclusion

The need for additional urban land to accommodate the Growth Plan targets to the year 2051 have been confirmed by the Watson & Associates Phase 2 MCR Report: Urban Land Needs Assessment and the inclusion of the Subject Lands within the Urban Centre land use designation represents an appropriate extension to the Rockwood community.

In keeping with Provincial objectives, the proposed expansion:

- has direct access to full municipal servicing;
- will be developed with more than 10% attainable housing; and,
- will accommodate more than 381 residential dwelling units.

Accordingly, the inclusion of the Subject Lands within the Urban Centre land use designation confirms to and implements both provincial and local objectives and represents good land use planning.

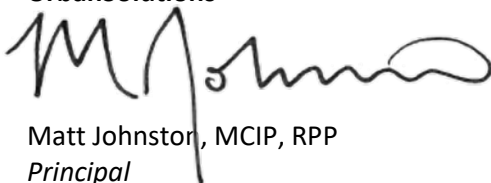
## Recommended Changes to the OPA No. 119 and the County of Wellington Official Plan

Based on the above, UrbanSolutions recommends the following three changes to the County of Wellington Official Plan:

1. To amend Schedule A-1 of OPA No. 119, being Schedule A – County Growth Structure by identifying the subject lands as Designated Growth Area within the Primary Urban Centre of the Urban System as shown in Appendix C.
2. To amend Schedule A-4 of OPA No. 119, being Schedule A3 – County Growth Structure – Guelph-Eramosa by identifying the subject lands as Designated Growth Area within the Primary Urban Centre of the Urban System as shown in Appendix D.
3. To amend Schedule A-11 of OPA No. 119, being Schedule B3 – Guelph-Eramosa Land Use Plan by changing the land use designation from Prime Agriculture of the Rural System to Primary Urban Centre of the Urban System as shown in Appendix E.

Thank you for the opportunity to provide these comments. Please feel free to contact the undersigned to discuss the matter further.

