

June 29, 2023

#### **Via Digital Upload**

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

c/o

Mr. Damien Schaefer Municipal Services Office – Eastern Region 8 Estate Lane – Rockwood House Kingston, ON, K7M 9A8

RE: Request to Facilitate the Proposed Redesignation of the Subject Lands 3111 Parkedale Avenue, Brockville, Ontario ERO No. 019-6104

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of AJGL Group Inc., the owner of the subject lands municipally known as 3111 Parkedale Avenue, in the City of Brockville.

On May 30, 2023, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on the proposed amendments to the City of Brockville's Official Plan via Official Plan Amendment No. 20 (OPA 20), which contains new and revised policies to guide growth and development within the City to the year 2046. The subject lands described below are well suited for future growth, as will be discussed throughout the remainder of this Letter. This submission will conclude with specific changes recommended to OPA 20 to better align with the goals and objectives of the Province.

# **Site & Surrounding Context**

The subject lands have a total area of approximately 35.5 hectares (87.7 acres) and are currently occupied by the Brockville Highland Golf Club, which ceased operations in October of 2019. The lands are bounded by Parkedale Avenue to the north and have approximately 1,146.4 metres of frontage on the Highway 401 corridor to the south.

It should be noted that a large portion of the subject lands comprises parcels currently owned by the proponent (indicated by the red-shaded area in Figure 1), while a small triangular portion located at the northwest corner comprises a parcel not currently owned by the proponent (indicated by the yellow-shaded area in Figure 1). In taking a comprehensive approach to the planning matters associated with this submission, both portions collectively comprise the subject lands, as described herein.

A variety of uses surround the subject lands. To the north are existing single-detached dwellings and vacant land designated for Future Employment uses, Parks and Open Space, and Urban Reserve Area in Schedule 1 of OPA 20. To the east is a +/- 3.37-hectare parcel of vacant land (formerly part of the Brockville

Highland Golf Club) which is designated Mixed Use Commercial Area on Schedule 1 of OPA 20. Directly to the south is the Highway 401 corridor, beyond which are a variety of existing employment uses and vacant land designated for Future Employment uses. To the west, the subject lands are bounded by the City's municipal boundary (Figure 1).



Figure 1 – Subject Lands and Surrounding Context Map

#### **Existing Planning Policy Framework**

#### Province of Ontario

To address current housing supply concerns, the Province of Ontario has established the Housing Supply Action Plan and the More Homes Built Faster Act; which has been given Royal Assent. This Plan is part of a long-term strategy to help build more homes and make life more affordable for families across Ontario.

Additionally, the Provincial Policy Statement (PPS) provides strong policy directives on the promotion of economic development and competitiveness within employment areas. Specifically, Policy 1.3.1 of the PPS states that "Planning authorities shall promote economic development and competitiveness by:

b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses, and;

c) facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment ..."

Further, Policy 1.3.2.6 of the PPS requires planning authorities to protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations.

### City of Brockville Official Plan (2012)

The subject lands are currently designated 'Parks and Open Space Area' with a 'Future Employment' overlay on Schedule 1 – City Structure of the City of Brockville Official Plan. This overlay was added to Schedule 1 as a part of the City's 2019 Official Plan update and serves to protect identified lands from incompatible uses due to their strategic location and access to major transportation corridors; until such a time that they are redesignated and redeveloped in accordance with their planned use (Figure 2).



Figure 2 – City of Brockville Official Plan (2012) – Schedule 1 – City Structure

#### City of Brockville New Official Plan (2022)

Similarly, the subject lands are designated 'Parks and Open Space Area' with a 'Future Employment' overlay on Schedule 1 of OPA 20 (Figure 3).



Figure 3 – OPA 20 Proposed Changes to Schedule 1



Figure 4 – Growth Management Schedule to OPA 20

OPA 20 also introduces a Growth Management Schedule to the City's Official Plan, wherein an eastern portion of the subject lands is proposed to be designated 'Neighbourhood Area' (Figure 4). As outlined on the Constraints Schedule of OPA 20, this area represents the full extent of the lands located outside of the closed waste disposal site's 500 metre buffer area. To facilitate this, OPA 20 also proposes to remove this portion of the subject site from the 'Parks and Open Space - Private Recreational Areas' designation on Draft Schedule 3 – Natural Heritage System, Open Space & Constraints.

City of Brockville Comprehensive Zoning By-law No. 050-2014

The subject lands are currently zoned Rural (RU) and Rural (RU2) on Schedule A of the City of Brockville Comprehensive Zoning By-law No. 050-2014 (Figure 5).

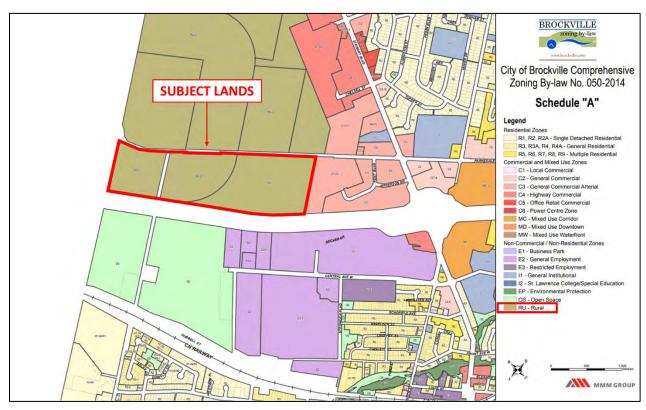


Figure 5 - City of Brockville Comprehensive Zoning By-law No. 050-2014 - Schedule "A"

#### **Background Materials**

Terrastory Environmental Consulting Inc. was retained to complete a Preliminary Natural Heritage Constraints Analysis of the subject lands, which is contained in Appendix A of this Letter. The Analysis identified unevaluated wetlands on site but determined that the spatial extent of such to be less than what is indicated by provincial mapping. Significant Woodlands were also documented on-site in accordance with the mapping contained in Draft Schedule 3 of OPA 20. Should development permission be granted, an Environmental Impact Study (EIS) will be completed in accordance with *Planning Act* requirements to comprehensively characterize the biophysical features and conditions of the subject lands. This EIS will confirm and refine existing wetland boundaries, confirm the presence or absence of habitats for species at risk, and provide technical recommendations and mitigation measures to minimize the potential for environmental impact.

