



August 18, 2023

**Via Digital Upload**

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

c/o

Mr. Dellarue Howard  
Community Planning and Development  
Exter Road Complex 2<sup>nd</sup> Floor  
659 Exeter Road  
London, ON N6E 1L3

**RE: Request to Facilitate the Proposed Redesignation of the Subject Lands  
4 Line & Highway 10, Melancthon, ON  
ERO No. 019-7119**

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 4 Line & Highway 10, Melancthon, in the County of Dufferin.

On June 21, 2023, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on the proposed Official Plan Amendment No. 2 (OPA 2) – which constitutes Dufferin County’s first phase of its ongoing Municipal Comprehensive Review. This amendment was adopted by Dufferin County Council on April 13<sup>th</sup>, 2023 via By-law No. 2023-25 and contains policy updates to bring the Dufferin County Official Plan (DCOP) into conformity with the Growth Plan. The Amendment also establishes both population and employment targets and allocates additional land for residential, commercial, and employment needs to the County’s lower-tier municipalities in keeping with the findings of a Land Needs Assessment prepared by WSP. 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 changes recommended to Dufferin County’s New Official Plan to better align with the goals and objectives of the Province.

**Site & Surrounding Context**

The subject lands have a total area of approximately 56.7 hectares (140.2 acres) and are predominantly comprised of vacant agricultural land. The lands are bounded by Highway 10 and vacant agricultural land to the north, a new low-rise residential subdivision located within the existing Urban Settlement Area directly to the east, and both agricultural lands and single detached dwellings to the south and west.

It should be noted that while a large portion of the subject lands comprises a parcel currently owned by the proponent (as indicated by the red-shaded area in Figure 1), three (3) smaller parcels along the westerly property line are not currently owned by the proponent (as indicated by the yellow-shaded area

in Figure 1). In taking a comprehensive approach to planning matters associated with this submission, both parcels collectively comprise the “subject lands”, as described herein.

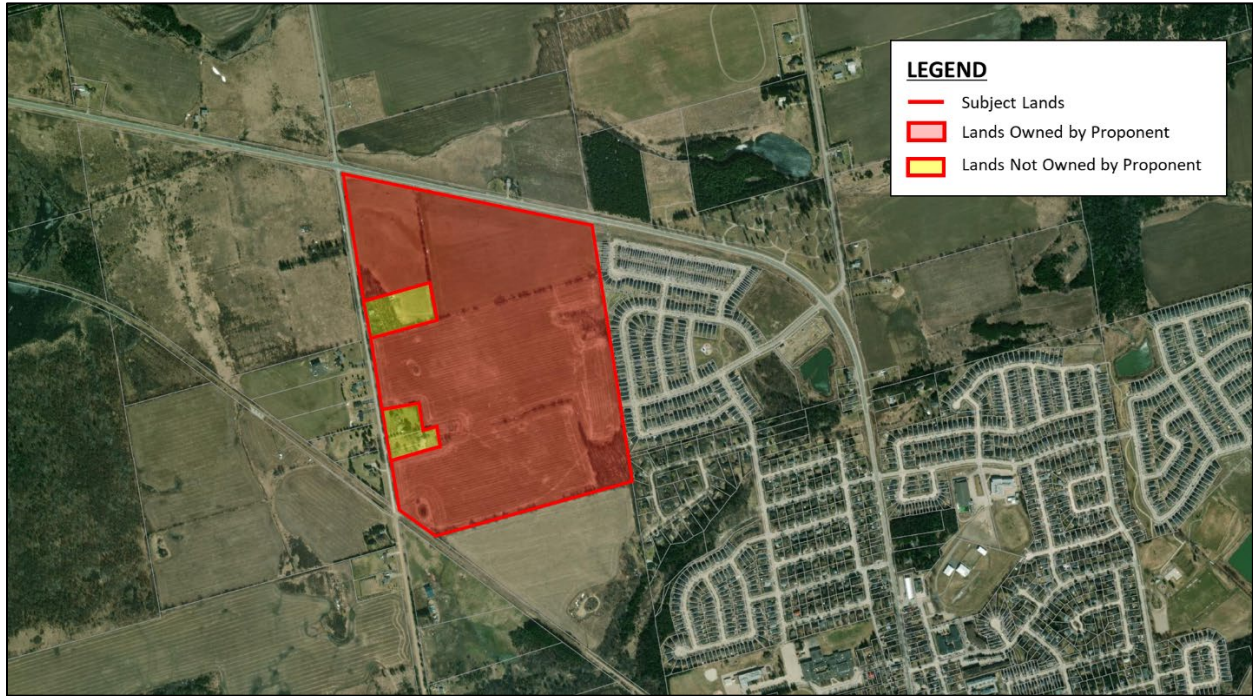


Figure 1 – Subject Lands and Surrounding Context Map

As previously noted, the subject lands are located directly northwest of an existing Urban Settlement Area, as outlined in Figure 2 below.

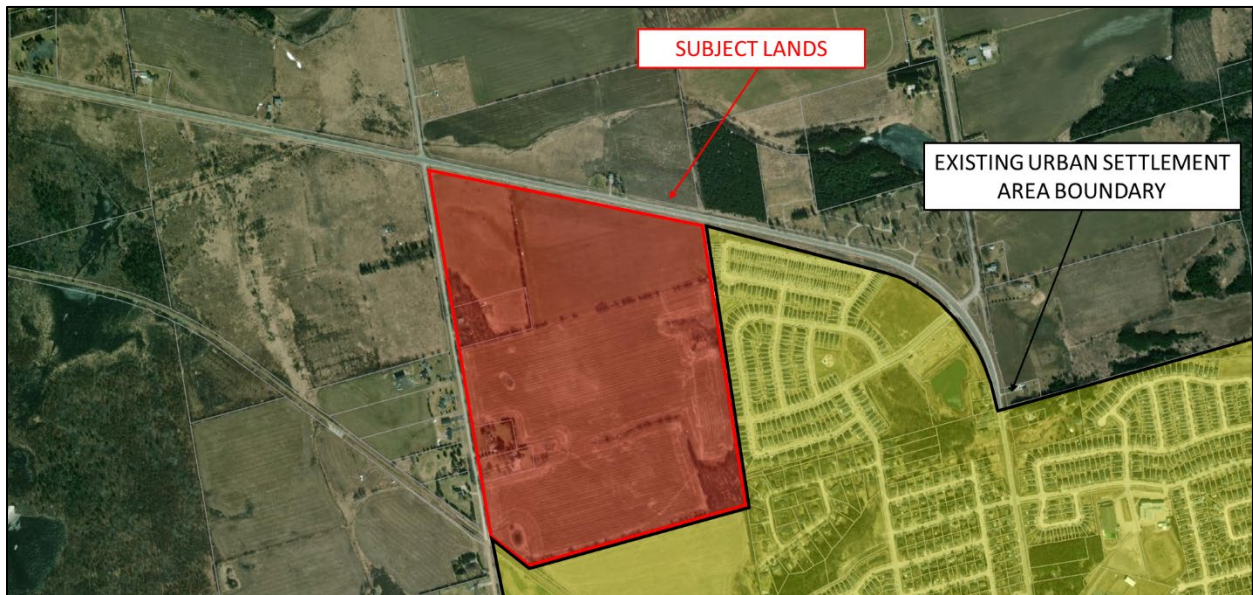


Figure 2 – Subject Lands in Proximity to the Existing Urban Settlement Area Boundary

The lands located directly southeast of the subject lands within the existing Urban Settlement Area are comprised of a newly constructed low rise residential subdivision, beyond which is a grocery store; elementary school; high school; community centre; numerous public parks; and a variety of other urban commercial and retail uses.

