

P L A N N I N G
J U S T I F I C A T I O N
R E P O R T

6586 BEATTY LINE NORTH
TOWNSHIP OF CENTRE WELLINGTON

MARCH 2025
FILE #11554

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1. INTRODUCTION

Weston Consulting has been retained by Sorbara/Tribute Brubacher Holdings Inc., the registered owner of the lands municipally known as 6586 Beatty Line North in the Township of Centre Wellington (the "Subject Property") to provide professional planning services. The Subject Property is contemplated for inclusion within the Fergus Settlement Area Boundaries to permit urban-type residential uses. The Subject Property would form a logical extension of the Storybrook Subdivision, which is a subdivision consisting of low and medium density residential uses, a park, and a stormwater management pond. The Storybrook Subdivision was planned to incorporate the Subject Property with respect to servicing infrastructure, street connections and public amenities.

In May 2024, Weston Consulting submitted a letter requesting a Settlement Area Boundary Expansion ("*May 2024 SABE Request*") to include the Subject Property within the Fergus Settlement Area Boundaries as a logical extension of the Storybrook Subdivision. The *May 2024 SABE Request* addressed the expansion criteria in provincial policy documents prior to enactment of the Provincial Policy Statement 2024 ("PPS 2024"). Applications for a County Official Plan Amendment ("OPA") and Local OPA are being submitted to the County and Township to (re) designate the Subject Property to the appropriate land use designations that will permit urban-type residential development on the Subject Property, which supports the *May 2024 SABE Request*. The proposed OPAs would extend the urban boundary as it is currently outlined in the County and Township official plans. The applications and supporting materials are submitted in accordance with the Pre-Application Consultation ("PAC") Checklist requirements and comments from the Township, County, and other agencies and departments.

This Planning Justification Report should be read in conjunction with the *May 2024 SABE Request*. The report will address the Settlement Area Boundary Expansion ("SABE") criteria in the PPS 2024 that were not considered in the May 2024 letter, along with the applicable environmental, servicing, and complete community policies in all the provincial, regional, and municipal planning documents that pertain to the proposed OPAs. In doing so, the proposed OPAs considers the appropriate planning matters and their corresponding policy tests to support the proposed SABE on good planning principles.

This report provides the planning rationale in support of the proposed development and planning applications, and provides corresponding analysis and justification in accordance with good planning principles. It is recognized that applications for Zoning By-law Amendment, Site Plan Approval and Draft Plan of Subdivision will be required to develop urban-type uses on the Subject Property if it is included within the Fergus Settlement Area Boundaries and will be provided at the appropriate time.

1.1 PURPOSE OF THE REPORT

The purpose of this report is to outline the nature of proposed OPAs and to evaluate the applications' consistency/conformity to the policies of the Planning Act, the Provincial Policy Statement (the "PPS 2024"), the County of Wellington Official Plan (the "CWOP") as amended by OPA 119, OPA 120, and OPA 123, the Township of Centre Wellington Official Plan (the "TCWOP"), the Township of Centre Wellington Zoning By-law 2009-045 (the "ZBL"), and other applicable policies, studies, regulations and guidelines that apply to the Subject Property. At the time of writing, the County has released a draft OPA 126 to identify urban boundary expansions in Centre Wellington. Subject Property is not contemplated for inclusion in the urban boundary according to Schedule A1 of OPA 126. In the event OPA 126 is adopted by Council without amendments, this OPA will facilitate an urban boundary expansion pursuant to the *May 2024 SABE Request*.

This report provides planning analysis and justification for the proposal in accordance with good planning and urban design principles, and provides a basis for the advancement of the planning applications through the planning process.

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2. SITE DESCRIPTION AND CONTEXT

2.1 LOT DESCRIPTION AND CONTEXT

The Subject Property is approximately 43.2 hectares in size, rectangular in shape and has approximately 300 metres of frontage along Beatty Line North. The Subject Property is currently vacant except for one single-detached dwelling. An abandoned railway traverses through the Subject Property in a northwest/southeast direction. Pockets of wooded areas are located adjacent to the abandoned rail corridor and along Beatty Line North, with the driveway from Beatty Line North to the existing dwelling traversing through a portion of the wooded area. Rural and agricultural uses are predominantly found in the area surrounding the Subject Property. A residential subdivision is currently under construction immediately south of the Subject Property, within the Fergus settlement area. The subdivision has been designed to integrate the Subject Property with respect to street connections, servicing infrastructure and public amenities.

The Subject Property is legally described as follows:

LOT 17, CONCESSION 14 NICHOL DESIGNATED AS PART 1 ON 61R-11588 SUBJECT TO AN EASEMENT IN GROSS OVER PART 11, 61R22133 AS IN WC673953 TOWNSHIP OF CENTRE WELLINGTON



Figure 1: Air Photo

2.2 SURROUNDING LAND USES

The following uses are within the vicinity of the Subject Property as outlined in Table 1.

Table 1: Surrounding Land Uses

Direction	Land Uses
North	North of the Subject Property is an agricultural property at the corner of Beatty Line and Sideroad 15. Further north are additional agricultural lots.
East	Immediately to the east of the Subject Property is Beatty Line. Further east is a wooded lot, followed by a recently completed low-rise residential subdivision comprised of single-detached dwellings and townhouse blocks.
South	To the south is the under-construction Storybrook Subdivision which consists of low and medium density residential uses. Further south of this is another recently completed residential subdivision comprised of single-detached dwellings.
West	West of the Subject Property are various agricultural lots.

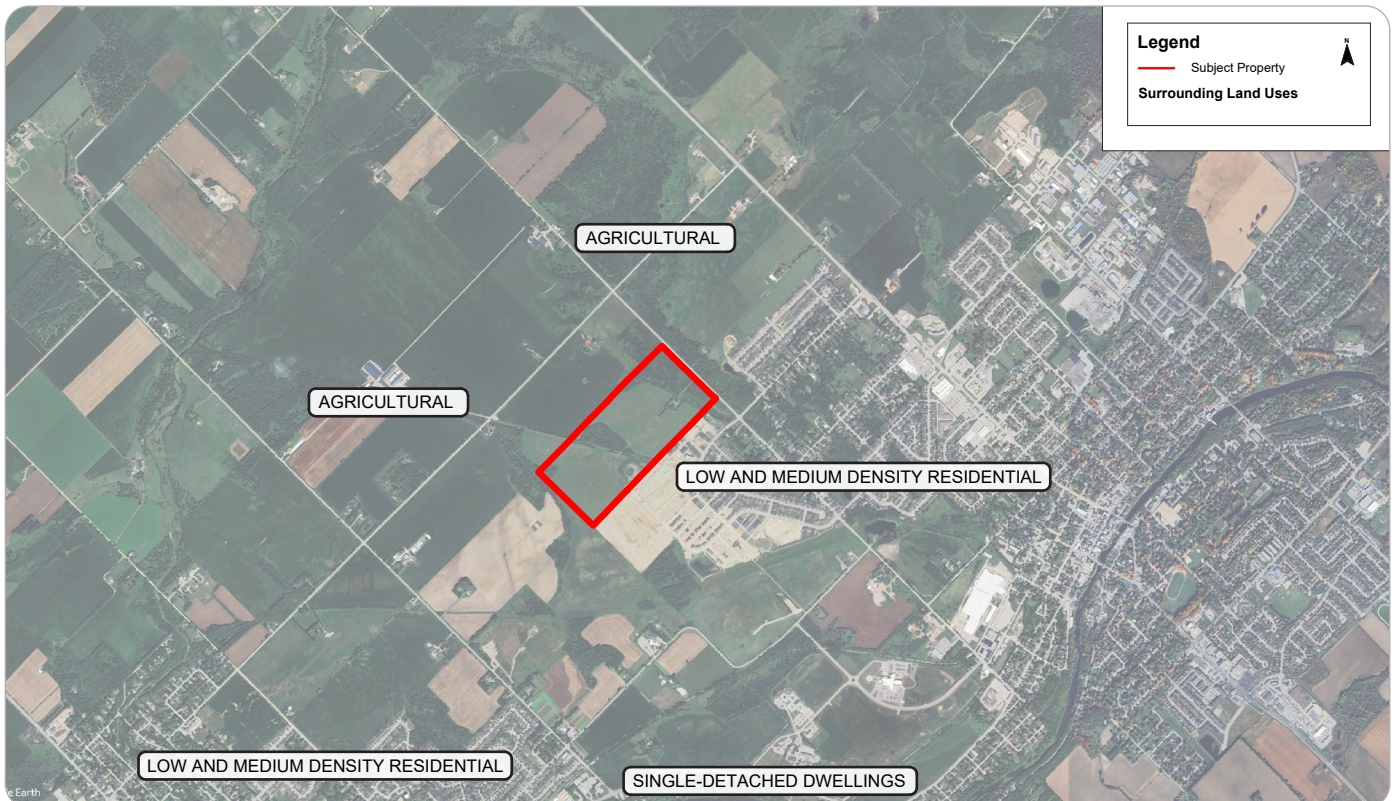


Figure 2: Surrounding Land Uses

2.3 MUNICIPAL LAND USE POLICIES AND ZONING

The Subject Property is currently designated *Prime Agricultural* and *Core Greenlands* according to Schedule B1 (Land Use Centre Wellington) of the County of Wellington Official Plan (the "CWOP"). Lands designated as *Prime Agricultural* are to be protected in the long-term for agricultural uses, while *Core Greenlands* are generally intended to be protected for development except in accordance with the development criteria as outlined in the CWOP.

The Subject Property is currently not located within the Fergus Urban Boundary and therefore does not have a land use designation in the TCWOP. In the absence of a land use designation in the lower-tier municipal official plan, the in-force policies of the CWOP are determinative of the current land use permissions on the Subject Property at this time.

The ZBL zones the Subject Property as *Agricultural (A)*, *Environmental Protection (EP)*, and *Environmental Protection Overlay* according to Schedule A, Map 17. Development is generally not permitted within the noted zones. A Zoning By-law Amendment would be required at the appropriate time to rezone the Subject Property to permit residential development.

2.4 TRANSPORTATION

The Township of Centre Wellington Official Plan identifies the segment of Beatty Line between Garafraxa Street West in the south and Sideroad 15 (Woolwich Street East) in the north as a Future Collector Road according to Schedule B (Municipal Servicing Plan). Collector Roads primarily connect with arterial roads while also being utilized to move both within and between neighbourhoods. Frontage along Beatty Line North will provide future vehicular access to the Subject Property to ensure connectivity and access to adjacent and surrounding lands.

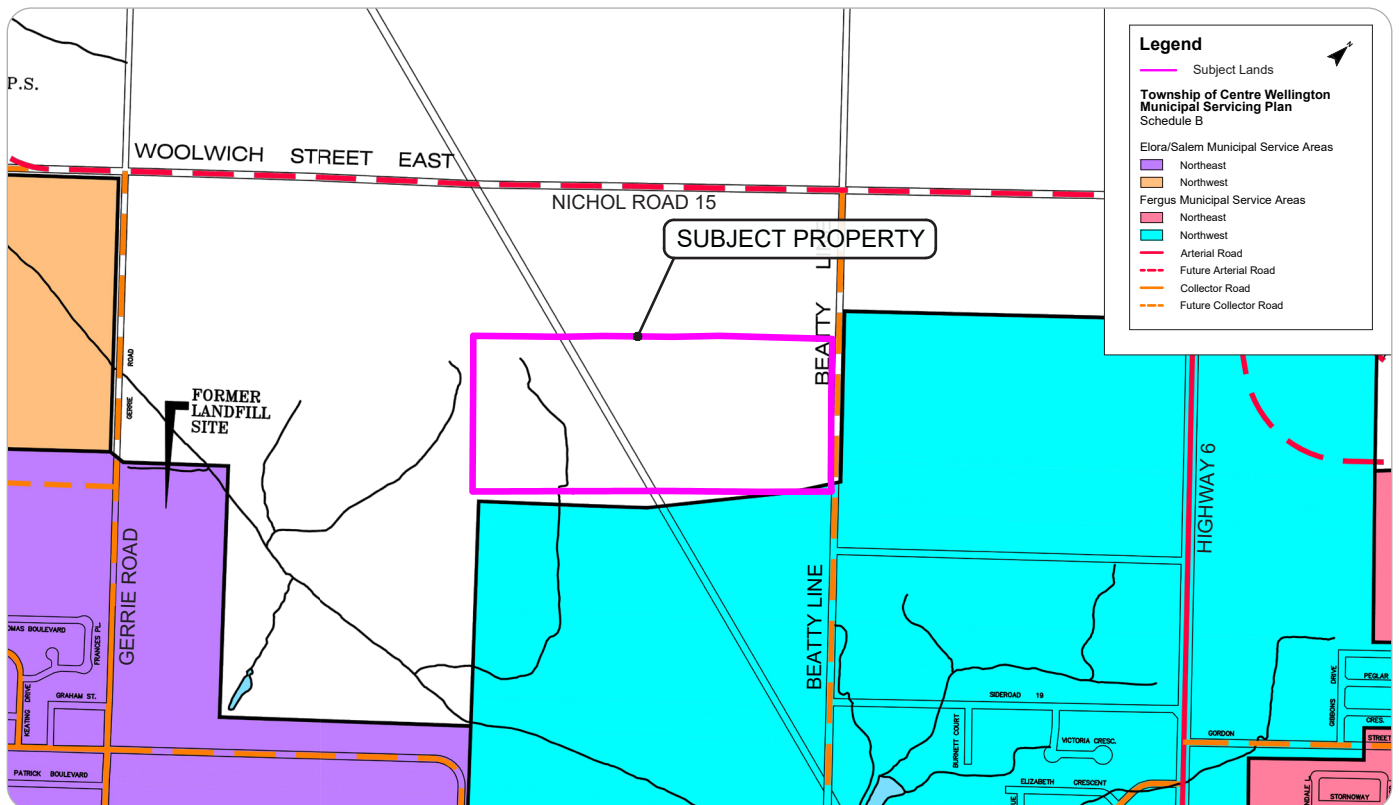


Figure 3: TCWOP Schedule B (Municipal Servicing Plan)

2.5 NEARBY DEVELOPMENT APPLICATIONS

This section provides a summary of select development applications for lands located within the nearby vicinity of the Subject Property to illustrate the type of development being contemplated in this area of the Township. These applications demonstrate how development within the Township is trending towards intensification and (re)development on underutilized parcels of land.