#### **Planning Merit**

OPA 20 was presented to the City of Brockville's Planning and Operations Committee on July 5, 2022 via Staff Report No. 2022-131 and was adopted by Council on August 23, 2022 via By-law No. 066-2022. OPA 20 is currently before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act* and is within a 30-day commenting period via ERO No. 019-6104.

#### Proposed 'Neighbourhoods Area' Designation

In July 2021, the City retained NPG Planning Solutions to assist with the preparation of OPA 20 and several supporting documents, including a Residential Land Supply Analysis (2021 – 2046). In accordance with the requirements of the Provincial Policy Statement, this Analysis uses population and employment forecasting data generated by Metro Economics to quantify the amount of land required to support planned residential growth to a time horizon of 2046. Having identified the need for an additional 665.2 units by 2046, the Analysis determined that the City requires an additional residential land supply of approximately 38.24 hectares to accommodate forecasted growth. Accordingly, UrbanSolutions supports the eastern portion of the subject lands' proposed 'Neighbourhood Area' designation in OPA 20's Growth Management Schedule (Figure 4); as such represents a logical southward extension of the existing 'Neighbourhoods Area' designation to the north (opposite Parkedale Avenue) and supports the identified need for additional residential land. As such, Appendices B, D and F of this Letter include subsequent Schedule changes to OPA 20 that are required to fully realize this envisioned land use.

In keeping with the Provincial Housing Supply Action Plan, ERO No. 019-6104 presents an opportunity to further revised OPA 20 by redesignating the eastern portion of the subject lands (as identified in the Growth Management Schedule to OPA 20) to permit residential uses. Making this change now, through this ERO, supports the Province's goal of building 1.5 million homes over the next 10 years.

#### Proposed 'Employment Area' Designation

Further, while the need for additional residential land to support forecasted growth is recognized, the fact that the subject lands represent an ideal location for future employment uses is well documented in the City's Official Plan. As such, Appendix D of this Letter includes a recommended map change to Draft Schedule 6 of OPA 20 which adds the (above-noted) eastern portion of the subject site to a Site Specific Policy Area (4.3.4.1) that permits the full range of uses permitted within the Employment Area designation (as outlined in Section 4.7.2 of City's New Official Plan) in addition to those permitted within the Neighbourhood Area designation (as outlined in Section 4.3.2). It should be noted that any future development proposed within this portion of the subject lands will need to be evaluated through a future Zoning By-law Amendment application in accordance with the *Planning Act;* which will confirm ultimate land use patterns and distributions through standard planning and public engagement processes.

In December of 2021, NPG Planning Solutions prepared a subsequent Employment Land Supply Analysis (2021 – 2046) in support of OPA 20. Based on the results of a Location Quotient (LQ) Assessment, the Analysis forecasted an increase of 413 jobs within employment land areas between 2021 and 2046 which results in the need for an additional 16.5 hectares of employment land over the forecasted period (using an assumed density of 25 jobs per hectare). Given that the City of Brockville has identified an available employment land supply of 186.93 hectares, the Analysis concludes that no additional land is required to accommodate forecasted growth but discourages the conversion of existing employment lands (for non-employment uses) in order to protect long-term supply. It should be noted, however, that this 186.93 hectare employment land reserve includes the +/- 35.5 hectare subject lands despite the fact that such are not currently designated for *current* employment uses on Schedule 1 of OPA 20. In keeping with the Provincial Planning Statement's policies relating to economic development, ERO No. 019-6104 represents an opportunity to further revise OPA 20 by redesignating the western portion of the subject lands to permit employment uses within the horizon of the City's Official Plan (Appendix B).

Section 1.3.1(c) of the Provincial Planning Statement requires municipal planning authorities to promote economic development and competitiveness by "... identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment." While the subject site's existing 'Future Employment' designation is reflective of its strategic location along a major goods movement corridor (Highway 401), its current 'Parks and Open Space Area' designation on Schedule 1 of OPA 20 acts as a barrier to immediate investment. As Appendix 2 of the aforementioned Employment Land Supply Analysis already identifies the entirety of the subject lands as being a part of the City's 'Available Employment Land Supply', their redesignation to permit *current* employment uses is logical and reflective of both their market-ready position and strategic location compared to the balance of sites that comprise the City's available employment land supply.

Further, Section 3.3.1.2 of the City of Brockville Official Plan states that employment uses shall be directed to Employment Areas and be located adjacent to or in close proximity to Highway 401 and major arterial roads where an appropriate level of municipal services are provided. It should be noted that the proposed residential and employment uses can be accommodated from a servicing perspective via connection to existing infrastructure located to the east of the subject lands, and that any future upgrades will be the sole responsibility of the proponent.

As noted in the enclosed Preliminary Natural Heritage Constraints Analysis prepared by Terrastory Environmental Consulting, it should also be noted that any future development will be evaluated through a supporting EIS to ensure that such adheres to all applicable natural heritage policies and minimizes the potential for environmental impact. Similarly, should any development be proposed prior to the City receiving provincial approval to reduce or eliminate the existing 500 metre buffer surrounding the closed waste disposal site located north of the subject lands, then such located in affected areas will be accompanied by a study which satisfies both City and Provincial requirements related to land uses near landfills – in accordance with Section 3.7.2.25 of the City's Official Plan.

