

PLANNING JUSTIFICATION REPORT

6581 Highway 6, Fergus

**Official Plan Amendment, Zoning By-Law Amendment, & Draft Plan of
Subdivision Applications**



EXECUTIVE SUMMARY

This Planning Justification Report ('Report') has been prepared as part of the complete application submissions for an Official Plan Amendment (County and Township), Zoning By-Law Amendment and Draft Plan of Subdivision applications for the proposed residential development of the property municipally known as 6581 Highway 6 in the County of Wellington ('Subject Property' or 'Subject Lands').

The applicant is advancing applications to amend both the County of Wellington and Township of Centre Wellington Official Plans to bring the Subject Lands into the Fergus settlement area boundary and designate the lands accordingly for residential use. The Subject Property was included within the Fergus settlement area as part of the ministerial amendments to Official Plan Amendment (OPA) 119 approved by the MMAH on April 11, 2023, which was later reversed by the Ministry. The property immediately to the south (which is also owned by the applicant) has been recommended for inclusion within the Fergus Settlement Boundary as part of OPA 126 of the County's Urban Boundary Expansions and is subject to a site-specific application to implement the recommendations of the MCR.

The Proposed Development consists of a mix of low to medium density residential blocks comprising of a total of up to 535 units. The unit mix is comprised of single detached dwellings, street townhouses, medium density dwelling units, and mixed-use (commercial/retail) units. The Proposed Development will also include a 0.9 hectare (2.2 acre) park centrally located within the neighbourhood which if included will form a larger park with the South Lands.

It is our opinion that the inclusion of the Subject Property within the settlement area boundary is warranted, and the Proposed Development represents logical and orderly development of the Fergus community. The proposed inclusion of the Subject Lands is consistent with the Provincial Planning Statement (PPS) objectives to accelerate housing and land supply by promoting efficient land use, optimizing infrastructure, and supporting the development of a complete, mixed-use community by incorporating it into the South lands recommended for urban area expansion.

This Report discusses the existing conditions of the Subject Property, the neighbourhood context of the site, the existing land use planning controls which apply, the required planning applications, and the land use planning rationale with respect to the same, and the required supporting studies.

Specific consideration has been given to assessing the existing land use planning development controls which currently apply to the lands and the suitability of these lands. Based on our review of the Subject Lands and its context, it is our opinion that the property municipally known as 6581 Highway 6 is appropriate for the proposed residential and mixed-use development.

This Report provides land use planning opinion that the Proposed Development has regard for the matters of Provincial interest as set out in the Planning Act, is consistent with the PPS, and conforms to the Wellington County Official Plan, and the Township of Centre Wellington Official Plan and Zoning By-Law.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the Proposed Development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations



set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

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1. INTRODUCTION

This Planning Justification Report ('Report') has been prepared as part of the submission for an Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision applications for the proposed residential development of the property municipally known as 6581 Highway 6 in the County of Wellington ('Subject Property' or 'Subject Lands').

As part of the complete application package, an Official Plan Amendment (both County and Township) and Zoning By-law Amendment application to redesignate and rezone the proposed blocks are included to facilitate the Proposed Development. A Draft Plan of Subdivision showing the proposed redevelopment of the site with up to 535 units comprised of single-detached, semi-detached, street townhouses, medium density dwelling units, and mixed-use units with park space and associated road network ('Proposed Development') integrating it into the South Lands has been prepared.

Note that these applications have been submitted concurrently to those of the adjacent southern lands' property. These two (2) properties will collectively form a complete and cohesive community, subject to Council's approval.

The applicant is advancing applications to amend both the County of Wellington and Township of Centre Wellington Official Plans to bring the Subject Lands into the settlement boundary and designate the lands accordingly to allow for their use for residential purposes. The Subject Property was formerly included within the Fergus settlement area as part of the ministerial amendments to OPA 119 approved by the MMAH on April 11, 2023, which was subsequently reversed by the Ministry. Further, the property immediately adjacent to the south has been recommended for inclusion within the Fergus Settlement Boundary as part of OPA 126 of the County of Wellington's settlement area boundary expansions. These lands to the south are also subject to site specific planning applications by our client to facilitate their use for residential purposes.

It is our opinion that the inclusion of the Subject Property within the settlement area boundary and the Proposed Development represent logical and orderly development of the Fergus community. The proposed inclusion of the Subject Lands is consistent with the PPS objectives to accelerate housing and land supply by promoting efficient land use, optimizing infrastructure, and supporting the development of a complete, mixed-use community.

This Report discusses the existing conditions of the Subject Property, the neighbourhood context of the site, the existing land use planning controls which apply, the required land use planning applications, and the land use planning rationale with respect to the same, and the required supporting studies.

Specific consideration has been given to assessing the existing land use planning development controls which currently apply to the lands and the suitability of these lands. Based on our review of the Subject Lands and its context, it is our opinion that the property municipally known as 6581 Highway 6 is an appropriate location for the proposed residential and mixed-use development.

Further, this Report has consideration of the supporting studies/reports/plans that have been prepared in support of these applications to form a complete submission package. As per the

applicant, is our understanding that the Pre-Consultation Record received from municipal staff was generally positive and that this submission package addresses all of the necessary technical work.

This Report provides land use planning opinion that the Proposed Development has regard for the matters of Provincial interest as set out in the Planning Act, is consistent with the PPS, and conforms to the Wellington County Official Plan, and the Township of Centre Wellington Official Plan and Zoning By-Law.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the Proposed Development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

2. SITE DESCRIPTION

The Subject Property is municipally addressed as 6581 Highway 6, Township of Centre Wellington and known legally as Part Lot 17, CON 16 Nichol as in ROS228713 ('Subject Property' or 'Subject Lands').

The location of the Subject Property is shown on Figure 1. The Subject Property is located on the east side of St. David Street North and Highway 6, north of Gordon Street, and west of Gartshore Street, north of the Fergus urban area.



Figure 1: Location of Subject Property (Source: Google Earth)

The Subject Lands have a total area of +/-20 hectares in area with a frontage of +/-407 metres on Highway 6. The Subject Lands are currently used for agricultural purposes with a residential dwelling/farmhouse fronting Highway 6.

The Subject Property currently contains one (1) single-detached dwelling and agricultural accessory uses (i.e. barns and silos), as shown in Figure 4. A Heritage Impact Assessment prepared by CHC Ltd. identified the existing farmhouse as meeting the criteria for heritage designation. As such, the farmhouse is to be retained on its own block (Block 65) to preserve the heritage value. The Report also confirms the other existing structures including a garage, barn, two silos, shed, and an outbuilding, do not have heritage significance. As such, these buildings will be demolished to facilitate the Proposed Development.



Figure 2: Street view of Subject Property (Source: Google Maps)



Figure 3: Existing single-detached dwelling and agricultural accessory uses (Source: Google Maps)



Figure 4: Existing single-detached dwelling on Subject Property (Source: Google Maps)

3. CONTEXT ANALYSIS

The Subject Lands are located north of the existing Fergus Settlement Area boundary. The lands south of the Subject Lands are generally urbanized, while those to the east, north and west are generally rural lands for agricultural purposes, with intervening natural heritage features and hedgerows throughout.

Immediately south of the Subject Property are lands that are currently used for agricultural purposes. These lands are recommended to be included within the settlement boundary (OPA 126) and form the southern portion of the proposed broader subdivision proposed by the applicant. There has been a site-specific Official Plan Amendment (County and Township), Zoning By-Law Amendment and Draft Plan of Subdivision application submitted for these adjacent lands to implement the recommendations of the County-led municipal comprehensive review and to allow for the residential development of these lands.

Further south are a range of uses including residential and commercial/retail uses. Single-detached dwellings are the most common form of housing in the Fergus Settlement Area, but a few higher density residential buildings are found in the area, including two (2) four-storey apartment buildings on 165 and 169 Gordon Street as well as a mix of single-detached dwellings and rowhouses within the subdivision north of Side Road 18 and west of Highway 6, and the subdivision north of Gordon Street and southeast of the Subject Lands.

The broader neighbourhood also contains a mix of uses, including commercial and institutional uses, as well as parks and trails. Commercial uses, such as restaurants, hotel, gas station, department store, grocery store, garden centre, car dealership, and health care facilities, are located south of the Subject Lands along St. David Street North. There are several schools and churches in the area, including St. Joseph's Church and Catholic School, Victoria Terrace Public School, and Bethel Baptist Church. Several parks and trails are also located close to the Subject Property, including Gibbons Park Drive and Trail, and Harper Crescent Park.

An industrial area is located west of Gartshore Street. Within the area, industrial uses such as manufacturing, auto services, suppliers, and storage units are found. Two (2) electric utility companies are also located along this road, namely Centre Wellington Hydro and Nexans Canada.

The Subject Lands are located on the east side of Highway 6 which is classified as a Provincial Highway in the County of Wellington Official Plan (Schedule B1 - Centre Wellington Land Use). Highway 6 connects Fergus to the Arthur Settlement Area in the north and the City of Guelph in the south which extends further to Highway 401. Fergus has connectivity to Belwood in the northeast via Garafraxa Street East, Elora in the west via St. Andrew Street West and Belwood Lake Conservation Area in the east via Belsyde Avenue which further connects to Orangeville.

The County of Wellington or the Township of Centre Wellington currently do not have an established public transit network. However, the Subject Lands are well connected regionally and have on-demand transit access to nearby communities. Residential development on the Subject Lands will further position Fergus to support a multi modal transportation system through transit supportive densities.

Figure 5 with the following table shows existing buildings and points of interest within close proximity to the site.



Figure 5: Context Map (Source: Google Maps)

Identifier	Description
A	Subject Property (6581 Highway 6)
B	South Lands, also owned by applicant (968 St David St N)
C	Single-Detached Neighbourhood
D	Two (2) Four-Storey Apartment Buildings (Figure 7)
E	Multi-Unit Commercial Plaza
F	Car and Trailer Dealership
G	Best Western Hotel, Tim Hortons, and gas station (Esso)
H	St. Joseph's Church & Catholic School (Figure 10 & 11)
I	Walmart
J	Industrial Uses
K	Nexans Canada Inc
L	Residential Neighbourhood (Figure 8 & 9)
M	Garden Market/Nursery
N	Victoria Terrace Public School
O	Gibbons Drive Park and Trail
P	Harper Crescent Park
Q	Priority Pallet Inc. (Pallet Supplier)
R	Agricultural Uses
S	New Residential Subdivision (Beatty Ln & Farley Rd)



Figure 6: Agricultural uses located north of the Subject Property on Highway 6 (Source: Google Maps)



Figure 7: Two (2) four-storey apartment buildings on 165 and 169 Gordon Street (Source: Google Maps)



Figure 8: Single-detached dwellings on Gibbons Drive (Source: Google Maps)



Figure 9: Rowhouses on Gibbons Drive (Source: Google Maps)



Figure 10: St. Joseph Catholic School at 150 Strathallan St (Source: Google Maps)



Figure 11: St. Joseph's Church at 760 St. David St N (Source: Google Maps)

4. OVERVIEW OF PROPOSED DEVELOPMENT

The overarching purpose of the land use planning applications is to bring the Subject Lands into the Fergus Settlement area, designate the lands for residential purposes in both the County and Township Official Plans to facilitate the Proposed Development, apply appropriate zoning based on the proposed Draft Plan of Subdivision, and facilitate the subdivision of land as shown on the plan.

The Proposed Development is comprised of a mix of low to medium density residential blocks comprising of a total of up to 535 units. The unit mix is comprised of 130 single detached dwellings including the existing heritage farmhouse, 266 street townhouses, 125 medium density dwelling units, and up to 14 units within a mixed-use block to accommodate a range of uses. The Proposed Development will also include a 0.9 hectare (2.2 acre) park space (Block 66) centrally located within the neighbourhood, and will be integrated into the South Lands park block.

The Draft Plan of Subdivision, as shown in Figure 13, shows the proposed blocks and lotting fabric, associated road network, and recreational areas such as park space and pathways. The proposed lot fabric also aims to facilitate connectivity to the adjacent properties for future development, as shown in Figure 14.

Vehicular access to the Proposed Development is provided from Highway 6 through a 20 metre wide street (Street G). Future access will also be provided through internal streets A, D, E and F from the subdivision lands to the south. All internal streets shown on the Draft Plan are to be conveyed to the municipality as public right-of-ways. The internal streets range in width from 20 metres to 23 metres which can be utilized for on-street parking or active forms of transportation.

a) Mix of Residential Uses

The Proposed Development contemplates a mix of low and medium density residential dwellings for a total of approximately 367-535 units as shown in Figure 13. The unit mix includes approximately 87-129 single detached dwellings, 179-266 street townhouses, 93-125 medium density dwelling units, and 8-14 mixed-use units. The Proposed Development will also include a 0.9 hectare (2.2 acre) park (Block 66) and centrally located within the neighbourhood. The proposed unit breakdown is shown in Figure 12. The Proposed Development contemplates a total net density of 18.9 to 27.5 units per hectare.

The single detached dwellings will have frontage ranging from 11 metres (36 feet) to 15 metres (50 feet) and the street townhouses have frontages ranging from of 5.5 metres (18 feet) to 8.3 metres (27 feet). The mixed-use dwelling units are located central to the Subject Lands, adjacent to the central park block.

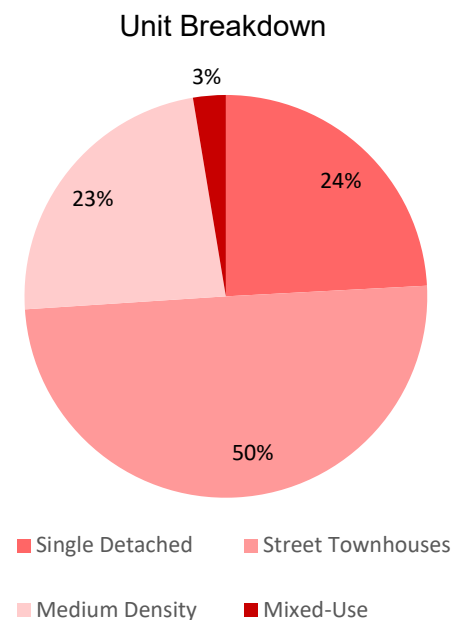


Figure 12: Proposed Unit Breakdown

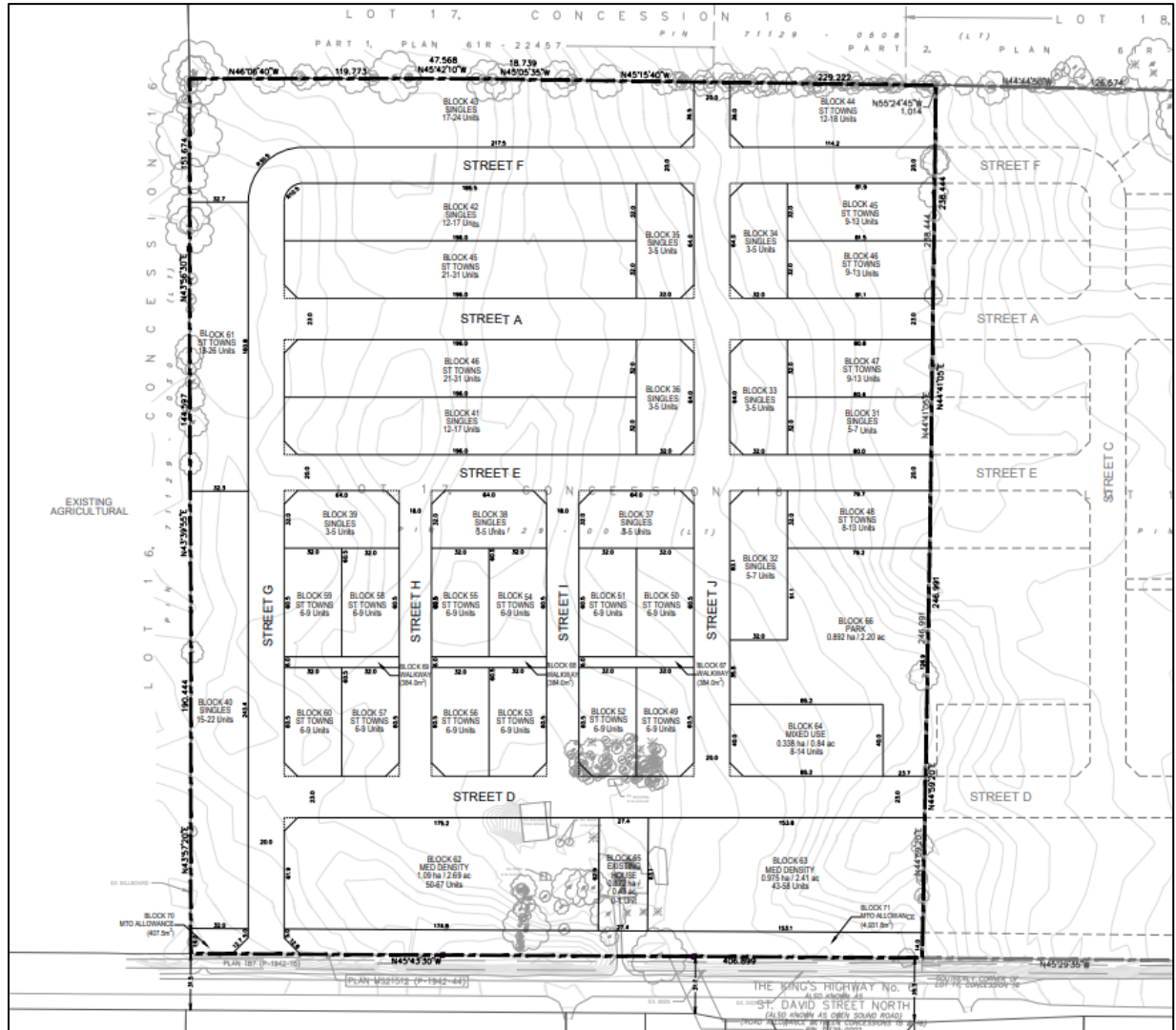


Figure 13: Draft Plan of Subdivision (Source: Polocorp Inc.)

b) Access, Circulation and Parking

Vehicular access to the Proposed Development is provided from Highway 6 through a 20-metre wide street ('Street G'). Internal road connections to the proposed subdivision on the south lands are provided through Street A, E, and F while Street J provides for a future road allowance to the adjacent lands to the east. All internal streets shown on the Draft Plan, as shown on Figure 13, are to be conveyed as public right-of-ways. The internal streets range in width from 20 to 23 metres with mid-block walkways for better urban design, walkability and active uses.

Parking for single detached dwellings and street fronting townhouse dwellings is provided in individual garages attached to each unit, while that for stacked townhouse dwellings is provided through surface parking spaces, which will be determined through detailed design.