Kind Regards,  
**UrbanSolutions**

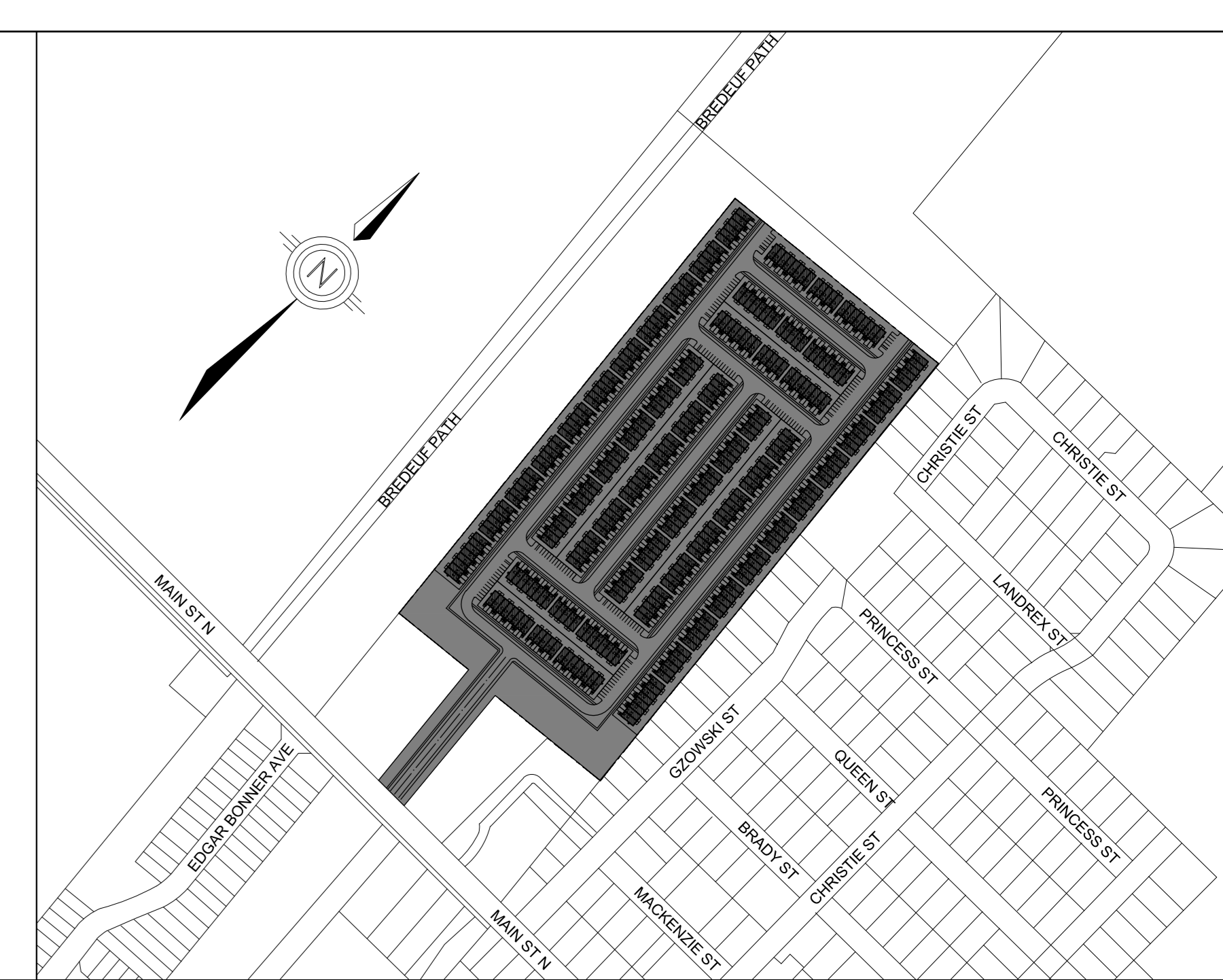


Matt Johnstor, MCIP, RPP  
*Principal*

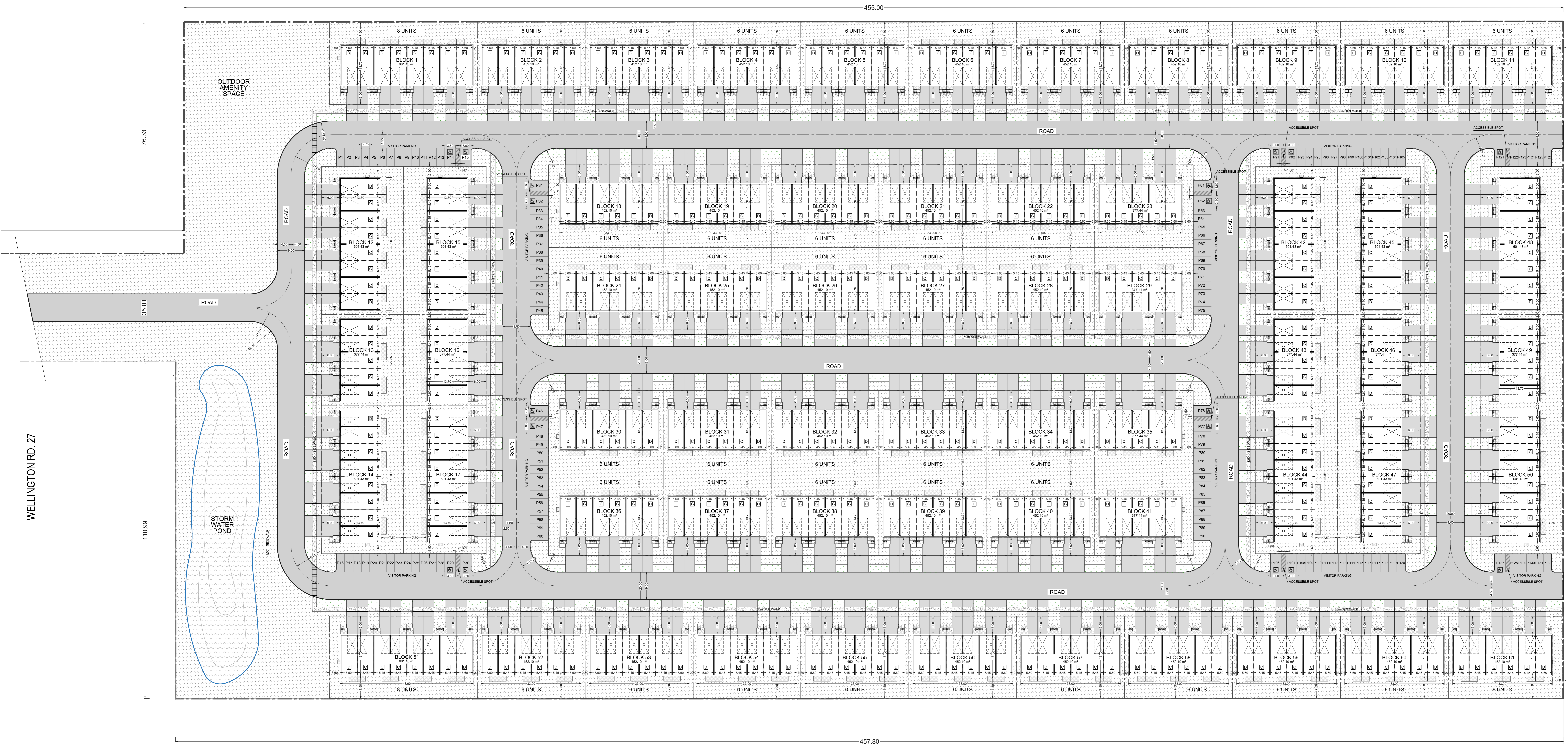
## Appendix A – Site Plan



# RESIDENTIAL DEVELOPMENT (FREEHOLD TOWNHOUSES) 5149 WELLINGTON RD. 27 TOWNSHIP OF GUELPH-ERAMOSA (ROCKWOOD) ±381 TOTAL UNITS