#### **Planning Merit Conclusion**

The need for additional residential land to accommodate planned growth to the year 2046 – in accordance with provincial requirements – has been confirmed by the findings of the Residential Land Supply Analysis

(2021 – 2046) prepared by NPG Planning Solutions. Further, the importance of planning for strategic employment areas is well-established in Section 1.3 of the Provincial Policy Statement and Section 3.2.5.5 of the City of Brockville Official Plan; as such promote economic development and competitiveness and support the achievement of complete communities. Accordingly, the proposed redesignation of the subject lands conforms to and implements both Provincial and local objectives and thus, represents good land use planning.

#### Recommended Changes to OPA 20 and the City of Brockville Official Plan

Based on the above, UrbanSolutions recommends the following five (5) map changes to OPA 20:

- 1. To amend Schedule 1 of OPA 20, being 'OPA 20 Proposed Changes to Schedule 1' by removing the subject lands' 'Future Employment' overlay and redesignating them from 'Parks and Open Space Area' to 'Neighbourhood Area' (eastern portion) and 'Employment Area' (western portion) as shown in Appendix B.
- 2. To amend Draft Schedule 3 of OPA 20, being 'Natural Heritage System, Open Space & Constraints' by removing the western portion of subject lands from the 'Private Recreational Areas' designation as shown in Appendix C.
- 3. To amend Draft Schedule 6 of OPA 20, being 'Draft Schedule 6 Site Specific Policy Areas' by adding to subject lands to Site Specific Policy Area 4.3.4.1 as shown in Appendix D.
- 4. To amend the Growth Management Schedule to OPA 20 by removing the western portion of the subject lands' 'Future Employment' overlay and redesignating such from 'Parks and Open Space Area' to 'Employment Area' as shown in Appendix E.
- 5. To amend the Constraints Schedule of OPA 20 by removing the subject lands' 'Future Employment' overlay and redesignating them from 'Parks and Open Space Area' to 'Neighbourhood Area' (eastern portion) and 'Employment Area' (western portion) as shown in Appendix F.

In support of recommended map change No. 3 outlined above, UrbanSolutions also recommends the following text change to OPA 20:

- 1. That the following be added to the City of Brockville Official Plan as Section 4.3.4 and 4.3.1:
- "4.3.4 SITE SPECIFIC POLICY AREA (SSPA)
- 4.3.4.1 SSPA Stewart Boulevard and Parkedale Avenue Lands

SSPA 4.3.4.1 is identified on Schedule 6 and relates to those lands located west of Stewart Boulevard and south of Parkedale Avenue. In addition to the uses permitted within the

Neighbourhood Area designation as outlined in Section 4.3.2, uses permitted within the Employment Area designation outlined in Section 4.7.2 shall also be permitted."

Thank you for the opportunity to provide these comments. Please feel free to contact the undersigned to discuss the matter further.

Kind Regards, UrbanSolutions

Matt Johnston, MCIP, RPP

Principal

cc:

AJGL Group Inc. (via email)

m. Leistae Matthew LeBlanc, M.PL, BA (Hons) Planner

	Appendix A – Terra Preliminary Nat	astory Environme tural Heritage Constraint		
3 Studebaker	Place, Unit 1, Hamilton, ON l	_8L 0C8   (905) 546-108	87   urbansolutions.info	10 of 21

June 28, 2023 Project No.: 23119



AJGL Group Inc. 425 Alness Street North York, ON M3J 2T8 jamie.erlick@gmail.com

SUBJECT: Preliminary Natural Heritage Constraints Analysis

3111 Parkedale Avenue (and adjoining properties)

Township of Elizabethtown-Kitley and City of Brockville

Terrastory Environmental Consulting Inc. (hereinafter "Terrastory") was commissioned to undertake a preliminary assessment of natural heritage constraints and considerations at the above-captioned location (hereinafter "Study Area"), which overlaps with the Township of Elizabethtown-Kitley (United Counties of Leeds and Grenville) and City of Brockville. Mapping which indicates the preliminary biophysical conditions of the Study Area is provided in **Figure 1**.

# **EXISTING BIOPHYSICAL CONDITIONS**

A Terrastory Ecologist (C. A. Wegenschimmel) visited the Study Area on 22 June 2023, which was formerly maintained as a golf course. A variety of natural features occur along the margins of the golf course, particularly in the western portion of the Study Area. Mature deciduous and mixed forest communities were documented, being dominated to varying extents by Sugar Maple (*Acer saccharum*), Red Oak (*Quercus rubra*), Bur Oak (*Quercus macrocarpa*), Eastern White Pine (*Pinus strobus*), and Trembling Aspen (*Populus tremuloides*). Green Ash (*Fraxinus pennsylvanica*) was found in higher proportions within the deciduous swamps. Where the woodlands have been disturbed (e.g., occur in close proximity to existing buildings which supported the golf course operation), non-native and/or early-successional tree species dominate, including Manitoba Maple (*Acer negundo*), Large-tooth Aspen (*Populus grandidentata*), and Black Locust (*Robinia pseudoacacia*). Narrow strips of treed hedgerows demarcate the former golf course holes in certain places.

Several wetland communities were documented within the Study Area, including treed swamps, thicket swamps, and marshes. A watercourse associated with the Butler's Creek subwatershed flows in a southwest direction through the Study Area.

# SIGNIFICANT NATURAL HERITAGE FEATURES

Based on available background information and the results of Terrastory's site reconnaissance visit, the following significant natural heritage features were documented within the Study Area (see **Figure 1**):

- Unevaluated wetlands, including treed swamp, thicket swamp, and marshes.
- Significant Woodlands (per Schedule B3 of the Township's Official Plan and Schedule 3 of the City's Official Plan).
- A watercourse and associated online ponded areas containing direct fish habitat.

# TERRASTORY

- Small rock barrens where granitic bedrock is exposed at the surface.
- Butternut (Endangered tree species) and potential habitats for other Endangered/Threatened species.
- Candidate Significant Wildlife Habitat.