Table 2: Nearby Development Applications

#	Address	Application Type and File No.	Proposal	Status
1	465 Garafraxa Street West	RZ02/23	To rezone the lands to permit a 32-unit stacked townhouse condominium development.	Approved
2	961 St. David Street North	RZ015/22	To rezone the lands to permit 13 detached dwellings and 37 townhouse units.	Approved
3	950-960 St. David Street North	RZ011/22	To rezone the lands to permit 112 stacked townhouse units.	Approved
4	77 McQueen Boulevard	RZ03/23	To rezone the lands to permit a 100-unit apartment building.	In progress
5	149 & 157 Sideroad 18	RZ07/22	To rezone the lands to permit two semi-detached dwellings and one single-detached dwelling.	Approved
6	820 St. David Street North	RZ05/18	To rezone the lands to permit a 6-storey retirement residence.	Approved
7	350 St. Andrew Street West	RZ05/21	To rezone the lands to permit 5-storey apartment building with at-grade commercial uses.	Approved

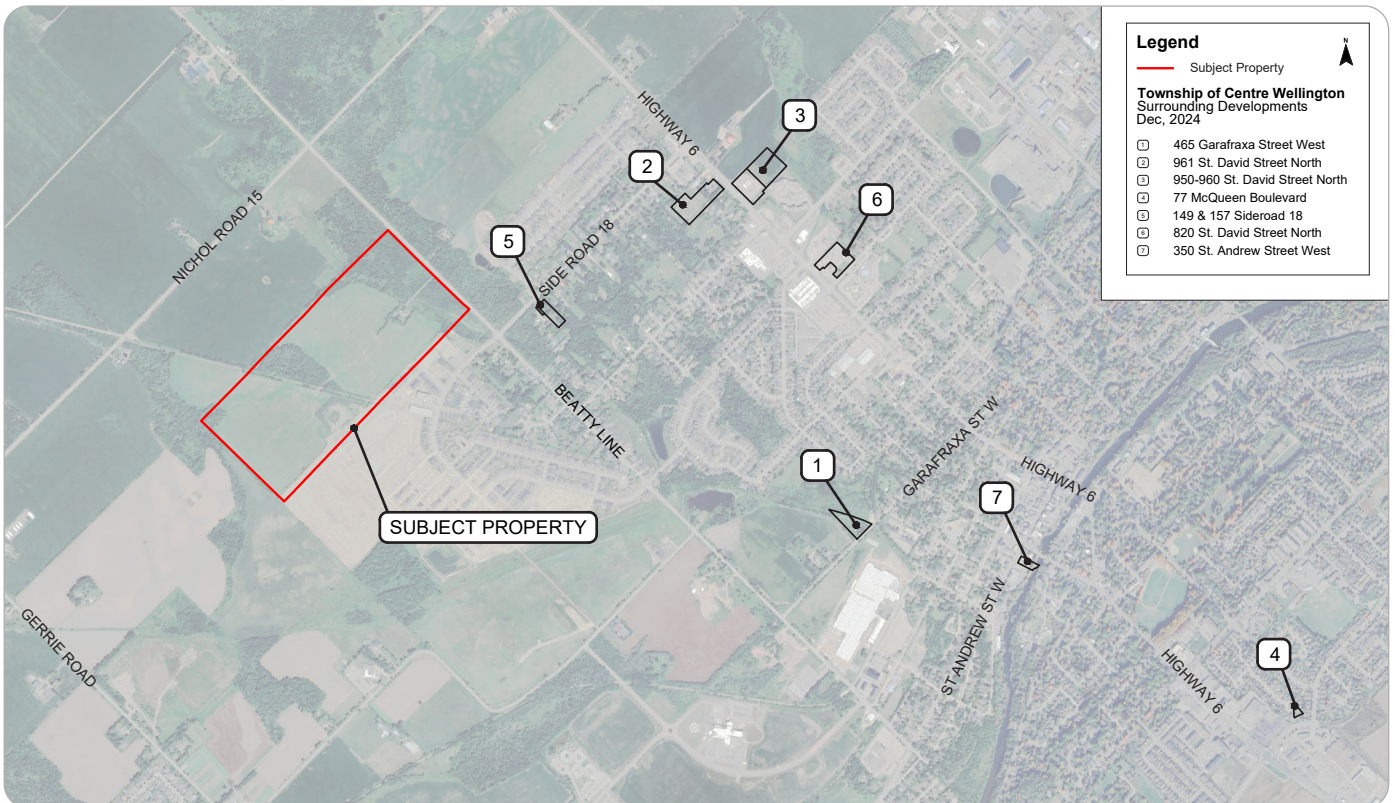


Figure 4: Map of Nearby Development Applications

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3. PROPOSED SETTLEMENT AREA BOUNDARY EXPANSION

3.1 WELLINGTON COUNTY OPA 119, OPA 120, AND OPA 123

OPA 119 to the CWOP was adopted by County Council on May 26, 2022 and approved by the Minister on April 11, 2023, with 33 modifications. The purpose of OPA 119, as further described below, is to guide and direct future growth and development in Wellington County in a manner that is consistent with the Provincial Policy Statement 2020 and in conformity with the Growth Plan for the Greater Golden Horseshoe 2020. OPA 119 was approved by the Province with 33 modifications, which brought the Subject Property into the Fergus Settlement Area, whereas the Council-adopted OPA maintained the Subject Property outside of the boundary.

However, the enactment of Bill 150 by the Province on November 16, 2023 reversed the site-specific SABE that was approved for the Subject Property via OPA 119. Later, the Province enacted Bill 162, *Get it Done Act, 2024* in May 2024. The purpose of Bill 162 is to retroactively add modifications to OPA 119. However, the site-specific SABE over the Subject Property was not re-instated as part of Bill 162.

On February 23, 2023, the County of Wellington enacted By-law No. 5808-23 to adopt OPA 120 (Country Growth Forecast) to revise the Wellington Growth Forecast and update the population, household, and employment projections to the 2051 planning horizon. Wellington County is forecasted to have a total population in 2051 of 160,000 residents, with 66% living in *Primary Urban Centres*, while there are expected to be 57,940 households and 70,000 jobs. The southern boundary of the Subject Property is shared with the northern boundary of the Fergus *Primary Urban Centre* and the Storybook Subdivision that is currently under construction. The Storybook Subdivision was designed to integrate the Subject Property with respect to street connections, servicing infrastructure and public amenities.

On October 6, 2023, OPA 123 was circulated to agencies and members of the public for comments. The main purpose of this amendment is to further implement recommendations of the County's Land Needs Assessment (LNA) and Growth Management Report to ensure suitable lands are available to accommodate forecasted growth in the County to 2051 and beyond. Among other changes, OPA 123 will redesignate certain lands that were modified by the Province through OPA 119 to an appropriate land use designation. Within the November 9, 2023 County Official Plan Review – Progress Report #10 for Centre Wellington, staff recommended preparing a more detailed evaluation framework and criteria (including phasing) based on Provincial, County and local policies in consultation with Township staff. In response, Staff had extended the submission window for urban expansion requests in Centre Wellington until Wednesday, January 3, 2024. For these reasons, amendments regarding the Township of Centre Wellington were not included in the County's OPA 123. Modifications to the Fergus Settlement Area needed to be implemented through a Local OPA. OPA 123 was adopted by Council on October 31, 2024 but has not yet been approved by the Province.

For further discussion regarding the three County OPAs, please refer to our *May 2024 SABE Request*.

3.2 WELLINGTON COUNTY REPORT #PD2024-08

On February 8th, 2024, County of Wellington Staff presented report #PD2024-08, which provides an overview of the Provincial and County policy framework to consider urban boundary expansions and provides the framework developed to screen and evaluate where urban expansions should occur. Furthermore, the staff report outlines that the Township of Centre Wellington requires an additional 238 hectares of *Community Area* for land expansion needs. We consider and evaluate the suitability of the Subject Property for urban expansion in our *May 2024 SABE Request*.

3.3 OPA 126

On October 28, 2024, the County circulated draft OPA 126, which includes urban boundary expansions for Fergus and Elora/Salem in Centre Wellington, County-wide policy updates and other changes. At the time of writing, OPA 126 does not contemplate an urban boundary expansion to include the Subject Property.

3.4 PROPOSED SETTLEMENT AREA BOUNDARY EXPANSION

Following the enactment of County OPA 119, OPA 120, and the circulation of OPA 123, the *May 2024 SABE Request* was submitted to the Township of Centre Wellington to include the Subject Property within the Fergus Settlement Area Boundary pursuant to the ongoing Municipal Comprehensive Review (MCR). The Subject Property is located directly north of the Storeybrook residential subdivision that is currently under construction. The Storeybrook subdivision was planned to incorporate the Subject Property with respect to servicing infrastructure, street connections and public amenities.

The Conceptual Block Plan prepared by Weston Consulting provides high-level details on the proposed development for the Subject Property as part of the proposed SABE and demonstrates the integration with the Storeybrook subdivision.

The Conceptual Block Plan, provided for illustrative purposes, provides 4.3 ha of townhouse blocks and 13.5 ha of single-detached blocks. The net developable area is 29.0 ha, of which 5% is contemplated to be allocated for parks and 6% for stormwater management. Site constraints, consisting of identified natural heritage features, comprise approximately 14.2 ha. The road network, stormwater management facilities, and natural heritage features have been reviewed and confirmed by technical studies discussed in the SABE letter and this Planning Report.

A proposed local road will connect to Street A of the Storeybrook Subdivision to facilitate pedestrian and vehicular access across the sites. A local road connection is proposed to Beatty Line along with a future connection to the site north of the Subject Property.

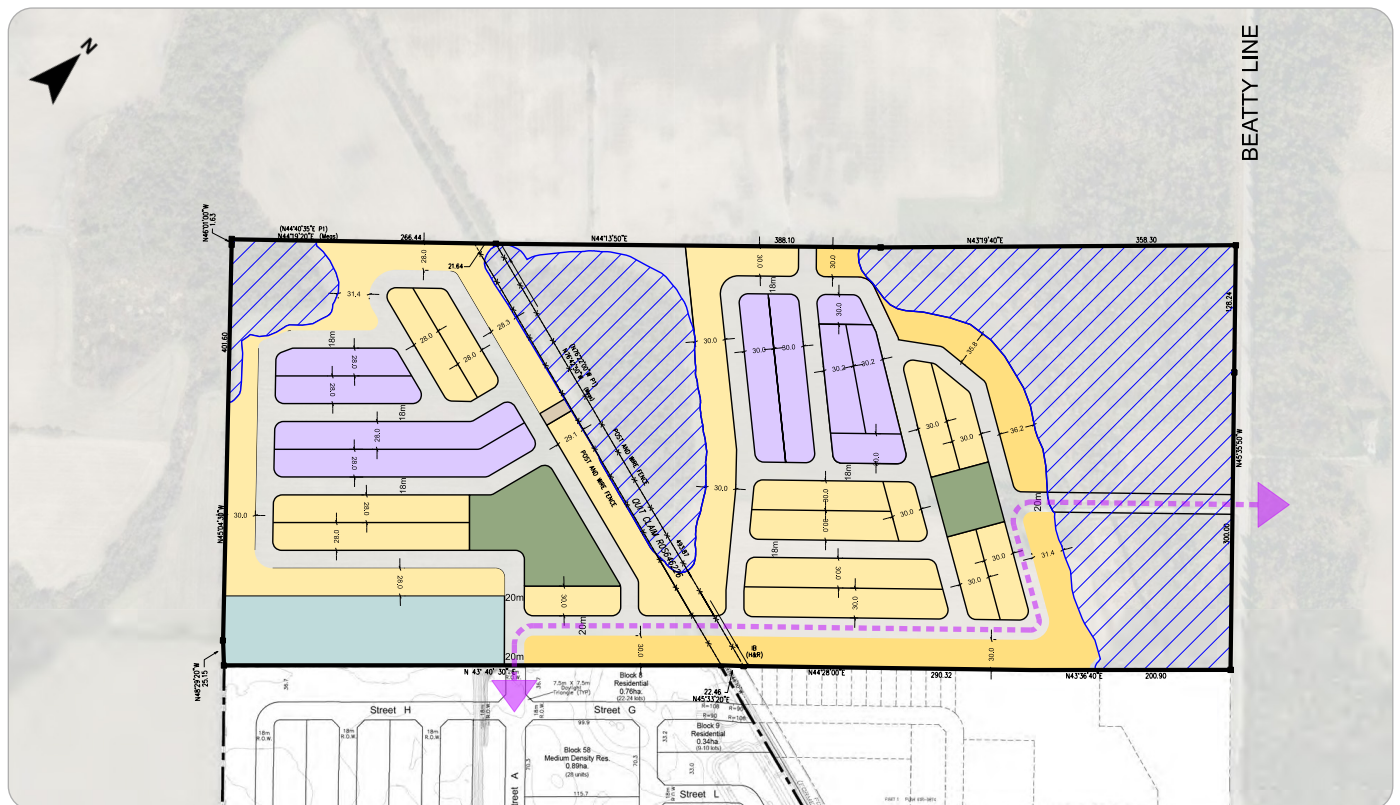


Figure 5: Concept Block Plan

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4. PROPOSED PLANNING APPLICATIONS

Applications for a County Official Plan Amendment (“OPA”) and a Local OPA to the County of Wellington Official Plan and Township of Centre Wellington Official Plan, respectively, are required to support our *May 2024 SABE Request* and address matters relating to servicing, environment, and complete communities to permit the proposed conceptual development. Our *May 2024 SABE Request* is intended to facilitate the SABE through the municipal comprehensive review process, whereas the County OPA and Local OPA will support the previous SABE request by providing formal applications under the *Planning Act*, 1990 with the necessary drawings, studies, materials, and public consultation and stakeholder input to justify the SABE in a fulsome manner. Given that Township staff are working with County staff to evaluate SABE requests through the County’s MCR, the proposed OPAs appropriately supplements our SABE request from May 2024. The *2024 SABE Request* should be read in conjunction with this Planning Justification Report.

- Within the *Urban Boundary and Neighbourhood Residential, Multiple Residential, Park/Open Space, Natural Area, and Stormwater Management* on Schedule A-3 (Land Use Plan Fergus, Elora-Salem); and,
- *Northwest Fergus Municipal Service Area* on Schedule B (Municipal Servicing Plan) of the TCWOP.

It is recognized that applications for a Zoning By-law Amendment, Site Plan Approval, and Draft Plan of Subdivision will be required to fully permit the proposed development. These applications will be submitted following the approval of the OPAs.

The County OPA proposes to designate the Subject Property to:

- *Designated Greenfield Area and Primary Urban Centre* on Schedule A (County Growth Structure);
- *Designated Greenfield Area and Primary Urban Centre* on Schedule A1 (County Growth Structure Centre Wellington); and,
- *Primary Urban Centre and Core Greenlands* on Schedule B1 (Land Use Centre Wellington).

The Local OPA proposes to redesignate the Subject Property from *Prime Agricultural* and *Core Greenlands* to:

- *Residential and Core Greenlands* within the *Urban Boundary* on Schedule A-1 (Land Use Plan Fergus, Elora-Salem);

5. PUBLIC CONSULTING STRATEGY

In accordance with the requirements of the *Planning Act*, a Public Consultation Strategy is required for application undertaken as part of a public process. As such, the following strategy is provided in support of the proposed OPAs application.

The foregoing Public Consultation Strategy is in compliance with and exceeds provincial legislation. Weston Consulting is committed to facilitating the public engagement process.

Once the application has been deemed complete, it is to be assigned a Statutory Public Meeting before the Committee of the Whole. Once the date is identified, a notice sign will be posted on the Subject Property within 20 days of the meeting as prescribed in Section 34 (14.3) of the *Planning Act*. The notice sign will articulate the date, time, and location of the public meeting, the applications submitted, the proposed development concept, and provide contact information for citizens wishing to submit written comments regarding the application.

