



June 29, 2023

Via Digital Upload

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

c/o

Ms. Sadie Brown
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
303 Lester Avenue, Trenton, Quinte West, Ontario
ERO No. 019-6937**

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 303 Lester Road, Trenton, in the City of Quinte West.

On May 30, 2023, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on the proposed comprehensive amendment to the City of Quinte West's Official Plan via Official Plan Amendment No. 21 (OPA 21), which contains policies to guide growth and development within the City over a twenty-five year planning horizon to the year 2046. The subject lands, as described below, are well-suited for future growth, as will be discussed throughout the remainder of this Letter. This submission will conclude with specific policy changes recommended to OPA 21 to better align with the goals and objectives of the Province.

Site & Surrounding Context

The subject lands have a total area of approximately 271.0 hectares (669.7 acres) and are predominantly comprised of vacant agricultural land. The lands are bounded by the Highway 401 corridor to the north and have approximately 1,515.0 metres of frontage along Lester Road (predominately) to the south.

A large portion of the subject lands comprises parcels currently owned by the proponent (indicated by the red-shaded area in Figure 1) while two (2) small lots located on the north side of Lester Road are 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 is the Highway 401 corridor, beyond which are vacant agricultural lands (northeast) and vacant lands located within the City's Urban – Planning District designation (Schedule A – Land Use). To the east are vacant agricultural lands and a series of single-

detached dwellings fronting Lester Road which are located within the City’s rural boundary. To the south is a low-density residential neighbourhood located within the City’s rural boundary and to the west is vacant land and commercial uses located within the City’s Urban – Planning District (Schedule A – Land Use).



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 Quinte West Official Plan (2013)

The subject lands are currently designated ‘Rural’ and ‘Agricultural’ on Schedule A – Land Use of the City of Quinte West Official Plan (Figure 2).