The Proposed Development has been carefully designed to optimize the Subject Lands in creating a cohesive and interconnected road network with the adjacent south lands.

c) Amenity Areas and Landscaping

The Proposed Development contemplates a central common park area (0.9 ha) identified as Block 66 in the Draft Plan in Figure 13. The proposed park space will form approximately half of the total park space for the entire community once combined with Block 25 of the adjacent south land subdivision. The total park space provided between the two (2) properties is proposed to be 1.7ha (4.2ac). The applicant is open to County or Centre Wellington on what programming they would like to see. From a recent Council meeting, it was discussed by a young delegate, for the potential of further basketball courts in the town of Fergus.

Continuous pedestrian sidewalks along municipal streets and mid-block pathways connections are also proposed to enhance the walkability of the Proposed Development while providing active recreational opportunities in the community.

The Proposed Development contemplates private amenity areas in the rear yards for single detached dwellings and street fronting townhouse units. Enhanced landscaping is contemplated for the entrance from Highway 6 and along internal streets.

In addition to this, connectivity to the Park (Block 66) is contemplated through accesses going to the North.

d) Site Servicing

The Proposed Development is proposed to be serviced via existing and extended municipal water and sanitary servicing on Highway 6. The existing sanitary sewer on Highway 6 terminates just south of Side Road 18 and an extension in the northerly direction along Highway 6 to the Subject Lands is required. The Functional Servicing and Stormwater Management Design Report prepared by GEI Consultants confirmed that there is sufficient capacity in the existing 200 mm sanitary sewer and downstream wastewater treatment plan (with scheduled upgrades for 2029) to service the Proposed Development. Sanitary servicing for the Proposed Development can be provided via gravity connection to the existing sanitary sewer.

The existing watermain on Highway 6 terminates just south of Side Road 18, and an extension to the Subject Lands is required. This extension can be completed at the same time as the sanitary sewer extension to minimize disruption and restoration along Highway 6.

Extension of the trunk storm sewer is not required to support the Proposed Development. Please note that an upgrade completed in 2021 contemplated future growth in the North part of Fergus, so servicing would come through the South Lands and be fed off of the Trunk Sanitary sewers and associated utilities. The applicant has sized the pipes accordingly in the South Lands to facilitate the North lands. The Proposed Development intends to connect to a proposed stormwater management facility (2.4 hectares) contemplated on the lands to the south with required quantity and quality controls. A summary of the proposed Functional Servicing and Stormwater Management Design Report prepared by GEI can be found in Section 9 of this report.

e) Future Development

The proposed Draft Plan of Subdivision has considered the future development of the adjacent property to the south and to the East with a street connection. The Proposed Development provides for potential future connections to the southern lands to create a well-designed and

cohesive subdivision community. The proposed subdivision development of the lands to the south, also owned by the applicant, is shown in Figure 14.

With the phased development of the North/South lands, the contiguous subdivision was designed to provide a large centrally located park, integrated street network for improved circulation, shared SWM facility/infrastructure for optimized servicing, and diverse residential base to support a mix of uses. The North/South lands aim to provide several benefits to the community as a result of the cohesive, interconnected and phased subdivision development.

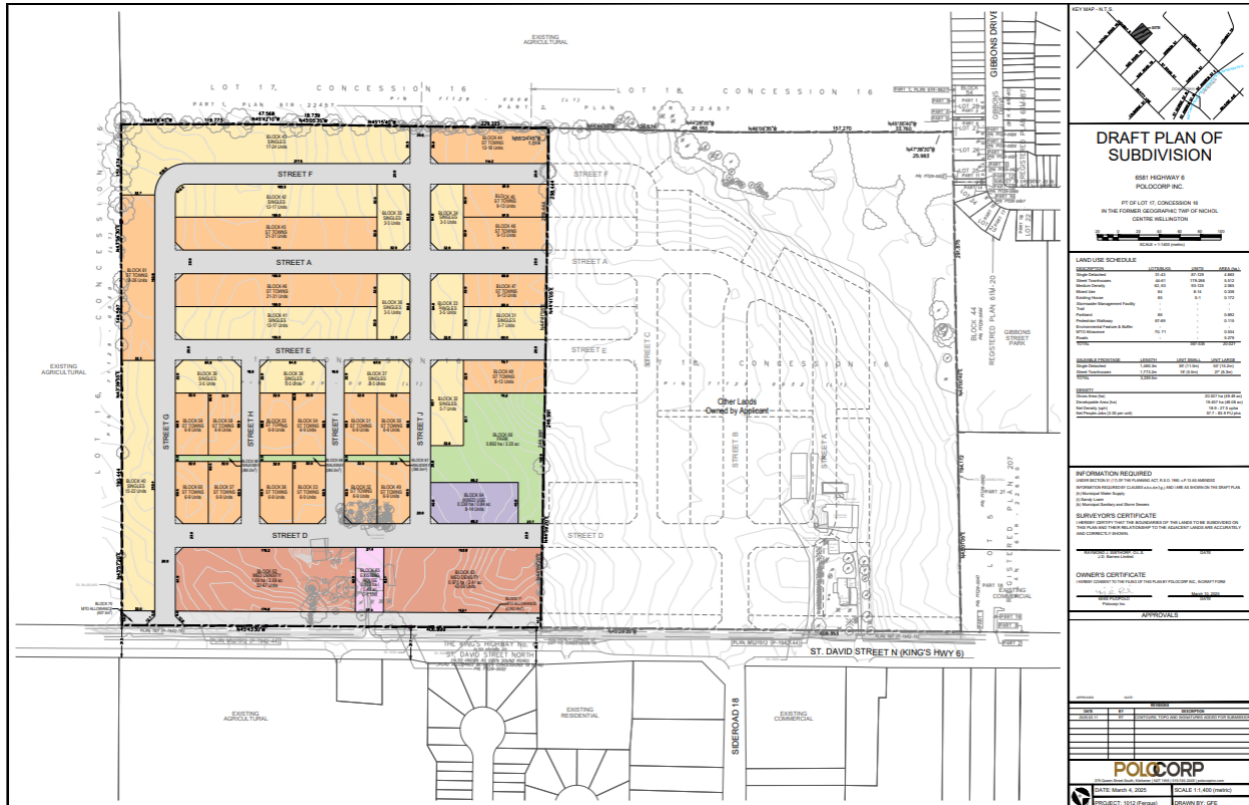


Figure 14: Proposed Development with Lands to the South (Source: Polocorp)

5. REQUESTED LAND USE PLANNING APPROVALS

In order to permit the Proposed Development an Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision applications are proposed. Details of these required planning applications are provided as follows:

County of Wellington Official Plan Amendment:

- 1) To incorporate the Subject Lands within the “Primary Urban Centre” and “Designated Greenfield Area” boundary of the Township of Centre Wellington in Schedule A (County Growth Structure).
- 2) To incorporate the Subject Lands within the County’s “Primary Urban Centre” and “Designated Greenfield Area” boundary in Schedule A1 (County Growth Structure – Centre Wellington).
- 3) To redesignate the Subject Lands from “Agricultural” to “Primary Urban Centre” of Fergus in Schedule B1 (Land Use – Centre Wellington).

Township of Centre Wellington Official Plan Amendment:

- 1) To incorporate the Subject Lands within the Township’s Urban Boundary and “Built Boundary” in Schedule A-1 (Land Use Plan).
- 2) To redesignate the Subject Lands from “Agricultural” to “Residential” in Schedule A-1 (Land Use Plan)

Township of Centre Wellington Zoning By-Law Amendment:

- 1) To rezone a portion of the Subject Lands from “Agricultural (A)” in Schedule A (Zoning Map 75) to “Residential 2 (R2)”, “Residential 3 (R3)”, “Residential 4 (R4), and “Residential Mixed Use (R6)” as shown in the Draft Plan of Subdivision.
- 2) To rezone a portion of the Subject Lands that include the parkland blocks from “Agricultural (A)” to “Open Space Recreation (OS)” as shown in the Draft Plan of Subdivision.

Draft Plan of Subdivision:

- 1) To establish thirty-four (34) blocks for residential development, parkland, and walkways, including a separate block for the existing heritage farmhouse
- 2) To establish a road network to be conveyed to the Township upon approval of the Draft Plan

6. LAND USE PLANNING FRAMEWORK

Land use planning and decision-making related to the same is guided by a range of legislation, policies, and plans set out at the Provincial, County, Township and neighbourhood levels. The following subsections of this Report discuss the land use planning policy framework applicable to the Subject Property and how they have been considered in the Proposed Development applications.

a) Planning Act

The Planning Act, R.S.O. 1990 establishes the legal framework for land use planning in Ontario, and includes legislative direction with regards to Official Plans, Zoning By-Laws and Site Plan Approvals among other planning tools. The Planning Act also provides the Minister of Municipal Affairs and Housing with policy making authority to issue policy statements and plans to guide land use planning and development in the province, which is the basis for the Provincial Planning Statement.

The following subsections of this report provides an overview of the Planning Act as it applies to the Proposed Development and commentary relating to how the Proposed Development adheres to the direction set out therein.

i. *Matters of Provincial Interest*

Section 2 of the Planning Act sets out various '*Matters of Provincial Interest*'. In carrying out their responsibilities under the Planning Act, decision-makers must have regard to these Matters of Provincial Interest. Table 1 outlines the Matters of Provincial Interest set out in Section 2 of the Planning Act and commentary regarding how each matter has been considered, where applicable.

Provincial Interest	Demonstration of Regard
a) The protection of ecological systems, including natural areas, features, and functions;	The Proposed Development will preserve and integrate natural features through maintaining green spaces, implementing stormwater management systems, and incorporating native landscaping.
b) The protection of agricultural resources of the Province;	The development will expand the Urban Settlement Boundary of Fergus in order to permit the development. The expansion of the settlement area satisfies the policy direction for settlement area expansions laid out in the updated PPS (2024). As detailed within the Agricultural Impact Assessment prepared by Stantec, there are no reasonable alternatives that avoid agricultural lands as all lands surrounding Fergus are Prime

	Agricultural and complies with the MDS formulae.
c) The conservation / management of natural resources and the mineral resource base;	Not applicable.
d) The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	The Subject Property contains a farmhouse with several associated outbuildings. A Heritage Impact Assessment was conducted by CHC Ltd. and found that the existing farmhouse meets the criteria for heritage designation. The heritage farmhouse is contained within its own block (Block 65) to be preserved and incorporated into the Proposed Development.
e) The supply, efficient use, and conservation of energy and water;	The Proposed Development is proposed to connect to extended services on St. David Street North and the proposed Stormwater Management facility within the adjacent development also owned by the applicant, representing a logical extension and wise use of existing infrastructure.
f) The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The Proposed Development demonstrates regard for the adequate provision and efficient use of transportation, sewage, and water services by incorporating vehicular access from Highway 6, extending municipal water and sanitary services to the Subject Lands, and connecting to the stormwater management pond to the south.
g) The minimization of waste;	The Proposed Development is considering several sustainable design elements, which will be confirmed through the subdivision registration and building permit processes. The development is proposed to utilize the existing waste/garbage pickup services provided by the County.

h) The orderly development of safe and healthy communities;	The Proposed Development demonstrates regard for the orderly development of safe and healthy communities by proposing a mix of residential units, recreational areas, a central amenity space, and a connected road network. The design of the development encourages walkability and provides opportunities for active recreation within the community.
i) The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The Proposed Development will be designed to meet or exceed the requirements set out in AODA and the OBC, as applicable.
j) The adequate provision and distribution of educational, health, and recreation;	The Proposed Development has regard for the adequate provision and distribution of recreational facilities by proposing common amenity areas, a centralized park, and mid-block pathways to enhance walkability and recreational opportunities for future residents.
k) The adequate provision of a full range of housing, including affordable housing;	The Proposed Development will provide adequate provision of a full range of housing options by proposing a mix of low and medium density residential dwellings, including single detached homes, street fronting townhouses, stacked townhouses, and mixed-use townhouses.
l) The adequate provision of employment opportunities;	There is one (1) mixed-use block currently proposed to include employment and residential uses adjacent to the park block to encourage walkability.
m) The protection of the financial and economic well-being of the Province and its municipalities;	The development will be subject to municipal fees including development charges, planning/building/engineering fees and parkland contributions.
n) The co-ordination of planning activities of public	Through the development review process, the County/Township will circulate the application for

bodies;	comments from relevant public bodies to obtain feedback on the application(s).
o) The resolution of planning conflicts involving public and private interests;	The applicant is committed to working with relevant agencies to resolve comments/concerns received through the consultation process.
p) The protection of public health and safety;	The Proposed Development is not anticipated to have adverse negative impacts on public health and safety. The development intends to be fully AODA compliant with amenity areas facilitating outdoor activities and supporting public health.
q) The appropriate location of growth and development;	The Subject Lands are an appropriate location for growth and development. The Proposed Development is located along Highway 6, a major arterial roadway, and on the northwestern edge of the Fergus Settlement Area. Development at this location would provide continuity to existing urbanized lands. The Proposed Development will connect to the development of the property to the south also owned by the applicant to create a cohesive community that provides a mix of dwelling types to contribute to the diversity of housing options available in the area. The development's proximity to existing urbanized lands to the south and west, as well as to nearby municipal services and amenities, further demonstrate the suitability of the location for the Proposed Development.
r) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The development is currently considering several sustainable design elements throughout the site with a pedestrian-friendly focus, featuring a connected road network, accessible amenities, and dedicated recreational spaces. Although Fergus does not currently have public transit infrastructure, the Proposed Development supports transit supportive densities, creating opportunities for the provision of future public

	transit services within the Township.
s) The promotion of built form that, i) is well-designed, ii) encourages a sense of place, and iii) provides for public spaces that are high quality, safe, accessible, attractive, and vibrant.	The Proposed Development responds to the Township Official Plan Community Design policies and guidelines in Section 6 of this report.

Based on the foregoing, it is our opinion that the Proposed Development has regard for the matters of Provincial interest as set out in the Planning Act.

ii. Criteria for Plan of Subdivision

Section 2 of the Planning Act sets out various '*Matters of Provincial Interest*'. The following table outlines the Criteria for Draft Plan of Subdivision approvals set out in Section 51(24) of the Planning Act and commentary regarding how each matter has been considered, where applicable.

Provincial Interest	Demonstration of Regard
a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The Proposed Development has regard for the matters of Provincial Interest as discussed in the Table above.
b) whether the proposed subdivision is premature or in the public interest;	The subdivision is not premature as it has been proposed during County's ongoing OPA 126 to review Settlement Area Boundaries Expansions. It is in the public interest to develop lands with adjacent properties to create cohesive communities and increase housing supply.
c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The plan conforms to the general intent and purpose of the Official Plan. An amendment to the Official Plan is required to include the development within the Fergus settlement area boundaries.
d) the suitability of the land for the purposes for which it is to be subdivided; d.1) if any affordable housing units are being proposed, the	The Subject Lands are suitable for the Proposed Development. There are no reasonable alternatives for inclusion within the settlement area without removing Prime Agricultural lands. The

suitability of the proposed units for affordable housing;	development proposes a mix of housing options at various degrees of affordability.
e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	The plan proposes one (1) access to Highway 6 as part of this proposal. A second access is proposed to the south lands or southern portion of the plan which maintains connectivity with the establish highway system.
f) the dimensions and shapes of the proposed lots;	The plan has regard for the varying lot sizes and shapes suitable for each proposed housing type (single-detached, semi-detached, street townhomes and medium density blocks).
g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	The plan has regard to all restrictions and proposed restrictions on the lands including those implemented by the County or Township by way of zoning by-law or Conditions of Approval.
h) conservation of natural resources and flood control;	The Geotechnical Report prepared by CVD recommends the site to be raised to establish floor basement levels at least 0.6 metres above high groundwater levels for flood control.
i) the adequacy of utilities and municipal services;	The Functional Servicing and Stormwater Design Report prepared by GEI confirms the available servicing capacity and design.
j) the adequacy of school sites;	There are several nearby schools in the Fergus Settlement Area. The school board and related agencies will confirm capacity of these schools upon circulation of this application package. Should the local school boards identify the need for a new

	school, the proposed plan may be able to be modified.
k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	The current design has regard for the land being conveyed as the plan contemplates the conveyances of 5.28 ha for municipal road allowances, 0.9 ha for parkland dedication, and 0.5 ha for a Ministry of Transportation road widening along Highway 6.
l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and	The plan optimizes the available supply and use of energy through efficient land use patterns and lotting.

Based on the foregoing, it is our opinion that the Proposed Development has regard for Criteria for a Draft Plan of Subdivision as set out in the Planning Act.

b) Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS), 2024 is issued under Section 3 of the Planning Act and came into effect on October 20, 2024, replacing the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe, which were issued in 2020. Approval authorities, including Council of the Township of Centre Wellington, in carrying out their responsibilities under the Planning Act, are to ensure that their decisions “are consistent with” the PPS.

The PPS builds upon the policy direction expressed in the Planning Act (“Matters of Provincial Interest”) related to land use planning, which supports the Provincial goal of enhancing the quality of life for all citizens of Ontario. The focus of the PPS is on supporting a strong and competitive economy by increasing the supply and variety of housing options, by prioritizing compact and transit-supportive design, by optimizing investments in infrastructure and public service facilities, by recognizing the unique role of Indigenous communities, and by directing growth and development within existing urban and rural settlements to protect natural resources for the long-term, including natural areas, water, aggregates and agricultural lands.

The PPS is to be read in its entirety and applicable policies are to be applied to specific situations/applications. The following table provides a summary of relevant policies of the PPS and describes how the Proposed Development is consistent with this policy direction.