In addition, Township staff will circulate meeting notices to property owners within 120 metres (400 feet) of the Subject Property. Notice will also be posted by the Township of Centre Wellington website and made available through local media postings.

An informal Public Open House could be held to provide the public with additional information about the proposed development in advance of or following the Statutory Public Meeting. The possibility of an informal meeting could be considered if the proposed applications were to garner a high level of public interest. This informal Public Open House would be an opportunity to answer questions and further discuss the proposal.

At the Statutory Public meeting, all interested persons will be given the opportunity to express concerns and opinions by way of a deputation. All deputations will be made a matter of the public record.

The applicant will work with Township staff to address, to the extent possible, any and all concerns articulated at the Statutory Public Meeting. Comments and input received will be considered by the applicant and any appropriate revisions to the plans will be made through a re-submission.

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6. PRE-CONSULTING AND SUPPORTING MATERIALS

A Pre-Application Consultation (“PAC”) meeting was held with Centre Wellington staff on September 13, 2023 in order to determine the studies, plans and materials required to fulfill the requirements of a Complete Application submission under the *Planning Act*. We believe that a Complete Application has been submitted at this time. A summary of the studies and reports provided in this submission is outlined in the following paragraphs.

Community Area Land Needs Assessment

Parcel Economics Inc. prepared a Community Area Land Needs Assessment in support of the proposed OPAs dated November 21, 2024. The purpose of this assessment is to identify the amount of land required in Wellington County and Centre Wellington to accommodate growth to 2051, based on the Fall 2024 Ontario Population Projections prepared by the Ontario Ministry of Finance.

The assessment indicates that Wellington County needs to expand settlement area boundaries to accommodate an additional 611 hectares of Community Area lands. This is 356 hectares more than the 255 hectares identified in the Phase 2 MCR Report: Urban Land Needs Assessment released in August 2022 (the “Phase 2 LNA”). In Centre Wellington, there is a need to expand the settlement area boundary to accommodate at least an additional 362 hectares of Community Area lands. This is 158 hectares more than identified in the Phase 2 LNA (204 hectares).

Parcel considers this to be the minimum expansion required in Centre Wellington, as constraints in the Town of Erin would result in Wellington County not meeting the population forecasts prepared by the

Ontario Ministry of Finance in Fall 2024. Recognizing the constraints in the Town of Erin, Parcel reallocated the additional growth to Wellington North and Centre Wellington. Based on this alternative scenario, a settlement area boundary expansion of 452 hectares of Community Area lands is required in Centre Wellington.

Environmental Impact Statement

An Environmental Impact Statement (EIS) was prepared by GeoProcess Research Associates dated January 15, 2025 in support of the proposed OPAs. The EIS has been prepared to assess potential negative impacts that the proposed development may have on the natural heritage features and provides recommendations on the natural area boundaries, mitigation measures, and design measures to accommodate or enhance existing natural features and functions.

The results of the study indicate that based on Schedule B1 (Centre Wellington) of the County of Wellington Official Plan, three areas are designated as *Core Greenlands*. These three areas are identified as Provincially Significant Wetlands (PSW). These wetlands are treed swamp ecotypes and as a result are also considered Woodlands. The site contains watercourses and GRCA regulated areas within the Provincially Significant Wetlands.

The EIS established a development limit around the identified natural heritage features along with other development and construction mitigation measures. GeoProcess concludes that that the proposed development will avoid impacting the significant

features and functions associated with the Core Greenlands areas, and meets the requirements of mitigating impacts on wildlife habitat and natural functions within the study area. Please refer to the study for detailed results and recommendations.

Geotechnical Investigation

Soil Engineers Ltd. prepared a Geotechnical Investigation dated January 2025 in support of the proposed OPAs. The purpose of the investigation is to reveal the subsurface conditions and determine the engineering properties of the disclosed soils for the design and construction of a proposed residential development. The investigation also provided a measurement of the on-site groundwater level. Recommendations are provided with respect to fill preparation, foundations, basements, underground services, backfilling, pavement design, stormwater management facilities, soil parameters, and excavation. Please refer to the investigation for the detailed results.

Hydrogeological Assessment

A Hydrogeological Assessment was prepared by Soil Engineers Ltd. dated Jan,28 2025. The purpose of the assessment is to determine the hydrogeological characteristics of the Subject Property. Summaries of the site's physiography, deposits, topsoil, ground water levels, hydraulic conductivity, potential groundwater exceedances, and dewatering requirements are provided. The result of the groundwater sampling indicates no exceedances when compared and evaluated against the Township of Centre Wellington Sanitary and Storm Sewer Use By-laws Parameters. Please refer to the preliminary assessment for detailed results.

Servicing and Stormwater Management Brief

SCS Consulting Group Ltd. prepared a Servicing and Stormwater Management Brief in support of the proposed OPAs dated Jan, 28 2025. The purpose of the brief is to propose grading, storm drainage, stormwater management, sanitary servicing, and water servicing on a conceptual basis.

The results indicate that the site can be serviced from the existing municipal wastewater and water systems located east and south of the site, subject to the Township of Centre Wellington's confirmation of capacity and allocation.

Transportation Impact Study

A Transportation Impact Study was prepared by BA Group dated January 2025 in support of the proposed OPAs. The purpose of the study is to assess the potential transportation impacts of the conceptual development. The results of the study indicates that the conceptual development can be suitably accommodated at all intersections within the study area in tandem with proposed TDM measures that include transit, cycling, and pedestrian-focused recommendations.

Agricultural Charactererization Report

An Agricultural Characterization Report was previously prepared by Colville Consulting Inc. dated March 2024 in support of the *May 2024 SABE Request*. The justification of this report will also support the current proposed OPAs. The purpose of this report is to assist in satisfying the Agricultural Resources criteria, which pertain to the protection of prime agricultural lands, minimizing fragmentation of prime agricultural lands, compliance with the Minimum Distance Separation (MDS) Formulae, and the avoidance or minimization of impacts to the agri-food network.

The report determines that the Subject Property have a higher proportion of lower priority prime agricultural lands relative to the other areas assessed, contain minimal investments in land improvements and no investments in agricultural infrastructure, are not part of a specialty crop area and do not exhibit any characteristics of a specialty crop area, immediately abut the existing urban boundary of Fergus and represent a logical extension of the existing urban boundary of Fergus, and have a lower potential for development constraints relating to the application of the MDS I formula. Thus, Subject Lands are a reasonable consideration for inclusion within the urban boundary of Centre Wellington.

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7. PLANNING POLICY FRAMEWORK

7.1 THE PLANNING ACT R.S.O.C.P.13

The following section outlines the applicable land use planning policies and provides an evaluation of the proposed development in the context of the policy framework. The following policy documents have been considered in this report:

- Planning Act, R.S.O 1990, c.P.13;
- Provincial Policy Statement (2024);
- County of Wellington Official Plan (February 2023 Office Consolidation);
- Wellington County OPA 119 and Bill 150 & Bill 162;
- Wellington County OPA 120;
- Wellington County OPA 123;
- Township of Centre Wellington Official Plan (February 2024 Office Consolidation); and,
- Township of Centre Wellington Zoning By-law 2009-045 (the “ZBL”).

In consideration of the proposed planning applications, Section 2 of the *Planning Act* must be considered as it provides the general direction for all land use planning decisions made in the Province of Ontario. The Report considers all elements under Section 2 and provides particular regard for policies a), e), f), h), h.1), j), l), m), o), p), and q).

- a) *The protection of ecological systems, including natural areas, features and functions;*
- e) *The supply, efficient use and conservation of energy and water*
- f) *The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- h) *The orderly development of safe and healthy communities;*
- h.1) *the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies*
- j) *The adequate provision of a full range of housing, including affordable housing;*
- l) *The co-ordination of planning activities of public bodies*
- m) *The resolution of planning conflicts involving public and private interests*
- o) *The appropriate location of growth and development*
- p) *The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians*
- q) *The promotion of built form that,*
 - i. *Is well designed*
 - ii. *Encourages a sense of place*
 - iii. *Provides for public spaces that are of high quality, safe, accessible, attractive and vibrant*

7.2 PROVINCIAL PLANNING STATEMENT 2024

The regulations and direction of Section 2 of the Planning Act informs the Provincial Policy Statement and establishes matters of provincial interest, thereby ensuring that the Provincial Policy Statement addresses issues of consistency with Section 2 of the Act.

The planning analysis in this Report will demonstrate protection of ecological systems and features/functions; the efficient use of energy and water, servicing, sewage, waste management, communication and transportation infrastructure; the orderly development of safe and healthy communities that are accessible for persons with disabilities; the adequate provision of a full range of housing; coordination of planning activities of public bodies; the resolution of planning conflicts involving public and private interests; the appropriate location of growth and development; the promotion of pedestrian-friendly and transit-supportive development design; and the promotion of well-designed and high-quality built form.

In our opinion, the proposed OPAs have appropriate regard for Section 2 of the *Planning Act*.

Based on the foregoing, it is our opinion that the proposed OPAs are consistent with the above policies of the PPS 2024.

On April 6, 2023, the province released Bill 97, the *Helping Homeowners, Protecting Tenants Act*. As part of Bill 97, the province proposed a new Provincial Policy Instrument to combine and consolidate the former PPS and Growth Plan into a singular provincial land use planning policy document referred to as the Provincial Planning Statement (the “PPS 2024”). The PPS 2024 came into effect on October 20, 2024. As a result, the policies within the PPS 2024 are in-force and determinative, and all planning decisions are required to be consistent with this new statement. Similar to its predecessor, the PPS 2024 provides the overarching policy direction on matters of provincial interest related to land use planning and development throughout the Province of Ontario.

Section 2.1 – Planning for People and Homes

Section 2.1 of the PPS 2024 outlines policies to provide for an appropriate supply, range, and mix of housing options and densities within the province. The following are applicable to the proposed OPAs:

2.1.4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and

2.1.6. Planning authorities should support the achievement of complete communities by:

- a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*

Section 2.2 – Housing

Specific policies to plan for an appropriate range and mix of housing options are outlined under Section 2.2 of the PPS 2024. The following are applicable to the proposed OPAs:

2.2.1. Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

The proposed OPAs will support the achievement of a *complete community* in Fergus by diversifying the mix of residential land uses; providing for a diverse range and mix of housing options in the form of townhouses and single-detached dwellings; and accommodating new parks and open spaces for the residents' enjoyment. The proposed mix of low and medium density housing blocks will facilitate expanded housing options in Fergus that will assist in meeting the social, health, economic and wellbeing requirements of future residents.

As well, the proposed OPAs by proposing a compact built form that will achieve a minimum density of 40 residents and jobs combined per hectare for *Designated Greenfield Areas* in the County of Wellington Official Plan. Given that *municipal official plans are the most important vehicle for implementation of the Provincial Planning Statement*, satisfying the County's minimum density target will ensure the efficient use of land, resources, infrastructure, and public service facilities, and supports the use of active transportation in conjunction with the proposed park blocks and street connections.

Section 2.3 – Settlement Areas and Settlement Area Boundary Expansions

Section 2.3.1 provides general policies for guiding growth and development within *Settlement Areas* and for expanding their boundaries in accordance with growth trends. The following are applicable to the proposed OPAs:

2.3.1.1. Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.

2.3.1.2. Land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a) efficiently use land and resources;*
- b) optimize existing and planned infrastructure and public service facilities;*
- c) support active transportation;*
- d) are transit-supportive, as appropriate; and*

The proposed OPAs would permit a compact development of low and medium density residential uses within the Fergus Settlement Area. In meeting the County's minimum density target of 40 residents and jobs combined per hectare for *Designated Greenfield Areas*, the proposed mix of residential blocks in the OPAs will efficiently utilize land and resources, optimize existing and planned infrastructure and public service facilities, support active transportation with the proposed parks, and support future transit connections when available.

Section 2.3.2.1 of the PPS 2024 outlines policies that planning authorities shall consider in allowing a new *Settlement Area* or permitting expansions of existing *Settlement Areas*:

Table 3: Provincial Planning Statement 2024 Settlement Area Boundary Expansion Policies

Policy	Rationale
<p><i>a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;</i></p>	<p>Per the Community Area Land Needs Assessment prepared by Parcel Economics Inc. dated November 21, 2024 in support of the proposed OPA, a settlement area boundary expansion of 611 hectares of Community Area Lands is required in Wellington County and 452 hectares is required in Centre Wellington.</p> <p>The proposed OPA will assist in broadening the range and mix of Community Area land uses in Fergus by providing for low and medium density residential uses alongside park and open space blocks. Overall, the proposed OPA will contribute a gross area of 43.2 hectares of Community Area land uses (29.0 hectares of which are developable) and help to satisfy the County and Township's land needs by the 2051 planning horizon. Furthermore, it must be recognized that only the net developable area of the Subject Property (29.0 hectares) can contribute to the the County's overall land needs, and the net area is less than the site's gross area (43.2 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.</p>
<p><i>b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;</i></p>	<p>The Storybrook Subdivision located immediately south of the Subject Property has been designed to accommodate the Subject Property with respect to street connections, servicing infrastructure and public amenities. The Site Servicing Brief prepared by SCS Consulting Group concludes that the existing sanitary and water infrastructure has available capacity to service the Subject Property.</p>

<p>c) whether the applicable lands comprise specialty crop areas;</p>	<p>According to the Agricultural Characterization Report (ACR) prepared by Colville Consulting Inc., the Subject Property does not comprise a specialty crop area.</p>
<p>d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;</p>	<p>Although the Subject Property is not designated Primary Urban Centre, according to Schedule B1 of the County of Wellington Official Plan. It is our opinion that the Subject Property is appropriate for a SABE as it previously formed part of the Fergus Settlement Area in accordance with Provincial modifications.</p>
<p>e) whether the new or expanded settlement area complies with the minimum distance separation formulae;</p>	<p>In addition, a desktop ACR was prepared by Colville Consulting Inc in support of the SABE request. The ACR concludes that the Subject Property has a higher proportion of lower priority prime agricultural lands relative to other areas, contain minimal investments in land improvements and no investments in agricultural infrastructure and have a lower potential for development constraints relating to the application of the MDS I formula.</p>
<p>f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and</p>	<p>In addition, a desktop ACR was prepared by Colville Consulting Inc in support of the SABE request. The ACR concludes that the Subject Property has a higher proportion of lower priority prime agricultural lands relative to other areas, contain minimal investments in land improvements and no investments in agricultural infrastructure and have a lower potential for development constraints relating to the application of the MDS I formula.</p>
<p>g) the new or expanded settlement area provides for the phased progression of urban development.</p>	<p>An expansion of the Fergus Settlement Area to include the Subject Property represents a logical extension of the urban boundary given the site's adjacency to the Storybrook Subdivision, which was designed to accommodate an expansion onto the site. Similarly, the Conceptual Block Plan for the Subject Property also includes considerations for future expansions toward Sideroad 15 and Beatty Line in terms of roads and servicing. The proposed OPA will facilitate a phased progression of urban development in the short and long-term.</p>

We address the SABE criteria of Section 2.3.2.1 in the preceding table on the basis that the *May 2024 SABE Request* was submitted pursuant to the ongoing County MCR and prior to the enactment of the PPS 2024. The PPS 2024 eliminates the requirement for municipalities to only consider such requests at the time of MCR processes or in limited circumstances outside of an MCR. SABE requests are now permitted outside the parameters of an MCR. It should be noted that the reports referenced above were prepared in support of the *May 2024 SABE Request*.

