

December 21, 2022

File No.: 20159

The Honourable Minister Steve Clark  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario M5G 2E5

*Submitted Online*

Dear Minister Clark:

**Re: County of Wellington Official Plan Amendment No. 119  
Environmental Registry Posting Number 019-5635  
Ministry Reference Number 23-OP-215446**

GSP Group is the planning consultant to North Arthur Developments Inc. (the “client”), owners of land located within the settlement area of Arthur to the west of County Road 14/Eliza Street and Tucker Street, north of the former rail corridor, known legally as Lots 76, 77, 78, 100, 101, 102 & part of McCord Street McCord’s Second Survey, Part Park Lots 1 & 2 Crown Survey, South Side of Macaulay Street, Part Park Lot 1, Crown Survey, North Side of Domville Street (“the Subject Land”) in the Township of Wellington North (the “Township”), County of Wellington (“County”). The location of the Subject Land and the surrounding land use context is shown in Figure 1 (see Attachment 1).

The following points provide a brief chronology of our client’s submissions to the County and the Township:

- In September 2020, our client attended a Pre-submission Consultation meeting with Township and County representatives regarding proposed applications to re-designate the Subject Land for residential and commercial/mixed-use;
- In March 2021, our client submitted applications for Official Plan Amendment (County File No. PLOPA21001) and Zoning By-law Amendment (Township File No. ZBA 11/21) which were deemed complete on June 9, 2021, seeking to redesignate the Subject Land from Industrial to Residential and Highway Commercial and to re-zone a portion of the Subject Land, to facilitate the development of a proposed residential and mixed use subdivision. The submission included the following information:
  - Planning Justification Report, prepared by GSP Group (March 2021);
  - Development Concept, prepared by GSP Group (February 2021);
  - Land Needs Analysis, prepared by Altus Group (February 2021);
  - Functional Servicing Report, prepared by Urbtech Engineering Inc (March 2021);
  - Transportation Impact Study, prepared by Crozier Consulting Engineers (March 2021);
  - Land Use Compatibility (Noise), prepared by HGC Engineering Ltd (March 2021);
  - Land Use Compatibility (Air Quality), prepared by BCX Environmental Consulting (March 2021);

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The proposed Development Concept is shown in Figure 2 (see Attachment 2) and the requested Official Plan Amendment is shown in Figure 6 (see Attachment 3).

- In May 2021, our client submitted an Employment Area Conversion request and supporting information to the County as part of the Municipal Comprehensive Review (MCR) process;
- In July 2021, our client provided information about the development proposal to area landowners and held a virtual public open house / meeting, and also presented information about the project to Township Council;
- In December 2021, on behalf of our client, we submitted the enclosed letter dated December 10, 2021, to the County of Wellington regarding Official Plan Amendment No. 119 (“OPA 119”), providing our comments (see Attachment 4). To summarize our comments:
  - Our client is supportive of Arthur being recognized as a Primary Urban Centre and continuing to include the area of the Subject Land within the settlement area boundary of Arthur, within which growth is both encouraged and expected in order to accommodate a significant portion of the growth in the County on the basis of urban development on full municipal services;
  - Schedule A6 (Schedule A-7 of OPA 119) designates the Subject Land as part of an Employment Area within the Arthur Primary Urban Centre, which we understand is based on the current Industrial designation of the area in the Official Plan and the limited scope of OPA 119 which is not intended to address employment area conversions and related requests that the County has indicated will be addressed through a subsequent OPA to be prepared by the County to implement additional phases of the MCR; and,
  - It was our understanding that our client’s applications are not impacted by OPA 119.
- In May 2022, we responded to the County’s peer review comments via further submissions including:
  - Planning letter providing further justification and outlining the proposed vision for North Arthur, prepared by GSP Group (May 3, 2022);
  - Memo regarding land needs providing comments on the County’s Phase 2 Land Needs Assessment and peer review comments, prepared by Altus Group (May 3, 2022); and,
  - Addendum to the Land Use Compatibility Study – Air Quality, prepared by BCX Environmental Consulting (May 2, 2022).