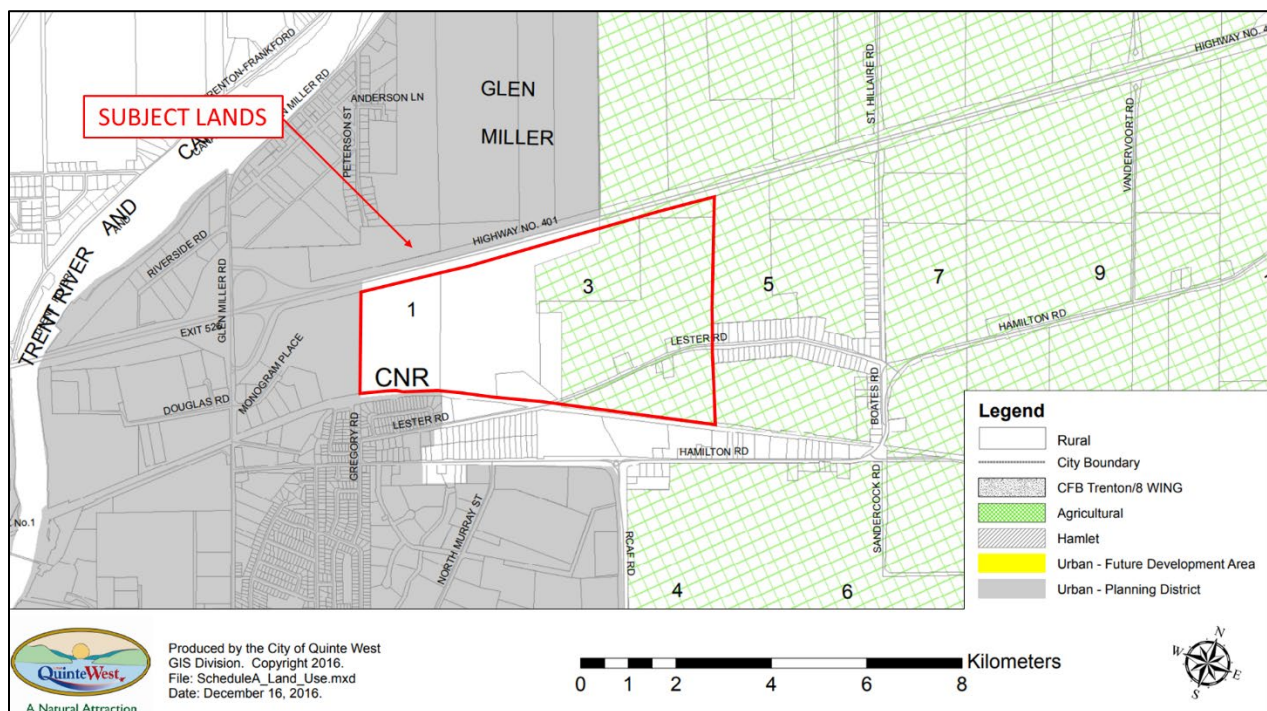


Figure 2 – City of Quinte West Official Plan (2013) – Schedule A – Land Use

City of Quinte West New Official Plan (2023)

Similarly, the subject lands are designated ‘Rural’ and ‘Agricultural’ on Schedule A – Land Use of the City of Quinte West’s New Official Plan (2023). It should be noted that the spatial extent of the subject lands’ ‘Agricultural’ designation has been reduced from that shown on Schedule A of the City’s current Official Plan (2013).

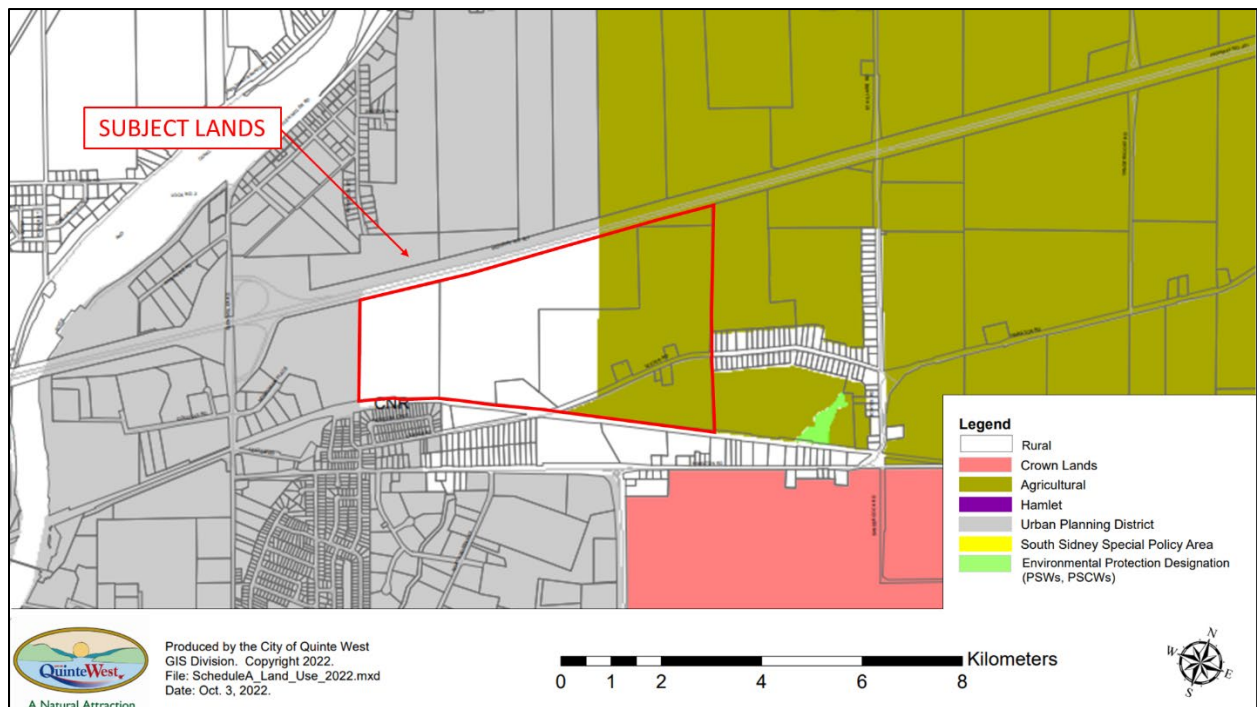


Figure 3 – City of Quinte West New Official Plan (2023) – Schedule A – Land Use

City of Quinte West Comprehensive Zoning By-law (2014)

The subject lands are currently zoned Agricultural (A), Rural Residential (RR), and Development (D) as per Schedule G – Sidney South of the Municipality’s Comprehensive Zoning By-law.

