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August 24, 2023

The Honourable Steven Clark  
Minister of Municipal Affairs and Housing

Municipal Services Office – Western Ontario  
659 Exeter Road, Floor 2  
London, ON  
N6E 1L3

Dear Minister Clark:

**RE: County of Dufferin Official Plan Amendment No. 3**  
**ERO Number: 019-7419**  
**Ministry Reference Number: 22-OP-237156**  
**MHBC File: 17111A**

MacNaughton Hermsen Britton Clarkson (MHBC) Planning Limited are currently retained by Aragon (Hockley) Development (Ontario) Corporation (the "Owner") to facilitate the planning approvals process for the proposed development on their lands legally described as Blocks 2 and 28 of Plan 7M-41 and Part 7 of Lot 5, Concession 2, Reference Plan 7R5452 in the Town of Mono, County of Dufferin (the "Subject Lands") and depicted in the figure below.



The Subject Lands are designated "Community Settlement Area" in the Dufferin County Official Plan and "Special Highway Commercial" in the Town of Mono Official Plan. The Owner submitted an Official Plan Amendment and Zoning By-law Amendment to facilitate the development of a 220-unit townhouse development on a portion of the Subject Lands in June 2022. These applications have now been appealed to the Ontario Land Tribunal for non-decision (OLT-23-000641).

We have also been actively engaged in the County of Dufferin's Municipal Comprehensive Review (MCR), and have previously submitted questions and comments during Phase 1 and Phase 2 of the MCR. These letters are attached for your reference.

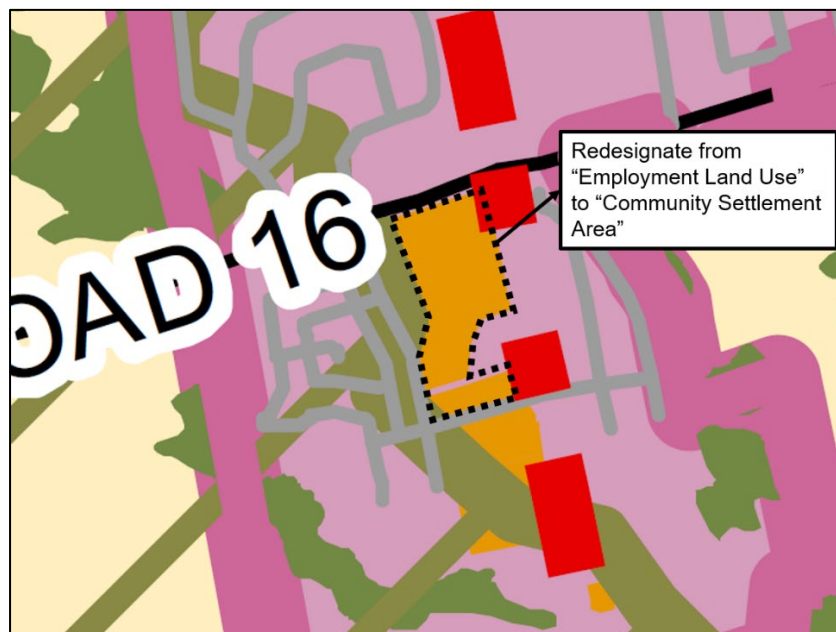
The Land Needs Assessment (LNA) conducted as part of Phase 1 of the MCR identified the Subject Lands as "Community Area", which provides for commercial, institutional and mixed-use development. However, the adopted Phase 2 County Official Plan Amendment identifies the Subject Lands as "Employment Land Use".

The proposed Employment Land Use designation directly contradicts the LNA's identification of the Subject Lands as Community Area, the current Special Highway Commercial designation in the Town of Mono's Official Plan, and the provincial planning legislation and policies related to the appropriate development of Employment Areas. We have raised several concerns with County planning staff on a number of occasions related to this change, but have not received any response from the County as to why this designation, that conflicts with local and Provincial policy, has been applied to the Subject Lands.

Due to the conflicts between the proposed Employment Land Use designation and the local and provincial planning policies and legislation, we request that the Minister modify the Subject Lands' designation to *Community Settlement Area*, which permits the development of the Subject Lands to implement a compatible and appropriate land use that permits much needed housing.

We have provided mapping to illustrate the proposed requested change as well as language to address the modification below:

**Modification:** "Schedule B Community Structure and Land Use" is modified by redesignating the lands located at Blocks 2 and 28 of Plan 7M-41 and Part 7 of Lot 5, Concession 2, Reference Plan 7R5452 in the Town of Mono from Employment Land Use to Community Settlement Area.



Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Kaitlin Webber, MA  
Planner



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

July 11, 2023

Cody Joudry  
Director of Development & Tourism

Dufferin County  
30 Centre Street  
Orangeville, ON  
L9W 2X1

Via email: [cjoudry@dufferincounty.ca](mailto:cjoudry@dufferincounty.ca)

Dear Mr. Joudry:

**RE: MUNICIPAL COMPREHENSIVE REVIEW  
PHASE 2 OFFICIAL PLAN AMENDMENT – SCHEDULES AND MAPS  
Aragon Kingfisher Development Lands (Blocks 2 & 28, Plan 7M-41 and Part 7 of Lot 5,  
Concession 2, Plan 7R5452)  
OUR FILE: 17111A**

We are currently retained by Aragon (Hockley) Development (Ontario) Corporation (the "Owner") to facilitate the planning approvals process for the proposed development on their lands legally described as Blocks 2 and 28 of Plan 7M-41 and Part 7 of Lot 5, Concession 2, Reference Plan 7R5452 in the Town of Mono (the "Subject Lands"). The Owner submitted an Official Plan Amendment and Zoning By-law Amendment for a 220-unit townhouse development on a portion of the Subject Lands (Town files OPA 2022-02 & ZBA 2022-02). These applications have now been appealed to the Ontario Land Tribunal.

We have been actively engaged in the County's Municipal Comprehensive Review (MCR), and have previously submitted questions and comments on the Draft Land Needs Assessment Report on July 28, 2022 and the Draft Schedules and Maps on January 20, 2023. Both of these letters are attached for reference.

The Land Needs Assessment (LNA) conducted as part of Phase 1 of the MCR identified the Subject Lands as Community Area, which provides for commercial, institutional and mixed-use development. To conform to the Growth Plan and implement the LNA, the Phase 2 County Official Plan Amendment (COPA) was prepared to update the policies and land use schedules of the County Official Plan (COP). The proposed Schedule B: Community Structure and Land Use Schedule prepared with the Phase 2 County Official Plan now identifies the Subject Lands as "Employment Land Use". This proposed land use designation directly contradicts the LNA's identification of the Subject Lands as Community Area, the current designation of the Subject Lands in the Town of Mono's Official Plan, and the provincial planning legislation and policies related to the appropriate development of Employment Areas, as described in detail below.

Neither the current COP nor the COPAs associated with the MCR define Employment Land Use or differentiate between Employment Land Use and "Employment Area". However, Employment Area (or "area of

employment”) is a defined term in the *Planning Act* and Provincial Policy Statement (PPS). The definition of area of employment was recently updated in the *Planning Act* following Bill 97, and is now defined as:

*“An area of land designated in an official plan for clusters of business and economic uses, those being uses that meet the following criteria:*

1. *The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:*
  - i. *Manufacturing uses.*
  - ii. *Uses related to research and development in connection with manufacturing anything.*
  - iii. *Warehousing uses, including uses related to the movement of goods.*
  - iv. *Retail uses and office uses that are associated with the uses mentioned in subparagraphs i to iii.*
  - v. *Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.*
  - vi. *Any other prescribed business and economic uses.*
2. *The uses are not any of the following uses:*
  - i. *Institutional uses.*
  - ii. *Commercial uses, including retail and office uses not referred to in subparagraph 1 iv.”*

Based on the above definition, the Community Area uses of commercial, institutional and mixed-use development would not be permitted in an Employment Area. At the local level, the current Highway Commercial designation and uses permitted on the Subject Lands also would not be permitted in an Employment Area. In addition to these uses not being permitted by definition, the Land Use Compatibility (1.2.6) and Employment Areas (1.3.2) policies in the PPS are not conducive to developing Employment Area uses in proximity to sensitive land uses due to the risk of adverse effects from odour, noise and other contaminants and risk to public health and safety. As the Subject Lands are surrounded primarily by sensitive land uses including existing residential and recreational uses, the designation of the Subject Lands as Employment Area would not be consistent in our opinion to the policies of the PPS.

We are also not aware of any planning analysis to warrant the change to the designation of the Subject Lands, now proposed as Employment Land Use.

Due to the conflicts between the proposed Employment Land Use designation and the local and provincial planning policies and legislation, we recommend that the County reconsider the proposed “Employment Land Use” designation for the Subject Lands. In our professional opinion, it would be more appropriate to maintain the Subject Lands’ current designation of Community Settlement Area, which permits the development of the Subject Lands as currently designated and would not create an incompatible land use context.

Yours truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Kaitlin Webber, MA  
Planner

January 20, 2023

Cody Joudry  
Director of Development & Tourism

Dufferin County  
30 Centre St  
Orangeville, ON L9W 2X1

Dear Mr. Joudry:

**RE: MUNICIPAL COMPREHENSIVE REVIEW: PHASE 2 OFFICIAL PLAN AMENDMENT –  
SCHEDULES AND MAPS  
Aragon Kingfisher Development Lands (Blocks 2 & 28 of Plan 7M-41 & Part 7 of Lot 5,  
Concession 2 of Reference Plan 7R5452)  
Our File: 17111A**

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We are currently retained by Aragon (Hockley) Development (Ontario) Corporation (the “Owner”) to facilitate the planning approvals process for their proposed development on the lands legally described as Blocks 2 and 28 of Registered Plan 7M-41 and Part 7 of Lot 5, Concession 2 of Reference Plan 7R5452 in the Town of Mono (the “Subject Lands”). The Town of Mono is currently in receipt of an Official Plan Amendment and Zoning By-law Amendment for a 220-unit townhouse development on a portion of the Subject Lands (Town files OPA 2022-02 / ZBA 2022-02).