Section	Policy	Discussion of Consistency
Planning for People and Homes		
2.1.4	Providing an appropriate range and mix of housing options and densities by: a) Maintaining 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 b) Maintaining at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.	The Proposed Development will contribute to a range and mix of housing options which helps maintain the ability to accommodate residential growth. a) The Proposed Development will facilitate up to 535 new residential units on previously undeveloped land, contributing to the 15-year residential growth capacity. b) As demonstrated by the Functional Servicing Report, there is sufficient existing and planned municipal servicing capacity to support the development, ensuring a three-year supply of serviced residential units.
1.1.3.1	Achieving 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, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs; b) improving accessibility for	a) The Proposed Development accommodates a range and mix of housing options. It also integrates recreational areas such as parkettes, alongside a network of pedestrian walkways / sidewalks. The development's proximity to existing commercial and institutional facilities within the broader community supports the creation of a complete community. b) The ultimate development of the Subject Lands will be

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| <p>people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and</p> <p>c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.</p> | <p>designed to meet or exceed the requirements set out in AODA and OBC.</p> <p>c) By providing a range of housing options and integrating accessible community amenities, the development establishes vibrancy while providing housing options for various income levels.</p> |
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Housing

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| <p>2.2.1</p> | <p>Providing for an appropriate range and mix of housing options and densities required to meet projected needs of current and future residents of the regional market area</p> | <p>The Proposed Development consists of a range and mix of housing options by providing a mix of single detached dwellings, street-fronting townhouses, and stacked townhouses. The variety of housing options will contribute to housing supply and needs of current and future residents with diverse household sizes.</p> |
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Settlement Areas

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| <p>2.3.1.1</p> | <p>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.</p> | <p>The Proposed Development is located at the northwestern edge of the Fergus settlement area boundary, and through the applications these lands are proposed to be included within the Settlement Area. The development is adjacent to existing urbanized lands to the south and west, as well as to nearby services and amenities.</p> <p>The Subject Lands are an appropriate location for a new, well-planned community through the logical expansion of the</p> |
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Fergus settlement area.

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 e) are freight-supportive	The Proposed Development demonstrates consistency with this policy as follows: a) The proposed residential and mixed-use development promotes efficient use of land through compact built form to optimize the use of the lands that is directly adjacent to the settlement area boundary. b) The plan contemplates extending existing water and sanitary services along Highway 6 and integrates public service facilities and recreational areas, minimizing additional infrastructure demands. c) The inclusion of the mid-block pedestrian pathways, sidewalks, and central amenity areas that encourage walkability within the community supports active transportation. d) The development supports transit supportive densities for future provision of public transit within the Township, as it is not currently available. e) Highway 6 remains unchanged as a main arterial. The Transportation Impact Assessment prepared by
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Paradigm Transportation Solutions concludes that impacts on existing transportation patterns will be minimized.

2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.	The Proposed Development supports the achievement of complete communities by incorporating a diverse range of housing options, as well as providing commercial/retail opportunities, public amenities, such as park space, and connecting to a trail network on the adjacent property to the south. This adjacent property also provides stormwater management servicing capacity which minimizes the investment in public infrastructure.
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Land Use Compatibility

3.5.1	Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.	The Proposed Development is primarily residential, and no major facilities are planned on the Subject Lands. Existing agricultural and industrial operations in the surrounding area have been identified and considered to ensure separation and to mitigate potential nuisances, thereby minimizing risks to public health and safety.
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3.5.2	Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.	There are industrial lands located along Gartshore Street, which is approximately 1 km east of the Subject Lands which provides an appropriate buffer to minimize impacts of the industrial area/uses. The separation between the proposed residential development adheres to the recommended separation distances as set out in the Provincial D-6 Series Guidelines.
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Waste Management

3.7.1	Waste management systems need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future requirements, and facilitate integrated waste management.	The Proposed Development includes planning for an integrated waste management system designed to accommodate both current and future needs. The Proposed Development intends to utilize the waste pickup services provided by the County.
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i. Settlement Area Boundary Expansions

Section 2.3.2 of the PPS 2024 provide policy directions with regards to Settlement Area Boundary Expansions. The Proposed Development proposes to expand the Settlement Area Boundary of the Fergus Settlement Area.

The County of Wellington has considered current and projected land use needs to accommodate population and employment growth. This is conducted through a Municipal Comprehensive Review (MCR) process, including a Land Needs Assessment (LNA), within its Townships.

In the following table, the policy criteria under Section 2.3.2 are provided, along with a description of how the Proposed Development is consistent with the planning framework.

Policy	Consistency/Comment
1) In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following: a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;	The County's ongoing Official Plan review identified the need to expand existing settlement area boundaries within the Township of Centre Wellington to ensure a balanced approach to community land need and employment land need targets. This need is supported by population growth forecasts, residential and employment targets, and land availability considerations, as outlined within the Wellington County Official Plan. The Technical Memorandum re: OPA 126 Urban Boundary Expansion prepared by Dillon Consulting Ltd. and included as part of the complete applications, identifies that at least an additional 25 ha of land is required in Fergus to satisfy the PPS requirement in policy 2.2.1 to provide for the needs of current and future residents for each type of housing, including grade-related forms. The memo also describes the 2024 PPS policy direction to accelerate housing and land supply as being a fundamental shift away from what has historically been a more restrictive approach to managing growth and urban expansion, as summarized in Section 9 of this report. The Proposed Development, with its diverse mix of single-detached dwellings, townhouses, and mixed-use units, would support the Township and County's visions of meeting community land need targets by offering a range of housing options that accommodates a variety of demographic groups. Moreover, one (1) mixed-use block is proposed to include employment and residential uses near dedicated community amenity spaces, and parks and trails within the development to support future and existing residents in the Township. The Proposed Development intends to connect to the proposed Draft Plan of Subdivision immediately adjacent to the south for a cohesive and complete community.

b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;	As outlined within the County's Growth Management Strategy, Settlement Area Boundary Expansions should be directed to locations that can be efficiently serviced by existing or planned infrastructure and public service facilities. The Functional Servicing and Stormwater Management Design Report by GEI Consultants Canada Ltd. confirms that the existing municipal water and sanitary services on St. David Street North have sufficient capacity to accommodate the proposed expansion, as summarized in Section 9 of this Report. The Proposed Development also intends to connect to the stormwater management pond and facility on the property immediately adjacent to the south that is also owned by the applicant. This will minimize the County's costs associated with infrastructure expansion. As such, the Proposed Development supports the PPS directive to ensure that the development is phased in tandem with infrastructure capacity.
c) whether the applicable lands comprise specialty crop areas	The Subject Property is not located within a specialty crop area.
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;	The PPS prioritizes directing growth to urban areas with limited agricultural impact. The Subject Lands are located on the northwestern edge of the Fergus settlement area, adjacent to the existing and proposed urbanized areas. This strategic location minimizes intrusion into prime agricultural areas and ensures that growth is concentrated in areas that are already transitioning to urban uses and will utilize existing municipal infrastructure. By focusing development adjacent to existing urban areas and highways, the County's approach aligns with the PPS directive to avoid unnecessary fragmentation of agricultural lands. As shown on the Land Use map (Schedule B1) of the County's OP, the majority of lands surrounding

the Fergus Settlement Area are classified as “Prime Agricultural Areas”. There are no large tracts of non-prime agricultural lands immediately adjacent to the boundary of the Fergus Settlement Area, which creates difficulty in identifying alternative locations that would completely avoid the loss of agricultural lands. The Township noted in an October 28, 2024 Settlement Area Boundary Expansion Recommendation Report that expanding into Prime Agricultural Areas cannot be avoided, as all land outside the Fergus Urban Centre is a Prime Agricultural Area. Therefore, any Settlement Area Boundary Expansion within the Fergus Settlement Area will result in the conversion of prime agricultural lands.

While there is a need to minimize the impact of development on prime agricultural areas, the proposed site located at the northwestern edge of the Fergus Settlement Area is adjacent to existing urbanized areas, highways and public infrastructure. The location of the Proposed Development supports a logical location for expansion of the Settlement Area Boundary, as compared to other potential sites being isolated and thus cause greater fragmentation of agricultural lands.

The location of the Subject Lands is contiguous to existing Built-Up areas, which confines urban growth to be more compact, thereby preserving the agricultural viability of other surrounding lands to the greatest extent possible. Given the constraints identified in Schedule B1, the Subject Property supports growth in a location that conforms to the PPS principles of minimal impact on the agricultural system.

e) whether the new or expanded settlement area complies with the minimum distance separation formulae;

There are few known livestock operations in proximity to the Subject Property, some of which are vacant or non-operational.

The Agricultural Impact Assessment prepared by Stantec Consulting Ltd. and summarized in Section 9 of this Report, as part of this Application. The report found two (2) properties may have potential

	to impact the Subject Property if occupied at 100% barn capacity. However, based on verbal confirmation with the property owners, the livestock barns capacities and usage was confirmed. The assessment found the encroachment to be negligible, which would comply with the Minimum Distance Formulae and are suitable lands to be included within the settlement boundary.
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	The PPS definition of agricultural system has two components: a) agricultural land base; and b) agri-food network. The PPS definition of agri-food network includes elements like infrastructure, processing, agricultural services, farm markets, distributors, etc. An Agricultural Impact Assessment is prepared by Stantec Consulting Ltd., as summarized in Section 9 of this Report, as part of this Application. In the case of the subject lands, the report concluded that the lands are anticipated to be an extension of an immediately adjacent urban area, and thus their development will not result in fragmentation of the agricultural land base. There is no processing, agricultural infrastructure, agriculture services, distributors, farm markets or similar uses key to the agri-food network that would be lost through the development of the land. Thus, the development of the land will have little to no negative impact on the Agricultural system. The assessment concludes that the Subject Property would be a good candidate for inclusion as the Subject Property represents lower priority prime agricultural lands given it is adjacent to the recently expanded Settlement Area Boundary and its potential for continued phased development. Further, the Township noted in an October 28, 2024 Settlement Area Boundary Expansion Recommendation Report that expanding into Prime Agricultural Areas cannot be avoided, as all land outside the Fergus Urban Centre is a Prime Agricultural Area.

g) the new or expanded settlement area provides for the phased progression of urban development.	The County of Wellington's Official Plan emphasizes the importance of a staged approach to urban growth. The Proposed Development supports a phased progression by concentrating growth adjacent to existing built-up areas, leveraging nearby capital projects, and thereby allowing for an efficient extension of services and minimizing fragmented development. The Proposed Development also considers the phased future development of the adjacent properties should they obtain the necessary planning approvals to permit these properties to be developed. The County's MCR process highlights the importance of logical growth patterns that make use of existing infrastructure and services, which is consistent with the intent of the development to enhance the existing urban fabric of the Fergus Settlement Area, rather than create isolated pockets of new development.
2) Notwithstanding policy 2.3.2.1.b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available	This policy does not apply as the purpose of the application is not the establishment of a new settlement area, but rather the expansion of the existing Fergus Settlement Area.

In addition to the above, the 2024 PPS sets out policy direction which is generally intended to accelerate housing supply and to focus more on facilitating the provision of new housing and land supply, while continuing to ensure that other matters of provincial interest (such as the protection of significant natural features, agriculture and water resources) are appropriately considered.

The new PPS introduced significant changes to how settlement area expansions are managed in Ontario. Under the previous Provincial Policy Statement, 2020, and the Growth Plan for the Greater Golden Horseshoe, 2019, which have been repealed and replaced by the new PPS, municipalities could only expand settlement areas through a municipal comprehensive review (MCR). This process previously required municipalities to undertake an analysis to justify

expansions, ensuring alignment with long-term planning goals and the efficient use of infrastructure.

In contrast, the new 2024 PPS allows for more flexibility dictating minimums whereby the old PPS dictated maximums by permitting settlement area expansions outside of the MCR process, provided a request is consistent with the criteria and/or expansion policies in the new PPS. This approach is fundamentally different from the previous MCR requirement, as it is understood the intent is to streamline the process and enable municipalities to respond more quickly to changing market demands, infrastructure availability, and community needs.

In our opinion, the Proposed Development is consistent with the intent of the PPS 2024 policies, with regards to Settlement Area Boundary Expansions, and that there is additional land needs beyond those contemplated by the ongoing municipal comprehensive review process, as demonstrated in the Technical Memorandum prepared by Dillon Consulting Ltd. with respect to OPA 126. The development concentrated growth within an existing urbanized area, provides a diverse range of housing options, and utilizes existing public infrastructure and services. The proposal does not impact Specialty Crop Areas, minimizes impacts on the agricultural system and complies with the MDS formulae.

Based on the foregoing, it is our opinion that the Proposed Development is consistent with the PPS 2024.

c) County of Wellington Official Plan

The Wellington County Official Plan sets out policy direction to the physical development of the County, its local municipalities and to the long-term protection of County resources over a 20-year planning horizon. The Official Plan was approved by the Ministry of Municipal Affairs on April 13, 1999, and came into effect on May 6, 1999. It was last updated in July 2024.

i. Primary Urban Centre Expansion

Section 4.8.2 of the Official Plan establishes policies with regards to the expansion of Primary Urban Centres within the County. It notes that a primary urban centre expansion may only occur as part of a municipal comprehensive review and is subject to several criteria as highlighted in Section 4.8.2. However, the Official Plan does not reflect the most recent policy changes under the new 2024 PPS which allows for a more flexible approach to settlement area expansions and no longer requires a municipal comprehensive review process.

Moreover, it is noted that the County of Wellington and its member municipalities recently began a process of reviewing urban boundary expansions. The Subject Property including the adjacent south lands property was initially recommended for inclusion within the Fergus settlement area as a single cohesive subdivision development as part of the ministerial amendments to Wellington County OPA No. 119 which was approved by the MMAH on April 11, 2023. However, the Ministry reversed this decision and the County has divided these lands after undergoing their own study, as further discussed in Section 7 of this report.

A Technical Memorandum was prepared by Dillon Consulting Ltd. with regards to OPA 126 which has been included as part of the complete application. This memo identifies that the 90 ha currently proposed to be added to the Fergus Settlement Area is underestimated given the land

needs and current housing deficit of the municipality. The report concludes that an additional 25 ha of land is required under the new 2024 PPS. The memo also describes the 2024 PPS policy direction to accelerate housing and land supply being a fundamental shift away from what has historically been a more restrictive approach to managing growth and urban expansion, as described in Section 9 of this report.

It is our opinion that the inclusion of the Subject Property within the settlement area boundary represents a logical and orderly expansion of the Fergus community. The proposed inclusion of the Subject Lands aligns with the County of Wellington Official Plan by promoting efficient land use, optimizing infrastructure, and supporting the development of a complete, mixed-use community. It represents an extension of the existing urban area along the main infrastructure alignment and development pattern of the Fergus community along Highway 6.

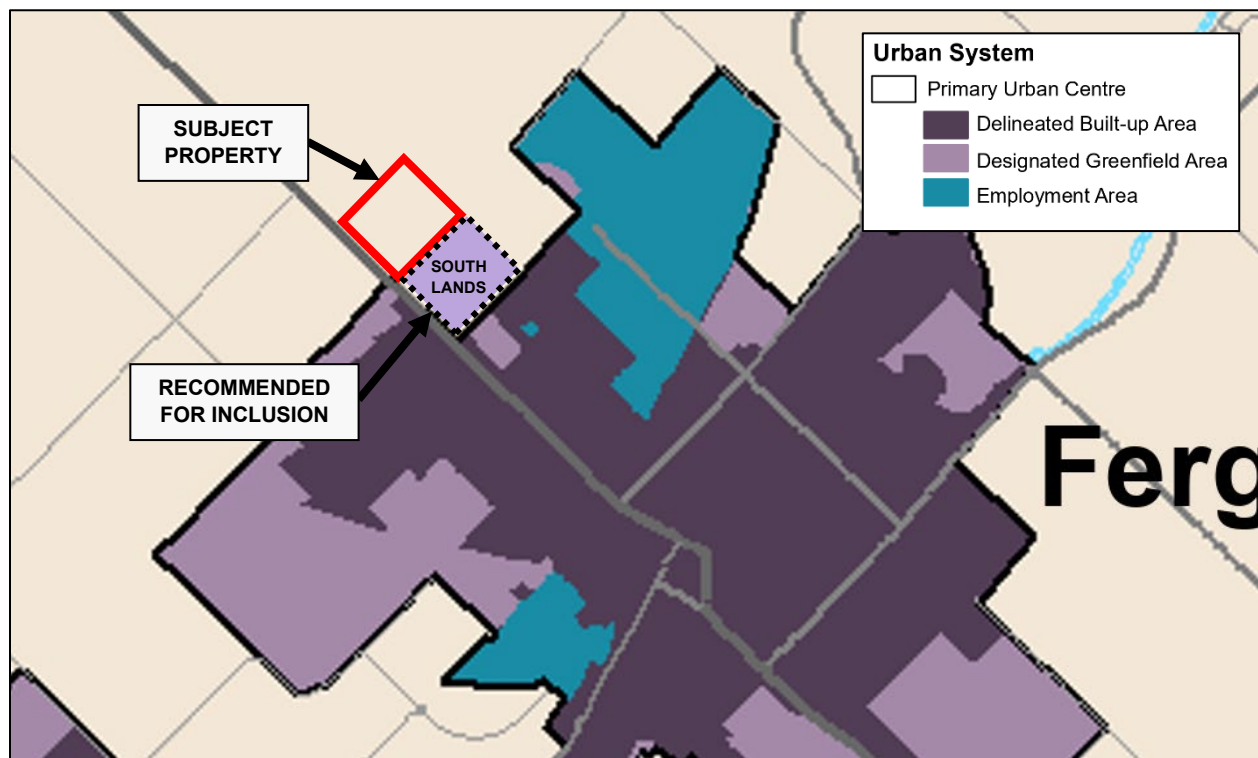


Figure 15: Wellington County Official Plan, Schedule A1 – Growth Structure Map Centre Wellington

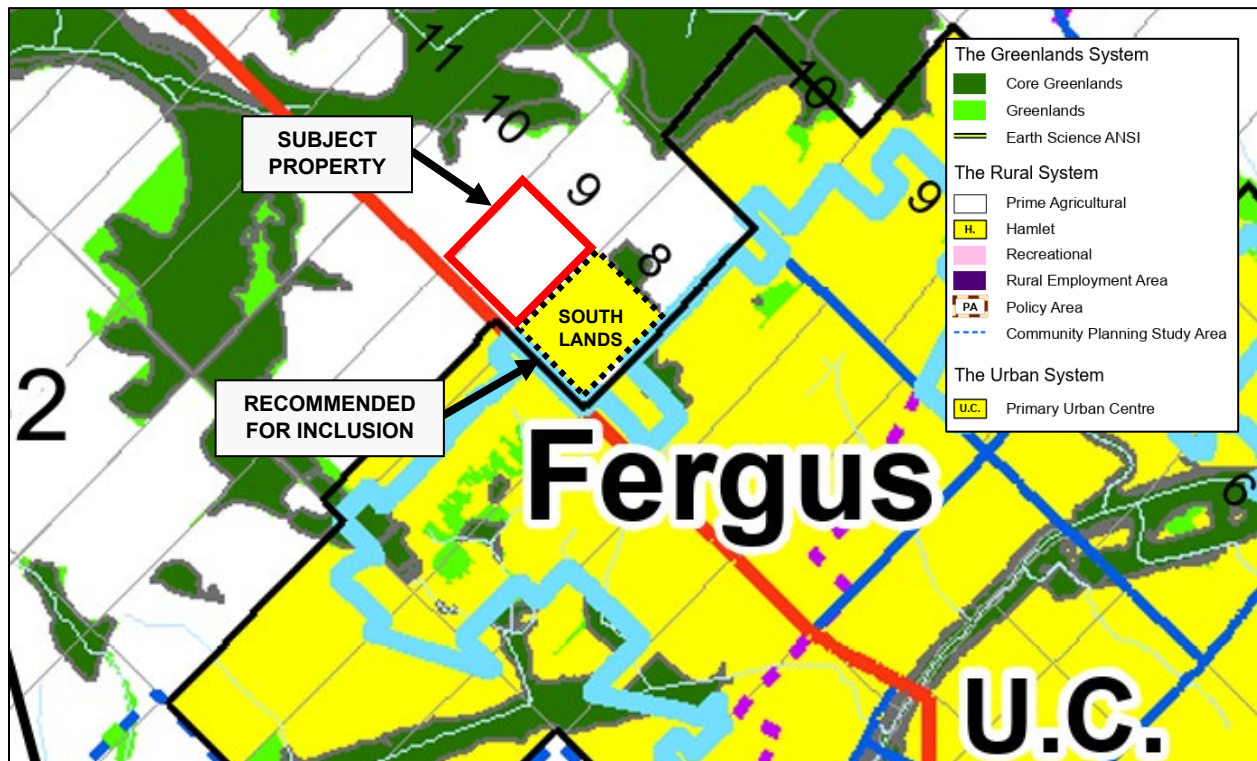


Figure 16: Wellington County Official Plan, Schedule B1 - Land Use Map Centre Wellington

ii. Wellhead Protection Area C

The Subject Lands are identified as a Wellhead Protection Area (WHPA), which is an area with significant drinking water threat and within which land use activities have the potential to affect the quality and quantity of water that flows into a local well.