The Provincial wetland mapping dataset was reviewed through this analysis as several unevaluated wetlands have been mapped within the Study Area. The Provincial wetland dataset was found to overrepresent the true spatial extent of wetland within the Study Area as determined by Terrastory. Wetlands mapped by the Province through the centre of the Study Area were found to be particularly inaccurate, as this area was represented by upland vegetation. Certain small additional wetlands (not mapped by the Province) were found in the northwest and southeast corners of the Study Area (see Figure 1). Confirmation of wetland boundaries would require a more detailed sitespecific assessment and verification by agency staff.

Forests/woodlands occurring in the western portion of the Study Area have been designated as "Significant Woodlands" per Schedule B3 of the Township's OP. These wooded areas represent the eastward limit of a broader, mature deciduous forest (with areas of plantation and treed swamp) extending westward towards Lyn Road. Additional woodlands in the northcentral and southcentral portions of the Study Area have been mapped as "Significant Woodlands" per Schedule 3 of the City's OP. Other woodlands within the Study Area would require a more detailed assessment to determine significance based on relevant criteria outlined in the applicable OP and/or Natural Heritage Reference Manual (NHRM).

The watercourse flowing southward/southwestward through the Study Area appears to have been artificially altered (i.e., widened) at some point historically to support its use as a golf "hazard". Thus, the watercourse exhibits a ponded condition. The watercourse is assumed to contain permanent water, and thus would provide direct habitat for fish, along with candidate overwintering and basking habitat for turtles.

Small, discrete rock barrens were documented primarily in the southwest corner of the Study Area. Rock barrens offer potential habitat for a variety of species of conservation interest and are further known to support specialized life history traits (e.g., thermoregulating, overwintering) for snake species.

In addition to the significant habitats noted above, other overlapping significant natural features may also occur within or adjacent to the Study Area, particularly Species at Risk (SAR) habitat and/or Significant Wildlife Habitat (SWH). For example, a Butternut (Juglans cinerea) was documented along the eastern property boundary. A formal Butternut Health Assessment is required to determine whether this individual is considered "retainable" or "archivable" pursuant to the Endangered Species Act. The Study Area may contain additional Butternut individuals, and also provides potentially suitable habitat for other Endangered/Threatened species including grassland birds (e.g., Bobolink, Eastern Meadowlark). Should existing buildings and/or structures on-site require demolition to support future development, an assessment of such built features for Endangered bat roosting habitat and/or Chimney Swift roosting/nesting habitat is recommended. Confirmation of the presence or absence of habitats for Species at Risk and/or SWH would occur through a formal and more detailed ecological assessment (e.g., EIS).

Prelim. Natural Heritage Analysis – 3111 Parkedale Avenue, Brockville

# NATURAL HERITAGE POLICY CONTEXT

There is an overlapping municipal, provincial, and federal policy framework respecting the protection of natural heritage features and areas across southern and eastern Ontario. These requirements include objectives, policies, and directives which are principally contained in federal and provincial statutes, regulations, policy statements, Official Plans, and guidance documents.

The Study Area is comprised of several parcels overlapping with two separate municipalities. The western portion of the Study Area occurs within the Township of Elizabethtown-Kitley in the United Counties of Leeds and Grenville. Western portions of the Study Area are designated "Rural Lands" per Schedule A (Community Structure and Land Use) of the County OP and are designated "Mineral Resource – Mineral" per Schedule A3 of the Township's OP. Schedule B3 of the Township's OP further indicates the presence of "Significant Woodlands" within the western portion of the Study Area. Portions of the lands within Elizabethtown-Kitley are zoned "Rural" per Schedule A3 of Zoning By-law No. 13-21.

The central and eastern portions of the Study Area are situated within the City of Brockville (singletier) and are designated "Parks and Open Space Area" per Schedule 1 (City Structure) of the City's OP, with a "Future Employment" overlay designation. "Significant Woodlands" are also mapped within the central portion of the Study Area per Schedule 3 (Natural Heritage System, Open Space & Constraints) of the City's OP. Portions of the lands within Brockville are zoned "Rural" per Schedule A of Zoning By-law No. 050-2014.

Development within portions of the Study Area – particularly within and/or adjacent to wetlands, watercourses, and floodplain/erosion hazards – is subject to regulatory approval by Cataraqui Conservation. The identification and delineation of flood/erosion hazards falls outside the scope of a natural heritage assessment and would require determination by separate technical professionals (e.g., Water Resources Engineer, Fluvial Geomorphologist, Geotechnical Engineer).

Conceptual buffers to the significant natural features identified herein have been applied per **Figure** 1 as follows:

- 30 m buffer from all unevaluated wetlands (per Policy 9.4.2.1.1 of Cataraqui Conservation Guidelines).
- 15 m buffer from the channel bank of watercourses and fish habitat.
- 10 m buffer from the dripline of Significant Woodlands.

It is emphasized that the buffers noted above and shown on **Figure 1** are conceptual and would require confirmation (and likely refinement) through completion of a future study (i.e., Environmental Impact Study). No buffer has been recommended from the identified rock barrens at this time as their significance is not currently known. Note also that the above-noted buffers relate exclusively to natural heritage and ecological features, whereas setbacks from any flood and/or erosion (i.e., meanderbelt, steep slope) hazards are determined by separate technical professionals.

#### CONCLUSIONS

The results of this preliminary natural heritage constraints analysis are summarized as follows:

• The Study Area was previously operated as a golf course.

