

February 13, 2024

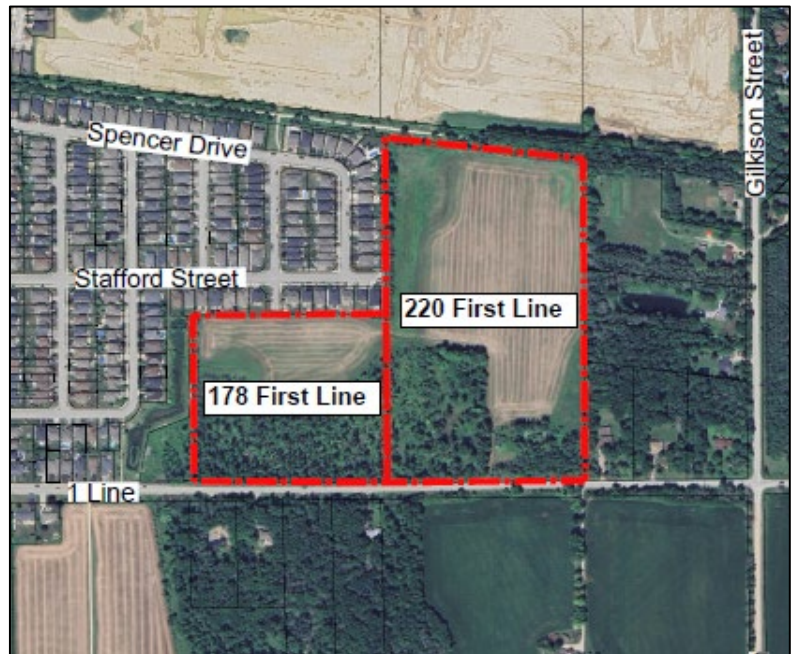
Tyler Shantz
 Municipal Services Office - Western Ontario
 659 Exeter Road
 Floor 2
 London, ON N6E 1L3

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 clients, Glenn Morell and Mark Morell, we have prepared the following letter regarding the Ministry's review of County of Wellington Official Plan Amendment 120.

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. 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. The subject lands have frontage on First Line, which is a Collector Road.



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 including reviewing the Phase 2 Municipal Comprehensive Review. Through this process, the County

identified a shortfall of Community Area designated land to accommodate the growth forecast to 2051. As a result, the Phase 2 MCR Report notes that the County will need to expand the Urban Settlement Area boundaries. We have submitted request to the County to consider including the subject lands within the Elora Primary Urban Centre for the County of Wellington. We understand that the urban boundary expansions will be made as a future amendment to the County Official Plan following the County's evaluation of the Urban Boundary Expansion requests.

The reasons for this request are as follows:

- 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 Township has sufficient servicing capacity to accommodate growth. 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.

The proposal represents a minor rounding out of the settlement area which will facilitate the development of underutilized, serviceable land, adjacent to the existing Primary Urban Centre and Built-up Area.

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

A handwritten signature in black ink, appearing to read "E Elliott".

Emily Elliott, BES, MCIP, RPP
Partner

cc. Glenn Morell and Mark Morell