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 and a southward-flowing watercourse on the subject lands and confirmed that any future development within or adjacent to these areas will be subject to regulatory approval by Lower Trent Conservation (LTC). The Analysis also identified woodland blocks within the Study Area that are considered candidate “Significant Woodlands” on the basis of their size, however, since no “Significant Woodland” mapping is available within the City’s Official Plan schedules, a more detailed site-specific study will be required to confirm this designation. 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 21 was presented to the City of Quinte West's Special Advisory Committee on February 13, 2023 via Staff Report #23-011PD and was adopted by Council on February 22, 2023 via By-law No. 2023-032. OPA 21 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. 019-6937.

Proposed Residential Uses

Attachment No. 2 to Report #23-011PD included a Residential Land Needs Assessment Report prepared by County staff which provides a long-term analysis of future residential growth and associated urban land needs in support of the City's new Official Plan. Among other findings, the Analysis identified a discrepancy in the number of new residential units delivered between 2016 and 2021 and the number of units anticipated over this period based on population projections and expected housing growth; in that 426 more units were delivered than anticipated (35.5% more). Similarly, the Analysis shows that Statistics Canada data from the 2021 census reported a growth rate of 7.5% between 2016 and 2021 within the Belleville Census Metropolitan Area (CMA) whereas projections generated by Watson and Associates in 2020 yielded an anticipated growth rate of 6.2% over that period. These discrepancies illustrate the inherent limitations associated with forecasting population growth and associated land needs. Given the current housing crisis and provincial directives contained within the *More Homes Built Faster Act*, it is important to err on the side of caution and plan for more residential growth than is anticipated based solely on the results of Land Needs Assessments or similar analyses. As such, Appendix B of this Letter includes a corresponding map change recommendation to Schedule "A" of OPA 21 which removes the subject lands' existing 'Rural' and 'Agricultural' designations and adds them to the 'Urban Planning District'; while Appendix C includes a recommended map change to Schedule "B1" which adds the subject lands to a new Planning District within the larger Urban Planning District outlined on Schedule "A".

In keeping with the Provincial Housing Supply Action Plan, ERO No. 019-6937 presents an opportunity to further revise OPA 21 by adding the subject lands to the City's Urban Planning District. 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 Uses

Further, the subject lands' strategic location along a major goods movement corridor (Highway 401) makes it an ideal candidate for future employment growth. This is reaffirmed by Policy 1.3.2.6 of the Provincial Policy Statement which requires planning authorities to promote economic development and competitiveness by protecting "... *employment areas* in proximity to *major goods movement facilities and corridors* for employment uses that require those locations." Further, Section 5.8 of OPA 21 states that "... industrial employment areas require enhanced protection, to discourage their conversion to other uses, due to their particular locational requirements, such as being in proximity to major highways." Accordingly, the proposed text changes to OPA 21 contained in the conclusion of this Letter include the addition of the subject lands to a new Planning District (Planning District 14); which also permits the full range of employment uses outlined in Section 5.8.2 within the portion of the district adjacent to Planning District 2B and the Highway 401.

It should be noted that any servicing and or infrastructure upgrades required to facilitate the future development of the subject lands will be the sole responsibility of the proponent. It should also be noted that any future development of the subject lands will be evaluated through a supporting Environmental Impact Statement to ensure that such adheres to applicable natural heritage policies.

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 Needs Assessment prepared by City Planning Staff. Further, the importance of planning for strategic employment areas is well-established in Section 1.3 of the Provincial Policy Statement and Section 5.8 of OPA 21; 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 21 and the City of Quinte West Official Plan

Based on the above, UrbanSolutions recommends the following map changes to OPA 21:

1. To amend Schedule A of OPA 21, being ‘Schedule “A” – Land Use’ by redesignating the subject lands from ‘Rural’ and ‘Agricultural’ to ‘Urban Planning District’ as shown in Appendix B.
2. To amend Schedule B1 of OPA 21, being ‘Schedule “B1” – Trenton Urban Service Area’ by adding the subject lands to the Trenton Planning District boundary as ‘Planning District 14’ as shown in Appendix C.