## **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.

### *Dufferin County Official Plan*

The subject lands are currently designated 'Countryside Area' on Schedule B – Community Structure of the Dufferin County Official Plan (DCOP). It should be noted that the portions of the site currently designated 'Countryside Area' on Schedule B are also designated 'Agricultural Area (S. 4.2) on Schedule C – Agricultural Area and Rural Lands of the Dufferin County Official Plan.

### *Township of Melancthon Official Plan*

The subject lands are currently designated 'Agricultural' and 'Environmental Conservation' on Schedule A-1 – Land Use and Roads Plan of the Township of Melancthon Official Plan.

### *Township of Melancthon Zoning By-law No. 12-1979*

The subject lands are currently zoned 'Development', 'Open Space', 'Recreation', Residential Type Five Exception Two', 'Residential Type Three Exception Three', 'Residential Type Three Exception Two' in the Township of Melancthon Zoning By-law No. 12-1979.

## **Background Studies**

### *Preliminary Environmental Constraints Map*

A Preliminary Environmental Constraints map prepared by Palmer is enclosed within Appendix A of this Letter. The map identifies areas of low constraint on the subject lands, including existing watercourses and drainage features. An Environmental Impact Study (which will be secured through the future Draft Plan of Subdivision and Zoning By-law Amendment application processes) will be required to finalize the limits of such identified natural features and confirm the ultimate development limits of the subject lands.

### *Site Servicing Investigation Letter*

A Site Servicing Investigation Letter prepared by SCS Consulting Group Ltd. is enclosed within Appendix B. The Letter concludes that the subject site can either be serviced from the existing municipal water and wastewater system located east of the site (subject to confirmation of capacity and allocation by the Town of Shelburne), or by having a new wastewater treatment facility constructed on the subject lands which would outlet to an on-site effluent bed for sub-surface discharge in accordance with provincial guidelines. In both scenarios, the Letter confirms that a future Hydraulic Analysis will be necessary to confirm the appropriate infrastructure sizing and configuration required to provide adequate supply and pressure to



service future development and to confirm that the existing water storage and supply infrastructure is adequate to service the subject lands.

### Planning Merit

As previously noted, OPA 2 was approved by Council on April 13, 2023 via By-law No. 2023-25. This amendment constitutes Phase 2 of the County’s ongoing Municipal Comprehensive Review and is intended to update the policies and land use schedules of the Official Plan to conform with the County’s population and employment growth projections contained in Schedule 3 of the Growth Plan – which is forecasted to reach a total of 95,000 residents and 39,000 jobs by 2051.

On July 13, 2022, WSP completed a Land Needs Analysis (LNA) in support of the Dufferin County Municipal Comprehensive Review to allocate the forecasted population and employment growth to each of the County’s eight (8) lower-tier municipalities, and ultimately determine whether (and to what extent) settlement area expansions are necessary. Using growth estimates generated by Metro Economics, as well as the findings of a high-level review of building permit data, the Analysis projects that the County will require an additional 10,339 dwelling units to accommodate forecasted population growth to 2051 (26,700 people). Of this total, the Analysis allocates 94% (9,757 units) to existing settlement areas and the remaining 6% (582 units) within rural areas outside of settlement areas (Table 1):

	<b>Total Dwelling Demand 2021 to 2051</b>	<b>% of Dwelling Units Outside Settlement Areas</b>	<b>Dwelling Units Outside Settlement Areas</b>	<b>Dwelling Units Inside Settlement Areas</b>
<b>Amaranth</b>	1,140	19%	216	924
<b>East Garafraxa</b>	354	26%	92	263
<b>Grand Valley</b>	2,445	0%	0	2,445
<b>Melancthon</b>	227	43%	99	129
<b>Mono</b>	180	55%	98	82
<b>Mulmur</b>	298	26%	79	219
<b>Orangeville</b>	3,620	0%	0	3,620
<b>Shelburne</b>	2,075	0%	0	2,075
<b>County Total</b>	<b>10,339</b>	<b>6%</b>	<b>582</b>	<b>9,757</b>

Table 1 – Exhibit 4 from Dufferin County’s Land Needs Assessment Report (July 13, 2022)

Based on the allocations outlined in Table 1, as well as the fact that the Growth Plan mandates a 40% County-wide intensification target within Delineated Built-up Areas, the Analysis concluded that the current density levels prescribed by the DCOP are insufficient to accommodate the allocated growth within the existing land supply. Accordingly, the Analysis recommends that each municipality update its minimum intensification targets in accordance with Table 2 below:

	<b>Current DCOP Minimum Intensification Target</b>	<b>Proposed OPA 2 Minimum Intensification Target</b>
<b>Grand Valley</b>	12%	40%
<b>Orangeville</b>	50%	60%
<b>Shelburne</b>	38%	48%

Table 2 – Current vs. Proposed Intensification Targets within Grand Valley, Orangeville, and Shelburne



The proposed minimum intensification targets outlined in Table 2 were then applied to the total forecasted unit demand (2021-2051) within Grand Valley, Orangeville, and Shelburne which produced a value of 4,146 units. Based on an estimate of remaining unit capacity within each municipality (as outlined in Appendix A of the Analysis), a capacity shortage of 2,187 units was identified across the County's existing Delineated Built-up Area. Accordingly, the Analysis recommended that Grand Valley, Orangeville, and Shelburne increase their intensification targets beyond what is outlined in Table 2 to achieve forecasted growth. Similarly, the Analysis identified a 1,467 unit capacity shortage across the County's Designated Greenfield Areas (lands within settlement areas and outside the delineated built boundary) based on forecasted growth, and recommended settlement area boundary expansions for Grand Valley and Shelburne accordingly.

While it is recognized that the above-noted strategy and recommendations are intended to accommodate the full extent of the County's forecasted growth, it should be noted that such will be contingent on having each municipality achieve ambitious density targets. For reference, OPA 2 seeks to establish an intensification target of 40% for Grand Valley's delineated built-up area whereas the current DCOP prescribes a target of only 12% for the municipality (Table 2). Should the County be unable to accommodate 40% of growth within its Delineated built-up Areas, additional urban land will be required to accommodate forecasted growth.

In light of the current housing crisis and provincial directives outlined in the *More Homes Built Faster Act*, it is important to plan for additional urban residential land due to the inherent challenges associated with achieving a 40% County-wide intensification target (given historic development patterns within the County). As such, Appendices C through N of this Letter include recommended map changes to Draft Schedules B, B1, C, E, and E1 of the New Dufferin County Official Plan which removes the subject lands' existing 'Countryside Area (S.4.0)' and 'Prime Agricultural (S.4.2)' designations and adds them to Urban Settlement Area designation. Subsequent map changes are also recommended to Schedules A, D, F, G, H, H1, and Appendix 3 of the County's current Official Plan, which are required to fully realize the recommended redesignation.