With the exception of criteria g), the SABE criteria of Section 2.3.2.1 of the PPS 2024 are similar in their intended application to the former SABE criteria of Section 1.1.3.8 of the PPS 2020 and Section 2.2.8.3 of the Growth Plan 2020. In addressing the PPS 2024 SABE criteria, the proposed OPAs augments our *May 2024 SABE Request* but with the recognition that the policies of the PPS 2020 and Growth Plan 2020 are no longer applicable. That said, our analysis of the in-force SABE criteria will also assist in “transitioning” our *May 2024 SABE Request* for consideration under the new provincial land use planning framework following the enactment of the PPS 2024.

Section 3.6 – Sewage, Water and Stormwater

Section 3.6 outlines the importance of making efficient use of existing infrastructure facilities. New development is mandated to be facilitated in a manner which makes efficient use and optimization of existing public infrastructure, including municipal water and sewage services. Policies 3.6.1, 3.6.2, and 3.6.8 speak to this need to efficiently utilize and optimize municipal water and sewage infrastructure, and to appropriately plan for stormwater management.

It is our opinion that the proposed residential density will efficiently utilize the existing municipal water and sewage infrastructure via the foresightful connections designed and provided through the Storybrook Subdivision. As well, a Functional Servicing and Stormwater Management Brief has been submitted to appropriately plan for on-site stormwater management.

Section 3.9 – Public Spaces, Recreation, Parks, Trails and Open Space

Policy 3.9.1 of the PPS 2024 outlines numerous sub-policies for promoting healthy, active, and inclusive communities through a variety of publicly-accessible recreational spaces. The following are applicable to the proposed OPAs:

1. Healthy, active, and inclusive communities should be promoted by:

- a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*

The proposed Conceptual Block Plan includes a street network that would connect to the nearby Storybrook Subdivision and future developments toward Beatty Line and Sideroad 15. This contemplated street network would help facilitate active transportation along with inter- and intra-community connectivity. As well, the proposed park and open space blocks will help provide outdoor, publicly-accessible recreational opportunities for persons of all ages and abilities. The proposed streets and parks will be designed to meet the municipal and provincial standards for ensuring pedestrian and vehicular safety through the detailed design stages.

Section 4.1 – Natural Heritage

The PPS 2024 outlines policies for protecting natural heritage resources in the Province for their economic, environmental, and social benefits for the long-term. The following policies are applicable to the proposed OPAs:

1. Natural features and areas shall be protected for the long term.

2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

According to the Environmental Impact Statement prepared by GeoProcess Research Associates, identified natural heritage features on the Subject Property include three *Provincially Significant Wetlands* along with watercourses and areas regulated by the GRCA. It is noted that the central *Provincially Significant Wetland* is expected to be removed in accordance with the Environmental Impact Statement. The proposed single-detached and townhouse blocks will avoid negative impacts on the *Provincially Significant Wetlands* and watercourse near Beatty Line, and their ecological functions given their location outside of the development limits delineated around each wetland by GeoProcess Research Associates.

Section 4.2 – Water

Section 4.2 of the PPS 2024 provides policies for protecting, improving, or restoring the quality and quantity of surface and ground water across the Province.

Policy 4.2.2. states that *“Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches.”*

As earlier discussed, the proposed location of the single-detached and townhouse blocks outside of the buffer areas around the *Provincially Significant Wetlands* and watercourse near Beatty Line will ensure the protection of these *sensitive surface water features*.

Summary

We have reviewed and considered all sections of the PPS 2024, and determined that the following policies were applicable and have been addressed in this review:

- Planning for People and Homes – 2.1.4. & 2.1.6.a);
- Housing – 2.2.1.b).1. & c);
- Settlement Areas and Settlement Area Boundary Expansions – 2.3.1.1; 2.3.1.2.a), b), c), and d); and 2.3.2.1;
- Sewage, Water and Stormwater – 3.6.1, 3.6.2, and 3.6.8;
- Public Spaces, Recreation, Parks, Trails and Open Space – 3.9.1.1.a) & b);
- Natural Heritage – 4.1.1, 4.1.2, and 4.1.8;
- Water – 4.2.2;

Based on the foregoing, it is our opinion that the proposed OPAs are consistent with the above policies of the PPS 2024.

7.3 COUNTY OF WELLINGTON OFFICIAL PLAN (FEBRUARY 2023 OFFICE CONSOLIDATION)

The CWOP was adopted by Regional Council on September 24, 1998 and was later approved by the Minister of Municipal Affairs and Housing (“MMAH”) on April 13, 1999. Since then, the CWOP has been amended numerous times. The most recent and relevant amendments to the CWOP are OPA 119, OPA 120, and OPA 123 as earlier discussed in this report and in our *May 2024 SABE Request*. The CWOP discussed in this Report is the February 2023 office consolidation as amended by OPA 119 and OPA 120.

The Subject Property is currently designated *Prime Agricultural* and *Core Greenlands* per Schedule B1 (Land Use Centre Wellington) of the CWOP.

Part 2 – Wellington’s Planning Vision

Part 2 of the CWOP outlines various fundamental beliefs and policy objectives, and situates the County within the context of its neighbours, the Province, and the broad systems of land that comprise Wellington. In particular, Section 2.1.1, Section 2.1.2, Section 2.1.4, Section 2.1.5, and Section 2.1.6 outline broad fundamental beliefs for which planning decisions shall conform to, including the achievement of sustainable development, healthy communities, land stewardship, and complete communities.

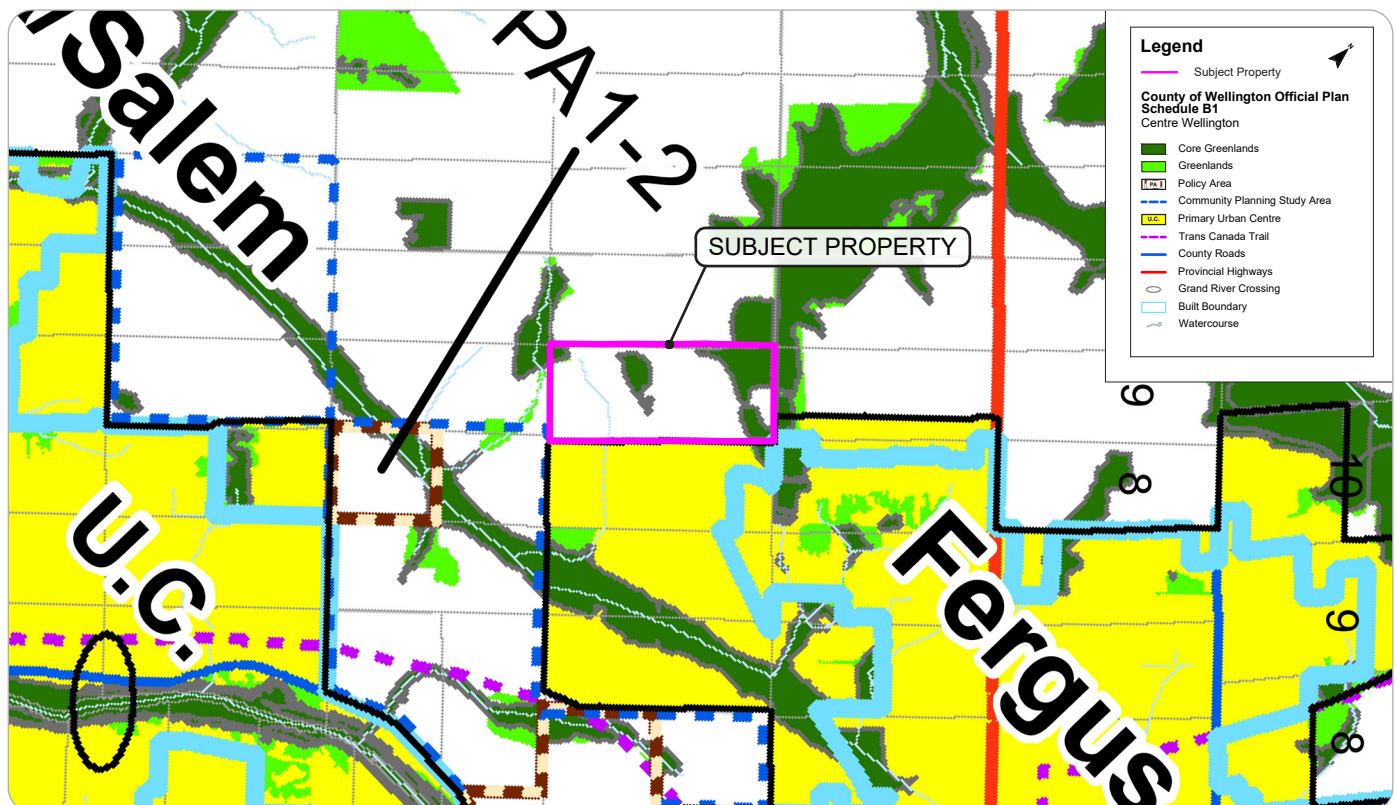


Figure 6: CWOP Schedule B1 (Land Use Centre Wellington)

Various planning policy objectives for the County are outlined under Section 2.2 of the CWOP. Policies 2.2.1, 2.2.2, 2.2.4, 2.2.7, 2.2.8, 2.2.9, 2.2.12, 2.2.13, 2.2.15, 2.2.21, and 2.2.22 are relevant to the proposed OPAs. These noted policies broadly relate to achieving the 2051 population target, directing growth to serviced urban areas, providing opportunities for housing, developing cost and energy-efficient complete communities and land use patterns while maintaining the County's small town and rural character and protecting the natural heritage system, ensuring that development pays for growth-related costs, and broadening recreational and leisure opportunities.

As we will demonstrate in addressing the policies of the CWOP, it is our opinion that the proposed OPAs will achieve these fundamental beliefs and policy objectives, thus conforming to the CWOP. An amendment to the CWOP is enclosed to facilitate an urban boundary expansion to include the Subject Property,

Part 3 – Wellington Growth Strategy

Policies for projecting, guiding, servicing, and allocating growth in the County are outlined in Part 3 of the CWOP. Section 3.1 outlines the County's general strategy for accommodating growth and development, which includes encouraging development patterns that are cost-efficient, environmentally sound, and provide access to community services and facilities. The majority of growth is to be direct to *Primary Urban Centres* that have municipal water and sewage services, which include *Designated Greenfield Areas*.

Section 3.2 directs that 89% of the County's population growth will occur in 12 *Primary Urban Centres*. To guide this growth, Section 3.3 outlines numerous guiding objectives that include encouraging cost-effective development patterns, achieving *complete communities* through compact built forms that take advantage of existing infrastructures, encouraging growth in *Primary Urban Centres* and higher densities in *Designated Greenfield Areas*, and providing for a variety of housing types. Further to this, *Designated Greenfield Areas* shall achieve a minimum density target of 40 residents and jobs combined per hectare. New development is encouraged to utilize municipal water and wastewater services to ensure the efficient and environmentally sound use of land per Section 3.4.

Section 3.5 allocates growth across the County and specifies that the population of Fergus Settlement Area is expected grow from 19,100 persons and 7,320 households in 2021 to 36,300 persons and 14,080 households by 2051.

The proposed OPAs will facilitate the efficient utilization of the existing municipal servicing infrastructure in a compact built form to provide for a greater variety of housing types in the Fergus Settlement Area. The proposed townhouse and single-detached blocks will achieve the minimum density target for *Designated Greenfield Areas* and assist the County in meeting its growth target for Fergus by 2051. By providing for a compact built form with varied housing types and connections to the Storybrook Subdivision, Beatty Line, and Sideroad 15 with park blocks, the proposed OPAs will assist in achieving a *complete community* in Fergus.

Part 4 – General County Policies

Part 4 of the CWOP outlines general policies pertaining to the protection and enhancement of cultural heritage resources, economic development, farmland protection, housing, human-made hazards, impact assessments, urban area protection, expansion of settlement areas, protection of water resources, watershed plans, public and open spaces, and community improvement. The following are relevant to the proposed OPAs and development:

4.4.1 Supply

The County will ensure that residential growth can be accommodated for a minimum of 15 years through residential intensification, redevelopment and if necessary, lands which are designated and available for new residential development.

The County will maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.

4.4.2 Variety

The County will provide for a variety of housing types to satisfy the present and future social, health and well-being requirements of residents of the regional market area. New residential developments will be promoted at densities which efficiently use available servicing and are appropriate to site conditions and existing patterns of development. New multiple lots or units for residential development will incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

4.4.3 Residential Intensification This Plan contains policies encouraging residential intensification in primary urban centres. The strategic approach to residential intensification intends to retain small town character and revitalize downtown areas which includes:

- a) supporting increased densities in newly developing designated greenfield areas with a broader mix of housing types than has been the norm in small towns;*
- j) ensuring that adequate infrastructure is, or will be, established to serve the anticipated development.*

4.4.4 Greenfield Housing

In designated greenfield areas, the County will encourage increased densities and a broader mix of housing and will:

- b) require new developments to achieve densities which promote the overall designated greenfield area density target of 40 persons and jobs per hectare and specifically:
 - i) strive to attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions;*
 - ii) somewhat lower densities may be considered in newly developing subdivisions where physical and environmental constraints such as larger than normal storm water management requirements, parcel dimensions that do not yield efficient lotting patterns and the need for transition areas from adjacent land uses, or on small parcels of under 2 hectares (5 acres);**
- v) encourage the introduction of medium density housing types in new subdivisions and other designated greenfield areas.*

The proposed OPAs will assist the County in meeting its residential growth targets while providing for a greater variety of housing types than has been the norm in small towns within a *Designated Greenfield Area*. The Subject Property will be developed to meet the minimum density target for *Designated Greenfield Areas* to efficiently utilize existing servicing infrastructure with consideration for the existing environmental constraints. The proposed townhouse blocks will also help introduce a medium density housing type in the *Designated Greenfield Area*.