The Subject Lands are identified to be within two WHPA (B & C) boundaries, as shown on Figure 17 below. However, it should be noted that much of the community of Fergus and surrounding lands are mapped as wellhead protection zone.

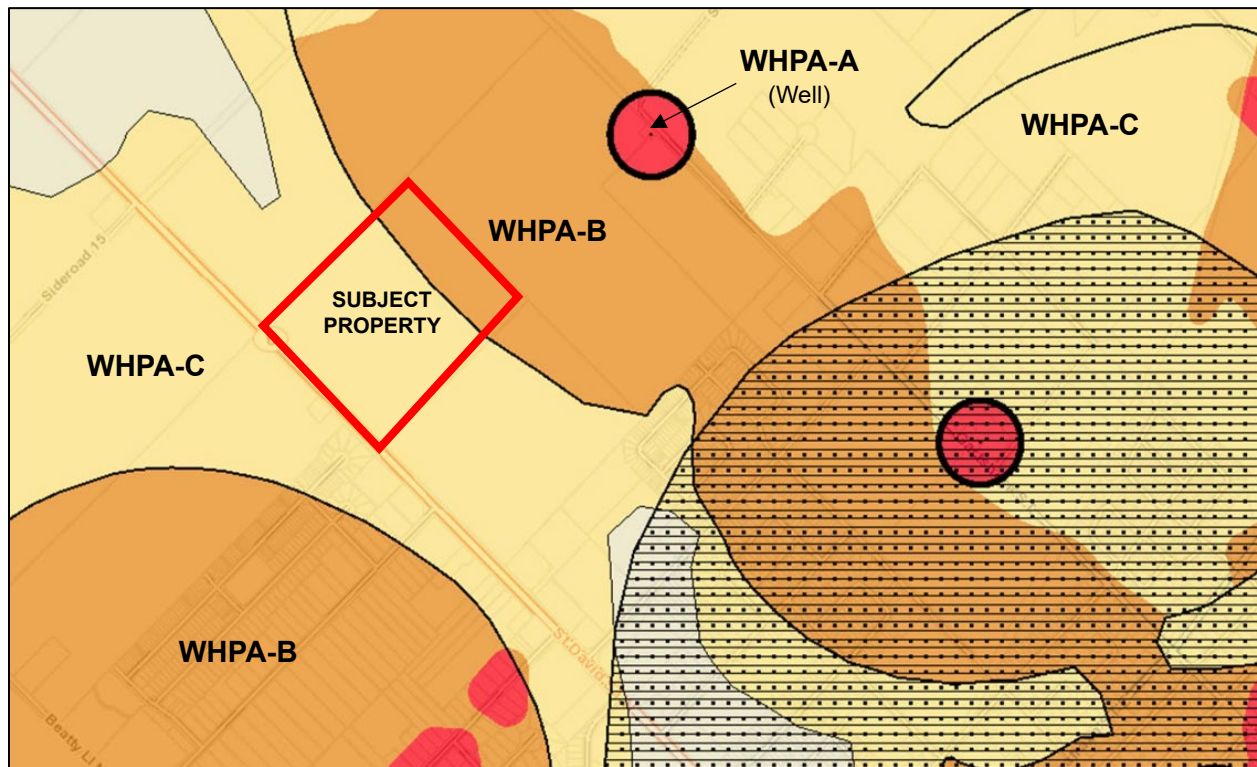


Figure 17: Wellington County Official Plan, Source Water Protection Mapping (Source: Online County Mapping Tool)

The southwestern portion of the Subject Lands is identified as WHPA-C, which has an approximate 5-year travel time for water to enter the well and has a vulnerability score ranging from 2 to 8, with 10 being the most vulnerable. The northeastern portion of the Subject Lands is identified as WHPA-B, which has an approximate 2-year travel time for water to enter the well and has a vulnerability score ranging from 6 to 10.

As such, the Proposed Development is subject to the Grand River Source Protection Plan. An application for new developments is subject to a Section 59 Notice in accordance with the Clean Water Act. The County's Risk Management Official will determine whether the use is prohibited or regulated through a Risk Management Plan in accordance with the Grand River Source Protection Plan. Section 59 approval will be obtained as part of the Draft Plan of Subdivision process.

d) Township of Centre Wellington Official Plan

The Township of Centre Wellington Official Plan ('OP') is the principal land use planning document guiding the long-term growth and development of the Township. The Township Official Plan was adopted on November 24, 2003, and was approved on May 31, 2005. The following provides an assessment of the proposed application in the context of the Official Plan.

i. Designations

The Subject Lands are currently outside the urban boundary of the Fergus Settlement Area, as shown on Figure 18, within the Township Official Plan. In order to permit the residential development of the lands, an amendment to the Township's Official Plan is required.

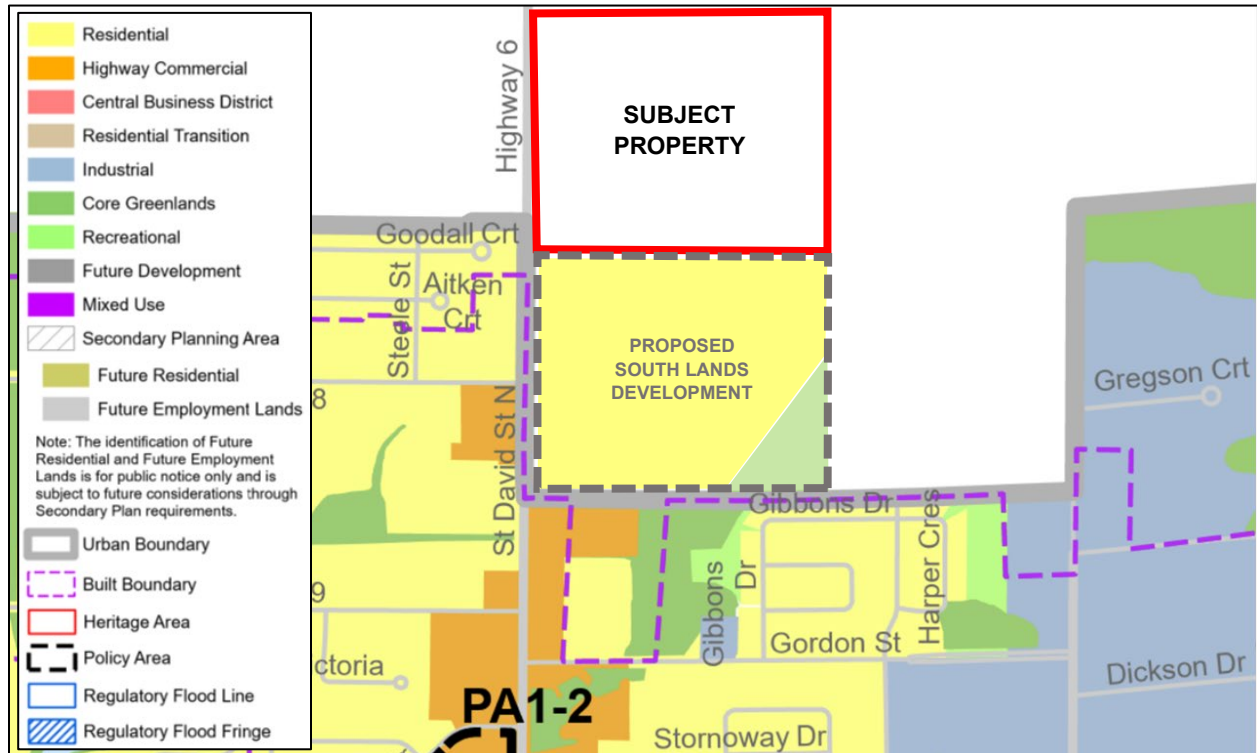


Figure 18: Township of Centre Wellington Official Plan, Schedule A-1 - Land Use Plan Fergus

By way of the site-specific Official Plan Amendment application, the Subject Lands are proposed to be redesignated as “Residential.” The “Residential” designation is intended to accommodate a range of residential uses, predominantly low-density residential in the form of single-detached and semi-detached dwellings. Multiple residential developments such as townhouses may be permitted in the “Residential” designation, with the condition that they do not exceed 35 units per hectare for townhouses or row houses. Currently, the Proposed Development considers a net residential density of up to 27.5 units per hectare.

ii. Ground and Surface Water Resources

The Township of Centre Wellington Official Plan locates the Subject Lands within a potential “Recharge Area”, as shown on Figure 19. Source water protection mapping also indicates that the Subject Property is within a wellhead protection area (areas B & C), as shown on Figure 17. However, it should be noted that much of the Fergus community and surrounding area is mapped as part of the Municipality's Groundwater Management Plan.

Section C.4.5.2 contains policies regarding the management of groundwater areas, including well field capture zones and recharge areas. Wellhead and capture zones and recharge areas warrant special consideration to safeguard groundwater resources and ensure long-term water

sustainability. The Proposed Development will incorporate Township guidelines and measures to address the specific needs of these sensitive areas.

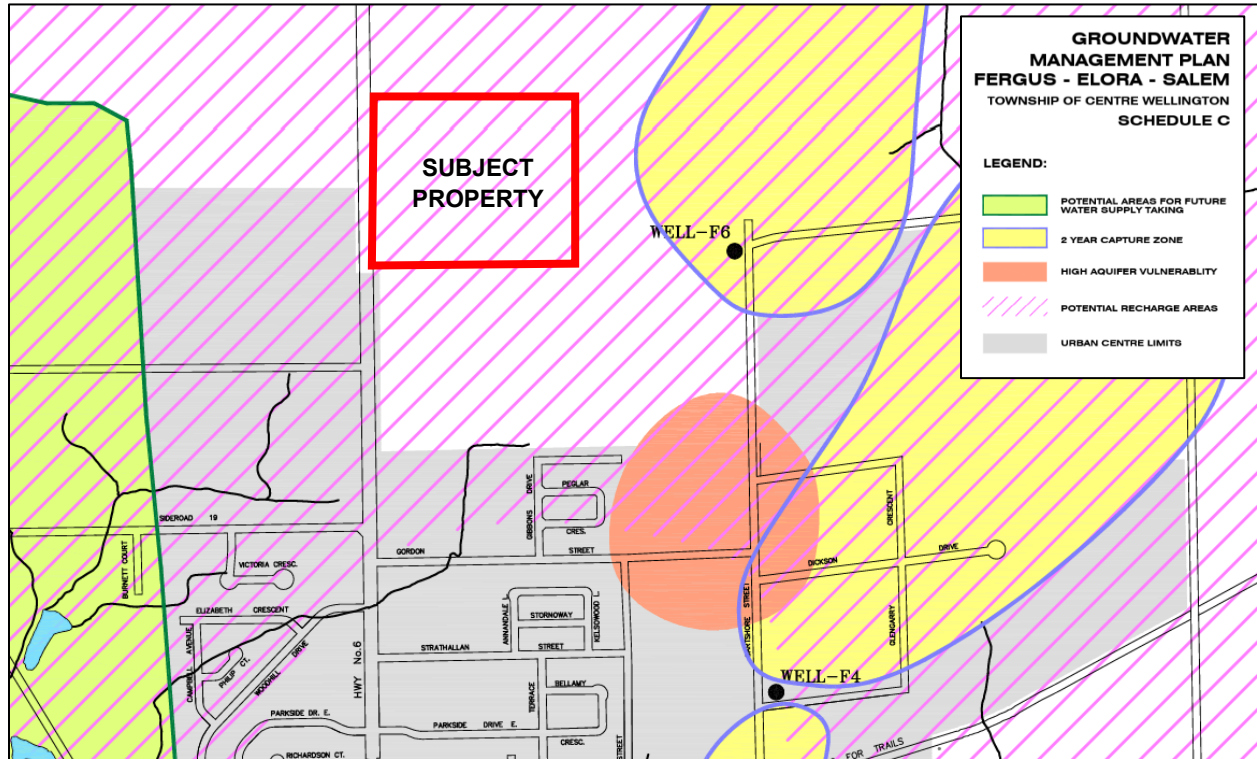


Figure 19: Township of Centre Wellington Official Plan, Schedule C – Groundwater Management

iii. Housing

Section C.5.6 of the Township Official Plan contains policies encouraging increased densities and a broader mix of housing in Greenfield areas. This approach 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:
 - a) strive to attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions;
 - b) somewhat lower densities may be considered in newly developing subdivisions where physical and environmental constraints such as larger than normal stormwater 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);
 - c) 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, stormwater 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 redesignation of the Subject Lands will support the development of the property for a range and mix of housing options and provides up to 83.9 people and jobs per hectare. It is anticipated that the ultimate development will provide a mix of low and medium-residential dwellings, including single-detached, street townhouses, mid-rise apartment units, and mixed-use units, which introduces further housing choices to the Township of Centre Wellington. The Proposed Development will be designed for compatibility with the existing surrounding uses. The proposed density is appropriate and will help achieve housing objectives for the Township.

iv. Municipal Servicing

The Proposed Development is currently located outside of the Urban Centre boundary but is proposed to be incorporated within the boundary as part of this Official Plan Amendment application. As per Section C.6 (Municipal Services) of the Official Plan, new development within the Township, notably Fergus and Elora-Salem, are required to connect to the existing municipal water and sewer services where they are available.

As a result, the Proposed Development proposes to connect to the newly upgraded existing municipal services along St. David Street North and Highway 6 and make efficient use of these existing services. The analysis and findings of the attached Functional Servicing and Stormwater Management Report, prepared by GEI Consultants Canada Ltd., confirm that municipal infrastructure has the capacity to service the Proposed Development on the Subject Lands, as summarized in Section 9 of this Report.

v. Parkland

Section C.12.1 of the Township Official Plan contains policies encouraging the conveyance of parkland for residential development. For residential development, up to 5% of the land should be conveyed for parkland dedication, or at a rate of one hectare for every 300 dwelling units. Section C.12.2 indicates that conveyed lands must be suitable for use as municipal parkland and must follow the given criteria:

C.12.2 Objectives	Consistency/Comment
1) Lands adjacent to established parks, school yards or storm water management areas.	The proposed park would not be located to adjacent established parks, school yards or storm water management areas, however, the proposed park will be located adjacent to the higher density residential blocks, including the mixed-use Block 64, and medium density Blocks 62 and 63 to the immediate west. This will ensure greater walkability and accessibility to nearby park space for future residents.

	Though not established at this time, the proposed park (Block 66), would also connect to the 0.8 ha park currently proposed in the southern lands OPA/ZBA application (Block 25). The intent of this design is to create a comprehensive and central park that is functional and large enough to provide ample recreational space for future residents.
2) Lands within easy walking distance of the residential area served.	The proposed applications contemplate the provision of a 0.9 ha park (Block 66) that is centrally located within the Proposed Development. The central location and connection to the North will therefore provide park space that is within easy walking distance of the entire proposed subdivision. Further, the proposed park (Block 66), would connect to the 0.8 ha park currently proposed in the southern lands OPA/ZBA application (Block 25), thus providing residents of both lands access to a large park space.
3) Lands located near the highest density residential developments.	The proposed park is adjacent to the proposed mixed-use block (Block 64), as well as Blocks 62 and 63 for medium density development located to the west. Therefore, the proposed park is located closest to the higher density housing blocks proposed in the subdivision.
4) Lands with adequate street frontage to provide for visibility and safety.	The proposed park will have approximately 35.8 metres of frontage, thus providing sufficient frontage for visibility and safety from the public realm. As previously noted, the proposed park as part of this OPA/ZBA and Draft Plan of Subdivision would connect to the 0.8 ha park currently proposed in the southern lands OPA/ZBA application (Block 25) which has a proposed frontage of approximately 86.9 m. Therefore, the park

would ultimately have frontage and/or visibility from two (2) fronts.

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| <p>5) Lands that are level, regularly shaped and not susceptible to major flooding, poor drainage, or other environmental or physical conditions that would interfere with their development or use for public recreation.</p> | <p>The proposed park is located outside of any regulated or natural hazardous lands. The proposed park, as per the preliminary grading plan and stormwater management plan, will be designed to ensure adequate drainage and meet all municipal engineering standards for public health and safety purposes.</p> |
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Section C.12.3 contains policy direction for the circumstance of cash-in-lieu of parkland. Cash-in-lieu may be accepted when the required amount of parkland dedication would be insufficient to satisfy municipal objectives.

The proposed Draft Plan of Subdivision submitted as part of this Official Plan and Zoning By-Law Amendment applications contemplates the provision of a 0.9 ha park (Block 66) to connect to the 0.8 ha park currently proposed to the south (Block 25), centrally located within the Proposed Development. Through the future Draft Plan of Subdivision process the ultimate size and location of parks within the plan area will be confirmed in consultation with municipal staff.

vi. Urban Design

Section C.15 of the Township of Centre Wellington Official Plan provides direction on Community Design policies and guidelines, which generally promote a higher standard of physical design for the built and natural environments within its Urban Centres.