Since adopting OPA 119, the County has prepared and released a Land Needs Assessment (LNA) – the Phase 2 M.C.R. Report: Urban Land Needs Assessment – Final Report dated August 29, 2022

prepared by Watson & Associates – and draft OPA 120 which proposes 2051 population and employment growth allocations for each local municipality and each urban centre (including Arthur). The LNA has recommended that the County retain the Subject Land as Employment Area lands, and it is our understanding that our client's request to re-designate the Subject Land for a residential and mixed-use neighbourhood development is not intended to be supported by the proposed growth allocations to Arthur proposed by the County in OPA 120. For Wellington North, the LNA has identified 80 hectares of community land required and 42 hectares of excess employment land.

At this time, we are writing on behalf of our client to ensure the Ministry, as the approval authority for OPAs 119 and 120 and any future OPAs proposed by the County to implement its MCR, is aware of our client's request which has not been supported by the County through its LNA, and that the processing of our clients' applications for the Subject Land has been stalled. In this regard, we highlight the following vision that our client proposed for North Arthur, which is supported by the Township's Community Growth Plan (see Attachment 5) and will assist the Province in meeting its housing objectives, for the Ministry's review and consideration:

- Our client is proposing a development that incorporates a mix of housing types and densities, including rental apartments, townhomes and single detached dwellings, that will help to support a range of market ownership and rental housing options for the community of Arthur and will help to provide much-needed housing supply to accommodate some of the forecast population growth as well as providing housing opportunities to accommodate growth in the local labour force in support of the needs of local employers.
- This is an opportune location for new housing within a short walking distance of the existing school and community park and recreation centre located to the south / south-east of the Subject Land. A new parkette, walkway and multi-use trails are also proposed within and connecting the development to complementary uses and facilities in the area.
- The project will also support the achievement of the greenfield density and intensification targets. Notably, the proposal will not only contribute to addressing some of the strong demand and affordability issues in the local and regional housing markets via the proposed development of the Subject Land, it will also unlock a future opportunity for the large residential/future development property (504 Eliza Street, approximately 2.1 hectares) adjoining the Subject Land, which is within the delineated built-up area, to intensify and contribute to meeting the intensification target. The proposed development recognizes the established residential use of the adjoining property and will support its intensification and redevelopment by providing road access and servicing.
- The development proposal supports land use compatibility with potential future employment uses by "regularizing" the interface of land designated for sensitive land uses and land reserved for future employment uses, establishing a logical and straight land use boundary between future residential and employment uses as an improvement over the current irregular boundaries. Visual and acoustic mitigation measures such as fencing and/or a berm

along the west boundary of the Subject Land would provide a land use separator and buffer to minimize the potential for land use conflicts and protect the land to the west for a range of potential employment uses. Our client has also reached an agreement with the owner of the industrial land to the west to ensure that any proposed industrial uses along this boundary are restricted to those that are compatible such as light industry and service uses, with appropriate mitigation of impacts where needed. A range of industrial or commercial uses could be considered for the employment area to the west from within the current M1 Zone permitted uses, including: bakeries, business or professional offices, industrial mall, mini-storage facilities, rental outlets, research and laboratory facilities, service or repair shops, print shops and wholesale outlets, as well as accessory uses such as factory outlets, showrooms and places of recreation.