KEY PLAN

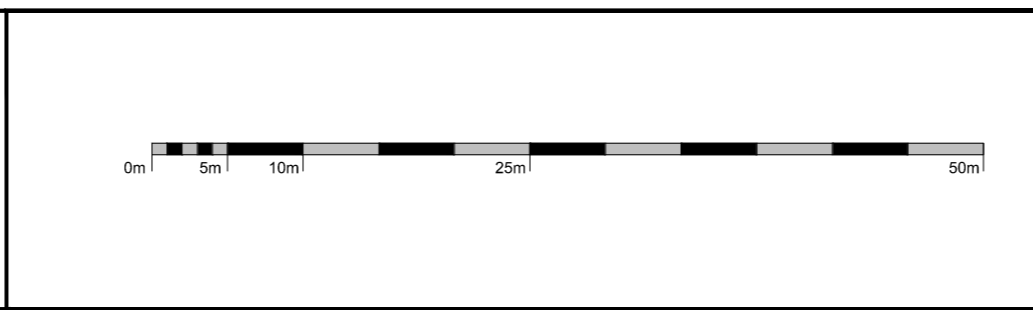


| SITE STATISTICS  |                           |        |
|--|---------------------------|--------|
| SITE AREA:   | 105,732.90 m <sup>2</sup> | 100%   |
| TOTAL BUILDING AREA:   | 32,036.84 m <sup>2</sup>  | 30.30% |
| BLOCK 1  | 452.10 m <sup>2</sup>     |        |
| BLOCK 2  | 452.10 m <sup>2</sup>     |        |
| BLOCK 3  | 452.10 m <sup>2</sup>     |        |
| BLOCK 4  | 452.10 m <sup>2</sup>     |        |
| BLOCK 5  | 452.10 m <sup>2</sup>     |        |
| BLOCK 6  | 452.10 m <sup>2</sup>     |        |
| BLOCK 7  | 452.10 m <sup>2</sup>     |        |
| BLOCK 8  | 452.10 m <sup>2</sup>     |        |
| BLOCK 9  | 452.10 m <sup>2</sup>     |        |
| BLOCK 10   | 452.10 m <sup>2</sup>     |        |
| BLOCK 11   | 452.10 m <sup>2</sup>     |        |
| BLOCK 12   | 452.10 m <sup>2</sup>     |        |
| BLOCK 13   | 452.10 m <sup>2</sup>     |        |
| BLOCK 14   | 452.10 m <sup>2</sup>     |        |
| BLOCK 15   | 452.10 m <sup>2</sup>     |        |
| BLOCK 16   | 452.10 m <sup>2</sup>     |        |
| BLOCK 17   | 452.10 m <sup>2</sup>     |        |
| BLOCK 18   | 452.10 m <sup>2</sup>     |        |
| BLOCK 19   | 452.10 m <sup>2</sup>     |        |
| BLOCK 20   | 452.10 m <sup>2</sup>     |        |
| BLOCK 21   | 452.10 m <sup>2</sup>     |        |
| BLOCK 22   | 452.10 m <sup>2</sup>     |        |
| BLOCK 23   | 452.10 m <sup>2</sup>     |        |
| BLOCK 24   | 452.10 m <sup>2</sup>     |        |
| BLOCK 25   | 452.10 m <sup>2</sup>     |        |
| BLOCK 26   | 452.10 m <sup>2</sup>     |        |
| BLOCK 27   | 452.10 m <sup>2</sup>     |        |
| BLOCK 28   | 452.10 m <sup>2</sup>     |        |
| BLOCK 29   | 452.10 m <sup>2</sup>     |        |
| BLOCK 30   | 452.10 m <sup>2</sup>     |        |
| BLOCK 31   | 452.10 m <sup>2</sup>     |        |
| BLOCK 32   | 452.10 m <sup>2</sup>     |        |
| BLOCK 33   | 452.10 m <sup>2</sup>     |        |
| BLOCK 34   | 452.10 m <sup>2</sup>     |        |
| BLOCK 35   | 452.10 m <sup>2</sup>     |        |
| BLOCK 36   | 452.10 m <sup>2</sup>     |        |
| BLOCK 37   | 452.10 m <sup>2</sup>     |        |
| BLOCK 38   | 452.10 m <sup>2</sup>     |        |
| BLOCK 39   | 452.10 m <sup>2</sup>     |        |
| BLOCK 40   | 452.10 m <sup>2</sup>     |        |
| BLOCK 41   | 452.10 m <sup>2</sup>     |        |
| BLOCK 42   | 452.10 m <sup>2</sup>     |        |
| BLOCK 43   | 452.10 m <sup>2</sup>     |        |
| BLOCK 44   | 452.10 m <sup>2</sup>     |        |
| BLOCK 45   | 452.10 m <sup>2</sup>     |        |
| BLOCK 46   | 452.10 m <sup>2</sup>     |        |
| BLOCK 47   | 452.10 m <sup>2</sup>     |        |
| BLOCK 48   | 452.10 m <sup>2</sup>     |        |
| BLOCK 49   | 452.10 m <sup>2</sup>     |        |
| BLOCK 50   | 452.10 m <sup>2</sup>     |        |
| BLOCK 51   | 452.10 m <sup>2</sup>     |        |
| BLOCK 52   | 452.10 m <sup>2</sup>     |        |
| BLOCK 53   | 452.10 m <sup>2</sup>     |        |
| BLOCK 54   | 452.10 m <sup>2</sup>     |        |
| BLOCK 55   | 452.10 m <sup>2</sup>     |        |
| BLOCK 56   | 452.10 m <sup>2</sup>     |        |
| BLOCK 57   | 452.10 m <sup>2</sup>     |        |
| BLOCK 58   | 452.10 m <sup>2</sup>     |        |
| BLOCK 59   | 452.10 m <sup>2</sup>     |        |
| BLOCK 60   | 452.10 m <sup>2</sup>     |        |
| BLOCK 61   | 452.10 m <sup>2</sup>     |        |
| PORCH & STAIRS & DECKS   | 3,340.78 m <sup>2</sup>   |        |
| PAVED AREA:  |                           |        |
| LANDSCAPE AREA:  |                           |        |
| SOFT LANDSCAPE AREA:   |                           |        |
| HARD LANDSCAPE AREA <sup>1</sup> :   |                           |        |
| NUMBER OF PARKING (C+D):   | 381(259+122)              |        |
| NUMBER OF PARKING SPACES <sup>2</sup> :                                    | 381+132+133               |        |
| <sup>1</sup> HARD LANDSCAPE AREA INCLUDES: SIDEWALKS, WALKWAYS, & CURBS.   |                           |        |
| <sup>2</sup> 2 PARKING SPACES FOR EACH UNIT: 1 GARAGE + 1 DRIVEWAY.        |                           |        |
| PARKING REQUIRED:  |                           |        |
| 1.4 SPACES/UNIT  |                           |        |
| 1.4 X 381 = 533  |                           |        |
| VISITOR'S PARKING PROVIDED:  |                           |        |
| 132 SPACES 2.75 m x 6.0 m  |                           |        |
| (14% BARRIER FREE SPACES 3.0 m x 6.0 m WITH 1.50 m AISLE BETWEEN 2 SPACES) |                           |        |