In keeping with the Provincial Housing Supply Action Plan, ERO No. 019-7119 presents an opportunity to further revise Dufferin County's Official Plan by adding the subject lands to the Urban Settlement Area designation in order to realize their full development potential. Further, the proponents have indicated the potential for the subject lands to be developed with modular housing units which can be brought on stream quicker than traditional dwelling types; thus achieving the objectives of the Province's *More Homes Built Faster Act*. Making this change now, through this ERO, supports the Province's goal of building 1.5 million homes over the next 10 years.

In considering the expansion or creation of a new settlement area through a municipal comprehensive review process, Section 1.1.3.8 of the Provincial Policy Statement states that the following must be demonstrated:

- a) sufficient opportunities to accommodate growth and to satisfy market demand are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;

- b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;
- c) in prime agricultural areas:
  - 1. the lands do not comprise specialty crop areas;
  - 2. alternative locations have been evaluated, and
    - i. there are no reasonable alternatives which avoid prime agricultural areas; and
    - ii. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;
- d) the new or expanding settlement area is in compliance with the minimum distance separation formulae; and
- e) impacts from new or expanding settlement areas on agricultural operations which are adjacent to or close to the settlement area are mitigated to the extent feasible.

The above-noted policies relating to existing prime agricultural areas are satisfied in that the subject lands represent a natural extension of the existing Urban Settlement Area boundary located directly to the southeast. Additionally, the future Draft Plan of Subdivision and Zoning By-law Amendment applications will provide the necessary tools to mitigate any impacts of the proposed urban uses on any nearby agricultural operations. This includes ensuring compliance with the minimum distance separation formulae established by the Province. Further, the enclosed Site Servicing Investigation Letter prepared by SCS Consulting Group Ltd. concludes that the subject site can be serviced by the existing municipal water and wastewater system located to the east of the site (subject to confirmation of capacity and allocation by the Town of Shelburne), or by having a new municipal system constructed on the subject lands; thus satisfying the above policies relating to infrastructure.

The Land Needs Assessment completed by WSP as a part of Dufferin County's Municipal Comprehensive Review identified specific intensification targets (and subsequent settlement area boundary expansions) that would be required to accommodate population and employment growth targets established by the Growth Plan. As previously noted, we believe that achieving these intensification targets will prove difficult given historic development trends within the County and that it is therefore important to plan for additional residential land. The recommended redesignation of the subject lands in the County's New Official Plan will support the Province's goal of building 1.5 million homes over the next 10 years.

### **Recommended Changes to Dufferin County's New and Current Official Plan**

Based on the above, UrbanSolutions recommends the following map changes to Dufferin County's New Official Plan:

1. To amend Draft Schedule B of Dufferin County's New Official Plan, being 'Draft Schedule B – Community Structure and Land Use' by redesignating the subject lands from 'Countryside Area (S.4.0)' to 'Urban Settlement Area' as shown in Appendix C.
2. To amend Draft Schedule B1 of Dufferin County's New Official Plan, being 'Draft Schedule B1 – Community Structure and Land Use' by redesignating the subject lands from 'Countryside Area (S.4.0)' to 'Urban Settlement Area' as shown in Appendix D.

3. To amend Draft Schedule C of Dufferin County's New Official Plan, being 'Draft Schedule C – Prime Agricultural Areas and Rural Lands' by redesignating the subject lands from 'Prime Agricultural Area (S.4.2)' to 'Urban Settlement Area' as shown in Appendix E.
4. To amend Draft Schedule E of Dufferin County's New Official Plan, being 'Draft Schedule E – Natural Heritage Features' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix F.
5. To amend Draft Schedule E1 of Dufferin County's New Official Plan, being 'Draft Schedule E1 – Natural Heritage System' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix G.

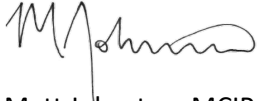
Additionally, the following subsequent map changes to Dufferin County's current Official Plan would also be required to implement the above-noted map changes to the County's New Official Plan:

1. To amend Schedule A of the Dufferin County Official Plan, being 'Schedule A – Provincial Plan Areas' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix H.
2. To amend Schedule D of the Dufferin County Official Plan, being 'Schedule D – Mineral Aggregate Resource Areas' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix I.
3. To amend Schedule F of the Dufferin County Official Plan, being 'Schedule F – Human-Made Hazards' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix J.
4. To amend Schedule G of the Dufferin County Official Plan, being 'Schedule G – Transportation' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix K.
5. To amend Schedule H of the Dufferin County Official Plan, being 'Schedule H – Active Transportation' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix L.
6. To amend Schedule H1 of the Dufferin County Official Plan, being 'Schedule H2 – Active Transportation' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix M.
7. To amend Appendix 3 of the Dufferin County Official Plan, being 'Appendix 3 – Potential Forest Hazard Classification for Wildland Fire' by adding the subject lands to the 'Urban Settlement Area' designation as shown in Appendix N.

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 – Preliminary Environmental Constraints Map

Prepared by Palmer



LEGEND

- Watercourse <sup>1</sup>
- Headwater Drainage Feature (HDF)
- NHS Area (Undifferentiated)
- Ecological Land Classification (ELC)
- Subject Property

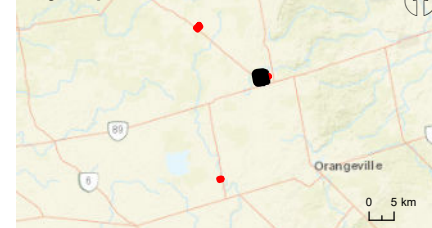
**Constraint Area**

- Low Constraint (47.9 ha)
- Moderate Constraint - Further Study Required (1.5 ha)
- High Constraint (3.7 ha)

**ELC LEGEND**

- AGR: Agricultural
- CUM1: Mineral Cultural Meadow
- FOD: Deciduous Forest
- HR: Hedgerow
- MAM: Mineral Meadow Marsh
- TBD: To Be Determined

**Key Map - Site Location**



North American Datum 1983  
Universal Transverse Mercator Projection Zone 17

Scale: 1:3,300  
Page Size: Tabloid (11 x 17 inches)

Drawn: SM  
Checked: JS  
Date: Aug 1, 2023



NORTH

Source Notes:  
Imagery (2015) provided by Southerwester Ontario Orthophotography Project (SWOOP). Contains information licensed under the Open Government Licence - Ontario.