- The proposed development will bring full municipal services, road access and stormwater management to North Arthur. This will support the provision of additional housing on full municipal services and the efficient use of land and infrastructure, provide revenue to help fund the municipality's infrastructure investments, and will help to front-end the necessary infrastructure to create shovel-ready industrial/commercial sites and reduce/eliminate some of the barriers to future job creation through appropriate and compatible future employment uses in North Arthur.
- Through our experience working with the current and previous landowners, as well as working with the County, Township, stakeholders, business owners and local residents during the Community Growth Plan process, it has become clear that there are barriers to developing North Arthur purely for employment uses, and further that the current Official Plan land use designations are not conducive to realizing identified community planning and growth objectives for Arthur. As such, the Community Growth Plan recommends revisiting the land use designations and consideration of a conversion of some of the land to other land uses including residential and commercial opportunities, which will help to support the viability of developing the area for urban land uses including appropriate employment uses. Our client's proposed development will support the viability of future job-creating uses in the area.

We believe that effective and comprehensive community planning requires thinking beyond the numbers generated through the County's long-term forecasting and land needs analysis to implement a community-driven local plan for Arthur that supports appropriate land uses in the right locations, optimizes the provision of infrastructure and public services such as schools, parks and recreation facilities, contributes to complete community development, avoids potential land use conflicts, and supports balanced growth. We are concerned that a narrow view of maintaining the current industrial land use on the Subject Land will work against achieving these objectives and will not serve to actually achieve the forecast employment growth in Arthur.

We bring this information to your attention to ensure the Ministry's awareness of the broader implications of the County's MCR in respect of our client's proposal and the future development of the Subject Lands and the impacts to the community of Arthur. We request that the Ministry consider these comments in this context at this time, noting that our client intends to make further submissions which may include requested modifications to future OPAs submitted by the County for Ministry review as part of its MCR process, to implement the necessary land use designations and policies to facilitate the vision for North Arthur outlined herein.

Thank you for the opportunity to submit comments. We would welcome the opportunity to review these matters with you at your convenience. If you require any further information, please contact me.

Sincerely,  
**GSP Group Inc.**

A handwritten signature in black ink, appearing to read 'S. Wever', written over a faint, illegible background.

Steve Wever, MCIP, RPP  
President

cc. Hannah Evans, Assistant Deputy Minister

# ATTACHMENT 1 - LOCATION AND AREA CONTEXT







Site Location and Context

Source: Google Aerial Imagery (2019)