Prelim. Natural Heritage Analysis – 3111 Parkedale Avenue, Brockville Project No.: 23119

- Several unevaluated wetlands were documented within the Study Area, consisting of various swamp and marsh communities; however, the spatial extent of wetland was found to be less than what is suggested by the Province.
- Confirmation of wetland boundaries would require a more detailed site-specific assessment and verification by agency staff.
- Significant Woodlands occur within the Study Area per mapping contained in the Township and City OPs; additional woodlands are present which should also be assessed for significance.
- Small rock barrens were found in a few locations, which may provide specialized habitat for certain wildlife and/or Species at Risk.
- In addition to Butternut, the Study Area contains potential habitat for other Species at Risk (e.g., grassland birds) and candidate Significant Wildlife Habitat, which would require further assessment through the completion of a more detailed ecological study (e.g., Environmental Impact Study).
- Should any buildings/structures on-site be demolished to support future development, an assessment of this building/structure as habitat for Endangered bats (i.e., roosting) and/or Chimney Swift (i.e., roosting/nesting) is recommended.
- The natural feature mapping per **Figure 1** would be subject to refinement during the completion of a more detailed ecological study (e.g., Environmental Impact Study).
- Conceptual buffers are indicated on **Figure 1** consistent with relevant municipal and Cataraqui Conservation policies; consideration for buffer refinements may occur through a future and comprehensive natural heritage study (e.g., Environmental Impact Study).
- Permissions from Cataraqui Conservation may be required should development occur within a regulated area.

Should any future development activities for the lands be proposed, an Environmental Impact Study (EIS) will be required to comprehensively characterize the biophysical features and conditions of the Study Area, particularly the wetlands, Significant Woodlands, fish habitat, potential Endangered/Threatened species habitat, and candidate Significant Wildlife Habitat. At a minimum, the EIS would include standard technical recommendations and mitigation measures to minimize the potential for environmental impact, such as (among others) appropriate setbacks, a timing restriction on vegetation removal (to protect nesting birds and roosting bats), and inclusion of appropriate stormwater management controls. Verification of the wetland boundaries during the appropriate season (i.e., approximately June 1 to September 30) with agency staff should be expected.

This letter provides a preliminary summary of the natural heritage conditions and expected constraints within the Study Area. Additional constraints (e.g., natural hazards) pertaining to other technical disciplines may also influence the spatial extent of area available for future development.

Should you have any questions or require further clarification regarding the contents of this letter, I would be pleased to discuss them further and can be reached by phone (905.745.5398) or email (tristan@terrastoryenviro.com).

Prelim. Natural Heritage Analysis – 3111 Parkedale Avenue, Brockville Project No.: 23119

# TERRASTORY environmental consulting inc.

Regards,

Terrastory Environmental Consulting Inc.

Tristan Knight, M.E.S., M.Sc., I.S.A., C.E.R.P.

Senior Ecologist | President

Prelim. Natural Heritage Analysis – 3111 Parkedale Avenue, Brockville Project No.: 23119

#### TERRASTORY

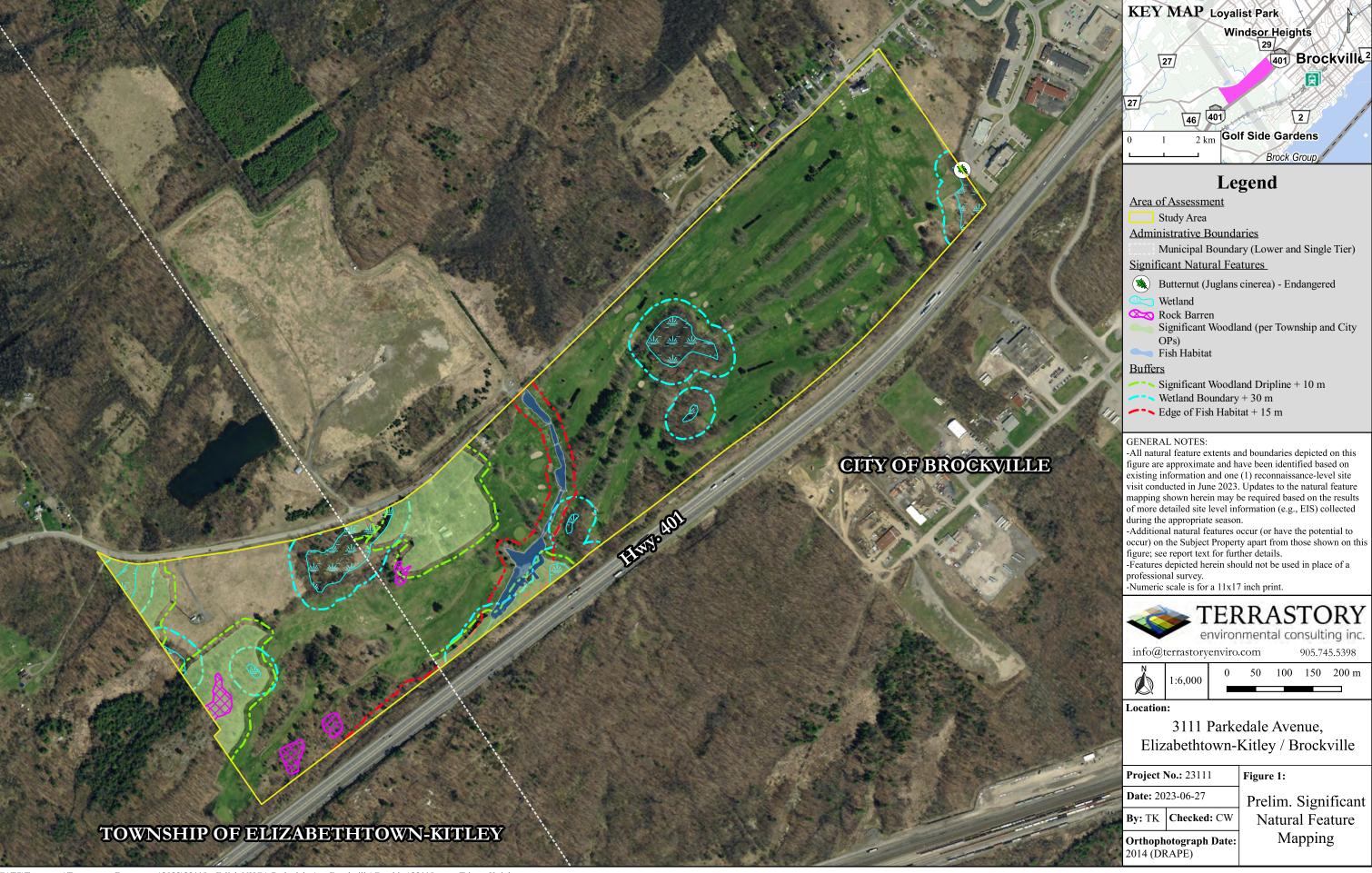
environmental consulting inc.