CLIENT	Roxborough Developments Ltd
PROJECT	Dufferin County DD
TITLE	<b>Preliminary Environmental Constraints and Opportunities</b> (4th Line and Highway 10, Melancthon)
REF. NO.	2103404-3-1
<b>Palmer™</b>	
<b>Figure 3A</b>	



## Appendix B – Site Servicing Investigation Letter

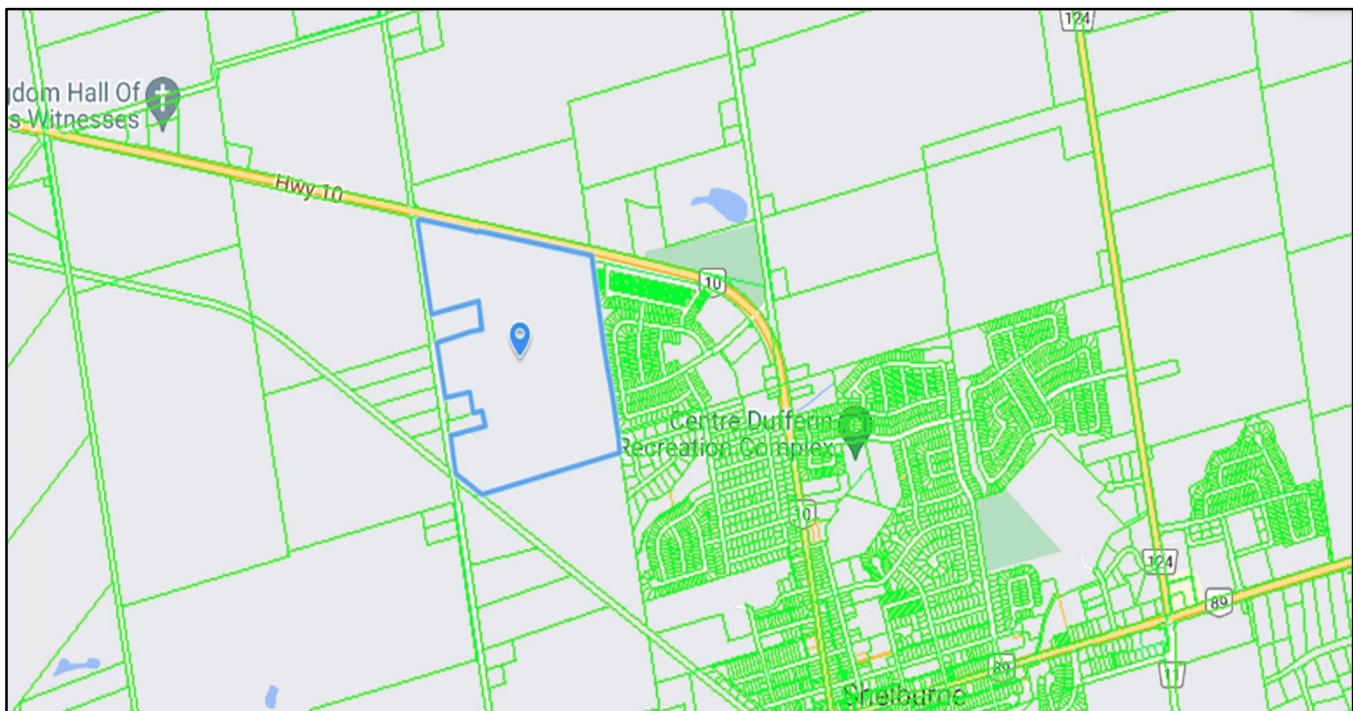
Prepared by SCS Consulting Group Ltd.

**Mr. Eric Silverberg**  
Roxborough Developments Ltd.  
5734 Yonge Street, Suite 508  
Toronto, Ontario, M2M 4E7

Dear Mr. Silverberg:

Re: **Proposed Site Servicing for  
4<sup>th</sup> Line and Highway 10, Township of Melancthon  
County of Dufferin, Ontario**

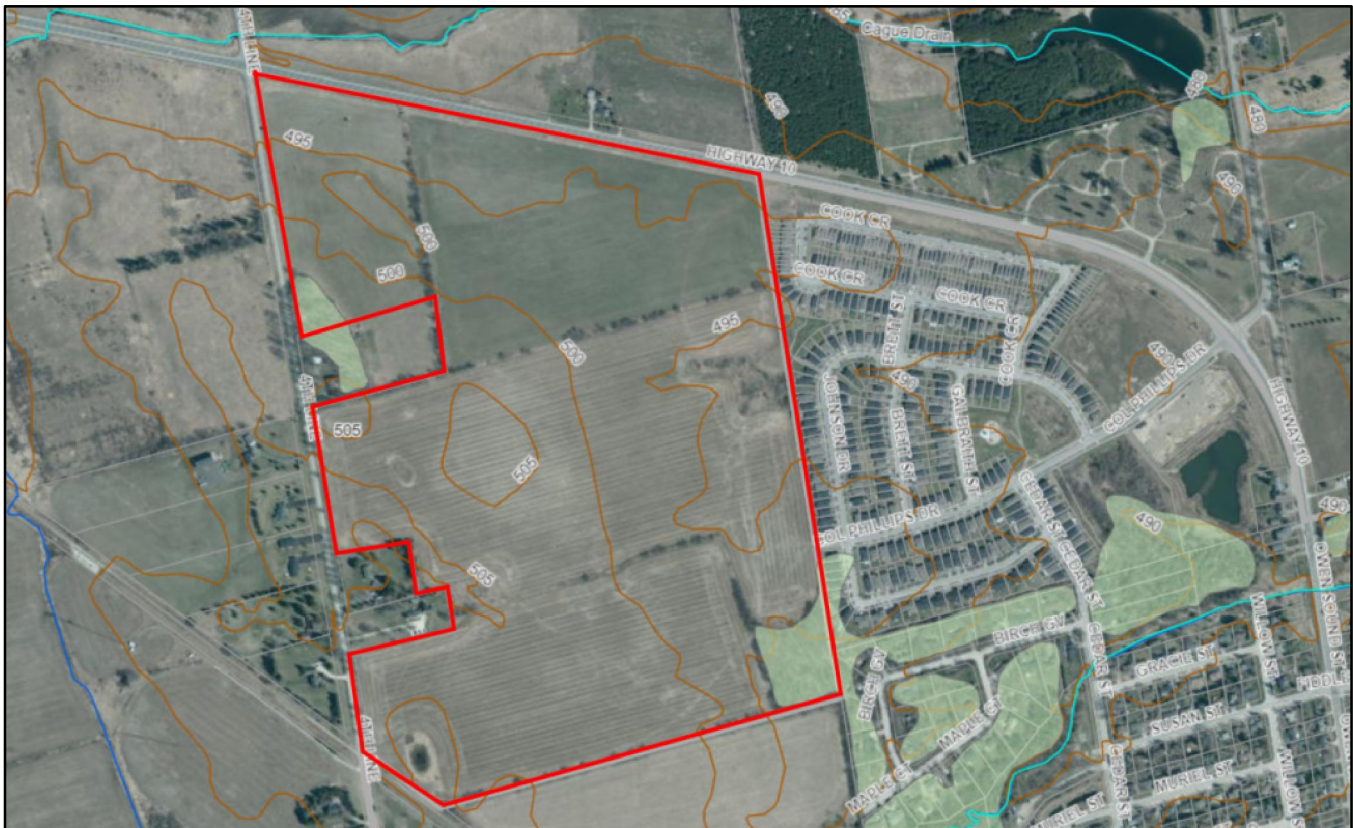
We are writing to provide a preliminary overview of the servicing potential for the lands at 4<sup>th</sup> Line and Highway 10 in the Township of Melancthon, County of Dufferin. The subject lands are immediately west of the Town of Shelburne, County of Dufferin (refer to **Figure 1** below). The subject lands are east of the 4<sup>th</sup> Line, south of Highway 10. The approximate site area is 53.0 ha (131 acres).