4.7 URBAN AREA PROTECTION

4.7.1 Distinct Urban-Rural Boundary

In order to allow the efficient expansion of urban areas, and to maintain a clear distinction between urban and rural areas, the County of Wellington:

- a) *prohibits new development adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion (adjacent will normally mean within 1 kilometre of an urban area boundary);*

Section 4.8.2 of the CWOP outlines criteria for considering such SABE requests as part of a municipal comprehensive review. An analysis of Section 4.8.2 was provided in the *May 2024 SABE Request* and is included in the following table:

Table 4: County of Wellington Official Plan Settlement Area Boundary Expansion Policies

Policy	Rationale
<p><i>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></p> <p><i>i) within the County of Wellington;</i> <i>ii) and within the applicable lower-tier municipality to accommodate the growth allocated to the municipality;</i></p>	<p>Per the Community Area Land Needs Assessment prepared by Parcel Economics Inc. dated November 21, 2024 in support of the proposed OPA, a settlement area boundary expansion of 611 hectares of Community Area Lands is required in Wellington County and 452 hectares is required in Centre Wellington. The required quantum of land identified by Parcel is greater than the County of Wellington staff report PD2024-08 which outlines that the Township of Centre Wellington requires an additional 238 hectares of Community Area for land expansion needs. Furthermore, it must be recognized that only the net developable area of the Subject Property (29.0 hectares) can contribute to the the County's overall land needs, and the net area is less than the site's gross area (43.2 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.</p> <p>Incorporating the Subject Property will enable the Township to achieve the Community Area expansion need as identified by Parcel Economics Inc.</p>

<p><i>b) the expansion makes available sufficient lands for a time horizon not exceeding the year 2051, based on the analysis provided for in a);</i></p>	<p>The proposed gross 43.2 hectares of additional land proposed through the May 2024 SABE Request would accommodate growth in a time horizon not exceeding the year 2051. According to a Growth Management Report prepared by Watson Associates, the Township of Centre Wellington is expected to accommodate an additional 11,260 units until 2051. Furthermore, County of Wellington staff report PD2024-08 outlines that the Township of Centre Wellington requires an additional 238 hectares of Community Area for land expansion needs.</p> <p>However, it must be recognized that only the net developable area of the Subject Property (29.0 hectares) can contribute to the the County's overall land needs, and the net area is less than the site's gross area (43.2 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.</p>
<p><i>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;</i></p>	<p>According to Policy 3.1.1, the designated greenfield area of the County will be planned to achieve an overall minimum density of not less than 40 residents and jobs per hectare. The May 2024 SABE Request to include the Subject Property within the Fergus settlement area will provide an additional gross 43.2 hectares of land and a net developable area of 29.0 hectares for future residential growth, which will support this growth target. The proposed OPA and Conceptual Block Plan demonstrates how the Subject Property will be built out.</p>
<p><i>d) where applicable, the proposed expansion will meet the requirements of the Greenbelt Plan;</i></p>	<p>N/A</p>
<p><i>e) the infrastructure and public service facilities needed for expansion will be environmentally sustainable and financially viable over the full life cycle of these assets;</i></p>	<p>The Storybrook Subdivision located immediately south of the Subject Property has been designed to accommodate the Subject Property with respect to street connections, servicing infrastructure and public amenities. A Functional Servicing and Stormwater Management Brief prepared by SCS Consulting Group in support of the 2024 SABE request letter concludes that the existing sanitary and water infrastructure has available capacity to service the Subject Property.</p>

<p><i>f) prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the County will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following;</i></p> <p><i>i) reasonable alternatives that avoid prime agricultural areas are evaluated; and;</i></p> <p><i>ii) where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;</i></p>	<p>The ACR prepared by Colville Consulting Inc that was prepared in support of the May 2024 SABE Request finds that the Subject Property has a higher proportion of lower priority prime agricultural lands relative to the other areas assessed. Given that the Subject Property features lands that are lower priority agricultural lands, the proposed expansion would conform to sub policies i) and ii). The proposed OPA support this.</p>
<p><i>g) any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;</i></p>	<p>The ACR prepared by Colville Consulting Inc concludes that the Subject Property has a higher proportion of lower prime agricultural lands relative to the other areas assessed. The report further concludes that the lands are immediately abutting the existing urban boundary of Fergus and represents a logical location for a SABE. A County OPA and Local OPA are now being submitted to augment the May 2024 SABE Request and provide further clarification on how growth will be directed and managed.</p>

h) in determining the most appropriate direction and location for expansion, the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the Provincial Policy Statement are applied, as well as the following are addressed:

i) the existing development pattern in the community;

ii) the potential impacts on people;

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

iv) the impacts on natural heritage systems and features;

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;

According to the Environmental Impact Statement prepared by GeoProcess Research Associates, the identified natural heritage features on the Subject Property include three Provincially Significant Wetlands. The Subject Property also contains a watercourse and areas regulated by the Grand River Conservation Authority (GRCA).

i) The Subject Property is located adjacent to the existing boundary, represents logical growth, as the County of Wellington is anticipated to grow by 11,260 units by 2051.

ii) No potential impacts on people are anticipated as part of the proposed SABE

iii) There will be no impacts on mineral aggregate areas.

iv) An Environmental Impact Statement has been prepared by GeoProcess Research Associates and concludes that there remains considerable development potential on the site while avoiding development in natural features.

v) There are no anticipated impacts to the groundwater and surface water of the Subject Property. The Functional Servicing and Stormwater Management Brief, prepared by SCS Consulting, states that the Subject Property can be serviced from the existing municipal water and wastewater systems located within the existing Storybrook Subdivision. Groundwater will be further examined as part of the development application process.

vi) The extension of municipal servicing to the Subject Property is an efficient use of the existing servicing infrastructure, as it will utilize existing services to accommodate future needs.

vii) There are no cultural heritage or built heritage features on the Subject Property.

<p>viii) logical boundaries based on existing property lines or recognized physical features where possible; and</p> <p>ix) other planning criteria considered appropriate in the circumstances.</p>	<p>viii) The proposed SABE contemplates logical boundaries to the Fergus Primary Settlement area. The lands are directly adjacent to the Fergus Primary Settlement Area and are in a well-suited position for the expansion of the settlement area.</p> <p>The report finds the Subject Property is situated outside of the Provincial Natural Heritage System and that considerable development potential on the site can occur while avoiding development in natural heritage features. In our opinion, the applicable policies under Chapter 4 (Wise Use and Management of Resources) and Chapter 5 (Protecting Public Health and Safety) of the PPS 2024 and TCWOP are also relevant and satisfied in this Report.</p>
<p>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;</p>	<p>The proposed OPA will support future residential growth. The Conceptual Block Plan, prepared by Weston Consulting, submitted in support of the OPAs demonstrates how future residential uses can be accommodated on the lands.</p>
<p>j) the settlement area to be expanded is in compliance with the minimum distance separation formulae.</p>	<p>In accordance with the Agricultural Characterization Report (ACR) prepared by Colville Consulting Inc, the Subject Property have a higher proportion of lower priority prime agricultural lands relative to the other areas assessed and have a lower potential for development constraints relating to the application of the MDS 1 formula.</p>

Technical studies were prepared in support of the *May 2024 SABE Request*, including a **Functional Servicing and Stormwater Management Brief** prepared by SCS Consulting Group, a **Environmental Impact Statement** prepared by GeoProcess Research Associates and an **Agricultural Characterization Report (ACR)** prepared by Colville Consulting, which demonstrate conformity with Section 4.8.2. These technical studies conclude that the Subject Property can be serviced from the existing municipal water and wastewater system and that the Subject Property is a suitable location for a SABE with respect to considerations related to the agricultural base. In our opinion, the proposed OPAs meet the criteria under Section 4.8.2 of the CWOP. The enclosed Conceptual Block Plan provide further detail on how residential growth will be directed.

Part 5 – The Greenland System

The CWOP outlines policies for defining, maintaining, and enhancing the Greenlands System across the County in Part 5. The purpose of the Greenlands System is to ensure that natural heritage features and areas are maintained for their natural beauty, to reduce exposure to unsafe conditions, for their recreational and economic value, and their spiritual value in relation to human health and well-being. The following policies are relevant to the proposed OPAs:

5.4.1 Wetlands

All wetlands in the County of Wellington are included in the Core Greenlands. Development and site alteration will not be permitted in wetlands which are considered provincially significant. Provincially Significant Wetlands are shown in Appendix 3 of this Plan. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted. The appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland.

5.6.2 Development Impacts

Where development is proposed in the Greenland system or on adjacent lands, the County or local municipality shall require the developer to:

- a) identify the nature of the features potentially impacted by the development;
- b) prepare, where required, an environmental impact assessment to ensure that the requirements of this Plan will be met, and consider enhancement of the natural area where appropriate and reasonable.
- c) address any other relevant requirements set out in Section 4.6.3 Environmental Impact Assessment.

No development will be approved unless the County is satisfied that the Greenland and Environmental Impact Assessment policies are met.

5.6.3 Adjacent Lands

For the purposes of this section of the Plan, adjacent lands are considered to be:

- a) lands within 120 metres of Provincially Significant Wetlands, provincially significant Life Science Areas of Natural and Scientific Interest, significant habitat of endangered and threatened species, fish habitat, significant wildlife habitat, significant valleylands, and significant woodlands.

5.6.4 Zoning

Core Greenland areas shall be placed in a restrictive zone which prohibits buildings, structures and site alterations except as may be necessary for the management or maintenance of the natural environment. Other greenlands may also be given a restrictive zoning by a municipal council.

Zoning by-laws may also recognize existing land uses in core greenlands and, where appropriate, provide for reasonable expansions or alterations. Zoning by-laws may also establish setbacks from Core Greenland areas in which no buildings or structures shall be permitted.

The Subject Property contains Provincially Significant Wetlands as identified in the Environmental Impact Statement prepared by GeoProcess Research Associates in accordance with the policies of Section 4.6.3 (Environmental Impact Assessment). It is noted that the central Provincially Significant Wetland is expected to be removed in accordance with the Environmental Impact Statement. The proposed conceptual development is situated adjacent to the Provincially Significant Wetlands and outside of the buffer areas delineated around each wetland by GeoProcess. As a result, the Provincially Significant Wetlands will be maintained and protected in conformity with the policies of Part 5.

The Provincially Significant Wetlands and their associated buffers will be placed in a restrictive zone in the implementing zoning by-law amendment upon submission of a rezoning application to permit future residential development on the Subject Property.

Part 7 - The Urban System

Part 7 of the CWOP outlines policies for directing and accommodating growth within the Urban System of the County. The Urban System includes *Primary Urban Centres* and are anticipated to accommodate the majority of new development and population growth that will be serviced by municipal water and wastewater infrastructure. Growth and change will be managed to retain the small-town character of Wellington and to achieve “healthy, complete, efficient, and sustainable communities.” The following policies are applicable to the proposed OPAs:

7.3 PLANNING APPROACH

Development based on municipal services which promote environmental protection and efficient land use will be encouraged.

Land use patterns in the urban system shall be based on:

- a) densities and a mix of land uses which:*
 - i) efficiently use land and resources;*
 - ii) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; and*

7.4 PRIMARY URBAN CENTRES

7.4.1 Permitted Uses

Primary urban centres are expected to provide a full range of land use opportunities. Residential uses of various types and densities, commercial, industrial and institutional uses as well as parks and open space uses will be permitted where compatible and where services are available. More detailed official plan designations and policies as well as zoning regulations will identify the location and nature of various permitted uses in primary urban centres.

7.4.2 Services

Sewage and water services will be provided in accordance with Section 11.2 of this Plan. Road access will be via internal roads where possible, then via local roads where possible and then via County Roads or Provincial Highways where there is no other alternative. In all cases, appropriate sighting standards must be met and road functions maintained.

7.4.5 Residential Use

Primary urban centres shall provide a broad range of residential uses to provide a diverse supply of housing, including affordable housing. Wellington will plan for a diverse range and mix of housing options, densities, and unit sizes on full municipal services.

7.4.12 Parks and Open Space

Primary urban centres shall provide adequate parks and open space areas to serve their population and may provide recreational opportunities for a larger regional population. Parks and open space areas may be located in or adjacent to greenland areas depending on impacts and opportunities.

7.4.13 Greenlands System

The Greenland System policies established in this Plan apply within primary urban centre. More detailed policies may be developed for primary urban centres, particularly where urban development is adjacent to Greenland System areas or where existing development has already occurred in or near Greenland System areas.

The proposed OPAs will provide for a mix of single detached and townhouse blocks that will meet the minimum density target for *Designated Greenfield Areas* and efficiently utilize land and the existing municipal servicing infrastructure.

The proposed mix of single detached and townhouse units will broaden the range of residential land uses in the *Primary Urban Centre* and contribute to a more diverse range and mix of housing options, densities, and sizes on full municipal services. The proposed park blocks will serve the local residents of the proposed development and the Storybrook Subdivision. Matters of conformity with the Greenlands Systems policies were discussed in Part 5 of the CWOP. Overall, we believe that the proposed OPAs conforms to the policies of Part 7.

Part 8 – Detailed Primary and Secondary Urban Centre Policies

Part 8 of the CWOP outlines detailed land use policies for all urban centres in the plan. They are intended to recognize and reinforce the role of urban centres as central places in Wellington with a small town character. Numerous vision statements and policy objectives are outlined under Section 8.1.3 and 8.1.4 pertaining to the urban centres, which include maintaining Wellington’s small town character, preserving the single-detached home as the dominant housing form while diversifying the variety of housing types, protecting the natural environment (including the Greenland System), providing opportunities for an adequate supply and diversity of housing to meet the needs of the County, balancing development with environmental protection, and ensuring the adequate provision of parkland.

We have considered the policies under Part 8 with respect to the proposed OPAs. Part 8 provides detailed land use policies for the *Residential, Central Business District, Residential Transition Area, Highway Commercial, Industrial, Recreational, and Greenlands* designations. The Fergus Settlement Area is designated as *Primary Urban Centre* and does not have a more detailed land use designation according to Schedule B1 (Land Use Centre Wellington) that would warrant a detailed discussion of the policies of Part 8.

Our *May 2024 SABE Request* would result in the inclusion of the Subject Property within the *Primary Urban Centre*, the policies of which were addressed in our discussion of Part 7. The proposed OPAs augments our *May 2024 SABE Request* by addressing the balance of the sections and policies of the CWOP. With respect to *Core Greenlands* on the Subject Property, we have considered the applicable detailed policies in our discussion of Part 5 of the CWOP. In doing so, the proposed OPAs will also achieve the objectives for *Greenlands* under Section 8.9.2 regarding protection of the natural environment for their ecological, economic, and social values.

Summary

We have reviewed and considered all sections of the CWOP, and determined that the following policies are applicable and addressed in this review:

- Part 2 (Wellington’s Planning Vision) – 2.1.1, 2.1.2, 2.1.4, 2.1.5, 2.2.1, 2.2.2, 2.2.4, 2.2.7, 2.2.8, 2.2.9, 2.2.12, 2.2.13, 2.2.15, 2.2.21, and 2.2.22;
- Part 3 (Wellington Growth Strategy) – 3.1, 3.2, and 3.5;
- Part 4 (General County Policies) – 4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.7.1 a), and 4.8.2;
- Part 5 (The Greenland System) – 5.4.1, 5.5.3, 5.6.3, and 5.6.4;
- Part 7 (The Urban System) – 7.3 a) i) ii), 7.4.1, 7.4.2, 7.4.5, 7.4.12, and 7.4.13; and,
- Part 8 (Detailed Primary and Secondary Urban Centre Policies) – 8.9.2.

Based on the foregoing, it is our opinion that the proposed OPAs conform to the above policies and the CWOP.