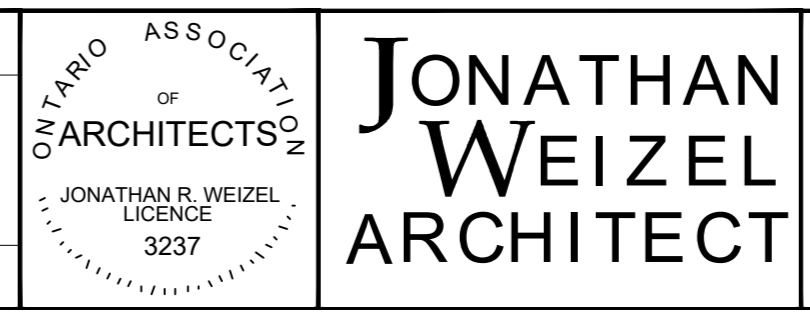
| No. | Reference                     | Date         | Revisions |
|-----|-------------------------------|--------------|-----------|
| 1   | Issued for Site Plan Approval | Jan 03, 2023 |           |

Note

THE GENERAL CONTRACTOR SHALL CHECK AND VERIFY ALL DIMENSIONS AND REPORT ALL ERRORS AND OMISSIONS TO THE ARCHITECT. DO NOT SCALE THE DRAWINGS. THIS DRAWING SHALL NOT BE USED FOR CONSTRUCTION PURPOSES UNTIL SIGNED BY THE ARCHITECT.



SHEET PRINT SIZE 36" x 24"  
36 JANESVILLE ROAD  
Thornhill, Ontario L4J 6Z9  
Telephone: (905) 707-1996  
Facsimile: (905) 707-3474

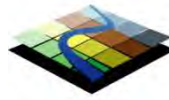


Project: RESIDENTIAL DEVELOPMENT (FREEHOLD TOWNHOUSES)  
5149 WELLINGTON RD. 27  
Township of Guelph-Eramosa (Rockwood)

| SHEET PLAN      |        |                 |              |
|-----------------|--------|-----------------|--------------|
| Drawn by:       | GN     | Date:           | JAN 03, 2023 |
| Checked by:     | JW     | Scale:          | 1:500        |
| Project Number: | 222/35 | Drawing Number: | A-001        |

Appendix B – Terrastory Environmental Consulting Inc.  
Preliminary Natural Heritage Constraints Analysis

January 3, 2023  
Project No.: 22214



**TERRASTORY**  
environmental consulting inc.

Erlick Agency Inc.  
8 Ardmore Road  
Toronto, ON M5P 1V3  
*Sent via email to: erlickgroup@gmail.com*

**SUBJECT: Preliminary Natural Heritage Constraints Analysis  
5149 Wellington Road 27  
Community of Rockwood, Township of Guelph-Eramosa**

---

Terrastory Environmental Consulting Inc. (hereinafter “Terrastory”) was commissioned to undertake a preliminary assessment of natural heritage constraints and considerations at the above-captioned location (hereinafter “Subject Property”) in Rockwood (Township of Guelph-Eramosa). Mapping which indicates the biophysical conditions of the Subject Property is provided in **Figure 1**.