Figure

1

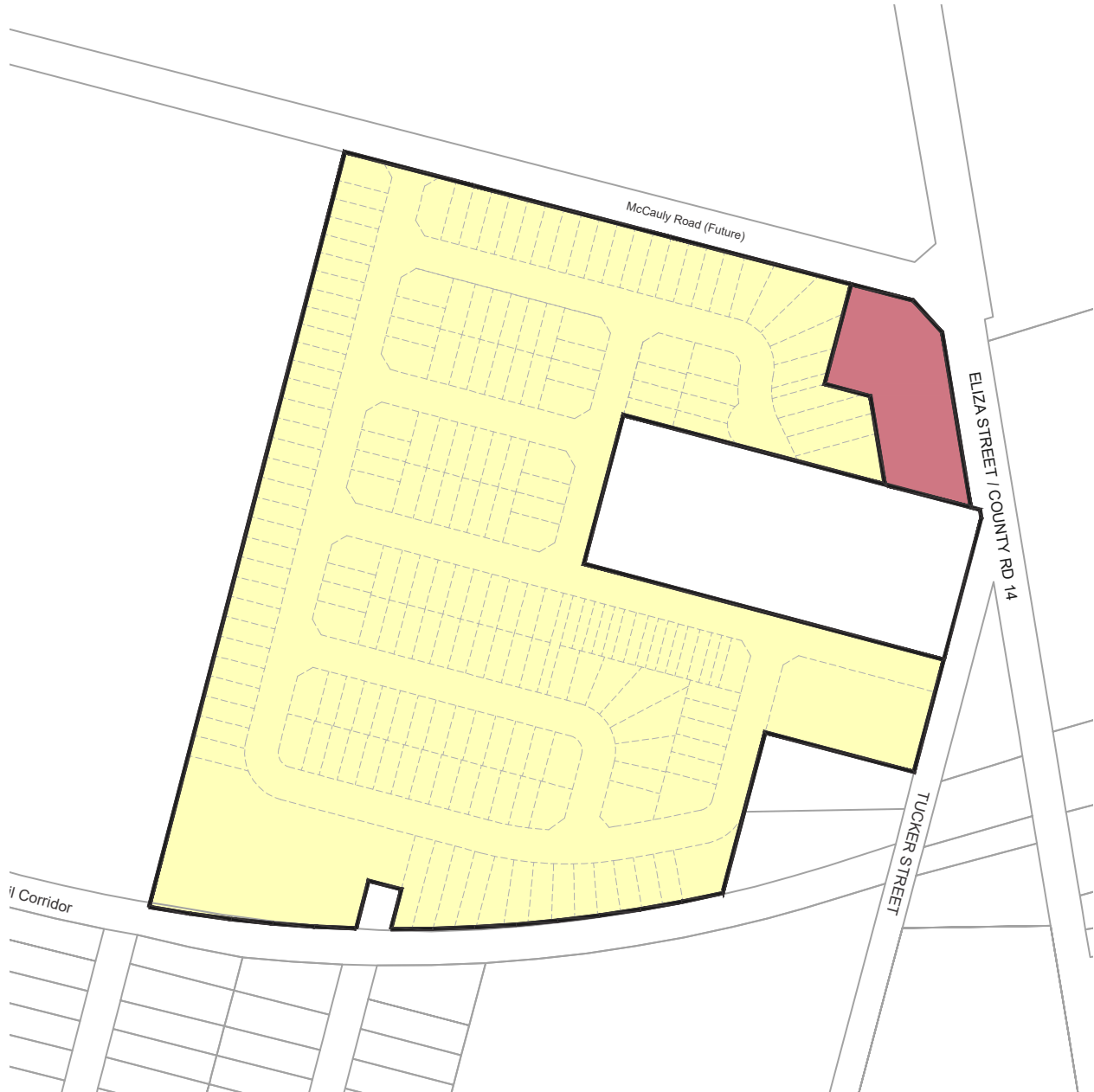
# ATTACHMENT 2 - DEVELOPMENT CONCEPT



		UNITS
	36' SINGLE DETACHED LOTS	92
	40' SINGLE DETACHED LOTS	91
	20' STREET TOWNHOUSE LOTS	16
	MEDIUM / HIGH DENSITY	TBD
<b>TOTAL</b>		<b>199</b>



Development Concept  
Source: GSP Group (February 2021)

ATTACHMENT 3 - REQUESTED OFFICIAL PLAN AMENDMENT



-  RESIDENTIAL DESIGNATION
-  HIGHWAY COMMERCIAL WITH SPECIAL POLICY (MIXED USE)



Proposed Official Plan Amendment

Source: GSP Group (2021)

Figure  
**6**



## ATTACHMENT 4 - OPA 119 SUBMISSION LETTER



SHAPING GREAT COMMUNITIES

December 10, 2021

File No.: 20159

County of Wellington  
Planning and Development Department  
74 Woolwich Street  
Guelph, ON  
N1H 3T9

Attn: Sarah Wilhelm, MCIP, RPP  
Manager of Policy Planning

**Re: Official Plan Amendment 119 – County Growth Structure  
North Arthur Developments**

GSP Group is the planning consultant to North Arthur Developments Inc. (the “client”). In March 2021, our client submitted applications for Official Plan Amendment (County File No. PLOPA21001) and Zoning By-law Amendment (Township File No. ZBA 11/21) which were deemed complete on June 9, 2021. These applications are currently in process for lands in the northern area of the Arthur Urban Centre in the Township of Wellington North (the “Subject Land”).