C.15.2 Objectives	Consistency/Comment
6) To achieve a higher standard of architectural design in the built environment which is based on the compatibility of new urban development with the existing pattern of urban development.	Enhanced architectural elements are proposed to be incorporated in the design of the subdivision and will be compatible with the existing development pattern.
7) To enhance the enjoyment of the built environment	The Proposed Development has been designed to be consistent with the existing built environment and will enhance the surrounding area through public amenities, park space, and design.
8) To achieve a varied pattern of built form that supports and enhances the urban experience through architectural design	A variety of building materials will be used to enhance the built form and urban

that addresses both aesthetic and functional requirements.	experience while creating a cohesive development.
9) To achieve a complementary relationship between new buildings and existing buildings, while accommodating a gradual evolution of architectural styles, as well as accommodating innovative built forms.	The design of the Proposed Development will complement the existing character of the surrounding area achieving a complementary relationship between the proposed dwelling and the existing heritage farmhouse.
10) To enhance the unique character of a district, neighbourhood, grouping of buildings or prominent building, based on an analysis of their identifiable architectural characteristics.	The Proposed Development will have an identifiable design while being well-integrated to enhance the surrounding area. The existing heritage farmhouse will be maintained and enhanced on its own block (Block 65) of the Draft Plan.
11) To maximize the richness and visual delight of the existing building architecture, specifically within the Central Business District, through attention to massing, proportion, façade articulation, architectural detail, materials, and their successful integration.	The development considers the massing, proportions, façade articulations, architectural details, materials, and integration of the development as a whole towards a thoughtful subdivision design for Fergus.
12) To identify and encourage the maintenance and enhancement of “gateway” entrances, both from a vehicular and pedestrian point of view, into the Urban Centres. Gateway entrances should reflect the unique character of the area where they are located	The proposed entrance from Highway 6 will be framed with well-designed buildings and landscaping to create a gateway to the Proposed Development. Other design elements to enhance the entrance as a gateway are being considered.

Based on the foregoing, it is our opinion that the Proposed Development is aligned with the direction of the Township of Wellington Official Plan.

e) Township of Centre Wellington Zoning By-Law

The Subject Lands are subject to the Township of Centre Wellington Zoning By-Law No. 2009-045. The Subject Lands are currently zoned as “Agricultural (A),” as shown on Figure 20.

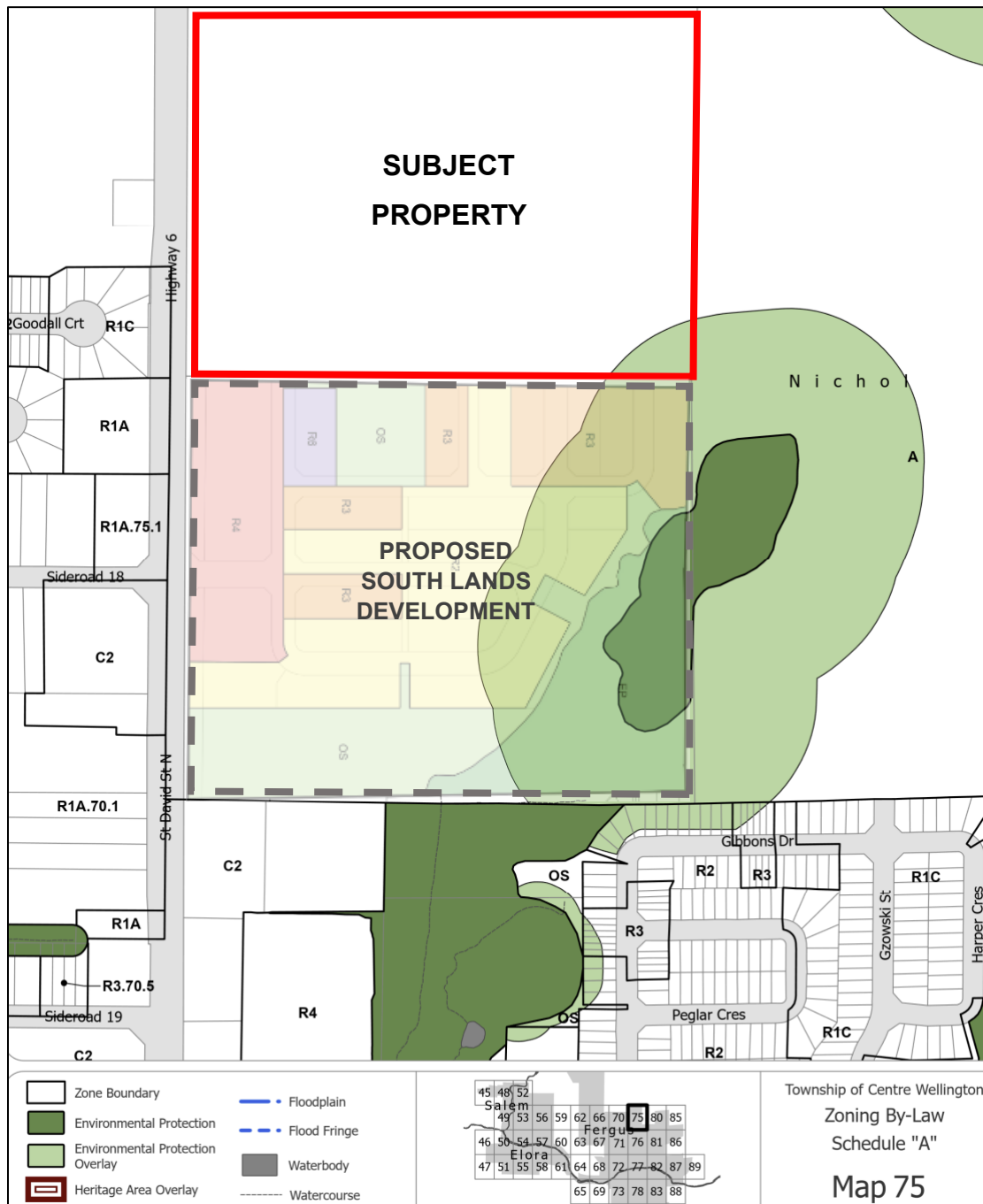


Figure 20: Township of Centre Wellington Zoning By-Law, Schedule A - Map 75

The permitted uses within Zone A include agricultural uses as well accessory uses thereto. As such, a Zoning By-Law Amendment application is included as art of this application as the Proposed Development is currently not permitted with the Agricultural (A) zone.

The Proposed Development requires the rezoning of the property from “Agricultural” to “Residential 2 (R2)”, “Residential 3 (R3)”, “Residential 4 (R4)”, and “Residential Mixed Use (R6)”. The parkland block will be zoned accordingly as “Open Space Recreation (OS)”.

i. Permitted Uses

The permitted uses in each respective zone is listed below:

Residential 2 (R2)	Residential 3 (R3)	Residential 4 (R4)	Mixed-Use (R6)
• Small lot single detached dwelling • A semi-detached dwelling • An existing link or twin dwelling • A duplex dwelling • A group home in accordance with Section 4.16 • Uses, buildings and structures accessory to the foregoing, including: i. A bed and breakfast establishment (Class 1) in accordance with Section 4.6 ii. An accessory apartment in accordance with Section 4.1 iii. A home occupation in accordance with Section 4.18	• Triplex dwelling • Fourplex dwelling • Street townhouse dwelling • Cluster townhouse dwelling • Uses, buildings and structures accessory to the foregoing including i. A home occupation in accordance with Section 4.18	• Cluster townhouse dwelling • Stacked townhouse dwelling • Apartment dwelling • Uses, buildings and structures accessory to the foregoing	• Cluster townhouse • Stacked townhouse dwelling • Apartment dwelling • Public building • Church • Retirement residence • Art gallery • Artisan studio • Auditorium • Business or professional office • Commercial Recreation • Commercial School or Studio • Convenience Store • Hotel • Medical clinic • Parking lot • Personal service shop • Private or commercial club • Restaurant • Retail store with gross floor area of 465 m2 of less

- Speciality food store
- Uses, buildings and structures accessory to the foregoing

ii. *Applicable Zoning Provisions*

Please note that the proposed building/structures within the Proposed Development intend to be designed to all applicable zoning regulations listed below. Should the structures when constructed not meet the applicable provisions and regulations below, a separate planning application under the Planning Act will be required to bring the property into conformity with the Zoning By-Law.

The applicable R2, R3, R4, and R6 zoning provisions that the Proposed Development must comply with are shown below in Table 1 & 2:

Table 1: Township of Centre Wellington Zoning By-Law - R2 & R3 Zoning Provisions

Zone	Residential 2 (R2)	Residential 3 (R3)
Building Regulation	Small Lot Single Detached Dwelling (Table 7D)	Street Townhouse (Table 7F)
<i>Min. Lot Frontage</i>	9 m	6 m
<i>Min. Lot Area</i>	279 sq. m	190sq.m per unit
<i>Min. Lot Depth</i>	-	26 m
<i>Max. Building Height</i>	3-storeys but not greater than 11 m	3-storeys but not greater than 11 m
<i>Min. Front Yard</i>	6 m or in accordance with Section 4.35, but 6m to front face of a garage if the driveway crosses a front lot line.	6 m or in accordance with Section 4.35, but 6 m to front face of a garage if the driveway crosses a front lot line.
<i>Min. Exterior Side Yard</i>	4.5 m, but 6 m to front face of a garage if the driveway crosses an exterior side lot line.	4.5 m, but 6 m to front face of a garage if the driveway crosses an exterior side lot line.
<i>Min. Side Yard</i>	1.2 m on one side; 0.6 m on the other side; 1.8 m between dwellings on abutting lots	1.8 m

<i>Min. Rear Yard</i>	7.5 m	7.5 m
<i>Max. Lot Coverage</i>	N/A	-
<i>Min. Landscaped Open Space</i>	The Front Yard on any Lot, excepting the Driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space. The width of the driveway shall not exceed 55% of the lot width, up to a maximum driveway width of 7.5 m.	40% of lot area The Front Yard on any Lot, excepting the driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space.
<i>Garage/Driveway Width Restriction</i>	The outside walls of an attached garage shall not exceed 55% of the lot width; and the driveway leading to the garage can be no more than the width of the exterior dimensions of the garage.	-
<i>Max. Number of Attached Dwelling Units in a Row</i>	-	6 units

Table 2: Township of Centre Wellington Zoning By-Law – R4 & R6 Zoning Provisions

Zone	Residential 4 (R4)	Residential Mixed-Use (R6)
Building Regulation	Apartment Dwelling (Table 7G)	Mixed-Use Building (Table 7H)
<i>Min. Lot Frontage</i>	20 m	5 m
<i>Min. Lot Area</i>	700 sq.m	No minimum
<i>Min. Front Yard</i>	6 m or in accordance with Section 4.35	No minimum
<i>Min. Exterior Side Yard</i>	6 m or in accordance with Section 4.35	No minimum
<i>Min. Side Yard</i>	½ the building height but no less than 3 m where windows of a Habitable Room face on a Side	No Minimum, except Where a side yard abuts a residential zone, the minimum side yard

	Yard, such Side Yard shall have a minimum width of not less than 7.5 m.	shall be 1.0 m; Where are a side yard abuts public land, the minimum side yard shall be 1.5 m
<i>Min. Rear Yard</i>	½ the building height but no less than 7.5 m	4 m
<i>Max. Building Height</i>	4-storeys but not more than 15m	18 m
<i>Min. Distance Between Buildings</i>	Where two or more buildings are located on any one lot, the distance between the face of one building and the face of another building shall be at least 15 m	40% of lot area The Front Yard on any Lot, excepting the driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space.
<i>Min. Common Amenity Area</i>	a) 30 sq.m (322.9 sq.ft) of common amenity area shall be provided for each of the first 20 dwelling units, and an additional 20 sq.m (215.3 sq.ft) provided for each additional unit above 20. Common amenity areas shall be aggregated into areas of not less than 50 sq.m b) Common Amenity Areas shall be designed and located so that the length does not exceed 4x the width. c) A Common Amenity Area shall be located in any Yard other than the required Front Yard or Exterior Yard. d) Landscaped Open Space areas, Building roof tops, patios, and above ground decks may be included as part of the Common Amenity Area if recreational facilities are provided and maintained.	a) 20 sq.m of common amenity area shall be provided for each dwelling unit. b) A Common Amenity Area shall be located in any Yard other than the required Front Yard or required Exterior Side Yard. c) Landscaped Open Space areas, Building roof tops, patios, and above ground decks may be included as part of the Common Amenity Area if recreational facilities are provided and maintained (e.g. swimming pools, tennis courts, lounges, and landscaped areas)
<i>Min Landscaped Open Space</i>	20% of lot area	20% of lot area

iii. *Proposed Zoning Schedule*

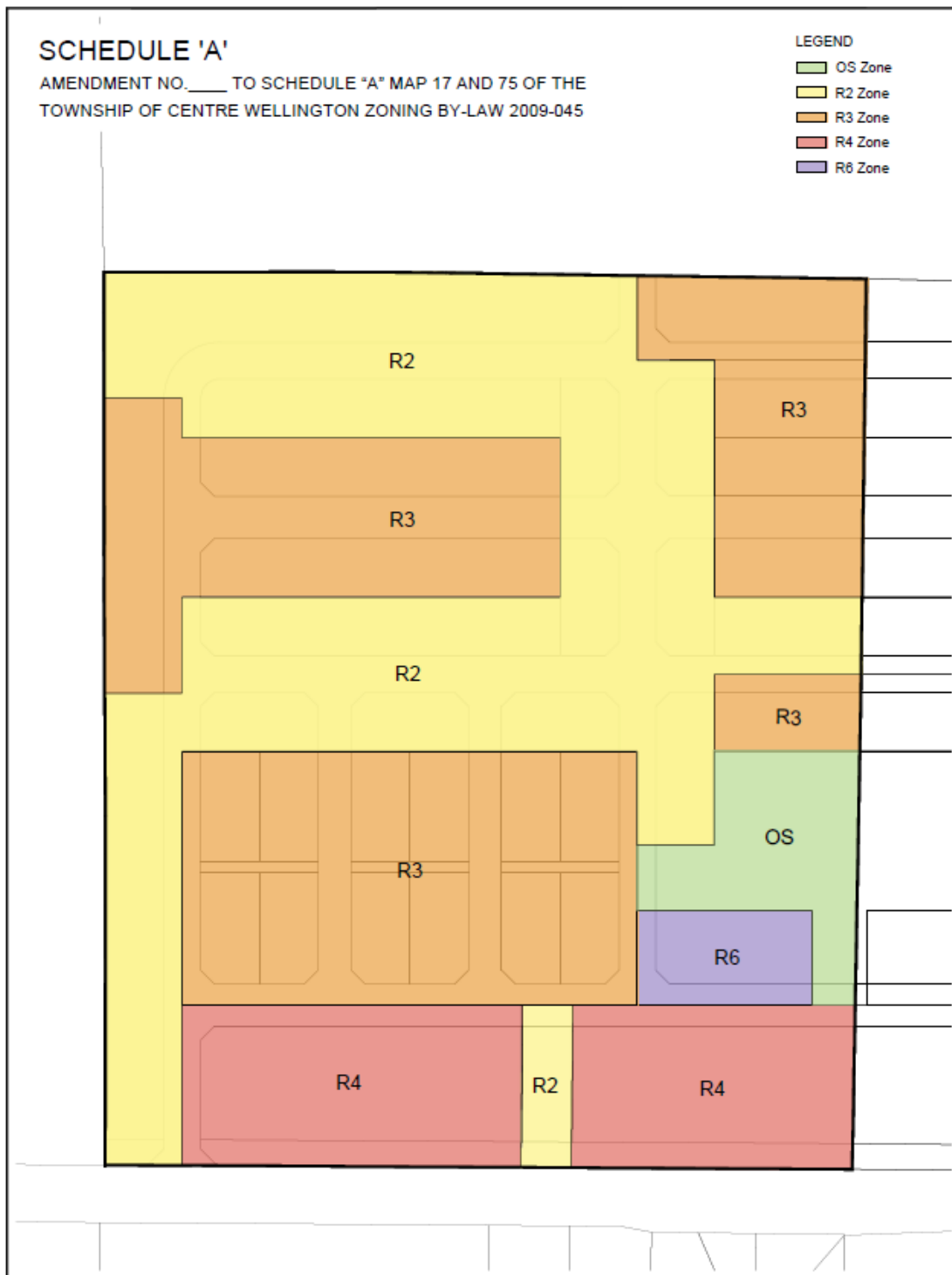


Figure 21: Proposed Draft Plan of Subdivision Zoning

7. ONGOING MUNICIPAL COMPREHENSIVE REVIEW

This section of the Report summarizes the ongoing Municipal Comprehensive Review (MCR) process currently taking place within the County of Wellington with regard to the Subject Lands. The following subsections include descriptions of the overall municipal comprehensive review process to date, the land needs assessment prepared by Watson and Associates, and the involvement of the applicant to date in the MCR process.

a) Municipal Comprehensive Review Process to Date

In order to ensure that the County and local Official Plans can accommodate the forecasted growth, the County is reviewing and updating its Official Plan policies to ensure that the Plan is continuing to support healthy, compact, and complete communities. This is conducted through a Municipal Comprehensive Review (MCR) and as part of a regular 5-year review.

In June 2021, County planning staff hosted a virtual Public Information Centre to update the public on recent growth management work and presented the Draft Phase 1 Report (Urban Structure and Municipal Growth Allocations of the MCR). Phase 1 of the MCR was subsequently finalized and approved by County Council on March 10, 2022. In April 2022, planning staff presented the results of Phase 2 (Land Needs Assessment) and its related consultation. The Phase 2 Land Needs Assessment technical report was finalized and approved on September 29, 2022, for all municipalities in the County, except for Centre Wellington, which remains under review.

Subsequently, OPA No. 119 – “County Growth Structure” was adopted by Wellington County Council which was later approved by the Ministry of Municipal Affairs and Housing (MMAH) on April 11, 2023. OPA 119 was the first MCR-related amendment to the County’s Official Plan.

This MMAH decision approved the ministerial amendments for the inclusion of the Subject Property along with the adjacent property to the south to be within the settlement boundary. This was part of the Ministry’s approval of the County’s OPA 119 with modifications which added 481 hectares of land to urban boundaries and converted 14 hectares of land from employment (i.e., industrial) to non-employment uses (e.g., residential and commercial).

Through Bill 150, the Minister reversed the modifications to 13 previous Official Plan approvals across the Province. Shortly after, the Province, through Bill 162, restored most of these modifications at the request of municipalities which essentially reversed the reversals, with Wellington County being an exception. While 29 reversed Minister’s modifications in Wellington County were restored at the request of the Municipalities via Bill 162, based on the Municipal requests, this did not include the modifications identifying new settlement areas including the subject lands.