In support of recommended map change No. 2 outlined above, UrbanSolutions also recommends the following text change to OPA 21:

1. That the following be added to the City of Quinte West Official Plan as Section 6.1.14:

“6.1.14 Planning District 14

Planning District 14 is considered to be a part of the primary Trenton Urban Area District Settlement Area defined by this Plan. Within this district, lands adjacent to Planning District 2B and Highway 401 shall be developed with employment uses in accordance with the policies of Section 5.8.2 – Employment Areas – Industrial, while the remainder of the lands within this district shall be developed with residential uses in accordance with the policies of Sections 5.6.7.1 – Low Density Residential; 5.6.7.2 – Medium Density Residential; and 5.6.7.3 – High Density Residential with a minimum density of 25 units per hectare. Any future development within this district shall be subject to the approval of Zoning By-law Amendment to ensure its orderly development and confirm the ultimate land use pattern and distribution.”

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



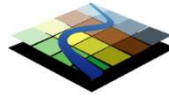
Matthew LeBlanc, M.PL, BA (Hons)
Planner

cc: AJGL Group Inc. (via email)

Appendix A – Terrastory Environmental Consulting

Preliminary Natural Heritage Constraints Analysis

June 28, 2023
Project No.: 23119



TERRASTORY
environmental consulting inc.

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

**SUBJECT: Preliminary Natural Heritage Constraints Analysis
303 Lester Road (and adjoining properties)
Community of Trenton, Municipality of Quinte West**

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”) in Trenton. 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 23 June 2023. The eastern portion of the lands are primarily in a naturalized state and contain several natural features including mature upland forest, former coniferous plantation, treed swamp, and meadow marshes. The upland deciduous forests are dominated by late-successional tree species including Sugar Maple (*Acer saccharum*), American Beech (*Fagus grandifolia*), and Ironwood (*Ostrya virginiana*), alongside some Bitternut Hickory (*Carya cordiformis*), Large-tooth Aspen (*Populus grandidentata*), and Black Cherry (*Prunus serotina*). A watercourse flows southward through the eastern portion of the lands, which is flanked on both sides by unevaluated wetland communities.

The central portion of the lands are primarily maintained for agricultural purposes (grains). Tilled agricultural lands generally exhibit limited to negligible natural heritage value where they do not directly abut a natural heritage feature and/or do not provide a wildlife movement/corridor function.

The western portion of the lands contains a distinct slope associated with a terrace, which was likely carved by glacial meltwater flowing southward in the Trent River towards Lake Ontario near the terminus of the previous ice age. A defined physical top of bank is present. The tablelands in this area consist primarily of early-successional thicket communities, while the valley slope is more treed. A deciduous swamp has been mapped at the toe of slope.

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, shallow marsh, and meadow marsh.

- Significant Woodlands.
- A watercourse and associated containing either direct or contributing fish habitat.
- 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 large portions of the Study Area as determined by Terrastory. Wetlands mapped by the Province through the central-east portion of the Study Area were found to be particularly inaccurate, as this area was represented by mature, upland vegetation. Additional wetlands (not mapped by the Province) were found in the northwest and southeast corners of the Study Area (see **Figure 1**) associated with the watercourse. Confirmation of wetland boundaries would require a more detailed site-specific assessment and verification by agency staff.

Two large, mature forest/woodland blocks within the central-east portion of the Study Area are considered candidate “Significant Woodlands” on the basis of their size (minimum >10 ha) and/or other biophysical characteristics (e.g., overlapping with wetlands, containing late-successional species). Other, smaller woodlands are also present within the lands. No “Significant Woodland” mapping is available within the Municipality’s OP schedules, and thus confirmation of woodland significance would require a more detailed, site-specific study with consideration for relevant criteria outlined in the applicable OP and/or Natural Heritage Reference Manual (NHRM).

The watercourse flowing southward through the Study Area may exhibit an “intermittent” flow regime. The watercourse is assumed to contain either direct or contributing fish habitat.

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). The Study Area provides potentially suitable habitat for several SAR (e.g., Butternut), though such habitats are largely contained within other significant natural features which would likely form constraints to future development (e.g., wetlands, Significant Woodlands). Should the agricultural lands be converted to hayfield, they could contain suitable breeding habitat for grassland SAR 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).

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 situated within the community of Trenton in the Municipality of Quinte West. The western portion of the Study Area is designated “Rural” per Schedule A (Land Use) of the Municipality’s OP, while the eastern portion of the lands are

designated “Agricultural”. Schedule G (Sidney South) of the Municipality’s Zoning By-law indicates that the western portion of the lands are zoned “Development” (D), while the eastern portion of the lands are zoned “Agricultural” (A). A “Flood Plain” and “Environmentally Sensitive Area” (ESA) overlay zones overlap with the lands surrounding the wetland and watercourse in the eastern portion of the Study Area.