The submitted planning applications seek to redesignate the Subject Land from Industrial to Residential and Highway Commercial and to re-zone a portion of the Subject Land, to facilitate the development of a proposed residential and mixed use subdivision. In July 2021, our client provided information about the development proposal to area landowners and held a virtual public open house / meeting, and also presented information about the project to Township Council. Currently, our client awaits the County’s review comments on the comprehensive information included with the applications as well as confirmation of the scheduling of a public meeting of Township Council. Our client has also submitted an Employment Area Conversion request and supporting information to the County as part of the MCR process.

On behalf of our client, we have reviewed draft Official Plan Amendment 119 (“OPA 119”) prepared by the County of Wellington as part of the County’s phased Municipal Comprehensive Review (“MCR”) to address Provincial conformity requirements. OPA 119 proposes to revise the Official Plan to define and identify a County growth structure. This letter summarizes our comments on the draft OPA 119 in relation to our client’s proposed development of the Subject Land.

The proposed growth structure in OPA 119 will establish a hierarchy of settlement areas in the County, consisting of Primary Urban Centres, Secondary Urban Centres, and Hamlets. As noted above, our client is working through the planning applications process for the Subject Lands in Arthur, a community that would be re-categorized from an Urban Centre to a Primary Urban Centre in OPA 119. The Subject Land is within the current settlement area boundary of the Arthur Urban

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## ATTACHMENT 4 - OPA 119 SUBMISSION LETTER

Centre and it is our understanding that no changes are proposed to this boundary with the designation of Arthur as a Primary Urban Centre in OPA 119.

Our client is supportive of Arthur being recognized as a Primary Urban Centre and continuing to include the area of the Subject Land within the boundary of Arthur, within which growth is both encouraged and expected in order to accommodate a significant portion of the growth in the County on the basis of urban development on full municipal services.

Draft Schedule A6 (Schedule A-7 of OPA 119) proposes to designate the Subject Land as part of an Employment Area within the Arthur Primary Urban Centre. As the County's Land Needs Analysis and other aspects of the County's MCR have not been finalized, and the scope of OPA 119 does not include the implementation of 2051 growth forecasts and changes to address the related land needs which are subject to justification through the MCR process, it is our understanding that:

- The designation of the Subject Land as part of an Employment Area is based on the current Industrial designation of the area in the Official Plan;
- OPA 119 is not intended to address employment area conversions and related requests at this stage of the MCR;
- Recommended employment area conversions will be addressed through a subsequent OPA to be prepared by the County to implement additional phases of the MCR later in the process; and,
- OPA 119 does not impact our client's ongoing applications and submitted Employment Area Conversion request, that the applications will continue to be processed, and that comments and recommendations on these applications will be made by the County and Township in due course.

We would appreciate your response to confirm this understanding is consistent with the County's position on these matters and look forward to the opportunity to review and provide further comment on future draft OPA(s) as they are proposed and released for comment to implement additional phases of the MCR. If you have any questions regarding this submission, please contact me.