**Figure 1 – Site Location (Geowarehouse, 2023)**

## **Existing Topography**

As shown in the figure below, the site falls generally in a north-east direction. There is a high point at an approximate elevation of 505m in the south west third of the site. The remaining areas of the site fall to Highway #10 and to the east of the site with an elevation of approximately 495m.



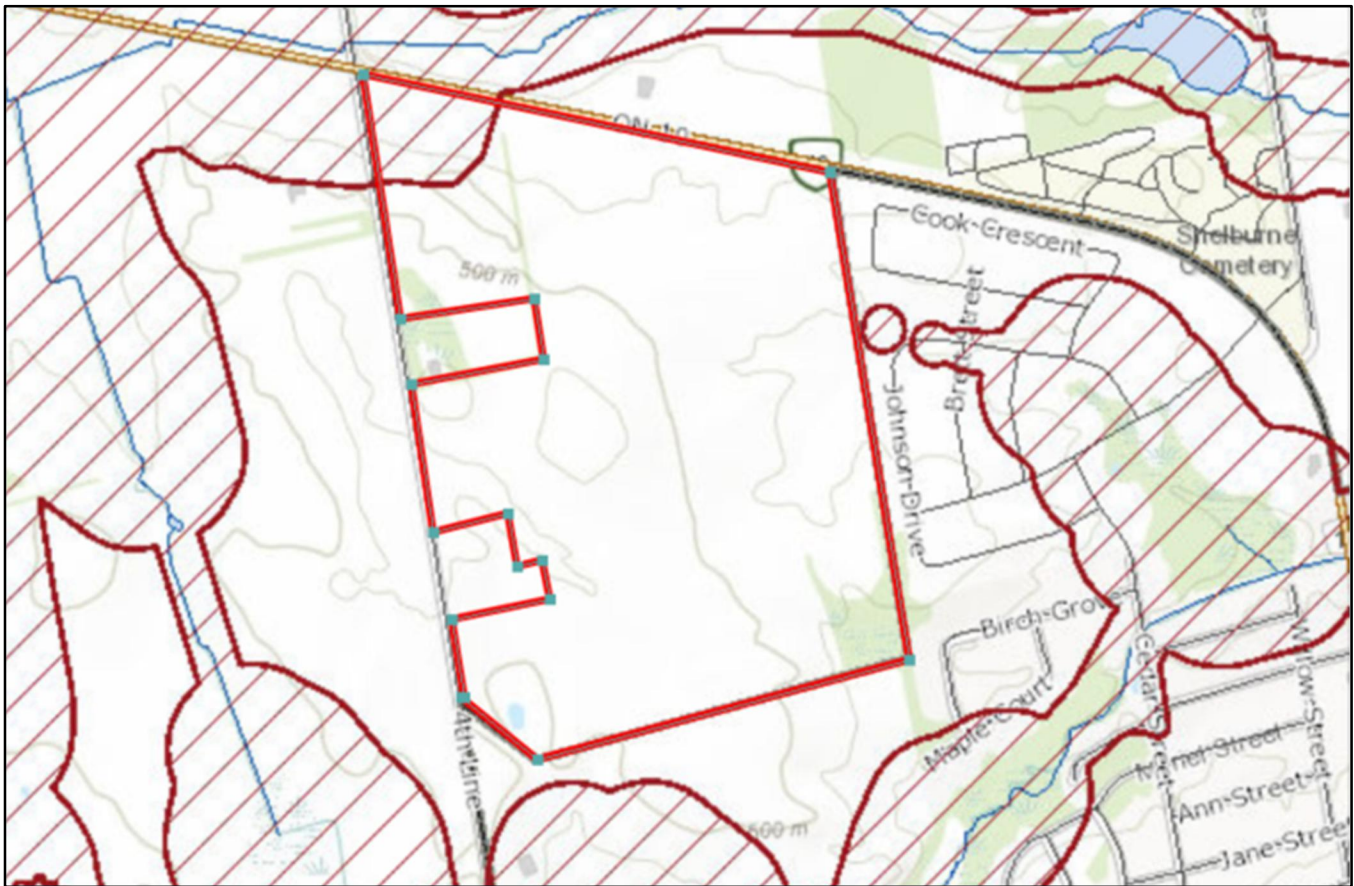
**Figure 2 – Existing Topography** (Dufferin County GIS, 2023)

## **Generic Regulation Mapping**

The subject parcel is in the jurisdiction of the Nottawasaga Valley Conservation Authority (NVCA). The site is located in the Nottawasaga River Watershed, approximately 1.2 km east of the watershed divided between the Nottawasaga River Watershed and the Grand River Watershed. The site's northwest corner includes a regulated area with a watercourse north of Highway #10. The nature of the regulated feature and associated impacts on developable area will be subject to further study and coordination with NVCA.







**Figure 3 – Generic Regulation Mapping (NVCA, 2023)**

### **Proposed Sanitary Servicing**

The subject parcel is immediately west of the Town of Shelburne. An agreement to service from the Town of Shelburne with the Township of Melancthon would allow this site to be serviced by connecting to the western end of the Van Dyk Sanitary Trunk Line.





**Figure 4 – Shelburne Sanitary Sewer System (Water/Wastewater MSP Clas EA Presentation)**

Sanitary sewer stubs have been provided at the locations noted in **Figure 5** below.

Ultimately, the site would discharge to the existing Shelburne Wastewater Treatment Plant. This servicing solution is subject to confirmation of capacity in the downstream system by the Town of Shelburne.

Alternatively, if it is determined that inter-municipal servicing is not accepted or that there is insufficient capacity in the Shelburne WWTP, the Site could be serviced via an on-site Wastewater Treatment Facility outletting to an on-site effluent bed for sub-surface discharge in accordance with provincial guidelines. The sizing and location of the effluent bed will be confirmed at the subsequent study stage based on contributing flow, topography, soil types, groundwater depths, and the soil hydraulic conductivity characteristics.





**Figure 5** – Shelburne Sanitary Sewer Network (*Water/Wastewater MSP Class EA*)

### **Proposed Water Servicing**

The subject parcel is immediately west of the Town of Shelburne. An agreement to service from the Town of Shelburne with the Township of Melancthon would allow this site to be serviced by connecting to the existing watermain on Johnson Drive and Col. Phillips Drive. Looping of the system will be required within the proposed development.







**Figure 5** – Shelburne Water Distribution Network (*Water/Wastewater MSP Class EA*)

The Town of Southgate operates a well-based water system with above-ground reservoir storage.

A future hydraulic analysis will be necessary to confirm the appropriate infrastructure sizing and configuration to provide adequate supply and pressure to service the proposed development and to confirm that the existing water storage and supply infrastructure is adequate to service the subject lands.