Phase 3 of the MCR (OPA 120 – “County Growth Forecast”) focused on the Urban Settlement Area Study and Policy Review began in 2023 and was approved by the Ministry on July 11, 2024. Phase 3 growth management has been divided into urban and rural components (Phase 3A and 3B). Currently, requests for urban boundary expansions submitted to the County are under review as part of Phase 3A, with ongoing evaluations for potential urban expansions in Centre Wellington.

The 2024 Provincial Planning Statement (PPS), effective October 20, 2024, has presented implications for both Phase 3A (Urban Residential Growth) and Phase 3B (Rural Residential

Growth). Agricultural Mapping and Policy Review have been paused due to the changes in the new PPS. Work on Phase 3A and the Settlement Boundary Expansion in Centre Wellington is expected to be completed in the Fall of 2024. The Land Needs Assessment process for Centre Wellington is discussed in the following section.

b) Land Needs Assessment – County of Wellington

This subsection of the report describes the Community Land Needs Assessment (LNA) process for the Township of Centre Wellington carried out to date as part of the broader MCR process. The County has generally followed the methodology established by the Minister of Municipal Affairs and Housing. The County defines a LNA as a technical, County-led process that determines:

- The amount of land required to accommodate the Provincially-projected growth to 2051;
- The need for any Employment Area land conversions to non-industrial uses;
- The need for any urban settlement boundary expansions

As part of Phase 2 of the County's Municipal Comprehensive Review (MCR) process, a final LNA report was endorsed by County Council in December 2022. The report identified the need for Settlement Area Boundary Expansions for the Fergus and Elora-Salem Urban Centres as shown in the Table below as the "Base Scenario".

On January 30, 2023, the County retained Watson and Associates Economists Ltd. to review the urban land needs on behalf of the Township, which is part of the beginning of Phase 3 of the County's MCR process to review identified opportunities to optimize urban land requirements through a review of key input and greenfield density assumptions. On November 14, 2023, Watson and Associates Economists Ltd. identified four (4) growth scenarios with varying intensification rates and Designated Greenfield Area (DGA) people/job per hectare densities. Watson recommended Scenario 3, which proposes an intensification rate and 53 people and jobs/ha in the DGA Community Area.

Watson accounted for the proposed South Fergus Secondary Plan, which incorporated a change in presumed land use from employment to community of 34 hectares, reducing the settlement area boundary expansion need for community use from 238 ha to 204 ha, while increasing the employment land need from 160 ha to 194 ha. The impact of the preferred scenario reduced the community land need from 204 to 120 ha, resulting in a total required expansion of **314 ha**.

On September 30, 2024, the Council of the Township of Centre Wellington endorsed Scenario 3. Township staff reviewed and modified Scenario 3 to reduce the greenfield density assumption from 53 to 52 people/jobs per ha, which increased the community land need for urban expansion from 120 ha to 132 ha. Below is a table comparing the base scenario to the preferred scenario. The preferred scenario resulted in a net land need savings of 72 ha.

	Base Scenario	Preferred Scenario
Total Community Land Need	238 ha	132 ha
Total Employment Land Need	160 ha	194 ha
Total Settlement Area Boundary Expansion Required	398 ha	326 ha
Net Land Need		72 ha

c) Involvement of Applicant (Polocorp Inc.)

The Subject Lands are currently located outside of, and adjacent to, the current Settlement Area Boundary of the Town of Fergus. As part of the Municipal Comprehensive Review (MCR), the owners of the Subject Lands have been following the process of the MCR and have submitted a request to the County, Township and Province in support of the inclusion of the Subject Lands within the Fergus Settlement Area.

Since early 2023, the applicant, Polocorp Inc., has been actively working with their consulting team to assess the viability of the Subject Lands for future development. Throughout the Municipal Comprehensive Review (MCR), the applicant has made several submissions for the inclusion of the Subject Lands in the Settlement Area, as well as providing comments about the MCR process. Below is a brief chronology of the key meeting dates and submissions:

- **November 17, 2021** – The applicant first met with the County of Wellington planning staff to discuss the status of the Official Plan Review Process and its impact on the Subject Lands.
- **December 6, 2021** – The applicant submitted a letter requesting that the Subject Lands be considered for inclusion within the Fergus Urban Centre, including the planning rationale for the Settlement Area Boundary Expansion.
- **May 2, 2022** – The applicant provided comments on the public process for Phase 2 of the MCR, affirming the number (238 ha) of growth in the Township of Centre Wellington and stating due to the numerous heritage resources spread throughout Elora, and to maintain its character, Fergus is the logical choice for the majority of this growth.
- **January 2023** – The Ministry of Municipal Affairs and Housing (MMAH) office contacted the applicant because the applicant had made a submission through the MCR process to indicate that the review period for the ERO for OPA 119 was expiring in February. MMAH requested the applicant to submit a letter of recommendation for inclusion to them directly for their consideration. This was indicated to the County.
- **February 13, 2023** – David Butler (of The Butler Group Consultants), the applicant's planning consultant at the time, submitted to the ERO, a Planning Justification Report indicating the logical reasoning of including the lands within the Settlement Area Boundary and how this represents good planning. The Planning Justification Report illustrated conformity to the previous County of Wellington and Township of Centre Wellington's

Official Plans, while concluding that the proposed Settlement Urban Boundary Expansion met the relevant tests.

- **April 11, 2023** – Following the decision of the Minister to include the Subject Lands within the urban boundary of Fergus, the applicant contacted County planning staff (Sarah Wilhelm – Manager of Policy Planning) to discuss the implications of the decision on the County’s MCR process. The applicant believed the County Official Plan remained in effect, and that the proposal to amend the PPS could allow additional lands to be added outside of the MCR process, based on future County or Township decisions.
- **May 25, 2023** – The applicant met with the Township planning staff to discuss changes to the urban area boundary, the Proposed Development concept plan, and engineering assessments completed to date. In this meeting, it was confirmed that municipal servicing is available for the entire site, however using it would limit other sites in Fergus from development. As a result, the applicant stated that they would not ask for full allocation of servicing, but proposed a phased approach.
- **July 18, 2023** – Based on discussions in May 2023, the applicant submitted a request for pre-consultation for Official Plan Amendment, Zoning By-Law Amendment, and Draft Plan of Subdivision applications.
- **August 23, 2023** – A pre-consultation meeting for planning application was held with planning staff from the Township of Centre Wellington and County of Wellington. As a result of the meeting, the applicant received detailed comments and have since allocated tasks to complete the necessary reports to the applicant’s consultant team.
- **August 30, 2023** – The applicant held a meeting with the MTO to discuss the comments provided at the pre-consultation meeting. As a result of this meeting, Centre Wellington planning staff was able to get instruction from the MTO indicating the next immediate step was to write a report in support of extending the ‘connecting link’ beyond the intersection of Gordon Street and St. David St. The applicant understands that through conversations with Township planning staff (Brett Salmon - Managing Director of Planning and Development), a report will be presented before Council in November for this request.
- **April 5, 2024** - Butler Group Consultants Inc., c/o Polocorp Inc., submitted a letter to the County, demonstrating how the inclusion of the Subject Lands would be in the public interest and represents good planning. The letter included an Evaluation Criteria Response Matrix responding to County guidelines and objectives listing a set of criteria to inform the evaluation of expansion requests by staff, as well as a Mapping Analysis to further illustrate the Subject Lands’ suitability for inclusion. The Matrix and Mapping Analysis demonstrate the suitability of the Subject Lands as an ideal opportunity for expansion. The letter also contained letters of recommendation and support from qualified experts working alongside the applicant for the Subject Lands’ future development. These letters are listed below.
- **December 2024** - The applicant retained Dillon Consulting Ltd. to review the initial Land Needs Assessment undertaken by the County and the follow-up assessment of alternative density scenarios for the Township of Centre Wellington to 2051. As detailed above, the applicant (Polocorp Inc.) has participated actively throughout the MCR process to date, and has maintained their position that the lands are suitable for inclusion within the Urban Area and made available for residential redevelopment. The proposed Official Plan

Amendment (County and Local), Zoning By-Law Amendment, and Draft Plan of Subdivision applications build off of this participation to date and would facilitate the logical extension of the Fergus Urban Area.

- **March 3 & 13, 2025** – The applicant attended the Public Information meetings, both digitally and in person.

8. LAND USE PLANNING RATIONALE

This section of the Report builds on the previous sections and provides land use planning opinion with regards to the site-specific planning regulations proposed to accommodate the contemplated development.

a) County of Wellington OPA 126

As noted previously, the Subject Lands are located at the northern boundary of the Fergus Settlement Area. By way of the proposed Official Plan Amendment application, the applicant is proposing to incorporate the Subject Lands within the urban settlement area boundary in the County of Wellington and the Township of Centre Wellington Official Plan.

As previously noted, the Municipal Comprehensive Review (MCR) process is no longer required under the new 2024 PPS for a settlement area expansion to be sought or approved. While the MCR process continues to follow the previous provincial policy (PPS, 2020), all planning decisions must now be made in accordance with the requirements of the 2024 Provincial Planning Statement.

By way of the site specific applications, the applicant is proposing to incorporate the Subject Lands within the County's "Primary Urban Centre" boundaries. The lands to the south of the Subject Lands are to be included within the "Primary Urban Centre" boundaries as part of OPA 126, shown in Figure 22, which have been comprehensively planned along with the northern lands as a cohesive development. The inclusion of the Subject Lands within the urban boundaries would provide an opportunity to densify the area, fulfilling Provincial, County and Township residential intensification targets.

As discussed earlier in this report, Watson & Associates Economists Ltd. were retained by the Township and County to review the Settlement Area Boundary Expansions and recommended a 20% intensification rate and 53 people and jobs/ha in the DGA Community Area (Scenario 3). Their Report concludes that the total settlement area boundary expansion land need is 314 ha.

As noted, the applicant has retained Dillon Consulting Ltd. to conduct an independent review of the Land Needs Assessment undertaken by the County and the follow-up assessment of alternative density scenarios for the Township of Centre Wellington to 2051. Dillon's review was undertaken from the perspective of land economics and urban land needs and has considered growth trends in the broader area. Dillon's review concludes that further Settlement Area Boundary Expansions (SABE) are warranted and appropriate and recommends considering additional expansions to reflect the intent of the 2024 PPS. The County LNA assumes a denser mix of housing in order to achieve the higher intensification rate under the Growth Plan. Whereas

a housing by type analysis was completed by Dillon Consulting Ltd. And concluded that there is a greater need for ground-related housing than intensification, and that intensification particularly in a smaller community with heritage considerations, fragmented parcels, and lack of amenities and infrastructure is more challenging.

The review also opines that the overall land needs for Centre Wellington are understated and overly dependent on the achievement of intensification targets that are unlikely to be achieved, as discussed further below in the following section of this report. The 2024 PPS policy and conditions through which boundary expansions are to occur have been considered and discussed in Section 6 of this Report. It is our opinion that all statutory and policy tests for the expansion of settlement area have been satisfied by through this application package.

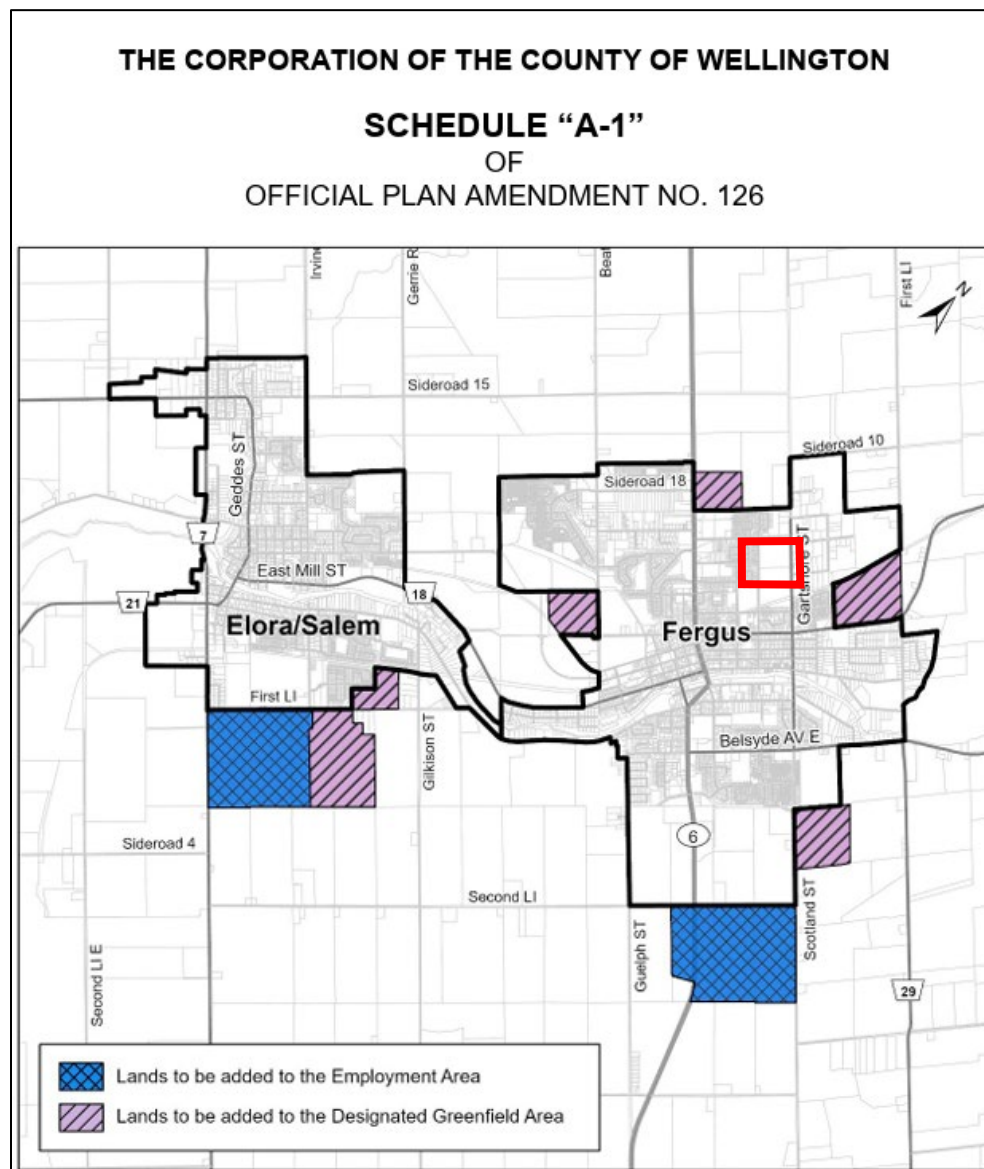


Figure 22: Draft Official Plan Amendment 126 - Schedule A-1

b) Settlement Area Boundary Expansion

Dillon Consulting Ltd. was retained by the applicant to prepare a Technical Memorandum re: OPA 126 Urban Boundary Expansion with their own independent housing-by-type analysis of the County and Township lands needs. This report provides recommendations based on Provincial and County growth forecasts and the subsequent land need.

The report notes that a primary objective of the new 2024 PPS is to accelerate housing supply which is a fundamental shift away from what has historically been a restrictive approach to managing growth and urban expansion to one now focused on facilitating the provision of new housing and land supply. In addition, a key policy shift now requires the delivery of a market supply of housing to meet need by housing type, in this case, more ground-related housing. Additionally, under the new 2024 PPS, the prior Growth Plan intensification target no longer applies.

The 2024 PPS “Housing Options” definition refers specifically to housing structure types, among other metrics, which includes both ground-related (single and semi-detached, rows and townhouses) and apartments or missing middle housing like garden suites or laneway housing. It is important to note that housing options refers to all types of housing including both ground-related units that tend to drive greenfield land needs and higher density apartment units, which tend to be the primary source of intensification from a built form perspective.

The provincial policy requires the need for each type of housing to be met independently towards the achievement of a community’s overall housing goals. The Dillon Assessment notes that it is no longer permissible to reduce the supply of grade-related housing required to meet market need, by shifting units to apartments through intensification targets. However, to achieve the increased 23% intensification rate assigned to the Fergus Urban Centre in the County LNA, the forecasted mix of housing must be shifted to an even denser pattern of growth from the current 2021 Census base of mainly low-density units (currently roughly 80%) to 55% low density, 25% medium density, and 20% high density units.

The Dillon Assessment provides that since the Growth Plan’s inception in 2006, it aimed – in part – to limit the amount of urban land used for greenfield development with the hopes to achieve higher levels of intensification by requiring a minimum of 50% of new units to occur within the built-up area. Dillon’s report reiterates that planning for this intensification rate will represent a significant change to the character of the Fergus Urban Centre.

Dillon’s November 2024 letter initially estimated a need for up to 320 ha of additional residential lands across the County, based on the current Ministry of Finance projections. The County LNA report and draft OPA 126 rely instead on the forecasts previously issued by the Province which utilizes the Growth Plan figures but did not rely upon the 2020 Hemson Technical report where the overall housing forecast to 2051 of units by type.

The County LNA determined that final amount of expansion land added to the Community Area in the Township of Centre Wellington is 169 ha of which approximately 79 ha are added to Elora and 90 ha are added to Fergus. However, similar to the County-wide impacts, a higher land need is required for Fergus if a more reasonable and market-based mix is applied the County LNA forecast of housing by type.

As shown in Table 3, the Dillon report concludes that the additional residential land need when applying the mix of housing growth forecasts in the 2020 Technical Report to the total housing growth forecast for Fergus in the County LNA yields a relatively modest but still need for at least 25 ha of additional residential lands.

Table 3: Fergus Urban Centre Total Residential Land Demand (Source: Dillon Consulting Ltd.)

Fergus Urban Centre Total Residential Land Demand 2021 - 2051				
Comparison of County LNA to Prior Growth Plan 2020 Technical Report				
County LNA	Single and Semi-Detached	Rows and Townhouse	Apartments (all types)	Total Units
Forecast Unit Growth	3,750	1,640	1,375	6,765
Housing Mix	55%	24%	20%	100%
Net Density (units per ha)	22	40	70	29.3
Net Land Need (ha)	170	41	20	231
Previous Provincial	Single and Semi-Detached	Rows and Townhouse	Apartments (all types)	Total Units
Forecast Unit Growth	5,168	568	1,028	6,765
County-wide Housing Mix	76%	8%	15%	100%
Net Density (units per ha)	22	40	70	25.6
Net Land Need (ha)	235	14	15	264
Summary and Comparison				
Variance (net land)	-64	27	5	-33
Variance (gross buildable at 45% net to gross factor)				-60
County Adjustments				37
Net Variance (gross ha Land Demand)				-23

Source: Dillon Consulting Ltd. based on the Technical Report prepared by Hemson Consulting Ltd. for the Ministry of Municipal Affairs and Housing, *Greater Golden Horseshoe: Growth Forecasts to 2051*, August 26, 2020, and the Phase 1 Urban Structure and Growth Allocations Report (June 16, 2021) and Phase 2 M.C.R. Report: Urban Land Needs Assessment County of Wellington (August 29, 2022 (both prepared by Watson and Associates.