# **STATEMENT OF LIMITATIONS**

This report has been prepared by Terrastory Environmental Consulting Inc. (hereinafter "Terrastory") for the client. All information, conclusions, and recommendations contained in this report are subject to the scope and limitations set out in the agreement between Terrastory and the client and qualifications contained in this report. This report shall not be relied upon by any third parties without the prior written consent of Terrastory. Terrastory is not responsible for any injury, loss, or damages arising from improper use of this report by third parties. Excerpts of this report or alterations to this report taken without the authorization of Terrastory invalidates the report and any conclusions therein.

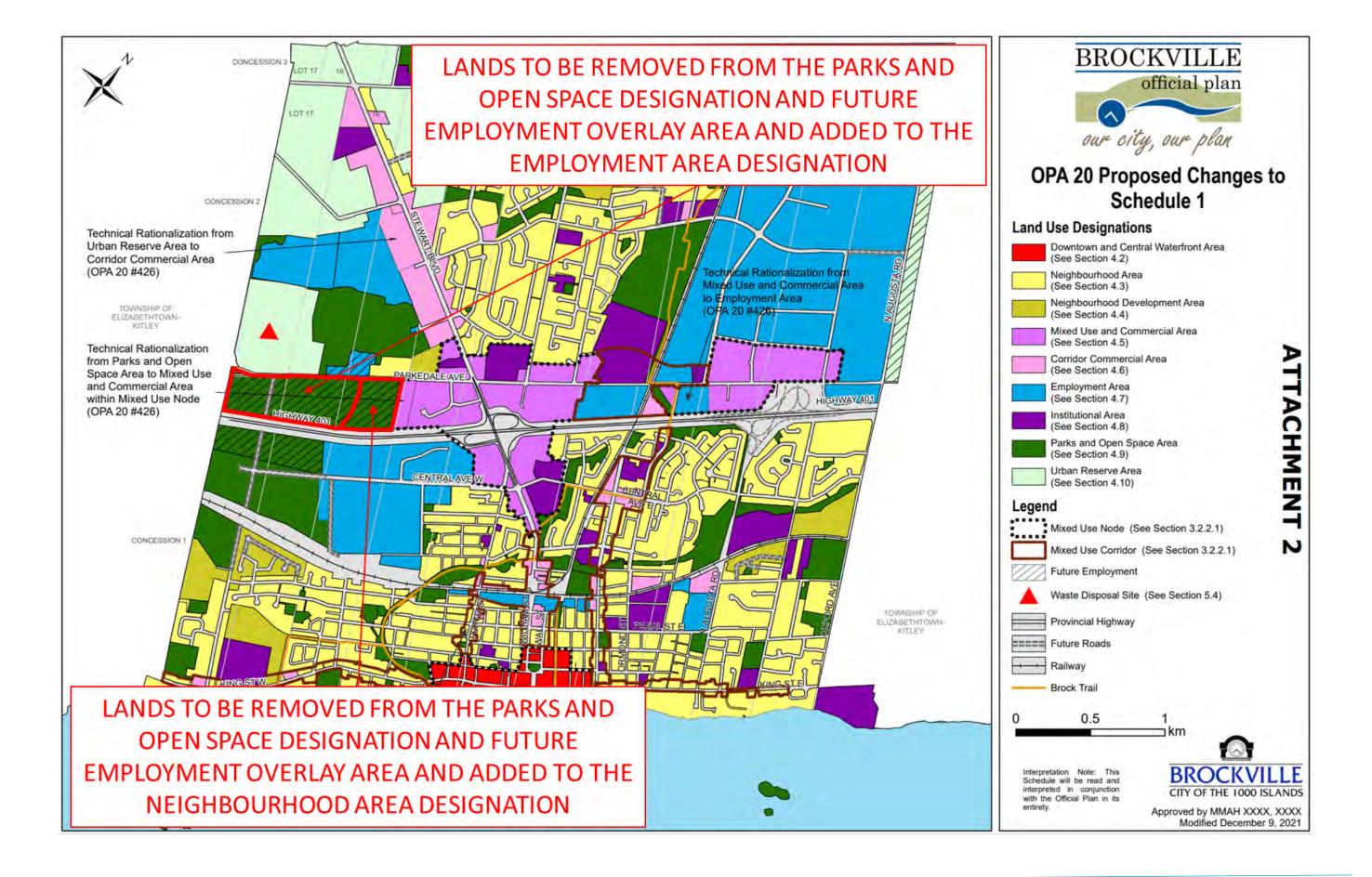
Prelim. Natural Heritage Analysis – 3111 Parkedale Avenue, Brockville Project No.: 23119