Re: | **Proposed Site Servicing for  
4th Line and Highway 10, Township of Melancthon  
County of Dufferin, Ontario**

File #: 2596  
June 8, 2023  
Page 7 of 7

## **Summary**

In summary, the site can be serviced from the existing municipal water and wastewater system located east of the site, subject to the Town of Shelburne's confirmation of capacity and allocation. A servicing agreement must be in place between the Town of Shelburne and the Township of Melancthon.

Please contact the undersigned if you have any questions or require additional information.

Sincerely,

**SCS Consulting Group Ltd.**



Steve Schaefer, P. Eng.

Principal

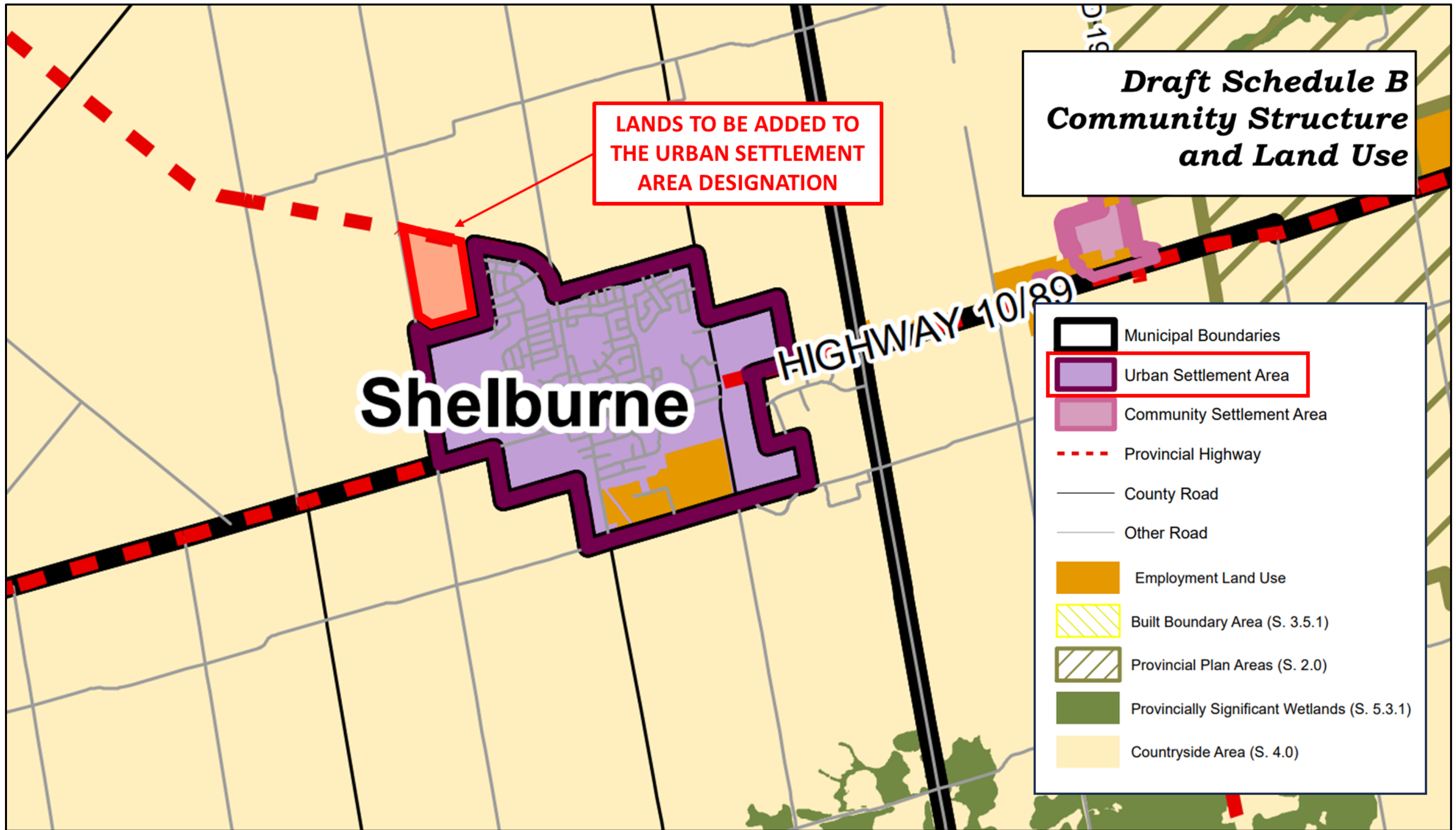
sschaefer@scsconsultinggroup.com

P:\2596 Melancthon 4th Line and Highway 10 (Shelburne)\Design\Reports\Servicing Investigation\2023 06(Jun) 01 - Preliminary Servicing Brief\2596-rf-Site Servicing Investigation Letter Shelburne-08Jun23.docx



## Appendix C – Draft Schedule B of Dufferin County’s New Official Plan

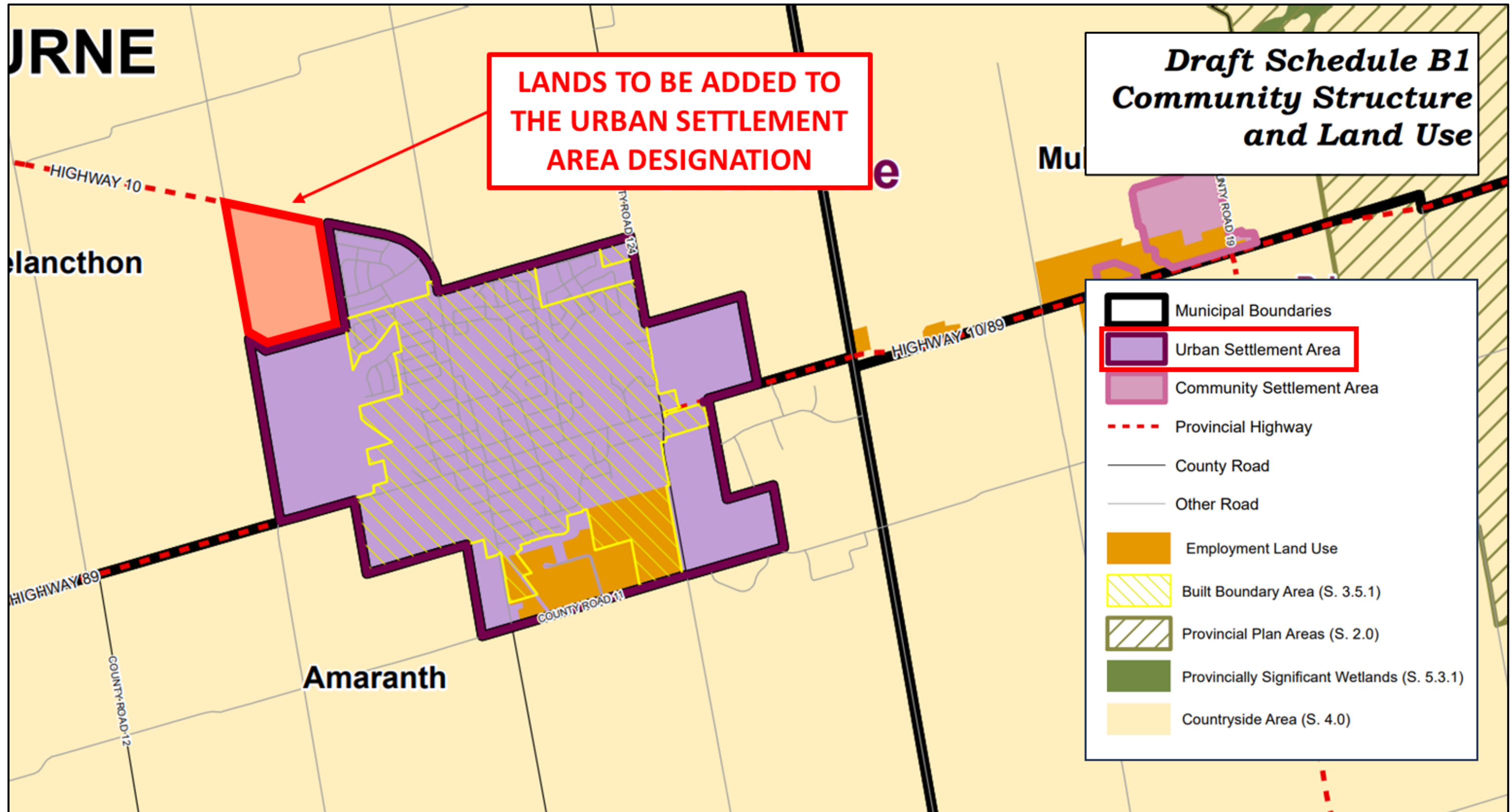
Proposed Changes to Draft Schedule B – Community Structure of Dufferin County’s New Official Plan