The base or low scenario is 90 ha which is comprised of the current Community Area lands proposed to be added to Fergus (OPA 126) while the mid-range scenario is 113 ha which includes the 25 ha of additional lands required by adding the mix of housing growth forecast. The high scenario is 220 ha, based on the Ministry of Finance projections that applies the share of Community Area lands for OPA 126 (roughly 40% of the total) to the County-wide need for approximately 320 ha of additional residential lands estimated previously for County MCR Base Case.

The estimate of land needs above is considered to be conservative, given that it does not take into account that the County LNA total housing forecast is roughly 3,100 units lower than in the 2020 Technical Report. Nevertheless, it is generally consistent to outlook to 2051 on a County-wide basis. Estimated land needs under the current Ministry of Finance projections, however, are considerably higher as shown as the high scenario or upper limit.

The report opines that limiting the amount of new urban land designations by way of a higher than achievable forecast of intensification and high-density apartment units is not sound growth

management nor consistent with new Provincial planning requirements. The Subject Property is 20 ha in area and represents an appropriate location for community growth. As a result, it is our opinion that the inclusion of the Subject Lands within the settlement area boundary is appropriate and represents good planning.

In addition to the above, it is noted that much of the available greenfield land within the Fergus Settlement Area is currently located in the southern area of the settlement area, the majority of which was brought into the urban area in 2003 which has yet to have been developed. We understand that these lands have been included within the South Fergus Secondary Plan and concurrently subject to a Master Environmental Servicing Plan, with the implementing Municipal Class EA being endorsed by Council in 2024. While these lands have been within the urban area for over two decades, the lands have not been developed for residential purposes to date, with no clear understanding of when they will be. By contrast, the applicant is prepared to advance the development of the lands subject to the proposed planning applications in short order, which will assist in the satisfaction of the municipality's housing needs.

c) Logical Location for Community Growth

The Subject Lands are a logical location for community growth due to its strategic position along Highway 6 and directly adjacent to the land recommended to be included by the County along the northern boundary for the Fergus Settlement Area, also owned by the applicant. The Proposed Development's proximity to existing infrastructure reduces the need for significant investments in service extensions. Additionally, these existing services have the capacity to support the forecasted growth from the Proposed Development with minimal upgrades.

The Proposed Development is located adjacent to Highway 6/St. David Street North, a major arterial road, providing efficient accessibility for future residents and connecting the Proposed Development to the surrounding urban area. The site's adjacency to the Fergus Settlement Area and adjacent property also owned by the applicant further strengthens the site's suitability for housing community growth. Growth in this area would represent a natural extension of the existing urban fabric, further exemplifying efficient land use.

Moreover, Centre Wellington staff report PLN2024-35 identified recommended Settlement Area Boundary Expansions (SABE), and indicated how the recommended expansions satisfy the criteria set out in the Growth Plan as well as the County's Urban Boundary Expansion Evaluation Framework. Labelled as SABE-E, the recommended settlement area expansion included only the southern portion of the development which fragmented the initial boundary expansion request for the Subject Property. The inclusion of the north portion of these lands would facilitate the phased development of lands suitable and ready for redevelopment as required by the Centre Wellington SABE evaluation criteria.

The Agricultural Impact and Minimum Distance Separation Assessment prepared by Stantec Consulting Ltd. evaluates the need for a Settlement Area Boundary Expansion to accommodate future population and employment growth. The property owners of potentially impactful livestock operations provided verbal confirmation of the usage and capacity of the barns. The barn at 6611 Highway 6 houses 11 hobby horses and has solid outdoor manure storage with no cover. The barn at 6585 Highway 6 North provided verbal confirmation that no livestock operations have or will take place. The assessment found the encroachment to be negligible, which would comply

with the Minimum Distance Formulae and are suitable lands to be included within the settlement boundary.

Their report further concludes that the Subject Property would be a good candidate for inclusion as the Subject Property represents lower priority prime agricultural lands given it is adjacent to the recently expanded Settlement Area Boundary and its potential for continued phased development with the lands adjacent to the south, also owned by the applicant.

Further, the Technical Memorandum re: OPA 126 Urban Boundary Expansion prepared by Dillon Consulting Ltd. identifies that the lands needed for the anticipated growth is insufficient based on the Provincial and County forecasts. Dillon's report concludes that the additional land need is at least 25 ha when applying a more appropriate housing mix to the total housing growth forecast for Fergus in the County LNA and Provincial forecasting.

It is our opinion that due to several factors the additional allocation as noted in the Dillon report be given first priority to the subject lands:

- As it creates a contiguous community with the Southern portion of lands owned by the applicant, and more efficient community design.
- The North/South Lands has completed all the requisite reports and studies per the applicants pre-consultation meeting on August 23, 2023 along with the ensuing comments to pre-emptively resolve any potential concerns or issues.
- The North/South Lands have the highest ranking of the list of properties proposed to not be included from the Triton Engineering Memo dated June 7, 2024 from a connectivity perspective with the proposed inclusion of the South Lands, as detailed below.

d) Serviceability of Subject Lands

In August 2023, a Pre-Submission Consultation Meeting was held discuss the comprehensive redevelopment of the subject lands and southern lands. In advance of this meeting a Engineering's Memorandum prepared by Triton Engineering dated July 21, 2023 was provided to our clients engineering consultant Ms. Angela Kroetsch, GEI Engineering.

The Memorandum concluded that there was sufficient sanitary capacity both downstream and at the wastewater treatment plant for the contemplated development and that through development staging water servicing for the entirety of the Subject Lands – both North and South Lands – could be provided in a phased manner. In the short term, it is anticipated that other developments in the Fergus area could experience similar constraints, however, it is our understanding that Centre Wellington is conducting an analysis on additional water capacity with a new well expected to be operational by 2027.

Further, Triton Engineering provided another Memorandum to Centre Wellington dated June 7, 2024, on their analysis of candidate lands for inclusion. The North/South lands rank the highest in terms of Sanitary/Water/Transportation analysis, whereas other highly ranked candidate lands may face capacity constraints, particularly downstream of their proposed inclusion.

The June 2024 Memorandum utilized the following two-step evaluation ranking process: Step 1 goal is to narrow down the parcels to those with existing or prospective services to the subject site, while Step 2 assesses the feasibility and potential of servicing the shortlisted developments.

Step 2 utilizes water and sanitary modeling to assess these parcels serviceability and site conditions. Figure 23 shows the Top 5 Ranked properties per the Step 2 Servicing Feasibility analysis.

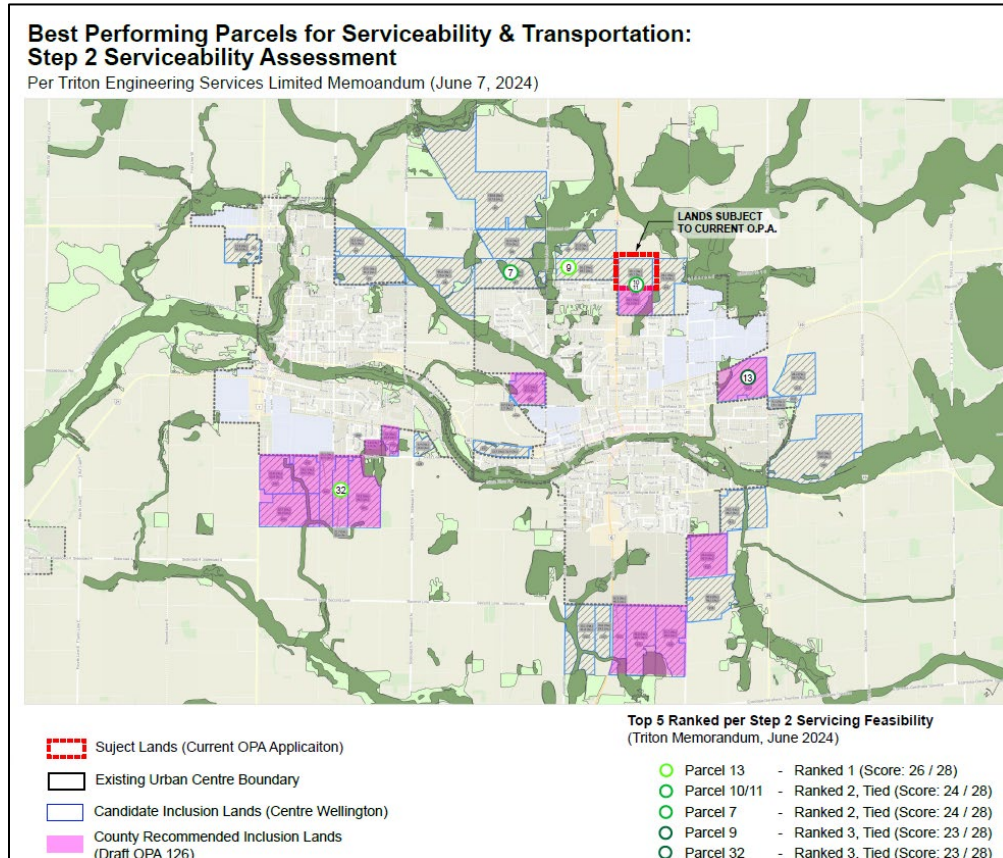


Figure 23: Step 2 Serviceability Assessment - Top Performing Parcels

As noted above, Step 2 of this assessment reviewed the feasibility and site conditions of water/sanitary servicing for the parcels. The Step 1 transportation score has been included in the Total Score to ensure a transportation component has been included in the SABE evaluation. Figure 24 below shows the ranking table from the June 2024 Triton Memo.

MCR Designation	Parcel ID	Water		Sanitary Connection	Sanitary Conveyance		Transportation Score (from Step 1)	Total Score
		Pressure	Flow	Gravity or SPS	Existing	Future		
SABR-051	1	3	3	0	0	0	3	9
SABR-023	2	1	3	0	0	0	3	7
SABR-025	3	1	5	3	0	0	3	12
SABR-037	4	3	3	0	0	0	3	9
SABR-019	7	3	5	3	5	5	3	24
SABR-043	9	0	5	3	5	5	5	23
SABR-022	10/11	1	5	3	5	5	5	24
SABR-033/34	12	3	5	0	5	5	1	19
SABR-020	13	3	5	3	5	5	5	26
SABR-035	18	1	5	3	5	5	3	22
SABR-060	19	1	3	0	3	3	3	13
SABR-038	20	1	3	0	3	3	3	13
SABR-039	21	3	3	0	3	3	3	15
N/A	22	3	3	0	3	3	5	17
N/A	23	3	3	0	3	3	5	17
N/A	24	3	3	0	3	3	3	15
SABR-026	25	3	5	0	5	3	5	21
SABR-007	29	3	3	3	5	5	3	22
SABR-006	30	3	3	3	5	5	3	22
SABR-061	31	5	5	0	0	0	3	13
SABR-062	32	5	5	0	5	5	3	23
SABR-064	-	REFER TO SEPARATE MEMO						

Figure 24: Triton Engineering Memorandum Rankings dated June 7th, 2024

It is also noted that Centre Wellington had completed an upgrade to the sanitary servicing along St. David Street/Highway 6 in 2021 (adjacent to the Polocorp South lands), and it is our opinion that prioritizing sites that leverage existing infrastructure over those requiring entirely new servicing is preferable from financial, engineering and planning perspectives.

Given the above, it is our opinion that North/South Lands properties are suitable locations for community growth and sites to be included within the Settlement Area based on the servicing and transportation rankings above.

e) Appropriateness of Proposed Official Plan Designations

As discussed previously, by way of the proposed Official Plan Amendment application, the applicant is proposing to redesignate the Subject Lands from “Agricultural” to “Residential”.

In consideration of the appropriateness of the “Residential” designation for the site, the land use of adjacent and nearby properties in the general area was reviewed in depth. As shown on Figure 15 & 16, most of the area to the south and west of the Subject Lands are designated as “Residential”, except for a small area along St. David Street North and Gibbons Drive which are designated as “Highway Commercial”.

The redesignation of the Subject Lands would provide continuity to the “Residential” designation and an opportunity to create a mixed-use, complete community given the location of commercial uses adjacent to the Subject Lands. The redesignation of the Subject Lands would also further support transit supportive densities for the provision of future public transit infrastructure within the Township.

The Residential designation is consistent with other areas of the adjacent Fergus settlement area and continues with the phased development of the proposed subdivision once included within the settlement area boundary.

f) Appropriateness of Proposed Zoning

As discussed previously, by way of the proposed Zoning By-Law Amendment application, the applicant is proposing to rezone the Subject Lands from “Agricultural (A)” to “Residential 2 (R2)”, “Residential 3 (R3)”, “Residential 4 (R4)”, and “Residential Mixed Use (R6)”.

Blocks 31 through 43 are proposed to be zoned “Residential 2 (R2)”. These blocks are intended for small lot single-detached dwellings and will be comprised of up to 129 dwelling units. The existing heritage dwelling (Block 65) will also be zoned as R2 to remain consistent with the remainder of the development but will maintain its heritage status on a large lot with no physical changes proposed.

Blocks 44 through 61 are proposed to be zoned “Residential 3 (R3)”. These blocks are intended for street townhouse dwellings and will be comprised of up to 266 dwelling units. These blocks are more centrally located within the Proposed Development alongside the proposed single detached dwellings.

Block 62 & 63 is proposed to be zoned “Residential 4 (R4)”. These blocks are intended for medium density apartment dwellings units and will be comprised of up to 125 dwelling units. The medium density blocks are proposed along St. David Street North to focus increased density along the arterial roadway and act as a gateway to the subdivision.

Block 64 is proposed to be zoned “Residential Mixed-Use (R6)”. This block is intended for mixed use units including both commercial/retail and residential uses and will be comprised of up to 14 total units. These mixed-use units are located near the central park to encourage walkability near the centre of the community and near amenity areas.

Block 66 will contain the proposed parklands and will be zoned accordingly as “Open Space Recreation (OS)”. This parkland block intends to be joined with the adjacent development’s parkland block to create a large central park space.

The proposed zoning intends to facilitate an appropriate transition from St. David Street North to the further into the development beginning with the medium density blocks to the street townhouses to the single detached dwellings. The resulting net residential density is up to 27.5 units per hectare with up to a net 83.9 people and jobs per hectare.

The proposed zoning is appropriate to accommodate the Proposed Development and make efficient use of the property for a phased subdivision development. The Subject Property is directly adjacent to the existing settlement area boundary of Fergus and provides an opportunity to create a thoughtful, well-design, and cohesive development once redesignated (subject to Council’s approval).

g) Complete Communities

The Provincial Planning Statement (PPS, 2024) defines Complete Communities as “places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer

and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.”

As discussed in Section 6.b of this Report, the proposed development will facilitate a complete community as the proposed subdivision provides a mixed-use neighbourhood and supports opportunities for equitable access to many necessities given its proximity to Fergus’ Downtown. A full range of housing, transportation, public service facilities, and stores are either provided within or located nearby.

Developing the North/South lands together allows for many aspects of the complete community to be included within the development itself. For example, a larger parkland space centrally located between the Lands, a better mix of housing options that accommodates daily living for people of all ages and abilities, and will provide the ability to create overall better facilities.

The overarching theme of complete communities are that they are inclusive, are appropriate for their contexts and meet the diverse needs of their populations. The proposed development establishes a new mixed-use neighbourhood that considers its locational context within the Fergus Settlement Area and nearby amenities while providing a full range of housing options. It is our opinion that the proposed development has regard to the Provincial policy direction to establish complete communities.

h) Studies Demonstrating Development Feasibility

As previously noted, the subject lands were included in the urban envelope from April 11, 2023 to December 2023. During this time, the applicant submitted a pre-submission consultation request, and participated in a Pre-Submission Consultation Meeting with County and Township staff on August 23, 2023. At this meeting a list of complete application requirements was provided for the anticipated Official Plan Amendment, Draft Plan of Subdivision and Zoning By-Law Amendment applications.

Although the property was later removed from the urban envelope, the applicant directed its consulting team to advance the identified studies to assess the appropriateness and feasibility of development on the subject lands. As per Section 8 of this Report, these studies have now been completed, demonstrating the feasibility of developing both the North and South Lands from various perspectives (i.e., environmental, agricultural compatibility, servicing etc.). The applicant intends to prioritize development on the South Lands before proceeding to the North, and is open to discussing phasing / staging of development strategies with the municipality to support orderly community development and alignment with broader growth management objectives.

Completing all necessary studies has eliminated uncertainties, confirming the site's feasibility for development. Unlike the South Fergus lands, which have remained in the urban envelope for 22 years without development progress, the applicant’s lands are largely unencumbered and positioned for more timely redevelopment.

i) Applicant Initiated SABE Suitability Analysis

On February 8th, 2024, the County of Wellington released its Urban Boundary Expansion Review Framework, detailing the criteria for evaluating the appropriateness and suitability of lands for boundary expansion. This framework presented three focus areas for consideration, including sustainability, complete and healthy communities, and efficient infrastructure and growth management. As a result, the applicant conducted a detailed assessment, applying the County's evaluation criteria to the Subject Lands with guidance from qualified professionals, including experts in transportation modeling, civil engineering, geotechnical assessments, heritage conservation, and land use planning.

Following this review, a response matrix was prepared to document compliance with each criterion, providing a structured analysis of the suitability of the Subject Lands for expansion based on the guidelines and objectives established by staff. Ultimately, the assessment confirmed that the Subject Lands meet the evaluation criteria and qualify for inclusion across all theme areas, with supporting explanations provided in the submission package to the County.

Additionally, we have reviewed the 30 properties requesting inclusion through the Municipal Comprehensive Review process were assessed using an overlay analysis of select evaluation criteria using publicly available data sources. This analysis utilized a binary evaluation method, where each candidate parcel was assessed against the seven criteria, with parcels impacted by a specific constraint receiving a score of 1 and those unaffected assigned a score of 0. The scores from each criteria-specific assessment for all candidate parcels were then summed, resulting in a total score between 0 (least impacted by constraints) and 7 (most impact by constraints). The analysis revealed that 8 of the 30 candidate parcels were impacted by only a single constraint (cumulative score of 1), including the Subject Lands, which contain a small portion of a natural heritage feature in the southwest corner. Overall, the findings of this analysis were largely consistent with other assessments conducted to assess suitability for inclusion within the urban boundary.