### **EXISTING BIOPHYSICAL CONDITIONS**

A Terrastory Ecologist (C. A. Wegenschimmel) visited the Subject Property on 21 December 2022 under winter conditions (i.e., snow present). The Subject Property was found to be comprised primarily of tilled agricultural lands (planted in corn in 2022), which offer negligible natural heritage value. A coniferous hedgerow dominated by White Spruce (*Picea glauca*) occurs in the southwest corner of the Subject Property, while a deciduous hedgerow consisting of Black Walnut (*Juglans nigra*), Manitoba Maple (*Acer negundo*), White Elm (*Ulmus americana*), and White Ash (*Fraxinus americana*) occupies the northeastern boundary of the Subject Property. Additional scattered woody vegetation occurs along the remaining property margins. Certain trees along the property margins are relatively large boundary trees containing cracks/cavities which could support wildlife use (e.g., bat roosting).

A small, disturbed area in the northwestern portion of the Subject Property was found by Terrastory to be wetland (meadow marsh) due to dominance by the invasive Reed-canary Grass (*Phalaris arundinacea*). It is unknown if this wetland is supported by surface water runoff or an elevated groundwater table (or a combination thereof). As Terrastory’s assessment was undertaken during winter conditions, the wetland boundaries were delineated based on limited visibility of (mostly senesced) vegetation and should therefore be considered approximate. Confirmation of wetland presence and a more precise delineation of its boundaries is best undertaken between approximately June 1 and September 30. The wetland is surrounded by a mixed meadow dominated by Smooth Brome (*Bromus inermis*), Queen Anne’s Lace (*Daucus carota*), Common Milkweed (*Asclepias syriaca*), and Kentucky Bluegrass (*Poa pratensis*).

Fields occur to the northwest and northeast of the Subject Property. While these fields are somewhat narrow (rectangular) and relatively small, they may provide habitat for certain grassland bird species at risk. Note that none of these fields extend within the Subject Property, but rather abut the property boundaries.

No surface water drainage features (e.g., watercourses, swales) were documented during the site assessment, suggesting that precipitation infiltrates into the surficial soils and/or runs off as sheet flow within the site.

No Endangered Threatened species (e.g., Butternut) or Significant Wildlife Habitat (SWH) were confirmed during the site assessment.

## **NATURAL HERITAGE POLICY CONTEXT**

There is an overlapping municipal, provincial, and federal policy framework respecting the protection of natural heritage features and areas across southern Ontario. These requirements include objectives, policies, and directives which are principally contained in federal and provincial statutes, regulations, policy statements, Official Plans, and guidance documents.

The Subject Property is zoned “Agricultural” (A) pursuant to the Township’s Zoning By-law 40/2016. There are no “Environmental Protection” (EP) zones mapped from within the Subject Property or adjoining parcels. The Subject Property is designated “Prime Agricultural” per Schedule A3 of the County of Wellington’s Official Plan (OP); no “Core Greenlands” or “Greenlands” are mapped from the Subject Property or adjoining parcels. A watercourse is mapped from an adjacent property to the west; however, this feature was not visible during the site assessment (from within the Subject Property) and is not mapped by the Grand River Conservation Authority (GRCA) on publicly-available screening maps.

The northeast corner of the Subject Property is contained within Natural Heritage System (NHS) of the Growth Plan made pursuant to the *Places to Grow Act* (see **Figure 1**). The Growth Plan NHS is an overlay designation specific to areas outside of the Greenbelt Plan and settlement areas. The portion of the Growth Plan NHS which extends within the Subject Property partially overlaps a hedgerow and tilled agricultural lands, and therefore was not intended to capture any Key Natural Heritage Features (KNHF) or Key Hydrologic Features (KHF).

As noted above, much of the Subject Property lacks natural heritage value given the preponderance of tilled agricultural lands. The primary natural heritage consideration associated with development within the Subject Property relates to the identified wetland (meadow marsh). The wetland has not been evaluated based on the protocols of the Ontario Wetland Evaluation System (OWES; recently updated in late 2022) and (if ever evaluated) is unlikely to be considered provincially significant. The wetland is dominated by invasive vegetation (Reed-canary Grass), and the conditions observed suggest that standing water is limited (i.e., significant breeding habitat for amphibians is unlikely to be present).

The County’s OP considers “all other wetlands” (i.e., non-PSW) as part of the “Core Greenlands” designation. Development within or adjacent to wetlands is also regulated by GRCA pursuant to O. Reg. 150/06. GRCA Policy 8.4.5 permits development within (or interference with) an “anthropogenic” wetland less than 2 ha where the wetland functions can be maintained or enhanced elsewhere within the subwatershed, and subject to satisfying the requirements of clauses a) to i). This includes demonstrating that the wetland is not part of a PSW, is not located within a floodplain or riparian community, has not been municipally designated, does not contain fish habitat or SWH, does not contain provincially or regionally significant species, does not provide a corridor or linkage function, and does not provide significant groundwater recharge/discharge.