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 Lower Trent Conservation (LTC). The identification and delineation of flood/erosion hazards associated with the watercourse and slopes within the Study Area 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 6.2.2.2.1.1 of LTC’s Policy Document).
- 30 m buffer from the channel bank of watercourses and fish habitat (per Policy 11.3.9iii of the Municipality’s OP).
- 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). Note also that the above-noted buffers relate exclusively to natural heritage and ecological features, whereas setbacks related to any flood and/or erosion (i.e., meanderbelt, steep slopes) hazards are determined by separate technical professionals.

CONCLUSIONS

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

- The Study Area contains tilled agricultural lands and a variety of natural features.
- Several unevaluated wetlands were documented within the Study Area, consisting of various swamp and marsh communities.
- Confirmation of wetland boundaries would require a more detailed site-specific assessment and verification by agency staff.
- Significant Woodlands occur within the Study Area based on their size and/or biophysical conditions; additional woodlands are present which should also be assessed for significance.
- The Study Area contains potential habitat for Species at Risk (e.g., Bitternut) 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 LTC policies; consideration for buffer refinements may occur through a future and comprehensive natural heritage study (e.g., Environmental Impact Study).
- Permissions from Lower Trent Conservation may be required should development occur within a regulated area.

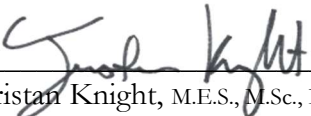
Should any future development activities for the lands be proposed, an Environmental Impact Study (EIS) will be required to comprehensively characterize the biophysical features and conditions of the Study Area, particularly the wetlands, Significant Woodlands, fish habitat, potential Endangered/Threatened 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).

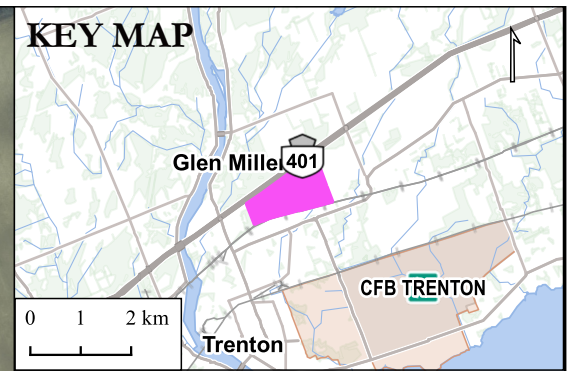
Regards,

Terrastory Environmental Consulting Inc.


Tristan Knight, M.E.S., M.Sc., I.S.A., C.E.R.P.
Senior Ecologist | President

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.



Legend

Area of Assessment

- Study Area

Significant Natural Features

- Physical Top of Bank of Terrace/Valley (Hazard)
- Wetland
- Significant Woodland
- Candidate Significant Wildlife Habitat
- Fish Habitat (Assumed Direct or Contributing)

Buffers

- Significant Woodland Dripline + 10 m
- Wetland Boundary + 30 m
- Top of Channel associated with Fish Habitat + 30 m

GENERAL NOTES:

- All natural feature extents and boundaries depicted on this figure are approximate and have been identified based on existing information and one (1) reconnaissance-level site visit conducted in June 2023. Updates to the natural feature mapping shown herein may be required based on the results of more detailed site level information (e.g., EIS) collected during the appropriate season.
- Additional natural features occur (or have the potential to occur) on the Subject Property apart from those shown on this figure; see report text for further details.
- Features depicted herein should not be used in place of a professional survey.
- Numeric scale is for a 11x17 inch print.