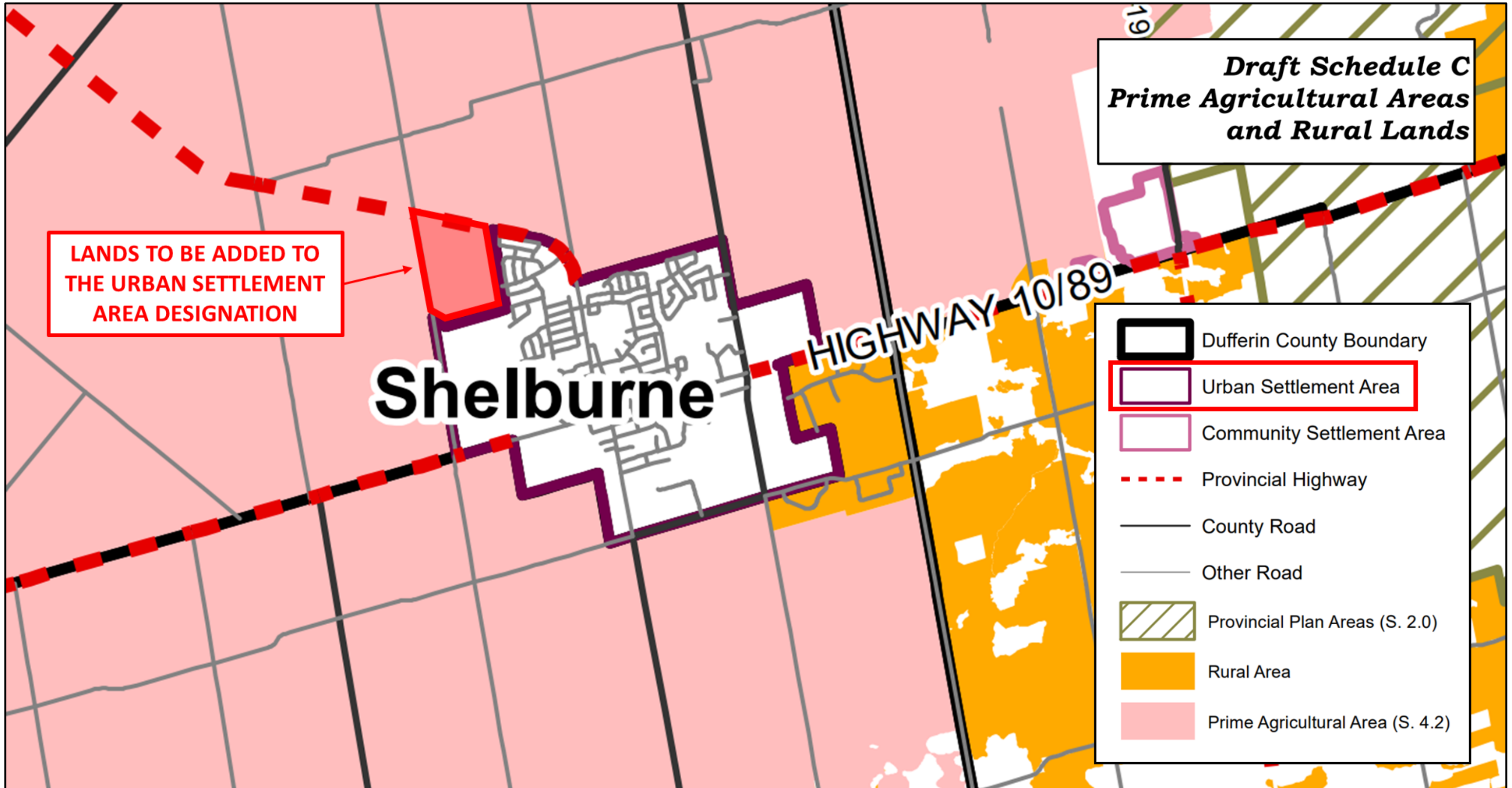
## Appendix D – Draft Schedule B1 of Dufferin County’s New Official Plan

Proposed Changes to Draft Schedule B1 – Community Structure and Land Use of Dufferin County’s New  
Official Plan