## **CONCLUSIONS**

The results of this preliminary natural heritage constraints analysis are summarized as follows:

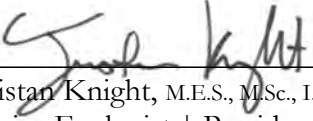
- The majority of the Subject Property is comprised of tilled agricultural lands (planted in corn in 2022) which lack natural heritage value and are therefore unconstrained from a natural heritage perspective.
- Fields on Adjacent Lands to the northwest/northeast could provide habitat for certain grassland bird species at risk; however, these fields do not extend within the Subject Property.
- Opportunities to protect certain larger trees along the property margins which offer potential wildlife habitat (particularly for roosting bats) and/or act as boundary trees should be explored at detailed design.
- A small, disturbed wetland (meadow marsh) dominated by invasive vegetation was documented in the northwest corner of the Subject Property during winter conditions; verification of the boundaries of this feature must occur during the growing season.
- A policy basis for relocation and replication of the wetland's functions is offered under GRCA Policy 8.4.5.

Should any future development activities for the lands be proposed, an Environmental Impact Study (EIS) will be required to comprehensively characterize the biophysical features and conditions of the Subject Property, particularly the wetland. At a minimum, the EIS would include standard technical recommendations and mitigation measures to minimize the potential for environmental impact, such as (among others) a timing restriction on vegetation removal (to protect nesting birds and roosting bats) and inclusion of appropriate stormwater management controls. The on-site wetland will either require protection from development (including an ecologically appropriate buffer zone) or could be functionally relocated/replicated pursuant to GRCA Policy 8.4.5 (provided that all relevant policy tests are satisfied). Verification of the wetland boundaries during the appropriate season (i.e., approximately June 1 to September 30) would be required.

Should you have any questions or require further clarification regarding the contents of this letter, I would be pleased to discuss them further and can be reached by phone (905.745.5398) or email (tristan@terrastoryenviro.com).

Regards,

Terrastory Environmental Consulting Inc.

  
Tristan Knight, M.E.S., M.Sc., I.S.A.  
Senior Ecologist | President

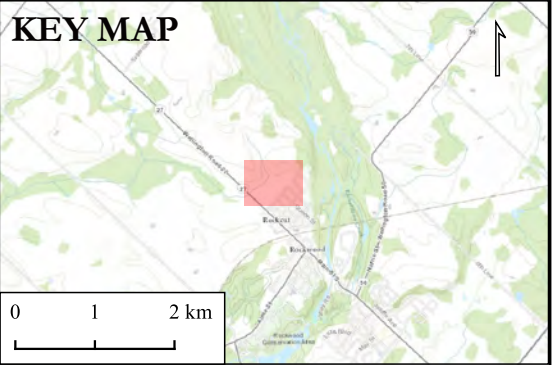
## **STATEMENT OF LIMITATIONS**

This report has been prepared by Terrastory Environmental Consulting Inc. (hereinafter "Terrastory") for the client. All information, conclusions, and recommendations contained in this report are subject to the scope and limitations set out in the agreement between Terrastory and the client and qualifications contained in this report. This report shall not be relied upon by any third parties without the prior written consent of Terrastory. Terrastory is not responsible for any injury, loss, or damages arising from improper use of this report by third parties. Excerpts of this report or alterations to this report taken without the authorization of Terrastory invalidates the report and any conclusions therein.

**Vegetation Community Codes:**

UPLAND  
 HE-1: Deciduous Hedgerow  
 HE-2: Coniferous Hedgerow  
 MEMM4: Fresh - Moist Mixed Meadow

WETLAND / AQUATIC  
 MAMM1-3: Reed-canary Grass Graminoid Mineral Meadow Marsh



**Legend**

**Area of Assessment**  
 Subject Property

**Administrative Boundaries**  
 Growth Plan Natural Heritage System  
 GRCA Regulation Limit (per Publicly-available Screening Maps)

**Biophysical Features and Conditions**  
 Terrain  
 Topographic Contours (1 m; derived from DTM)

**Vegetation Communities**  
 Meadow  
 Marsh (boundary is approximate)

**Significant Natural Features - Agency Identified**  
 Ontario Hydrological Network Watercourses

**GENERAL NOTES:**

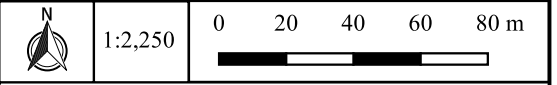
-All natural feature extents and boundaries depicted on this figure have been identified based on existing information and one (1) site visit conducted in December 2022. Updates to the information shown herein may be required based on the results of more detailed site level information collected during the appropriate season.

-Additional natural features occur (or have the potential to occur) on the Subject Property apart from those shown on this figure; see accompanying letter text for further details.

-Features depicted herein should not be used in place of a professional survey.

-Numeric scale is for a 11x17 inch print.