7.4 TOWNSHIP OF CENTRE WELLINGTON OFFICIAL PLAN (FEBRUARY 2024 OFFICE CONSOLIDATION)

The TCWOP is intended to guide, manage and direct growth and development within the Township of Centre Wellington. Town Council adopted the Official Plan on November 24, 2003 and it was approved by the OMB on May 31, 2006. The most recent Office Consolidation includes various OPAs up to February 2024. We understand that the Township is working with the County of Wellington to review and evaluate locations for urban expansion in Centre Wellington. It is anticipated that the Township will update the TCWOP through an official plan review process at a later date following the conclusion of the County's municipal comprehensive review.

The Subject Property is currently not located within the Fergus Urban Boundary and therefore does not have a land use designation in the TCWOP. The proposed OPAs would designate the Subject Property as *Residential* and *Core Greenlands* within the *Urban Boundary* on Schedule A-1 (Land Use Plan Fergus, Elora-Salem) and *Neighbourhood Residential, Multiple Residential, Park/Open Space, Natural Area, and Stormwater Management* on Schedule A-3 (Land Use Plan Fergus, Elora-Salem) to implement a site-specific SABE and permit residential development on the Subject Property, the policies of which we have considered in our discussion of the TCWOP.

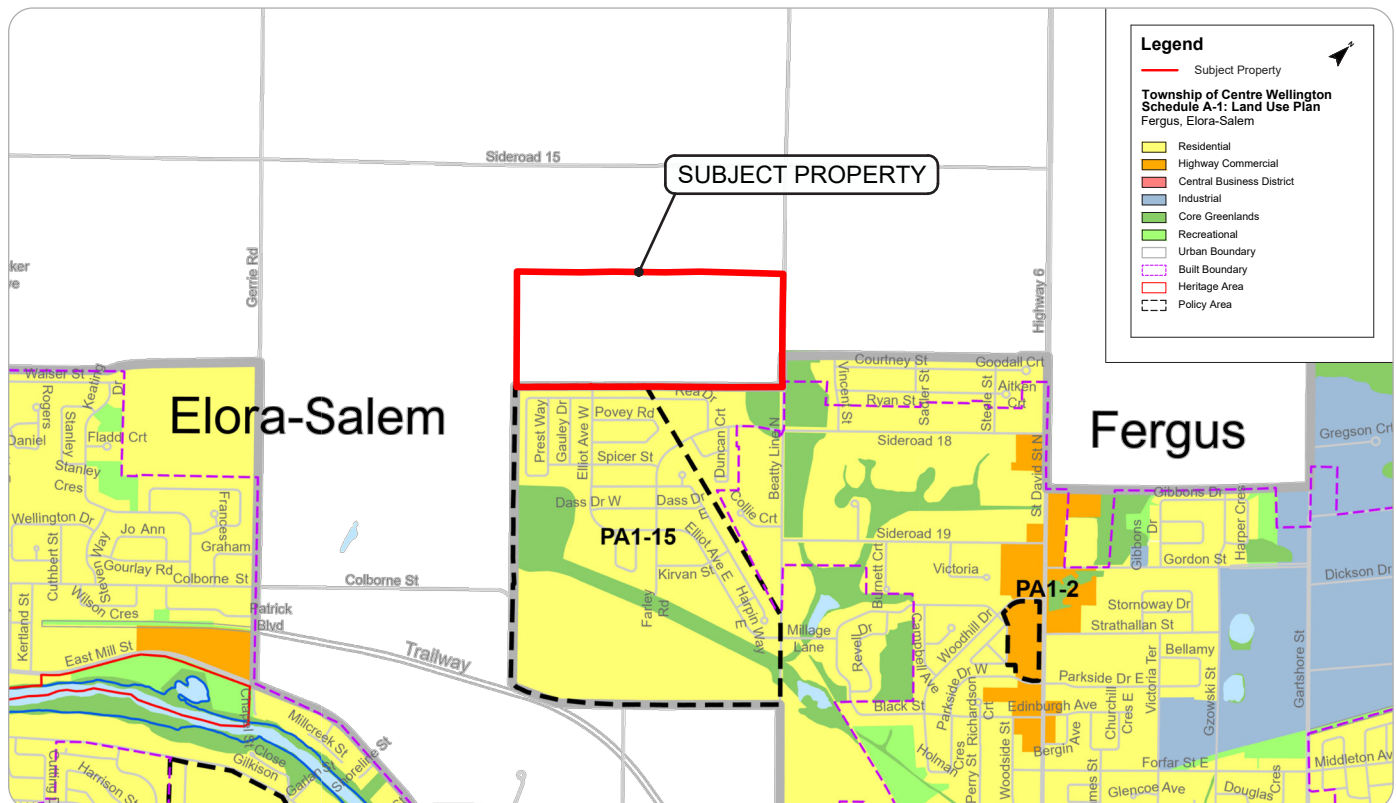


Figure 7: TCWOP Schedule A-1 (Land Use Plan Fergus, Elora-Salem)

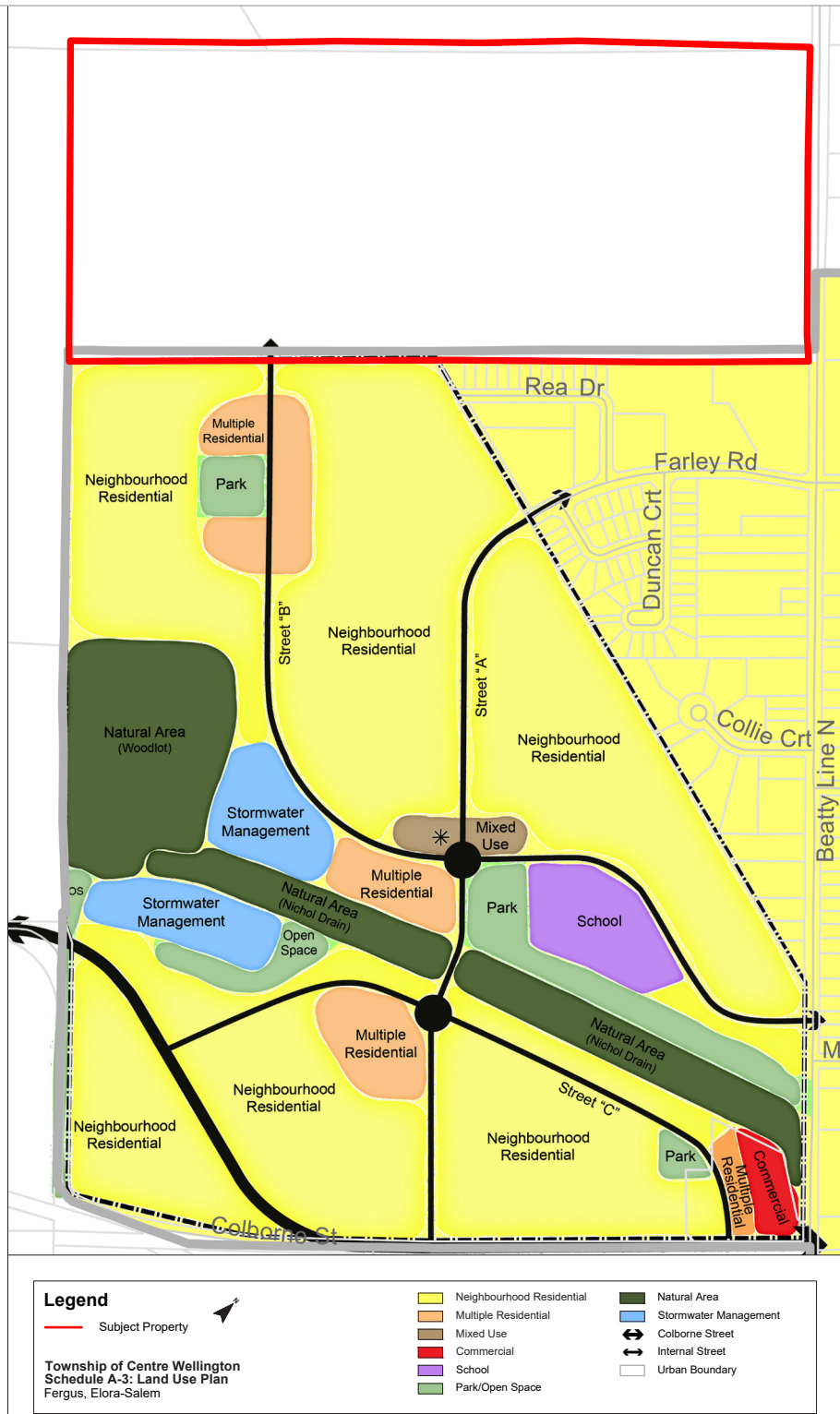


Figure 8: TCWOP Schedule A-3 (Land Use Plan Fergus, Elora-Salem)

A.1 - Purpose and Intent of the Plan

Section A.1 of the TCWOP outlines the purpose and intent of the plan, which provides direction for all future planning activities. The purpose of the TCWOP includes coordinating the effects of change and future development in consideration of the Township’s long-term interests, to guide future municipal decisions and expenditures regarding infrastructure, to provide the basis for future zoning regulations and standards, and to maintain the Township’s position as a desirable place to live, work, and play and learn.

B.4 - Major Goals

The major goals of the TCWOP with respect to guiding and directing growth and development in the Township are outlined under Section B.4. Several applicable major goals with respect to the proposed OPAs include protecting the Township’s

natural resources, providing opportunities for housing, broadening the supply and diversity of housing, ensuring the adequate provision of parks and open spaces, and providing improved municipal services and community facilities to serve residents. By conforming to the policies of the TCWOP, the proposed OPAs will achieve these major goals.

B.5 - Urban Area Expansion

Section B.5 of the Official Plan establishes criteria for a settlement area boundary expansion. These policies have been reviewed in our *May 2024 SABE Request* letter and are provided here. Accordingly, *“An Urban Centre expansion may only occur as part of a municipal comprehensive review where it has been demonstrated that:”*

Table 5: Town of Centre Wellington Official Plan Settlement Area Boundary Expansion Policies

Policy	Rationale
<p>a) Sufficient opportunities to accommodate the allocation in the County growth forecast through intensification and in designated greenfield areas, using the intensification target and greenfield density target, are not available</p>	<p>According to the Urban Structure and Growth Allocations Report prepared by Watson Consultants, the Township of Centre Wellington is anticipated to add 11,260 housing units until 2051. Per the Community Area Land Needs Assessment prepared by Parcel Economics Inc. dated November 21, 2024 in support of the proposed OPA, a settlement area boundary expansion of 611 hectares of Community Area Lands is required in Wellington County and 452 hectares is required in Centre Wellington. The Subject Property represents approximately 43.2 hectares of gross area (29.0 hectares of net area) that will contribute to the projected land need. Furthermore, it must be recognized that only the net developable area of the Subject Property (29.0 hectares) can contribute to the the County's overall land needs, and the net area is less than the site's gross area (43.2 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.</p>

<p>b) the expansion makes available sufficient lands for a time horizon not exceeding the growth forecast;</p>	<p>An expansion of the Fergus Settlement Area to include the Subject Property will provide an additional 43.2 gross hectares (29.0 hectares of net developable area) of land for Community Area uses. The enclosed OPA provides detail of how residential development will be accommodated on the Subject Property.</p>
<p>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, and the other policies of this Plan;</p>	<p>The 2024 SABE request was made pursuant to the County of Wellington's Official Plan Review process and is therefore appropriate with respect to supporting population targets.</p>
<p>d) the existing or planned infrastructure required to accommodate the proposed expansion can be provided in a safe, efficient, financially and environmentally sound manner;</p>	<p>The extension of municipal servicing to the Subject Property is an efficient use of the existing servicing infrastructure, as it will utilize existing services to accommodate future needs. The Functional Servicing and Stormwater Management Brief, prepared by SCS Consulting, states that the Subject Property can be serviced from the existing municipal water and wastewater systems located directly south of the Subject Property, within the existing Storybrook Subdivision, subject to the Township of Centre Wellington's confirmation of capacity and allocation.</p>
<p>e) 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</p>	<p>An Agricultural Characterization Report (ACR) was prepared by Colville Consultants and concludes the Subject Property represents a preferred location for a SABE. A County OPA and Local OPA are being submitted to facilitate residential development of the Subject Property.</p>
<p>f) impacts on agricultural operations which are adjacent to or close to the urban centre are mitigated to the extent feasible</p>	<p>The Agricultural Characterization Report identified seventeen agricultural uses within the Study Area. It includes thirteen livestock operations, three cash crop operations and one hobby farm. The inclusion of the lands as part of the SABE are not intended to negatively impact the nearby agricultural operations.</p>

g) 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;
- iii) the need to avoid mineral aggregate areas or where it is unavoidable to use lands of lower quality aggregate resources;
- iv) the impacts on natural heritage systems and features;
- 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;
- viii) logical boundaries based on existing property lines or recognized physical features where possible;
- ix) another planning criteria considered appropriate in the circumstances

i. The Subject Property is situated adjacent to the Fergus Primary Settlement Area, directly north of the Storeybrook residential subdivision that is currently under construction. The Storybrook subdivision was planned to incorporate the Subject Property with respect to servicing and road network.

ii. The proposed SABE is not situated in proximity to a mineral aggregate area.

iii. The proposed SABE will avoid mineral aggregate areas. Please refer to the enclosed ACR for details.

iv. A Natural Heritage Assessment has been prepared by GeoReport and Associates which concludes that development potential exists on the Subject Property. The Assessment identifies three Provincially Significant Wetlands, subject to re-evaluation on the Subject Property, however it concludes that development could proceed on a large portion of the site. Please refer to the Conceptual Block Plan prepared by Weston Consulting.

v. There are no anticipated impacts to the groundwater and surface water of the Subject Property. The Site Functional Servicing and Stormwater Management Brief, prepared by SCS Consulting, states that the Subject Property can be serviced from the existing municipal water and wastewater systems located within the existing Storybrook Subdivision. Groundwater will be further examined as part of the development application process.

vi. The extension of municipal servicing to the Subject Property is an efficient use of the existing servicing infrastructure, as it will utilize existing services to accommodate future needs.

vii. No negative impacts to the archaeological, cultural or heritage landscapes will occur through the inclusion of the Subject Property as part of a SABE.

viii. The proposed SABE is situated adjacent to the Fergus Primary Settlement Area and is a logical and continuous location for a SABE. To the south of the Subject Property is the Storybrook subdivision. The proposed Conceptual Block Plan, prepared by Weston Consulting, demonstrates how the lands will complement the existing subdivision being constructed to the south.

ix. Planning Criteria in the PPS 2024 and Official Plans have been addressed in this Letter.

h) The Township 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.	N/A
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As discussed above, the PPS 2024 eliminates the requirement for municipalities to only consider such requests at the time of MCR processes or in limited circumstances outside of an MCR. SABE requests are now permitted outside the parameters of an MCR.

