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August 4, 2023

Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON M7A 2J3

Dear Minister Clark:

**RE: ERO 019-6813 - Review of Proposed Policies Adapted from A Place to Grow and Provincial Policy Statement to Form a New Provincial Planning Policy Instrument Request for Modification
178 and 220 First Line, Centre Wellington (Elora)
OUR FILE 23250A**

On behalf of our clients, Glenn Morell and Mark Morell, we have prepared the following letter for consideration during the Ministry's review of the proposed new Provincial Planning Statement.

Our clients own the lands municipally known as 178 and 220 First Line in the Township of Centre Wellington (the "subject lands"). The subject lands have a combined area of approximately 14.93 hectares. Specifically, 178 First Line has an area of approximately 4.78 hectares and 220 First Line has an area of approximately 10.15 hectares. The subject lands are identified below:



The subject lands are bounded by the Elora Primary Urban Centre and residential uses to the north and west. Residential uses to the west are comprised of an existing subdivision (South Ridge) which was completed approximately five years ago. To the north is the Trestle Bridge Trail and a residential subdivision (South River) which is presently under construction. To the east are rural residential uses along Gilkison Street. To the south are rural residential and agricultural uses. The subject lands have frontage on First Line, which is a Collector Road.

Through the design and construction of the adjacent subdivisions, infrastructure was put in place to facilitate the future development of the subject lands, including:

- Two existing road stubs were constructed from the South Ridge subdivision to the west. These road stubs extend from Stafford Street and Reynolds Road and can be seen on the aerial photo above. The existing road stubs allow for the extension of existing local roads through the subject lands to facilitate orderly and efficient residential development with a road network that is integrated and compatible with adjacent lands.
- The South River subdivision to the north was designed with a watermain and sanitary services extending to the south from the subdivision to the subject lands where they are capped. The water and sanitary services were planned to accommodate the future development of the subject lands.

The majority of the subject lands are presently designated *Prime Agricultural* by the County of Wellington Official Plan, with the southwest portion designated *Core Greenlands* and *Greenlands*, corresponding with the approximate location of the wooded area.

We request that subject lands be incorporated into the boundary of the Elora Primary Urban Centre. The extent of the proposed modification to the County of Wellington Official Plan is illustrated below:



The proposal is a minor expansion of the settlement area which will facilitate the development of underutilized land, adjacent to the existing Primary Urban Centre and Built-up Area. The proposal would maintain the *Core Greenlands* and *Greenlands* designation for the protection of the woodlot. It is the intent that the precise land use designations, including the identification of the limits of existing natural features would be determined through future *Planning Act* applications related to a development proposal.

We have reviewed Policy 2.3 of the Planning Policy Statement and, in particular, Policy 2.3.4 regarding settlement area boundary expansion. The request addresses the criteria for settlement area boundary expansions for the following reasons:

- The subject lands can be serviced through connections to existing sanitary and water services extending to the subject lands from the adjacent residential plan of subdivision. These services have been designed in consideration of the potential future residential development of the subject lands.
- A Municipal Servicing Analysis was prepared in support of the County of Wellington's ongoing Municipal Comprehensive Official Plan Review. This analysis identifies that the Township of Centre Wellington has existing water and wastewater servicing uncommitted reserve capacity to accommodate near-term growth.
- The subject lands are not identified as a Specialty Crop Area, based on Provincial Agricultural Mapping.
- Existing livestock operations proximate to the subject lands are already constrained by existing nearby residential uses. Future applications will demonstrate compliance with MDS.
- The subject lands are limited for long-term agricultural use. The portion of the subject lands used for agricultural production is less than eight hectares which poses limitations on cropping and production of below average yields. Further, the potential for future livestock uses on the subject lands is limited due to the location of the subject lands adjacent Urban Area to the north and west and the rural residential uses to the east.
- Incorporating the subject lands into the Urban Area represents the phased progression of urban development as the subject lands are adjacent to the Elora Primary Urban Centre to the north and west. Accommodation has been made through adjacent plans of subdivision for transportation and servicing connections to the subject lands. Further, the subject lands have direct access to the Trestle Bridge Trail to the north which will facilitate active transportation throughout the community. The subject lands represent a logical location for residential development given the location adjacent to the existing Built-up Area, existing infrastructure connections being in place to facilitate servicing and transportation and proximity to existing active transportation networks.

For these reasons, the request to include the subject lands within the Elora Primary Urban Centre in the County of Wellington Official Plan satisfies the criteria of the Provincial Policy Statement for settlement area boundary expansions. This request represents a logical expansion of the settlement area to include lands for residential development which have servicing and transportation infrastructure in place, are adjacent to the existing Built-up Area and have limitations for long-term for agricultural use.

Thank you for the opportunity to submit this request. We appreciate your consideration and if you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "E. Elliott". The signature is written in a cursive, somewhat stylized font.

Emily Elliott, BES, MCIP, RPP
Associate

cc. Glenn Morell and Mark Morell