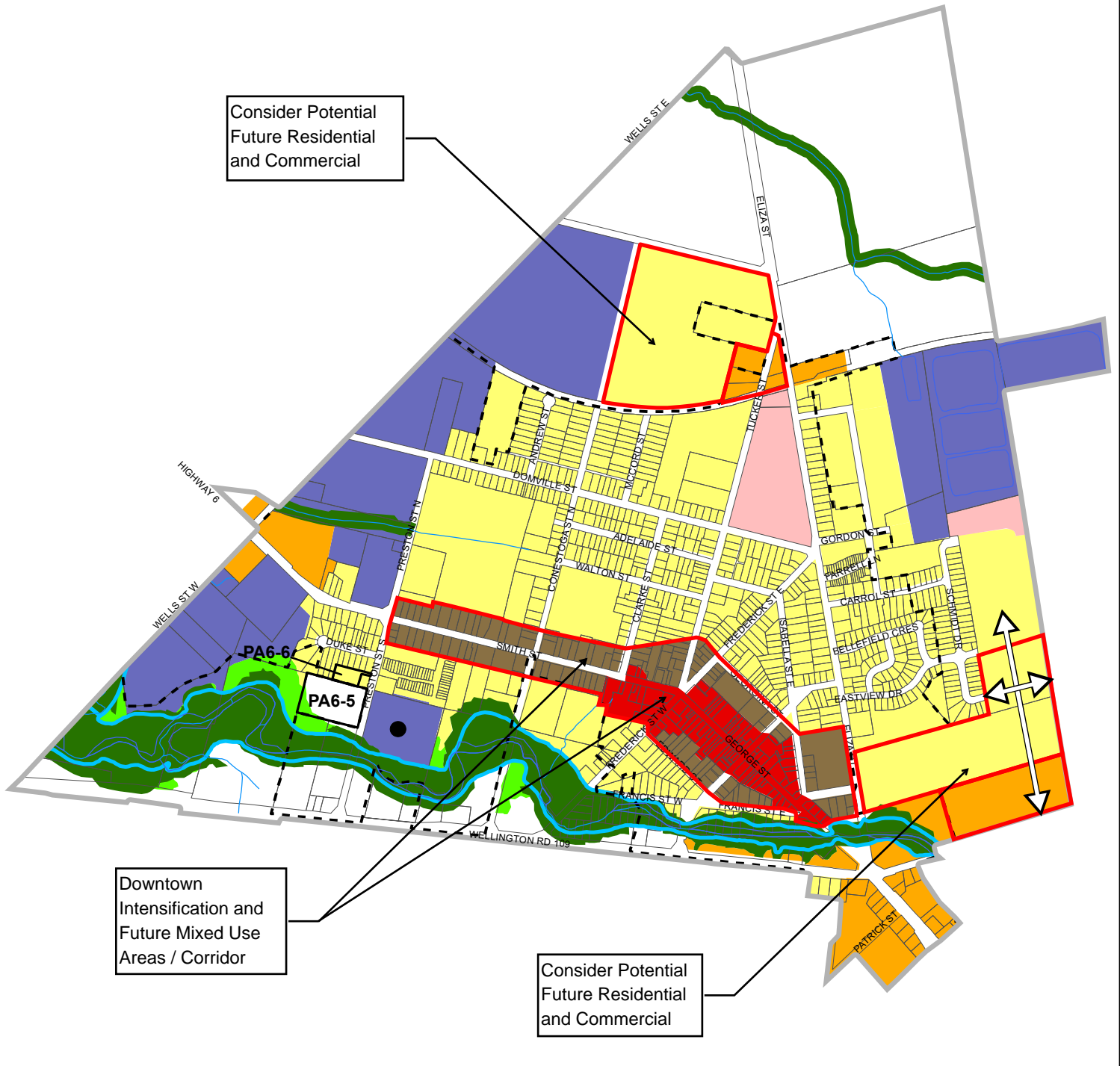
Sincerely,  
**GSP Group Inc.**



Steve Wever, MCIP, RPP  
Associate – Senior Planner

cc. Michael DeBiasio, North Arthur Developments Inc.

# ATTACHMENT 5 - COMMUNITY GROWTH PLAN RECOMMENDED LAND USE CHANGES



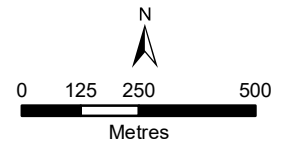
## Legend :

- |                           |                        |
|---------------------------|------------------------|
| Residential               | Future Development     |
| Commercial                | Lakes, Rivers, Streams |
| Industrial                | Regulatory Floodline   |
| Central Business District | Policy Area            |
| Core Greenlands           | Waste Water Facility   |
| Greenlands                | Built Boundary         |
| Recreation                |                        |

**ARTHUR**  
Township  
of  
Wellington North



**Schedule A6-2**



May 6, 1999  
Updated: March 3, 2016.  
Date Printed: March 3, 2016.