Section C - General Policies

Section C of the TCWOP outlines policies that apply to all development and land use designations. The purpose of these general policies is to outline policies for protecting cultural heritage, natural heritage, and ground and surface water resources, and to guide growth and development at a high-level. The following are applicable to the proposed OPAs:

C.3.1 Overview

The Township of Centre Wellington encourages the protection and enhancement of the natural heritage of the Township. When planning for the future of Centre Wellington, the Township will give consideration to the protection, preservation and enhancement of significant natural features including rivers and streams and their valley lands, wetlands, flood plains, headwaters and water catchment areas, ground water supplies, environmentally significant features, wildlife and fish habitats and lands with ecological functions. This applies regardless of whether the lands are designated Core Greenlands on the land use schedules.

Within the Natural Heritage System certain areas have greater sensitivity or significance. These areas will be identified in policy and protected. These areas have been included in a Core Greenlands designation on the land use schedules and include:

- Provincially Significant Wetlands*
- Habitat of endangered or threatened species*
- Floodways and hazardous lands*

Specific policies for the Core Greenlands land use designation are found in Section D.8. The following policies apply to natural heritage issues in general, including lands and features that may not presently be designated on the land use schedules.

C.3.2 Wetlands

All provincially and locally significant wetlands are included in the Core Greenlands designation. The Township recognizes the hydrological, social, ecological and economic value of wetlands and their role within the natural environment. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted.

- 1. No development is permitted on Provincially Significant Wetlands. Development on lands adjacent to Provincially Significant Wetlands will only be permitted subject to the preparation of an Environmental Impact Assessment as outlined by the policies of this Plan. Development on or adjacent to locally significant wetlands will also be subject to the preparation of an Environmental Impact Assessment in accordance with Section E.1.3 of this Plan.*

Core Greenlands are designated on the Subject Property per the TCWOP. While the proposed May 2024 SABE Request would include the entirety of the Subject Property in the urban boundary, the proposed development would not occur within the Provincially Significant Wetlands or watercourse that comprise the Core Greenlands. The limits of development around the Provincially Significant Wetlands and watercourse were established by the Environmental Impact Statement prepared by GeoProcess. The proposed development will occur adjacent to these noted features, ensuring that no negative or adverse ecological impacts will occur.

C.5 HOUSING POLICIES

C.5.1 Variety of Housing

The Township of Centre Wellington encourages the production of a wide range of housing types to meet future housing need. Council shall provide for the opportunity, through subdivision approval and zoning bylaw approvals, for a variety of housing types to be provided. Prior to approving new development or redevelopment, Council will consider the housing need within the community and the housing market area and provide opportunities for a range of housing types throughout the community that are appropriate given existing site conditions, neighbouring developments, and servicing options.

C.5.2 Supply of Residential Land

The Township of Centre Wellington shall, as long as land is available within the Urban Centre limits, maintain a minimum ten (10) year supply of residentially designated land within each Urban Area at all times. The Township of Centre Wellington adopts as a guideline the maintenance of a minimum three- (3) year supply of housing units in registered and draft approved plans of subdivision, and applications approved

C.5.5 Residential Intensification

This Plan contains policies encouraging intensification primarily in the urban centres. The strategic approach to intensification intends to retain small town character and revitalize downtown areas which includes: a) supporting increased densities in newly developing greenfield areas with a broader mix of housing types than has been the norm in small towns;

C.5.6 Greenfield Housing

In Greenfield areas, the Township will encourage increased densities and a broader mix of housing and will:

1. encourage approved but undeveloped plans of subdivision to consider revisions which add additional housing units in appropriate locations;
2. require new developments to achieve densities which promote the overall greenfield density target of 40 persons and jobs per hectare and specifically:
 - i. strive to attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions;
 - ii. somewhat lower densities may be considered in newly developing subdivisions where physical and environmental constraints such as larger than normal storm water management requirements, parcel dimensions that do not yield efficient lotting patterns and the need for transition areas from adjacent land uses, or on small parcels of under 2 hectares (5 acres);

- iii. *In (i) and (ii) above gross hectares or gross acres means residential land excluding environmentally protected features and non-residential uses (schools, convenience commercial) but includes roads, parks, storm water management areas or other utility blocks; and 3. encourage the introduction of medium density housing types in new subdivisions and other Greenfield areas.*

The proposed OPAs will assist the Township in meeting its residential growth targets while providing for a greater variety of housing types than has been the norm in small towns within a *Greenfield*. The Subject Property will be developed to meet the minimum density target for *Greenfields* to efficiently utilize existing servicing infrastructure with consideration for the existing environmental constraints. The proposed townhouse blocks will also help introduce a medium density housing type in the *Greenfield*.

C.6 MUNICIPAL SERVICES

C.6.1 General Servicing Policies

1. *All new development and redevelopment within the Fergus and Elora-Salem Urban Centres shall be provided with full municipal services, to such standards as may be required by the Township, including:*

- a) *Sanitary sewage disposal facilities*
- b) *Water supply facilities*
- c) *Storm drainage facilities*
- d) *Hydro*
- e) *Public roads*
- f) *Telecommunications*

2. *Telephone, cable television and natural gas services will be provided to all new development, wherever feasible and appropriate,*

C.6.2 Provision of Sewer and Water Services

The Fergus and Elora-Salem Urban Centres have municipal sewer and water services. New development will be required to connect to these services where they are available. It is the long-term intention of the Township to eventually provide municipal sewage and water services to all of the areas that are designated as part of the Fergus and Elora-Salem Urban Centres.

C.6.5 Sanitary Sewage Collection and Treatment

C.6.5.2 Connection

All new development in the Fergus and Elora Salem Urban Centres shall be connected to the municipal sanitary sewage system except where this Plan provides a specific exemption. The system and its various components and appurtenances are permitted in all land use designations of this Plan.

C.6.6 Water Supply and Distribution

C.6.6.2 Connection

All new development within the Fergus and Elora-Salem Urban Centres shall be connected to the municipal water supply system except where this Plan provides for specific exemptions. The system and its various components and appurtenances are permitted in all land use designations of this Plan.

The proposed OPA is intended with the full utilization of municipal water and wastewater servicing infrastructure via the future connections built into the Storybrook Subdivision. The Site Servicing Brief prepared by SCS Consulting confirms that the Subject Property can be serviced by the existing servicing infrastructure. Hydro, public roads, and telecommunication will be provided to the Subject Property as part of the proposed OPA through the development approvals process.

Section C.15 of the TCWOP outlines broad design policies and design guidelines to achieve higher standards in the physical design of the built and natural environment in its *Urban Centres*. The policies and guidelines in this section will be considered upon submission of the Zoning By-law Amendment, Site Plan Approval, and Draft Plan of Subdivision applications. These applications will provide further details regarding the proposed development with the intention of conforming to the design policies and having appropriate regard for the design guidelines.

Section D – Detailed Land Use Policies

Detailed land use policies are provided in Section D of the TCWOP. Section D.2 outlines objectives and policies regarding the *Residential* designation that is proposed for the Subject Property as part of the proposed OPA. Section D.2.1 states that “*The single-detached home is currently the dominant housing type in the urban centres and this situation is expected to continue. However, new housing types are needed to provide a greater variety of residential accommodation as well as a more affordable housing supply. The Municipal Plan anticipates that semi-detached, townhouse and apartment dwellings will be developed to respond to this need and that these units may eventually account for at least one quarter of all housing units in Fergus and Elora-Salem where full municipal services are available.*”

The following objectives and policies are applicable to the proposed OPAs:

D.2.2 Objectives For Residential Development

- 1. To ensure that an adequate supply of land is available to accommodate anticipated population growth over the planning period;*
- 2. To provide a variety of dwelling types to satisfy a broad range of residential requirements including affordable housing;*
- 5. To ensure that an adequate level of municipal services will be available to all residential areas;*

D.2.3 Permitted Uses

The predominant use of land in those areas designated RESIDENTIAL on Schedule “A” of the Plan shall be residential development. A variety of housing types shall be allowed, but low rise and low-density housing forms such as single-detached and semi-detached dwelling units shall continue to predominate.

Townhouses and apartments, bed and breakfast establishments, group homes and nursing homes, may also be allowed subject to the requirements of the Zoning By-law and the applicable policies of this Plan.

D.2.4 Low-Density Development

This Plan considers single-detached, semidetached and duplex dwellings to be low density housing forms. The Zoning By-law may provide separate zones for only single-detached, semi-detached or duplex dwelling units or a combination of any of the above.

D.2.5 Medium Density Development

Multipleresidentialdevelopments such as townhouses and apartments may be allowed in areas designated RESIDENTIAL subject to the requirements of the Zoning By-law and further provided that the following criteria are satisfactorily met:

- 2. That the design of the proposed height, setbacks, landscaping and vehicular circulation, will ensure that it will be compatible with existing or future development on adjacent properties;*

3. *That the site of the proposed development has a suitable area and shape to provide:*
 - a) *Adequate on-site landscaping to screen outdoor amenity areas both on the site and on adjoining property, to buffer adjacent residential areas and to improve the overall appearance of the development;*
 - b) *On-site amenity areas for the occupants of the residential units;*
 - c) *Adequate off-street parking, access and appropriate circulation for vehicular traffic, particularly emergency vehicles; and*
 - d) *Adequate grading to ensure that drainage from the property is directed to public storm drainage facilities and not to adjoining properties.*
4. *That adequate services such as water, sewage disposal, storm water, roads and hydro are available or shall be made available to service the development;*
6. *That in greenfield areas, medium density is encouraged to locate on major roadways, and roads designed to serve an arterial or collector function, while street townhouses are allowed on local roads.*
7. *That a separate zone(s) is established for multiple residential developments.*

The proposed OPA will facilitate the proposed urban-type development of single detached and townhouse blocks on the Subject Property that will be fully serviced by municipal services in the *Greenfield* area. This proposed urban-type development will assist the Township in accommodating its forecasted population growth and to provide for a more diverse range of housing types. Although the proposed number of townhouse units have not been finalized at this time, the intention is to conform to the overall minimum density target of 40 persons and jobs per hectare as prescribed by the CWOP.

The building and site design and layout is also intended to conform to the policies under Section D.2.5 of the TCWOP to ensure compatibility with existing/future nearby developments, pleasing visual appearances, adequate on-site parking & traffic functionality, and adequate grading. However, due to the *Provincially Significant Wetland* along Beatty Line, it is not possible to provide the townhouse blocks along this Future Collector Road.

Separate zones will be established for the townhouse blocks through the future Zoning By-law Amendment application.

D.8 CORE GREENLANDS

D.8.1 Planning Approach

General policies applying to the natural heritage of our community are found in Section C.2 of this Plan. In addition, the land use schedules also incorporate a Core Greenlands land use designation. This designation is a composite of Provincially Significant Wetlands, the habitat of endangered or threatened species and floodways and hazardous lands. The following policies specifically apply to the Core Greenlands designation. They should be read in conjunction with Section C.3.

D.8.2 Permitted Uses

Upon lands designated Core Greenlands, no development or site alteration is permitted within Provincially Significant Wetlands, in provincially significant portions of the habitat of threatened or endangered species, or in the floodway. Uses shall be limited to conservation and resource management, open space and passive recreation. Such uses shall only be permitted where it can be demonstrated that:

1. *There are no negative impacts on provincially significant features and functions and no significant negative impacts on other natural heritage features and functions;*
2. *Any natural hazards present can safely be overcome;*
3. *The development conforms to policies of the applicable adjacent or underlying designation permitted to continue*

D.8.3 Zoning

Lands designated Core Greenlands shall be placed in a restrictive zone that prohibits buildings, structures and site alternations except as may be necessary for the management or maintenance of the natural environment.

Zoning by-laws may recognize existing land uses in Core Greenlands areas, and, where appropriate, provide for reasonable expansions or alterations.

Zoning by-laws may also establish setbacks from Core Greenlands areas in which no buildings or structures shall be permitted.

D.8.4 Adjacent Lands

For the purposes of this section of the Plan, adjacent lands are considered to be lands within 120 metres of Provincially Significant Wetlands; and/or lands within 30 metres of all other Core Greenlands areas.

The proposed development will be situated outside of the development limits established around the *Provincially Significant Wetlands*. Therefore, the proposed development will occur adjacent to the *Core Greenlands*, ensuring that there are no negative impacts to the wetlands and their functions. The *Core Greenlands* will be placed in a restrictive zone to prohibit development via the future Zoning By-law Amendment application.

PA1-15 North West Fergus

Section PA1-15 comprises the policies regarding the North West Fergus Secondary Plan Area, which provide specific guidance and direction for development in this area. Lands within this Secondary Plan are envisioned with higher density built forms such as street townhouses along with lower density housing forms. Amenity areas are also envisioned throughout the Secondary Plan Area within walking distance of residents.

The Subject Property is not currently within the Secondary Plan. However, the Storybrook Subdivision contemplated an extension of its subdivision development pattern onto the Subject Property as evidenced by the built-in opportunities for infrastructural connections. Therefore, the proposed OPA will also extend the boundaries of the Secondary Plan Area to include the Subject Property as part of the SABE. The following objectives and policies in the Secondary Plan are thus applicable to the Subject Property:

Objectives

The objectives for development within North West Fergus are:

- a) *To create a neighbourhood that is compact, complete and connected;*
- b) *To promote and encourage a healthy and sustainable neighbourhood;*
- d) *To create a neighbourhood with defined centres and edges;*
- e) *To provide high quality streetscapes that accommodates natural heritage where appropriate;*
- f) *To establish a neighbourhood with a system of linked parks and open spaces;*
- g) *To create a neighbourhood with an integration of natural features as part of its character and open space system;*

- i) To provide a diversity of public domain experiences through a variety of scales, changing views, and natural and built environments;
- j) To create a neighbourhood with a permeable street system that supports pedestrians, bicycles, utility vehicles and automobiles;
- k) To establish environmentally appropriate design reflecting the site's natural features and position in the region's broader environmental context;

Land Use Policies

The following general policies apply throughout North West Fergus:

d) Opportunities to establish Low Impact Development (LID) approaches for stormwater management shall be explored during the plan of subdivision process, only where they do not cause undo longterm maintenance issues for the Township.

Neighbourhood Residential

The following policies apply to land identified as "Neighbourhood Residential" on Schedule A-3 of the Official Plan:

- c) The minimum residential density with the Neighbourhood Residential designation is 22 units per net hectare.
- f) A mix of dwelling types, lot sizes and widths, and elevation types shall be distributed throughout each subneighbourhood. The distribution will be regulated through zoning following the approval of plans of subdivision

Multiple Residential

The following policies apply to land identified as "Multiple Residential" on Schedule A-3 of the Official Plan:

- a) Ground-oriented multiple dwellings such as semi-detached dwellings, duplexes, cluster townhouses, and street townhouses are permitted in the Multiple Residential designation. Low-rise apartment buildings, generally up to four storeys in height, are also permitted.
- b) The minimum residential density for the designation is 30 units per gross residential hectare
- d) A mix of dwelling types, lot sizes, and elevations types shall be distributed throughout each sub-neighbourhood. The distribution will be regulated through zoning following the review and approval of subdivision plans.