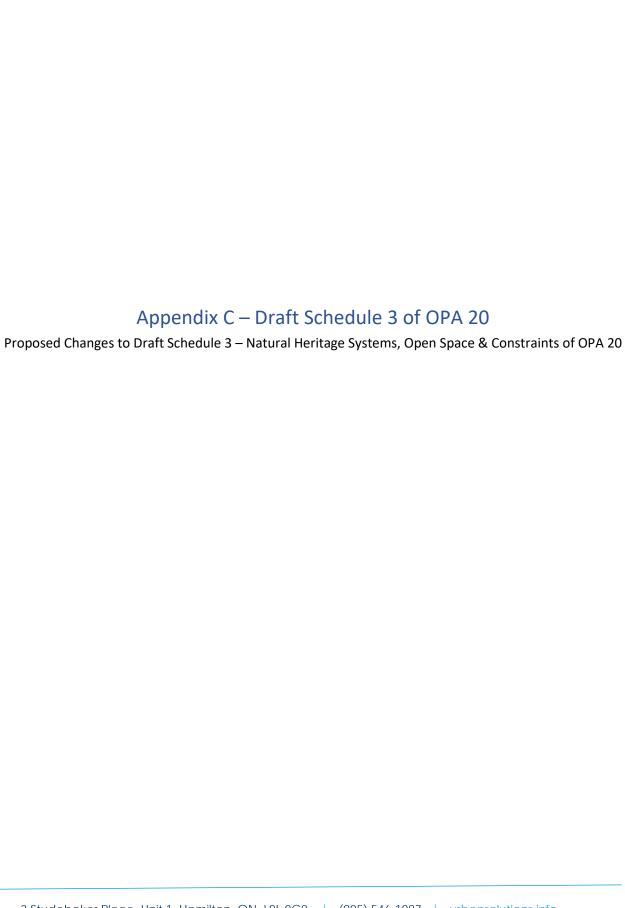
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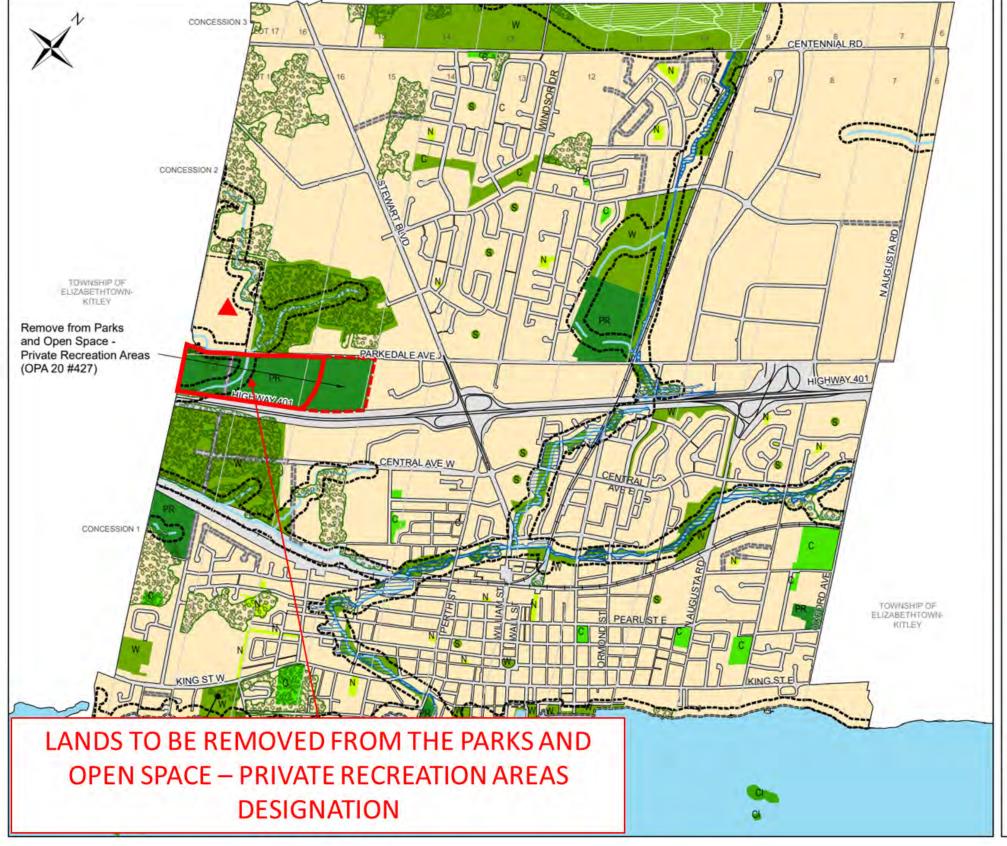