TERRASTORY
environmental consulting inc.
info@terrastoryenviro.com 905.745.5398

1:6,000

Location:

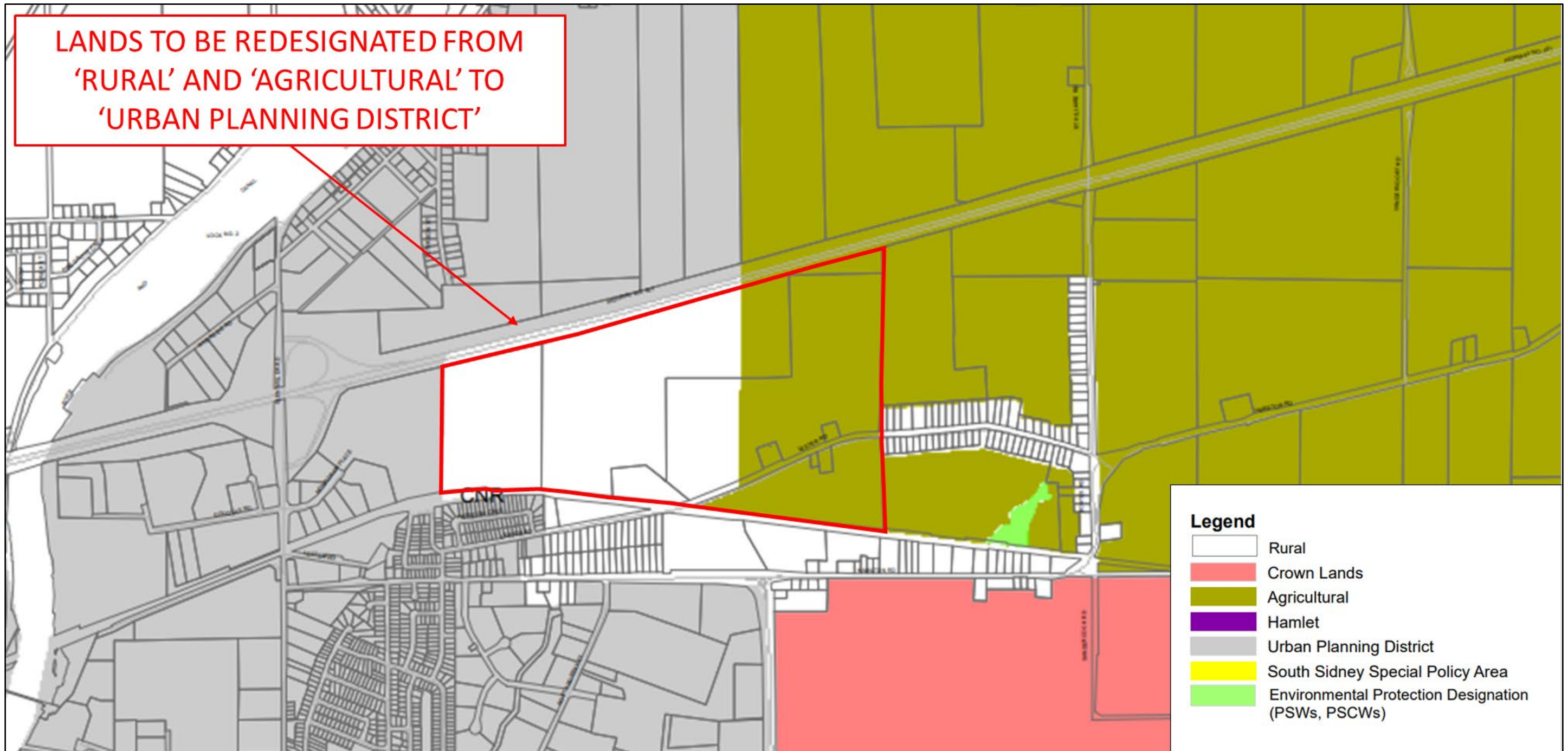
303 Lester Road,
Trenton (Municipality of Quinte West)

Project No.: 23111	Figure 1: Prelim. Significant Natural Feature Mapping
Date: 2023-06-27	
By: TK Checked: CW	
Orthophotograph Date: 2013 (SCOOP)	

Appendix B – Schedule “A” of OPA 21

Proposed Changes to Schedule “A” – Land Use of OPA 21

LANDS TO BE REDESIGNATED FROM
'RURAL' AND 'AGRICULTURAL' TO
'URBAN PLANNING DISTRICT'



Produced by the City of Quinte West
GIS Division. Copyright 2022.
File: ScheduleA_Land_Use_2022.mxd
Date: Oct. 3, 2022.



Appendix C – Schedule “B1” of OPA 21

Proposed Changes to Schedule “B1” – Trenton Urban Service Area of OPA 21