Natural Area

The following policies apply to land identified as "Natural Area" on Schedule A-3 of the Official Plan:

- a) No development will be permitted on land designated Natural Area, other than conservation uses, resource management uses, open space uses, and trails.
- c) Buffer areas have been included within the area identified as Natural Area to preserve the features and their functions, and further buffering is not required on adjacent land. The buffers include a 67.5 metre total corridor for the Nichol Drain No. 1; 15 metre buffers from the wetland boundaries; and, 10 metre buffers from the woodlot dripline

The proposed OPA will provide for single detached and townhouse blocks that are clearly demarcated throughout the Subject Property. The blocks will be designated in the appropriate *Neighbourhood Residential* and *Multiple Residential* designations within the Secondary Plan. The development blocks in these two designations will meet the minimum residential density target while also conforming to the minimum requirement of 40 residents and jobs per hectare per the CWOP. The proposed OPA will provide for a mix of dwelling types, lot sizes and widths, and elevation types throughout the site, which will be regulated through the future Zoning By-law Amendment application. Furthermore, the development blocks appropriately consider the development limits of the *Provincially Significant Wetlands* and their associated buffers, which will be designated as *Natural Area*, to ensure that they are protected in conformity with the policies of the TCWOP. The development of Subject Property will also incorporate LID or stormwater requirements in accordance with MECP and GRCA requirements.

The proposed sizes of the development blocks, the locations of the townhouse blocks, the parks, and the interconnectivity of the proposed streets internally and to Beatty Line and Sideroad 15 will assist in the creation of a compact, *complete community* that is connected to the rest of Fergus. The centrality of the townhouse blocks and parks will create a neighbourhood with a defined centre and a system of linked parks that integrates the *Natural Areas*. This, alongside the connections to the Storybrook Subdivision and to Beatty Line and Sideroad 15, will provide for a diversity of public domain experiences through a variety of changing views and natural and built environments.

Overall, it is our opinion that the proposed OPA conform to the policies of the North West Fergus Secondary Plan.

Summary

We have reviewed and considered all sections of the TCWOP, and determined that the following policies are applicable and addressed in this review:

- Section A.1 – Purpose and Intent of the Plan;
- Section B.4 – Major Goals;
- Section B.5 – Urban Area Expansion;
- Section C – General Policies: C.3.1, C.3.2, C.5.1, C.5.2, C.5.5, C.5.6, C.6.1, C.6.2, C.6.5.2, and C.6.6.2;
- Section D – Detailed Land Use Policies: D.2.2.1, D.2.2.2, D.2.2.5, D.2.3, D.2.4, , D.2.5.2, D.2.5.3, D.2.5.4, D.2.5.6, D.2.5.7, D.8.1, D.8.2, D.8.3, and D.8.4; and,
- PA1-15 – North West Fergus Secondary Plan: Objectives a), b), d), e), f), g), i), j), k); Land Use Policies d); Neighbourhood Residential a), b), c), f); Multiple Residential d); and Natural Area a) and c).

Based on the foregoing, it is our opinion that the proposed OPAs conform to the above policies and the TCWOP.

7.5 TOWNSHIP OF CENTRE WELLINGTON ZONING BY-LAW 2009-045

The Township of Centre Wellington Zoning By-law 2009-045 (the “ZBL”) is a by-law regulating the use of lands and the character, location, and use of buildings and structures within the Township. The Zoning By-Law came into force in 2009 and consolidates and incorporates amendments enacted by Township Council and the Ontario Municipal Board that are in full force and effect as of February 2024. The Zoning By-Law divides the Township into zones, each with their own set of land use permissions and performance standards regulating development.

The ZBL zones the Subject Property as *Agricultural (A)*, *Environmental Protection (EP)*, and *Environmental Protection Overlay* per Schedule A Map 17. A Zoning By-Law Amendment would be required to permit the proposed development with site-specific performance standards and will be submitted at the appropriate time.

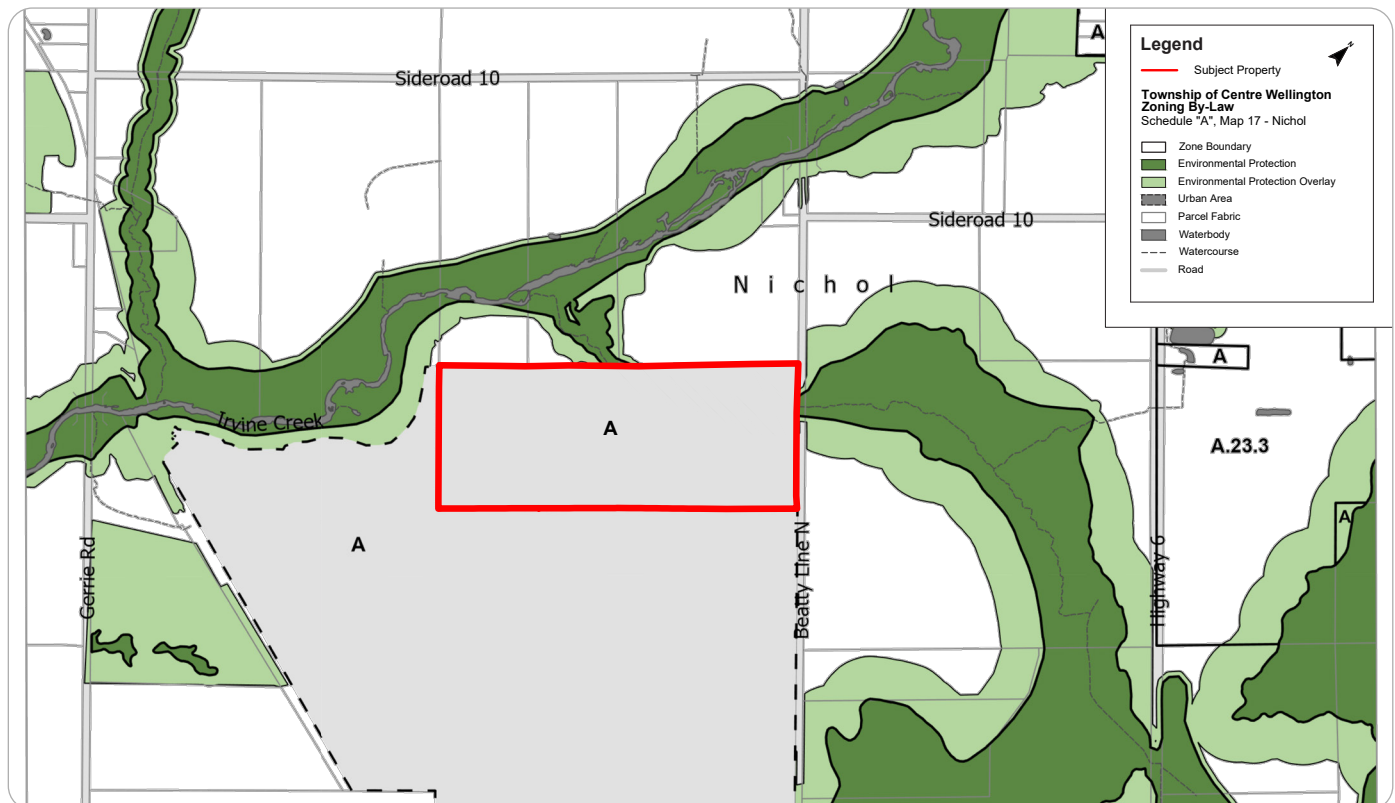


Figure 9: Zoning By-law 2009-045 - Schedule A, Map 17

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8. PROPOSED OFFICIAL PLAN AMENDMENTS

Amendments to the CWOP and TCWOP are required to implement the conceptual development as the in-force land use designations and overlays of the planning documents do not permit urban-type development on the Subject Property.

The County OPA proposes to designate the Subject Property to:

- *Designated Greenfield Area and Primary Urban Centre* on Schedule A (County Growth Structure);
- *Designated Greenfield Area and Primary Urban Centre* on Schedule A1 (County Growth Structure Centre Wellington); and,
- *Primary Urban Centre and Core Greenlands* on Schedule B1 (Land Use Centre Wellington).

The Local OPA will designate the Subject Property as follows:

- *Residential and Core Greenlands* within the *Urban Boundary* on Schedule A-1 (Land Use Plan Fergus, Elora-Salem);
- Within the *Urban Boundary* and *Neighbourhood Residential, Multiple Residential, Park/Open Space, Natural Area, and Stormwater Management* on Schedule A-3 (Land Use Plan Fergus, Elora-Salem); and,
- *Northwest Fergus Municipal Service Area* on Schedule B (Municipal Servicing Plan) of the TCWOP.

Furthermore, the Local OPA will add a site-specific policy to Section PA1-15 of the TCWOP. The intention of the site-specific policy is to permit medium density development at a proportion and density that is beyond what is permitted under Section D.2.5.1 Medium Density Development along with Policy a) and b) of Neighbourhood Residential under Section PA1-15. Please refer to the Draft Local OPA for further details on the instrument.

The effects of the OPAs are to redesignate the Subject Property and to expand the boundaries of the North West Fergus Secondary Plan in the TCWOP. The proposed OPAs will augment the *May 2024 SABE Request*. The instrument will establish permissions for serviced, urban-type land uses on the Subject Property in conformity with the minimum density targets of the CWOP, the TCWOP, and the Secondary Plan. In doing so, the OPA will assist the County and Township in meeting their residential growth targets by the 2051 planning horizon.

Through our review of the planning policies in the earlier sections of this Report and our planning analysis in the following sections, it is our opinion that the Draft OPAs has appropriate regard for matters of provincial interest under the *Planning Act*, is consistent with the PPS 2024, conforms to the CWOP and the associated OPAs (OPA 119, 120, and 123), conforms to the TCWOP, and has appropriate regard for the Wellington County Report # PD2024-08 and draft OPA 126.

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9. PLANNING ANALYSIS AND JUSTIFICATION

9.1 LOGICAL AND EFFICIENT SETTLEMENT AREA BOUNDARY EXPANSION

Our research and analysis lead us to conclude that the proposed OPA consider the applicable policy regime, applies sound planning principles, and facilitates the implementation of the Provincial, County, and Township policy framework. Therefore, the proposed OPAs will facilitate a compact development consisting of single-detached and townhouse blocks which constitutes “good planning” and is thus appropriate on the Subject Property. The proposed OPA represent good planning and is in the public interest, in so much as it:

- Constitutes a logical and efficient extension of the Fergus Settlement Area;
- Contributes to the creation of a *complete community*;
- Optimizes the efficient use of existing municipal servicing infrastructure and public amenities;
- Protects the natural heritage system;

It is our opinion that the proposed OPA constitute a logical and efficient expansion of the Fergus Settlement Area. Urban-type residential development on the site would represent an extension of the Storybrook Subdivision, whose street connections, servicing infrastructure, and public amenities are intentionally designed to accommodate a future expansion of the subdivision towards a site adjacent to the urban boundary. Completing this expansion that was built into the edge design of the Storybrook Subdivision represents a logical extension of the Settlement Area boundaries that will efficiently utilize existing municipal services. Moreover, our analysis re-affirms the Provincial decision to include the Subject Property within the Fergus Settlement Area in the original Provincially-modified OPA 119, and would contribute 43.2 gross hectares (29.0 net hectares) to meet the County's 611 hectares and Township's 452 hectares of Community Area land needs per the Community Area Land Needs Assessment prepared by Parcel Economics Inc. Furthermore, it must be recognized that only the net developable area of the Subject Property (29.0 hectares) can contribute to the the County's overall land needs, and the net area is less than the site's gross area (43.2 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.

9.2 CREATION OF A COMPLETE COMMUNITY

It is our opinion the proposed OPA contributes to the creation of a *complete community* within the Township of Centre Wellington. The proposed OPA will provide for a greater range and mix of housing types, sizes, tenures, widths and elevations through the proposed mix of single detached and townhouse blocks. These unit typologies will provide additional housing options in the Township that will accommodate households of varying incomes, ages, and structures, thereby helping to ensure that residents will be able to work and live within the Township at all stages of their life. The proposed park blocks locationally align with the proposed natural area blocks to integrate the natural environment and green spaces into the development of the Subject Property. This, along with the compact built form and interconnected street network proposed, will help create interesting, varied, and active transportation-friendly streetscapes on the Subject Property. Furthermore, including the Subject Property within the North West Fergus Secondary Plan will help ensure the creation of a *complete community* in the planning area in conformity with the plan.

9.3 OPTIMIZED AND EFFICIENT USE OF EXISTING INFRASTRUCTURE

The Subject Property is proposed to be developed for single detached and townhouse uses that will meet the minimum density target of 40 jobs and persons combined per hectare for *Designated Greenfield Areas* as per the CWOP. Accordingly, this proposed OPA will appropriately maximize the efficient use of municipal water, wastewater, and stormwater infrastructure. The proposed street connections to the Storybrook Subdivision and future connections to Beatty Line and Sideroad 15 will also facilitate the efficient use of transportation infrastructure and nearby amenities such as parks, schools, and community centres. The result will be the avoidance of any unjustified or uneconomical upgrades, improvements, or additions to municipal infrastructure in relation to the proposed development.

9.4 PROTECTION OF THE NATURAL HERITAGE SYSTEM

The proposed OPA will ensure the protection of the natural heritage system. Development on the Subject Property will occur adjacent to the on-site wetlands, watercourse, and GRCA-regulated areas, and are proposed outside of the development limits established around each feature by GeoProcess Research Associates in their Environmental Impact Statement. The implementing OPAs will designate these features and their development limits in the *Core Greenlands* designation to ensure their continued protection from a policy perspective.



10. CONCLUSION

The proposed OPA outlined in this report augments our *May 2024 SABE Request* by amending the CWOP and TCWOP to permit the development of single detached and townhouse units on the Subject Property. Applications for a Zoning By-law Amendment, Site Plan Approval, and Draft Plan of Subdivision will be submitted at a later date to fully implement the proposed development.

The accompanying supporting plans and reports indicate that the Subject Property is an appropriate candidate for inclusion within the Fergus Settlement Area for urban-type development. In accordance with the submitted materials, no significant impacts from an environmental perspective are anticipated as a result of the proposed development, and any potential impacts can be prevented by developing outside of the established limits of development. The Subject Property is a reasonable and logical candidate for urban-type development given its on-site conditions from an agricultural perspective, adjacency to the Fergus Settlement Area, and its prior inclusion in the Settlement Area per the original Provincially-approved OPA 119. Furthermore, there is sufficient water and wastewater capacity to accommodate the proposed SABE and development respecting the Subject Property per the submitted plans and reports.

In our opinion, the proposed OPA has appropriate regard for matters of provincial interest under the *Planning Act*, is consistent with the PPS 2024, conforms to the CWOP and the associated OPAs (OPA 119, 120, and 123), conforms to the TCWOP, and has appropriate regard for the Wellington County Report # PD2024-08 and draft OPA 126.

The proposed OPA is based on good planning principles and is supported by the various technical studies and reports submitted with the noted applications. The proposed applications have merit, and we request that it be approved by the County of Wellington Council and Township of Centre Wellington Council.

Respectfully submitted,

Weston Consulting



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President



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