# Appendix B – Schedule 1 of OPA 20

Proposed Changes to Schedule 1 of OPA 20

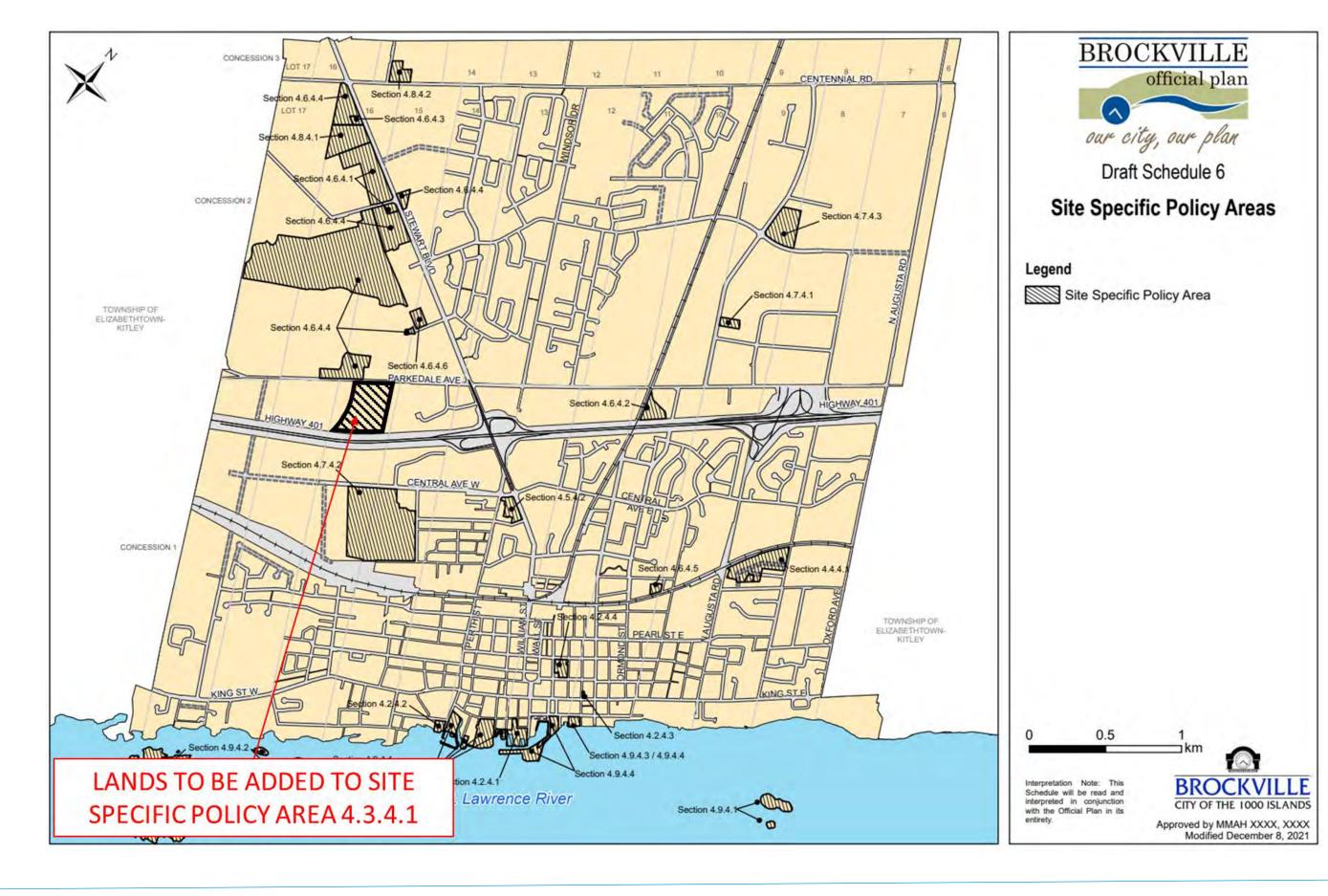




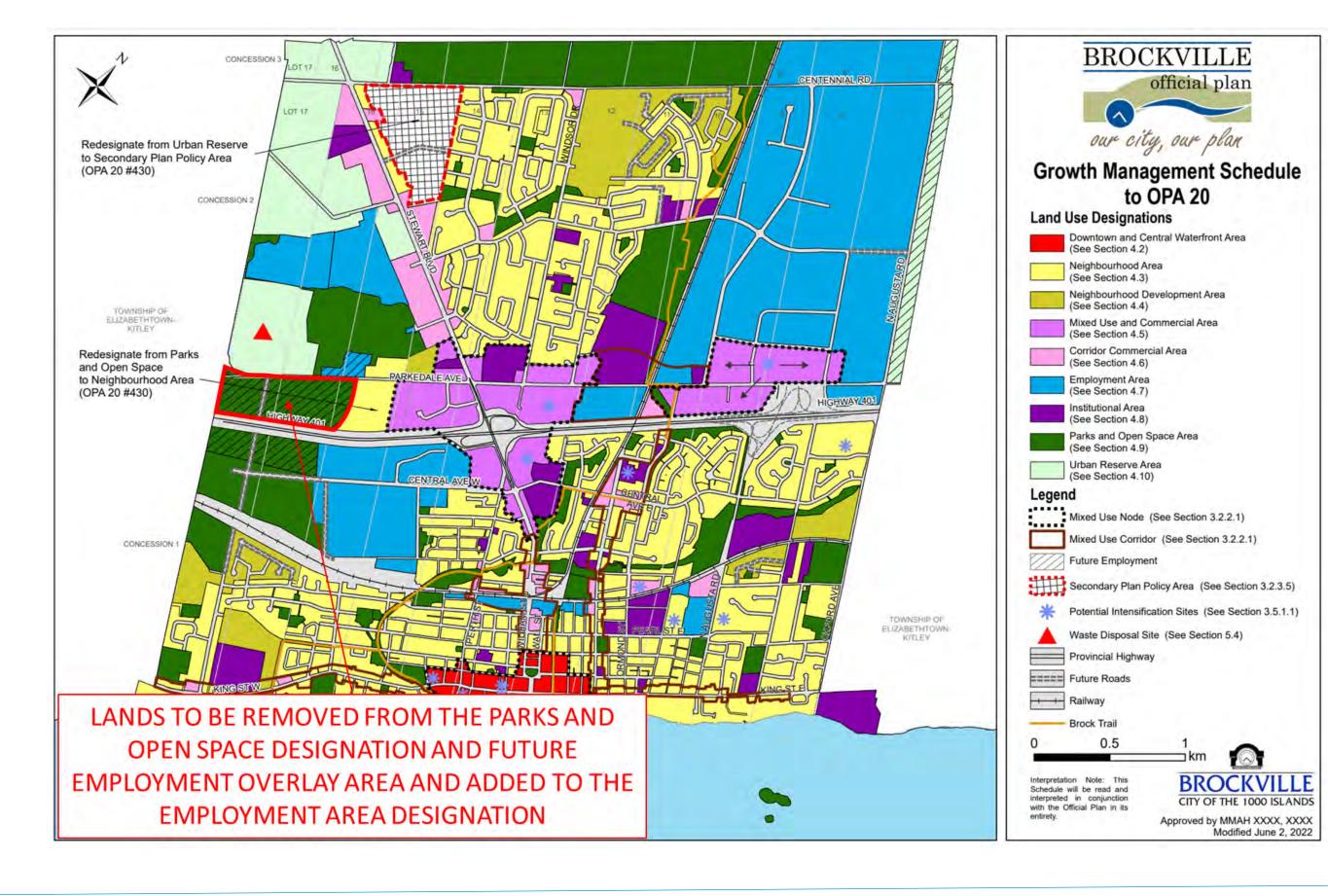




Appendix D – Draft Schedule 6 of OPA 20
Proposed Changes to Drat Schedule 6 – Site Specific Policy Areas of OPA 20



Appendix E – Growth Management Schedule to OPA 20 Proposed Changes to Growth Management Schedule to OPA 20



Appendix F — Constraints Schedule of OPA 20 Proposed Changes to Constraints Schedule of OPA 20
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