**TERRASTORY**  
 environmental consulting inc.  
 info@terrastoryenviro.com 905.745.5398



**Location:**  
 5159 Wellington Road 27,  
 Township of Guelph-Eramosa

|   |  |
|---|--|
| <b>Project No.:</b> 22214                 | <b>Figure 1:</b><br>Prelim.<br>Biophysical<br>Features and<br>Conditions |
| <b>Date:</b> 2023-01-03                   |  |
| <b>By:</b> TK   <b>Checked:</b> --        |  |
| <b>Orthophotograph Date:</b> 2015 (SWOOP) |  |

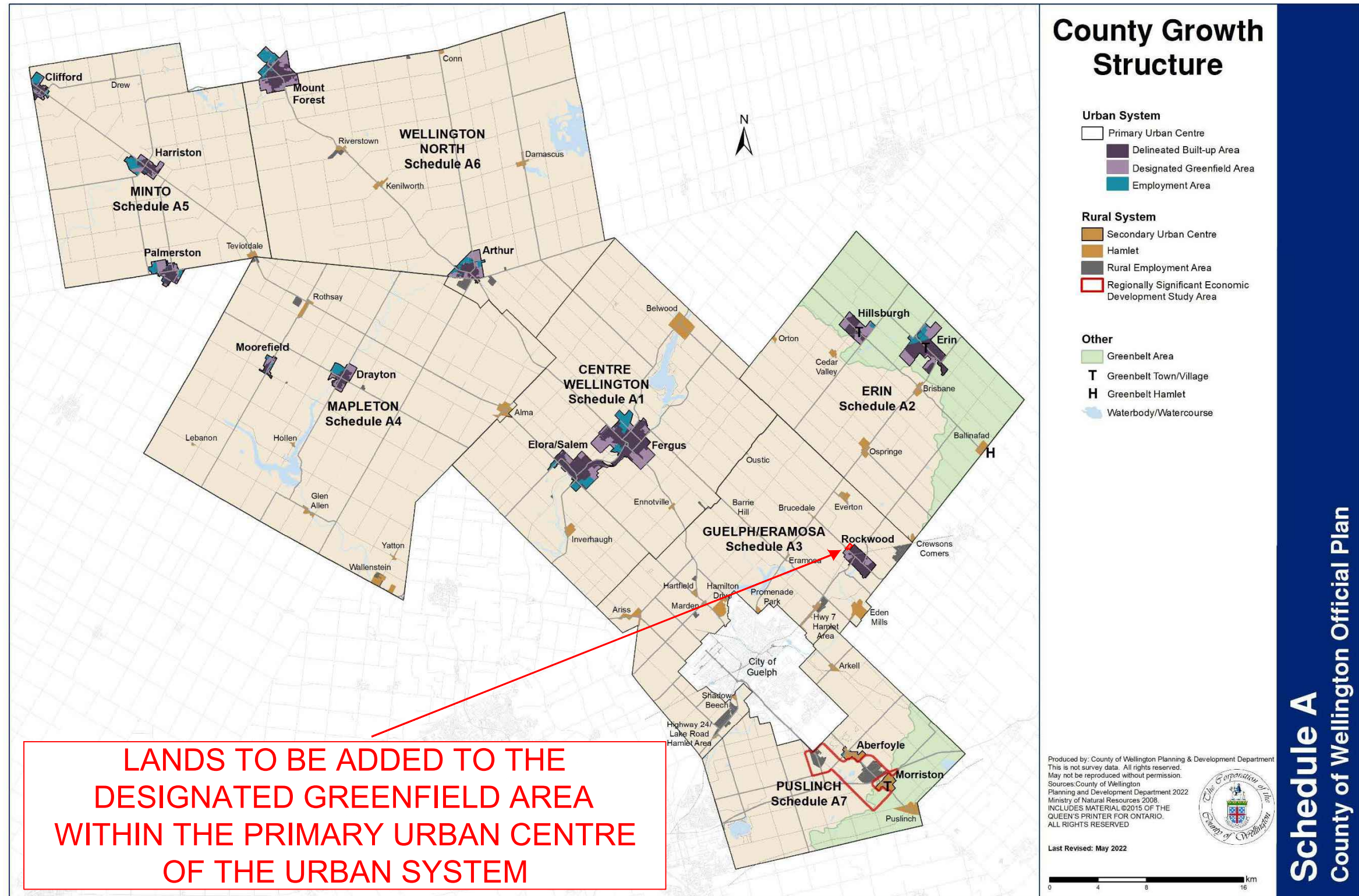
Appendix C – Schedule A-1 of OPA No. 119