This letter is in response to the County’s release of the Draft Schedules and Official Plan Amendment (“OPA”) prepared for Phase 2 of the County’s Municipal Comprehensive Review (“MCR”). Following our review, we have questions about draft Schedule B: “Community Structure and Land Use”, and the draft OPA, specifically as they relate to the proposed designation of the Subject Lands.

During Phase 1 of the MCR, the County prepared a Land Needs Assessment (“LNA”) to determine how and where allocated population and employment targets set by the Province can be accommodated in the County. Through the LNA exercise, land supply was identified as: 1) Residential; 2) Community Area (Commercial/Institutional & Potentially Residential); or, 3) Employment Area (Industrial). The Subject Lands were identified in the LNA as Community Area (Commercial/Institutional & Potentially Residential).

We understand that the purpose of Phase 2 of the MCR is to update the policies and land use schedules to conform to the Growth Plan and implement the LNA. In draft Schedule B: “Community Structure and Land Use”, the Subject Lands have been identified as “Employment Land Use”. However, neither the current County Official Plan nor the draft OPA include a definition or policies for this land use designation. Therefore, we would like to request the following information:

- 1) How does the County of Dufferin define "Employment Land Use"?
  - a. Will the County be releasing policy text that applies to this land use designation?
- 2) Have all lands identified as Community Area in the LNA been designated as Employment Land Use in Official Plan Schedule B?
  - a. If yes, what is the rationale for grouping the Community Area and Employment Area Lands?
  - b. If no, what is the rationale for identifying the Subject Lands as Employment Land Use?

We appreciate the opportunity to engage in the process and look forward to your response to our questions. Please feel free to contact us if you have any questions.

Yours truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Kaitlin Webber, MA  
Planner

*cc. Matt Alexander, Project Manager, WSP  
David Page, Aragon Properties Ltd.*



July 28, 2022

Cody Joudry  
Director of Development & Tourism

Dufferin County  
30 Centre St  
Orangeville, ON  
L9W 2X1

Via email: [cjoudry@dufferincounty.ca](mailto:cjoudry@dufferincounty.ca)

Dear Cody Joudry:

**RE: DRAFT LAND NEEDS ASSESSMENT REPORT  
ARAGON KINGFISHER DEVELOPMENT LANDS (Blocks 2 & 28 of Registered Plan 7M-41, Part  
7 of Lot 5, Concession 2 of Reference Plan 7R5452)  
OUR FILE: 17111A**

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We are currently retained by Aragon Kingfisher Developments in relation to their proposed development in the Town of Mono. Over the past year, we have monitored the County's Municipal Comprehensive Review ("MCR") process and most recently reviewed the Draft Land Needs Assessment Report ("LNAR") dated January 21, 2022 which was presented at the Public MCR Info Session on July 26, 2022. Following our review, we have questions about the methodology used in the Employment Analysis in relation to the lands owned by the Aragon (Hockley) Development (Ontario) Corporation (the "Owner") legally described as Blocks 2 and 27 of Registered Plan 7M-41 and Part 7 of Lot 5, Concession 2 of Reference Plan 7R5452 in the Town of Mono, County of Dufferin (the "Subject Lands").

According to the County of Dufferin Official Plan, the Subject Lands are designated *Community Settlement Area*. In the Town of Mono's Official Plan, the Subject Lands are designated *Special Highway Commercial* (Section 10.4), and in Zoning By-law 78-1, the Subject Lands are designated CH-4 *Highway Commercial*. However, we understand that the Town of Mono consider the Subject Lands as an Employment Area.

The Draft LNAR proposes an employment growth of 936 jobs in Mono from 2021-2051, with 519 of those jobs requiring non-residential land (Table 4.6). Of the jobs requiring non-residential land, employment classifications are divided into Employment Area (Industrial) or Community Area (Commercial/Institutional) (Table 4.7). From this classification, it was determined that Mono will see 109 Employment Area jobs by 2051 and has a surplus of 5.9 net ha of Employment Area land (Table 4.9). Commercial and Institutional projections were not calculated for the Town of Mono. Based on the breakdown presented in the Draft LNAR, it is our assumption that the Subject Lands would be considered in the Community Area classification for Commercial and Institutional jobs.



As the Draft LNAR does not include mapping or indicate the location of the lands identified as Employment Area or Community Area in their Employment Analysis, we would like to request the following information:

- 1) How were Employment Areas defined in the context of the Town of Mono?
  - a. What land use designations were included in the Employment Area calculations? Where were these lands located?
  - b. Was the Highway Commercial designation included as Employment Area? Or as part of the Community Area?
  
- 2) How were the Subject Lands classified for the purposes of the Draft LNAR? Which category (Employment Area or Community Area) are they within?

Once these questions have been clarified, we will continue to follow the MCR process and may have additional comments and questions. We appreciate the opportunity to participate in the process and look forward to your response. Please feel free to contact us if you have any questions.

Yours Truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Kaitlin Webber, MA  
Planner

*cc. Matt Alexander, Project Manager, WSP  
David Page, Aragon Properties Ltd.*