

February 14, 2024

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

Dear Mr. Shantz:

RE: County of Wellington Official Plan Amendment 120
ERO Number 019-6784 / Ministry Reference Number 23-OP-221631
OUR FILE 23250A

On behalf of our client, Biltmore Homes Limited, we have prepared the following letter regarding the Ministry's review of County of Wellington Official Plan Amendment 120.

Our client owns the lands municipally known as 795 Anderson Street in the Township of Centre Wellington (the "subject lands"). The subject lands have an area of approximately 7.3 hectares and are currently vacant. They are bounded by the Fergus Primary Urban Centre and residential uses to the east and south, residential uses to the west and agricultural uses to the north.

We have reviewed County of Wellington Official Plan Amendment 120 and agree with the population and employment forecasts for the County.



On behalf of our clients, we have been participating in the County's Official Plan Review process. Through this process, the County identified a shortfall of Community Area designated land to accommodate the growth forecast to 2051. As a result, the County will need to expand the Urban Settlement Area boundaries. We understand that the urban boundary expansions will be made as a future amendment to the County Official Plan. We have submitted a request to the County to consider including the subject lands within the Fergus Primary Urban Centre for the County of Wellington.

The reasons for this request are as follows:

- The subject lands represent a logical location for urban development as they are adjacent to the built-up area of the Fergus Primary Urban Centre, are bounded by residential development to the south and west and have access to a Township road designed to accommodate residential uses.
- The subject lands have not been used for agricultural production more than 50 years. An Agricultural Impact Assessment has been prepared, and filed with the County, which identifies that the subject lands are constrained for agricultural uses for the following reasons:
 - A site specific zoning regulation applies to the subject lands which prohibits “livestock housing facilities”;
 - The subject lands represent a small parcel (7.3 hectares) which includes a wooded area that is designated *Greenlands* by the County Official Plan;
 - The subject lands feature significant variations in elevation; and,
 - There are existing access limitations for farm vehicles to the subject lands.
- The subject lands are not identified as a Specialty Crop Area, based on Provincial Agricultural Mapping.
- The proposal complies with the Minimum Distance Separation criteria. Three livestock operations exist in proximity to the subject lands. For two of these operations, residential lots and the Urban Area boundary exist between the operation and the subject lands which results in existing MDS constraints on those operations. The third operation is located more than one kilometre from the subject lands so MDS is not a constraint due to the distance of the operation.
- There will be no impact on agricultural lands and operations close to the subject lands. The majority of surrounding lands are residential and rural residential with few uses in the agri-food network. The subject lands are buffered from surrounding agricultural operations which limit the potential for trespassing, littering, and complaints related to noise and odor.
- An appropriate servicing strategy will be determined through future application in support of a development proposal.

In our opinion, the minor rounding out to include the subject lands within the Fergus Primary Urban Centre in the County of Wellington Official Plan is appropriate and will facilitate the residential development of lands which are otherwise underutilized and not a viable agricultural property.

Thank you for the opportunity to submit these comments. We will continue to work with the County of Wellington through their Official Plan review, particularly with regard to Urban Area Boundary Expansion requests.

Yours truly,

MHBC



Emily Elliott, BES, MCIP, RPP

cc. Terry Ellery, Biltmore Homes