Input data sets used as part of this analysis are listed below. The package submitted to the County in April 2024, including the detailed response matrix, professional opinion letters, and overlay analysis maps, are enclosed in the current submission.

Criteria	Data	Source
Aggregate Resources (Map 1)	Mineral Aggregate Resource Overlay	County of Wellington Official Plan (Schedule D)
Floodplains (Map 2)	GRCA Floodplain Limit	GRCA Open Data, Groundwater Catalog
Natural Heritage (Map 3)	Core Greenlands and Greenlands; Provincial Natural Heritage System	County of Wellington Official Plan (Schedule B1); Ministry of Natural Resources and Forestry

Vulnerable Aquifer (Map 4)	Issue Contributing Area, Vulnerable Scoring Area (WHPA-E)	GRCA Open Data, Groundwater Catalog
Agricultural Soil Capability (Map 5)	Canada Land Inventory, Agricultural Capability, Overlay	Centre Wellington GIS
General Servicing (Map 6)	Fergus Municipal Service Areas (Northwest)	Centre Wellington Official Plan (Schedule B)
Active Transportation (Map 7)	Existing or Proposed Active Transportation Routes	Centre Wellington Trails Master Plan (Maps 3.1)
Cumulative Inclusion Constraints (Map 8)	Overlay of the above noted data sets	

9. SUPPORTING STUDIES

This section of the Report outlines the supporting studies conducted as part of the complete application package for Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision applications. In the subsections below, a summary of each study, report, or assessment will be described, including the party responsible, the date of completion, and the impact they have on the proposed Official Plan Amendment application.

a) Technical Memorandum - OPA 126 Urban Boundary Expansion

A Technical Memorandum re: OPA 126 Urban Boundary Expansion dated March 26th, 2025 was prepared by Dillon Consulting Ltd. that describes their review of the initial Land Needs Assessment (LNA) for the County and recommends further modifications.

The report identifies that a primary objective of the new 2024 PPS is to accelerate housing supply. While the 2024 PPS continues to encourage planning authorities to support intensification and establish minimum targets for units within the built-up area, the Dillon memo contends that these targets are no longer required to be implemented at the expense of other unit types (i.e. ground-related housing) as a mechanism to restrict the designation of new greenfield lands and housing supply.

The Dillon memo also notes that the prior Growth Plan intensification target, which is no longer applicable under the new 2024 PPS, made it necessary for most municipalities to plan for a long-term shift in housing density residential forms. The memorandum contends that the Growth Plan led to a shift in demand away from ground-related housing such as single-detached, semi-detached and rowhouse units towards higher density apartments of all types. Specifically, the memorandum contends that in order to achieve the increased 23% intensification rate assigned to the Fergus Urban Centre in the County LNA, the forecasted mix of housing must be shifted to an even denser pattern of growth from the current 2021 Census base of mainly low-density units (currently roughly 80%) to 55% low density, 25% medium density, and 20% high density units.

The memo discusses the shift towards higher density housing forms as it relates to prior Growth Plan policies and targets. From its inception in 2006, the Growth Plan aimed to limit the amount of urban land used for greenfield development with the hopes to achieve higher levels of intensification by requiring a minimum of 50% of new units to occur within the built-up area.

Dillon's report reiterates that planning for such an increase of higher density forms (i.e. apartment buildings) within the built-up area represents a significant change to the character of the Fergus Urban Centre. As Fergus is currently behind its housing targets and intensification goals, the memorandum provides that it is unlikely that the previous target set can realistically be achieved. The memorandum further provides that this change and intensity of new building activity would significantly impact on the overall 'feel' of the community and represents a major market shift for the local real estate market in relation to historic trends in the County.

Further, Dillon's November 2024 letter initially estimated a need for up to 320 ha of additional residential lands across the County, based on the current Ministry of Finance projections, which is noted that it may be lowered to around 260 ha based on recent immigration target changes. In contrast, the County LNA report and draft OPA 126 relies instead on the forecasts previously issued by the Province, those being the prior Growth Plan figures and the details in the 2020 Hemson Technical report. Compared to the Provincial forecast, the overall housing forecast to 2051 is lower and the forecast of housing demand by structure assumes a much denser pattern of growth.

The County LNA determines that final amount of expansion land added to the Community Area in the Township of Centre Wellington is 169 ha of which approximately 79 ha are added to Elora and 90 ha are added to Fergus. However, similar to the County-wide impacts, a higher land need is required for Fergus if a more reasonable and market-based mix is applied the County LNA forecast of housing by type.

The Dillon report concludes that the additional residential land need when applying the mix of housing growth forecasts in the 2020 Technical Report to the total housing growth forecast for Fergus in the County LNA yields a relatively modest need for approximately 25 ha of additional residential lands, which can be substantially realized through the inclusion of the Subject Lands.

The base or low scenario is 90 ha which is comprised of the current Community Area lands proposed to be added to Fergus (OPA 126) while the mid-range scenario is 113 ha which includes the 25 ha of additional lands required by adding the mix of housing growth forecast. The high scenario is 220 ha, based on the Ministry of Finance projections that applies the share of Community Area lands for OPA 126 (roughly 40% of the total) to the County-wide need for approximately 320 ha of additional residential lands estimated previously for County MCR Base Case.

b) Heritage Impact Assessment

The Heritage Impact Assessment dated February 16th, 2025, was prepared by CHC Limited, concluded that the Subject Property possesses significant cultural heritage value for both its design/physical value and contextual value.

The Subject Lands contain a historical farmhouse which is not currently designated. The 1 ½ storey, rubble stone farmhouse features an unusual asymmetrical double-gabled front façade and gables on all four facades, each with a different window configuration.

The report concludes that the farmhouse meets the Regulation 569/22 criteria for designation under Part IV of the Ontario Heritage Act and is worthy of conservation. It notes that none of the other farmstead buildings on the Subject Lands are considered significant. The report recommends that the farmhouse be incorporated into the planned subdivision on a generously sized lot, and should be accessed via internal streets, rather than directly from the highway. Additionally, it encourages the retention of the mature landscapes associated with the farmhouse, as it contributes to maintaining the farmhouse's public presence along St. David Street North/Highway 6.

c) Environmental Impact Study

An Environmental Impact Study (EIS) dated March 2025 was prepared by Dougan and Associates for the Proposed Development.

The EIS summarizes the background information of the natural heritage features on the site, as well as the results of field surveys completed between Fall 2023 and Summer 2024. The study reviewed several key aspects, including an analysis confirming plant and wildlife habitats, as well as a recommendation to establish proper buffers around natural heritage features. Other significant findings include the identification of Species at Risk (SAR) and migratory birds.

Several avoidance, mitigation and enhancement strategies have been identified in the report to address the potential impacts of the Proposed Development. The following have been provided:

- Remove trees and vegetation outside of critical wildlife breeding/roosting periods.
- Tree preservation strategies including installation of tree protection zones/fencing and mitigation through best management practices.
- Ensure water balance is maintained pre- to post-development.
- Prepare and install erosion and sediment control measures to prevent sedimentation of natural features.
- Tree replacement on-site at a 1:1 ratio using native species appropriate for the planting site.
- Restoration and biodiversity enhancements within the ecological buffer and parkland blocks.
- Install bat rocketbox and artificial nesting structure for Barn Swallow.

The report also recommends including Tree protection and buffer zone monitoring upon installation and throughout construction.

d) Functional Servicing and Stormwater Management Design Report

The Functional Servicing and Stormwater Management Design Report dated March 12, 2025, was prepared by GEI Consultants Canada Ltd. in support of the Proposed Development.

Water supply for the Proposed Development will be serviced by extending a watermain along St. David Street N. in the westerly direction to the site entrance followed by which a local watermain

will be extended throughout the site via the internal road network. The proposed watermain sizing will be completed as part of the detail design of the site once Draft Plan approval has been received.

Sanitary servicing for the Proposed Development will be extended from the 300mm diameter sanitary sewer on the east side of St. David Street North, which terminates just south of Sideroad 18. Since this existing 300mm diameter sanitary sewer extends across a portion of the frontage of the Subject Lands, the extension of a sanitary sewer would provide a gravity sanitary sewer outlet for the development.

The storm sewer system on the internal roads will be sized to convey the 5-year design storm to the stormwater management facility per the Township of Centre Wellington Development Manual. Major storm events will be conveyed overland through the municipal rights-of-way to the stormwater management facility. Each lot will have a proposed 100 mm diameter storm service lateral connected to the proposed storm sewer system in the municipal right-of-way which will ultimately travel to the stormwater management facility on the adjacent property to the south.

Primary sediment control will be achieved with the installation of heavy-duty sediment fencing around the property boundary. The silt fence will eliminate the opportunity for water borne sediments to be transported from the site. Temporary rock check dams will be installed in rear and side yard swales after the initial grading has been completed to slow the flow rates and promote the settlement of waterborne sediments before they reach the silt fences and the stormwater management facility.

e) Agricultural Impact and Minimum Distance Separation Assessment

The Agricultural Impact and Minimum Distance Separation Assessment dated March 4th, 2025, was prepared by Stantec Consulting Ltd. in support of the Proposed Development.

The report found that two properties (6611 Highway 6 and 6585 Highway 6) have the potential to impact the Subject Property at 100% barn capacities. However, verbal confirmation was received from those property owners to confirm the usage and capacity of the barns. The barn at 6611 Highway 6 houses 11 hobby horses and has solid outdoor manure storage with no cover. The assessment found the encroachment to be negligible, which would comply with the Minimum Distance Formulae and are suitable lands to be included within the settlement boundary.

While the barn at 6585 Highway 6 is used for general storage purposes only, specifically hay storage, and is not used for livestock operations or manure storage which would nullify the need for an MDS1 setback.

Additionally, the Township noted in an October 28, 2024, Settlement Area Boundary Expansion Recommendation Report that no MDS1 encroachments were identified on the Subject Property, which has been further supported by this study. Further, expanding into Prime Agricultural Areas cannot be avoided, as all land outside the Fergus Urban Centre is a Prime Agricultural Area. To mitigate loss of farmland, development into these areas should be phased, and prime agricultural lands should be kept in agricultural production until the land is needed for development.

Given the need for a Settlement Area Boundary Expansion to accommodate future population and employment growth, the report concludes that the Subject Property would be a good

candidate for inclusion as the Subject Property represents lower priority prime agricultural lands given it is adjacent to the recently expanded Settlement Area Boundary and its potential for continued phased development.

f) Transportation Impact Assessment

A Traffic Impact Assessment (TIA) was prepared by Paradigm Transportation Solutions Limited, dated March 2025, in support of the Draft Plan of Subdivision for the Subject Lands,

The TIA analyzed existing traffic conditions, including a review of the Proposed Development, as well as traffic forecasts for an opening-year horizon (2030), a five-year horizon (2035) and a ten-year horizon (2040). It also included recommendations to improve future traffic conditions to deem the Proposed Development as appropriate.

Based on the investigation carried out, the report concludes that the study area intersections are currently operating at acceptable levels of service and within capacity. The overall development at full build-out is forecasted to generate 249 new trips in the AM peak hour and 310 new trips in the PM peak hour.

Further, the report highlights existing capacity deficiencies under background conditions, which would be further exacerbated with the addition of site-generated traffic. This additional traffic contributes to capacity issues at the intersections of Highway 6 & Sideroad 18/Street A; Highway 6/St. David Street & Sideroad 19; St. David Street & Gordon Street. However, the report indicates that traffic control signals are not warranted for unsignalized study area intersections. The report recommends a southbound left-turn lane on Highway 6 at Street F is warranted, with a minimum storage length of 40 metres.

The report concludes with a further recommendation that the Township of Centre Wellington and the Ministry of Transportation come to an agreement on either extending the connecting link, widening Highway 6/St. David Street in the study area, or providing a Highway 6 by-pass of Fergus to reduce the through volumes in the community.

g) Hydrogeological Investigation Report

A Hydrogeological Investigation was prepared by Chung & Vander Doelen, dated February 28th, 2025, in support of the Proposed Development.

The Hydrogeological Investigation report characterizes the hydrological setting, and assesses the feasibility and potential impacts of servicing matters. Based on the results of the investigation, the following conclusions and recommendations are provided.

The report concludes that the Subject Property is predominantly underlain by fine sand deposits of the late Wisconsin stage of the Pleistocene period, which reduces in thickness from north to south across the property. Shallow groundwater generally mimics the topography of the Site and flows towards the southwestern corner of the property and towards the southeastern wetland.

Due to the predominance of the underlying fine sand deposits with a high infiltration rate and the relatively deeper-lying groundwater table in the north and central sections of the site, the target recharge quantity for matching in post-development of 57,580 m³/yr.

The property falls within the Fergus Wellhead Protection Area (WHPA) and is currently classified as WHPA-C and WHPA-B with an overall medium vulnerability rating between 6 and 8. The property is located between three (3) of the six (6) Fergus municipal supply wells. No chemical threats or concerns were identified within the property bounds.

It is recommended that once finished floor elevations and a site grading plan are available, that CVD be retained to review the final design and provide updates to the recommendations and conclusions provided in this report.

h) Geotechnical Investigation Report

A preliminary Geotechnical Investigation, prepared by Chung & Vander Doelen, and dated February 28, 2025, was conducted in support of the Proposed Development for the Subject Lands. The purpose of the investigation is to determine the subsurface conditions to assist in the design and construction of the proposed site development.

A total of ten (10) boreholes were drilled at locations throughout the Subject Lands. Monitoring wells and above-grade monument casting were installed at each borehole location. The locations of these boreholes/monitoring wells can be found in the Borehole Location Plan, Drawing 1 in the Geotechnical Investigation Report.

Generally, the boreholes contained native soil conditions capable of supporting the Proposed Development. However, top soil conditions were encountered at eight (8) boreholes with fill found further beneath two (2) of the boreholes. Three (3) other boreholes found very loose to loose soils beneath the surface. The report recommends that these areas be removed and replaced with engineered fill where necessary.

The report concludes that a permanent groundwater system (GWMS) be implemented for the development of the lands to control future groundwater levels. Alternatively, the site can be raised to establish floor basement levels at least 0.6 metres above high groundwater levels. Additional geotechnical engineering guidelines are provided to further support the proposed site development.

i) Noise Study

A Noise Feasibility Study, dated March 5th, 2024, was prepared by HGC Engineering, to examine the noise impacts of road traffic on Highway 6 in relation to the Proposed Development. The assessment was conducted in accordance with the Ministry of Environment, Conservation and Parks (MECP NPC-300) guidelines and the Township's noise control requirements.

The report concludes that future road traffic sound levels are predicted to exceed MECP guidelines at the dwellings closest to the roadways. The report recommends the installation of acoustic barriers for dwellings with flanking exposure to Highway 6, air conditioning units, and upgraded building and glazing construction. For dwellings located further from Highway 6, the report recommends forced air ventilation systems with ducts sized for future installation of air conditioning units. Additionally, noise warning clauses are required for dwellings with sound level excesses and to notify future occupants of the road traffic noise.

j) Stage 1 & 2 Archaeological Assessment

A Stage 1 & 2 Archaeological Assessment dated February 25th, 2025, was prepared by AMICK Consultants Ltd. in support of the Proposed Development.

The entirety of the study area was subject to property inspection and photographic documentation concurrently with the Stage 2 Property Assessment which consisted of high intensity test pit methodology at a five-metre interval between individual test pits and high intensity pedestrian survey at an interval of 5 metres between individual transects on August 2nd, September 14th, and October 11th & 18th 2024.

As a result of the assessment, one (1) historic site 24-656H1 (AkHc-30) was identified. The 24-656H1 (AkHc-30) Site assemblage dates primarily between the second quarter and last quarter of the nineteenth century, with the most likely date range from 1839-1890. The site contains at least 20 artifacts that date before 1900. Consequently, the site retains CHVI and a Stage 3 Site-Specific Assessment is recommended.

Based on the characteristics of these sites and the analysis of artifacts, the following recommendations are made:

1. The Cultural Heritage Value or Interest (CHVI) of the 24-656H1 (AkHc-30) Site has not been completely documented. There is potential for further CHVI for this location. The 24-656H1 (AkHc-30) Site requires Stage 3 Site-specific Assessment to gather further data to determine if Stage 4 Mitigation of Development Impact will be required.
2. A Stage 3 Site-specific assessment of the 24-656H1 (AkHc-30) Site must be completed for this site in accordance with the Standards and Guidelines for Consultant Archaeologists (MTC 2011). The Stage 3 Site-specific assessment will consist of the excavation of 1 by 1 metre square test units on a 5 by 5 metre square grid; the grid squares will be referred to by the intersection coordinates of their southwest corner. Each test unit will be excavated stratigraphically by hand into the first 5 centimetres of subsoil. Each unit will be examined for stratigraphy, cultural features, or evidence of fill, and all soil was screened through wire mesh of 6-millimetre width. All artifacts will be retained and recorded by the corresponding grid unit designation and will be held at the corporate office of AMICK Consultants Limited until such time that they can be transferred to an agency or institution approved by the Ontario MCM (MCM) on behalf of the government and citizens of Ontario.
3. The Stage 3 Site-specific Assessment of the 24-656H1 (AkHc-30) Site must include further archival research to establish the details of the occupation and land use history of the rural township lot of which the study area was a part.

Note the report has been submitted to and accepted by the Ministry of Citizenship and Multiculturalism (MCM) for approval and clearance. The recommended Stage 3 Assessment is scheduled to be conducted during Spring 2025 as weather permits.

10. CONCLUSION

This Planning Justification Report provides an assessment of the Proposed Development and development applications for the property known municipally as 6581 Highway 6, which includes a discussion on the existing conditions of the site, its context, the land use planning policy framework applicable to it and land use planning rationale for the development proposed.

Based on our assessment of the application and supporting materials, it is our opinion that both the proposed County and Township Official Plan Amendments, Zoning By-Law Amendment and Draft Plan of Subdivision applications are justified and have regard to the Planning Act, are consistent with the PPS, and aligned with the overarching goals and objectives of the County of Wellington Official Plan, the Township of Centre Wellington Official Plan, and Township of Centre Wellington Zoning By-Law.

Moreover, it is our opinion that all statutory and policy tests for the expansion of the settlement area boundary as set out in the PPS 2024 and for the redesignation of the Subject Lands have been satisfied by the application, which serves the public interest and represents sound land use planning.

Based on the above and the conclusions of this Report, it is our recommendation that the County of Wellington and the Township of Centre Wellington:

- Deem the application package complete and process the applications in accordance with the municipal process;
- Schedule a Neighbourhood Information Meeting to obtain comments from neighbouring residents and interested parties; and
- Circulate the application to internal departments, technical review agencies, and the community in accordance with city procedures and the Planning Act.

Respectfully submitted,



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