Proposed Changes to Schedule A – County Growth Structure



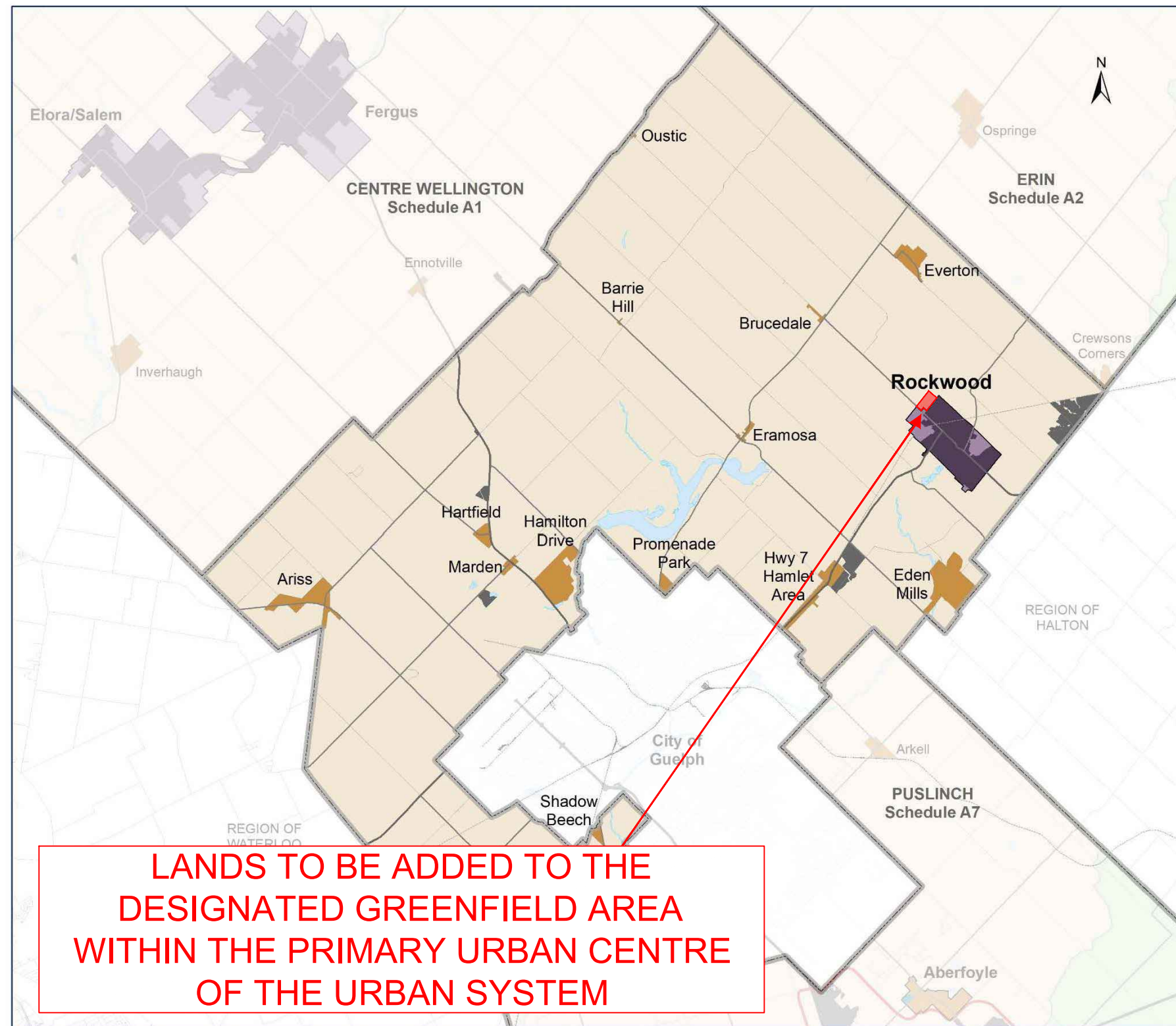
THE CORPORATION OF THE  
COUNTY OF WELLINGTON

**SCHEDULE "A-1"**  
OF  
OFFICIAL PLAN  
AMENDMENT NO. 119



Document Path: F:\GIS\Projects\Official Plan\Official Plan Amendments Mapping and Data\OPA 119\_Schedules\Schedule A to A7\_Urban Growth Structure\Schedule A\_County Growth Structure.mxd

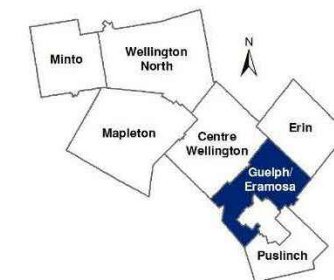
Appendix D – Schedule A-4 of OPA No. 119  
Proposed Changes to Schedule A3 – County Growth Structure-Guelph/Eramosa



**LANDS TO BE ADDED TO THE  
DESIGNATED GREENFIELD AREA  
WITHIN THE PRIMARY URBAN CENTRE  
OF THE URBAN SYSTEM**

**County Growth  
Structure  
GUELPH/ERAMOSIA**

- Urban System**
- Primary Urban Centre
  - Delineated Built-up Area
  - Designated Greenfield Area
- Rural System**
- Hamlet
  - Rural Employment Area
- Other**
- Waterbody/Watercourse



Produced by: County of Wellington Planning & Development Department  
This is not survey data. All rights reserved.  
May not be reproduced without permission.  
Sources: County of Wellington  
Planning and Development Department 2022  
Ministry of Natural Resources 2008.  
INCLUDES MATERIAL ©2015 OF THE  
QUEEN'S PRINTER FOR ONTARIO.  
ALL RIGHTS RESERVED.  
Last Revised: May 2022



Document Path: F:\LIS\Projects\Official Plan\Official Plan Amendments Mapping and Data\OPA 119\_Schedules\Schedule A to A7\_Urban Growth Structure\Schedule A3\_Guelph-Eramosa\_Growth Structure.mxd

Appendix E – Schedule A-11 of OPA No. 119  
Proposed Changes to Schedule B3 – Guelph/Eramosa Land Use Plan

THE CORPORATION OF THE  
COUNTY OF WELLINGTON

SCHEDULE "A-11"  
OF  
OFFICIAL PLAN  
AMENDMENT NO. 119

