



# INNOVATIVE PLANNING SOLUTIONS

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December 21, 2022

Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON.  
M7A 2J3

**Attn: Honorable Steve Clark, Minister  
Ministry of Municipal Affairs and Housing**

Dear Minister Clark:

**Re: City of Belleville New Official Plan  
ERO Number 019-4953  
Ministry Reference No. 12-OP-147282  
RIC (Midland Land) Inc.**

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IPS Consulting Inc. has been retained by RIC (Midland Land) Inc. to respond to ERO Number 019-4953 respecting further amendments to the new Belleville Official Plan as adopted Nov. 8 /21. Our client owns lands municipally addressed as 40 Wilson Avenue, Belleville (Figure 1). The following comments relate principally to the 5.25 ha. parcel of vacant land designated 'Industrial' in the current Belleville Official Plan. Our client's interest is that the lands be designated 'Residential' in the new Belleville Official Plan.

Figure 2 identifies land use designations as set out in the current City of Belleville (Belleville) Official Plan. Figure 3 identifies land use designations set out in the new Belleville Official Plan. Key modifications to the new Belleville Official Plan include the:

- Application of residential intensification policies to Residential and Community Facility designated properties. Both parcels are contemplated for residential redevelopment (Figure 1);
- The employment land conversion of the “Nortel” to a Residential land use designation (Figure 1).

The land use modifications introduced in the new Belleville Official Plan reflect a trend to infill residential intensification in this former industrial area.

**RIC (Midland Land) Inc. Employment Land Conversion Request (February 18, 2022)**

Please find attached correspondence from IPS Consulting Inc. dated February 18, 2022, to C. Willms, MMAH, responding to an earlier posting of ERO 019-4953. This correspondence provides a complete planning rationale supporting the employment land conversion request and is currently before the Minister as part of this application. For brevity, we will not restate the contents of the February 18, 2022 submission but offer the following additional commentary.

**PPS Policy 1.3.2.4**

PPS Policy 1.3.2.4 provides that:

*1.3.2.4 Planning authorities may permit the conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and there is a need for conversion.*

The City of Belleville (City) completed an employment land needs assessment as part of its 2018 Municipal Comprehensive Review (copy attached). The MCR determined that the City would have employment land requirement of approximately 80 ha. for the planning horizon of 2038 (pg. 10-11). It identified a net inventory of serviceable employment lands of 236 ha. (pg. 10-14). The MCR has confirmed that the subject lands are not required for employment purposes in the long term.

The subject lands are not part of a Provincially Significant Employment Zone or regionally significant as an employment area.

The question of ‘*need for conversion*’ has been reframed by *Bill 23, More Homes Built Faster Act, 2022*. There is solid policy alignment between the suite of initiatives set out in *Bill 23* and conversion of the subject lands for residential use to increase the supply and affordability of (infill) housing within the existing Belleville urban area. Beneficially, the residential conversion of the subject lands will support and spread the cost of provision of servicing infrastructure for multiple residentially-designated properties in close proximity (Figure 1).

### Employment Land Conversion Request Summary

On February 05, 2020 IPS Consulting Inc. provided a detailed planning rationale supporting the employment land conversion relative to evaluation criteria considered as part of the MCR process. While summarized here, the comments are fully articulated in our subsequent February 18, 2022 correspondence.

The planning rationale included recognition that the subject lands:

- Are located outside an established or proposed industrial or business park area;
- Are segregated from surrounding designated employment lands;
- Are surrounded by non-employment land uses on at least three sides;
- Conversion would not create an incompatible land use;
- Conversion would not negatively affect employment lands in the area;
- Conversion would be consistent and supportive of City policy planning objectives;
- Offer limited market choice for employment lands development due to size, configuration, physical conditions; and,
- Do not offer potential future expansion on existing or neighbouring employment lands.

In our view the proposed employment land conversion of the subject lands for Residential use is consistent with the PPS, current Provincial housing supply and affordability initiatives and long-term urban structure and land use objectives of the new Belleville Official Plan. We believe that the proposed employment land conversion for residential use represents good planning and request that the Minister provide for this modification.

We appreciate your consideration in this matter and are available to work with your staff to provide further clarification as necessary.

Respectfully submitted,

**Innovative Planning Solutions**

A handwritten signature in black ink, appearing to read 'K. Bechard', with a large, stylized flourish at the end.

Kevin Bechard, BES M.Sc. RPP

Senior Associate

Cc: R. Weldon, RIC (Midland Land) Inc.

S. Ashton, Director of Engineering and Development Services, City of Belleville