## Appendix E – Draft Schedule C of Dufferin County’s New Official Plan

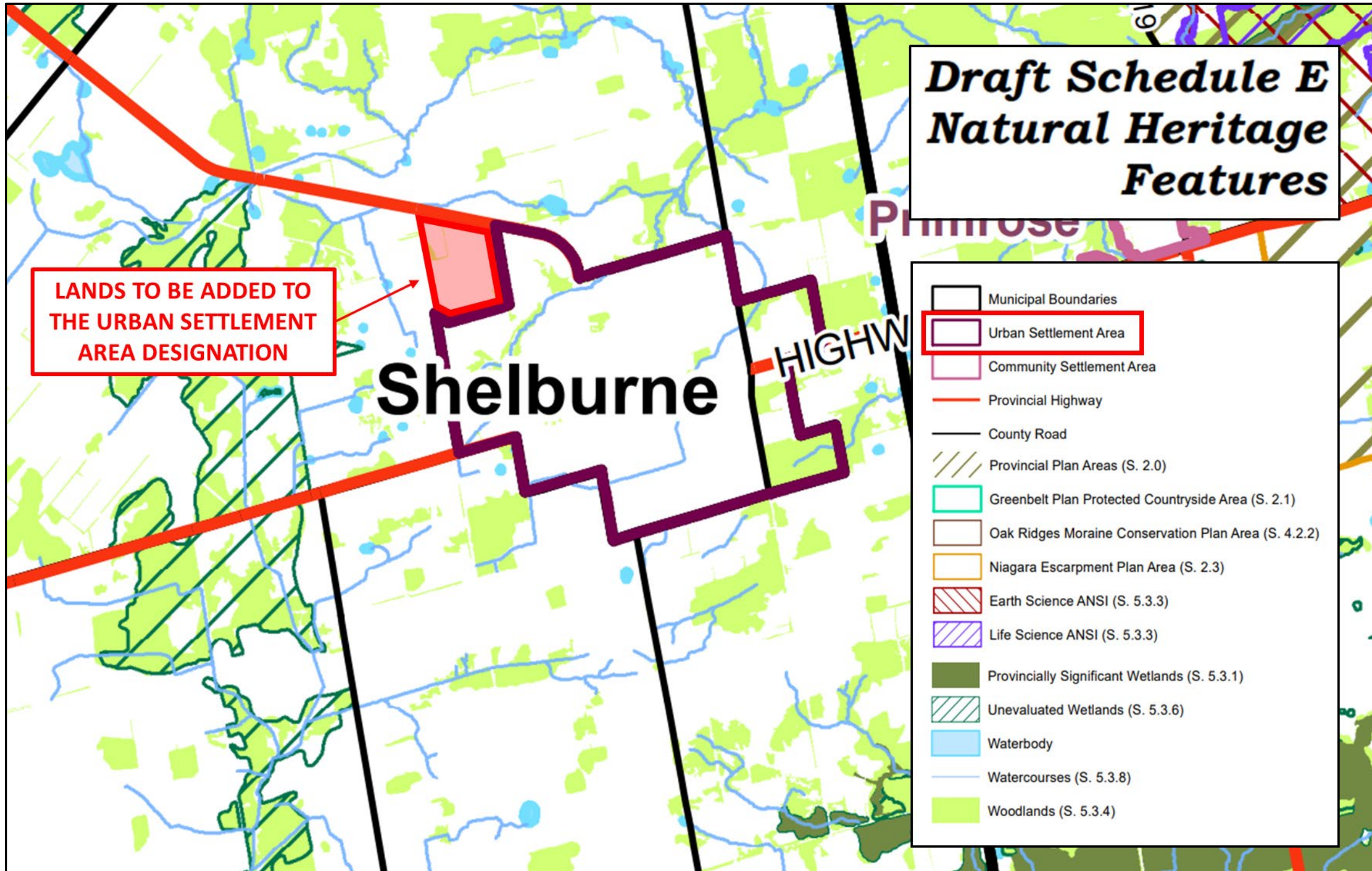
Proposed Changes to Draft Schedule C – Prime Agricultural Areas and Rural Lands of Dufferin County’s  
New Official Plan





## Appendix F – Draft Schedule E of Dufferin County’s New Official Plan

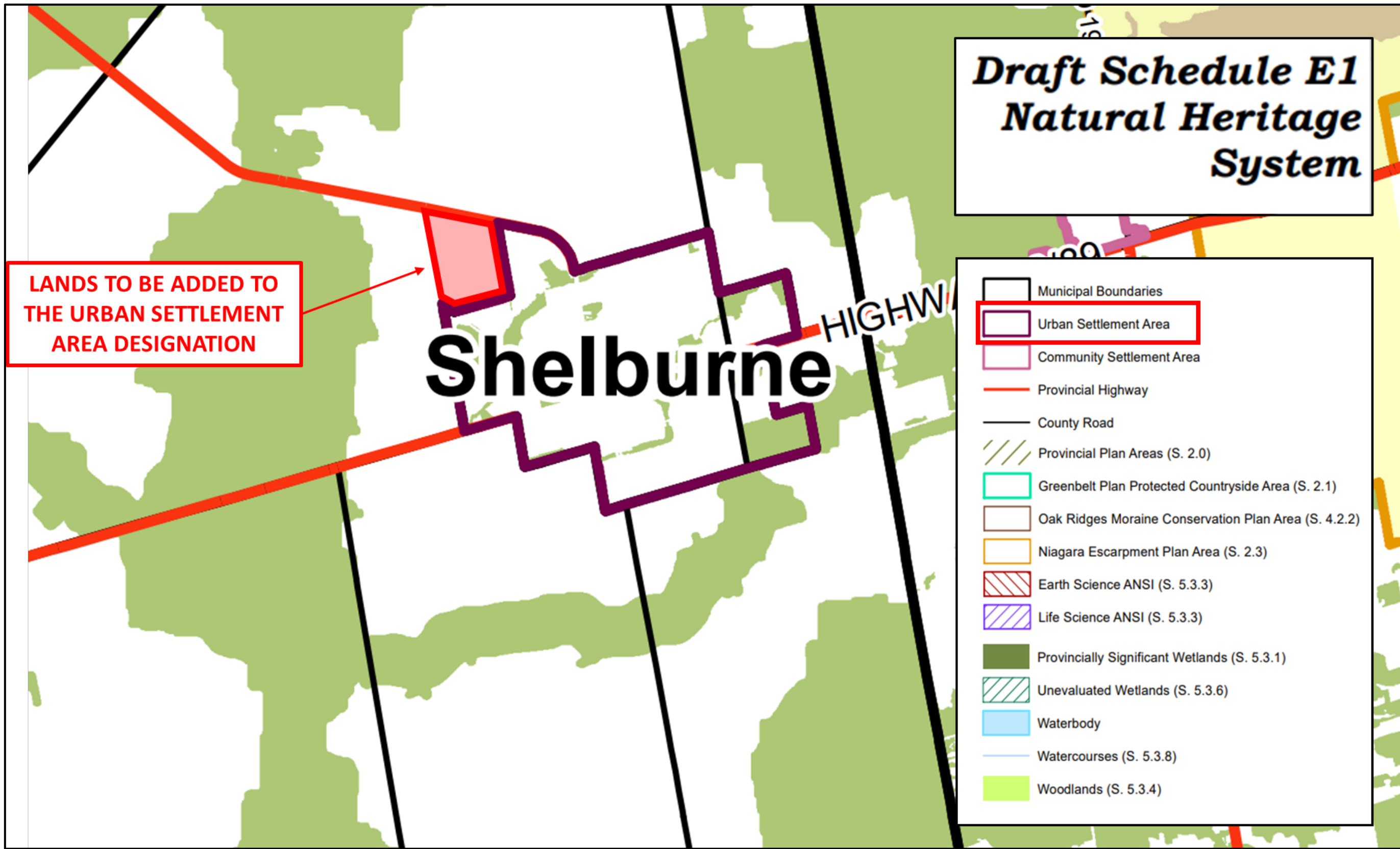
Proposed Changes to Draft Schedule E – Natural Heritage Features of Dufferin County’s New Official Plan



## Appendix G – Draft Schedule E1 of Dufferin County’s New Official Plan

Proposed Changes to Draft Schedule E1 – Natural Heritage System of Dufferin County’s New Official Plan

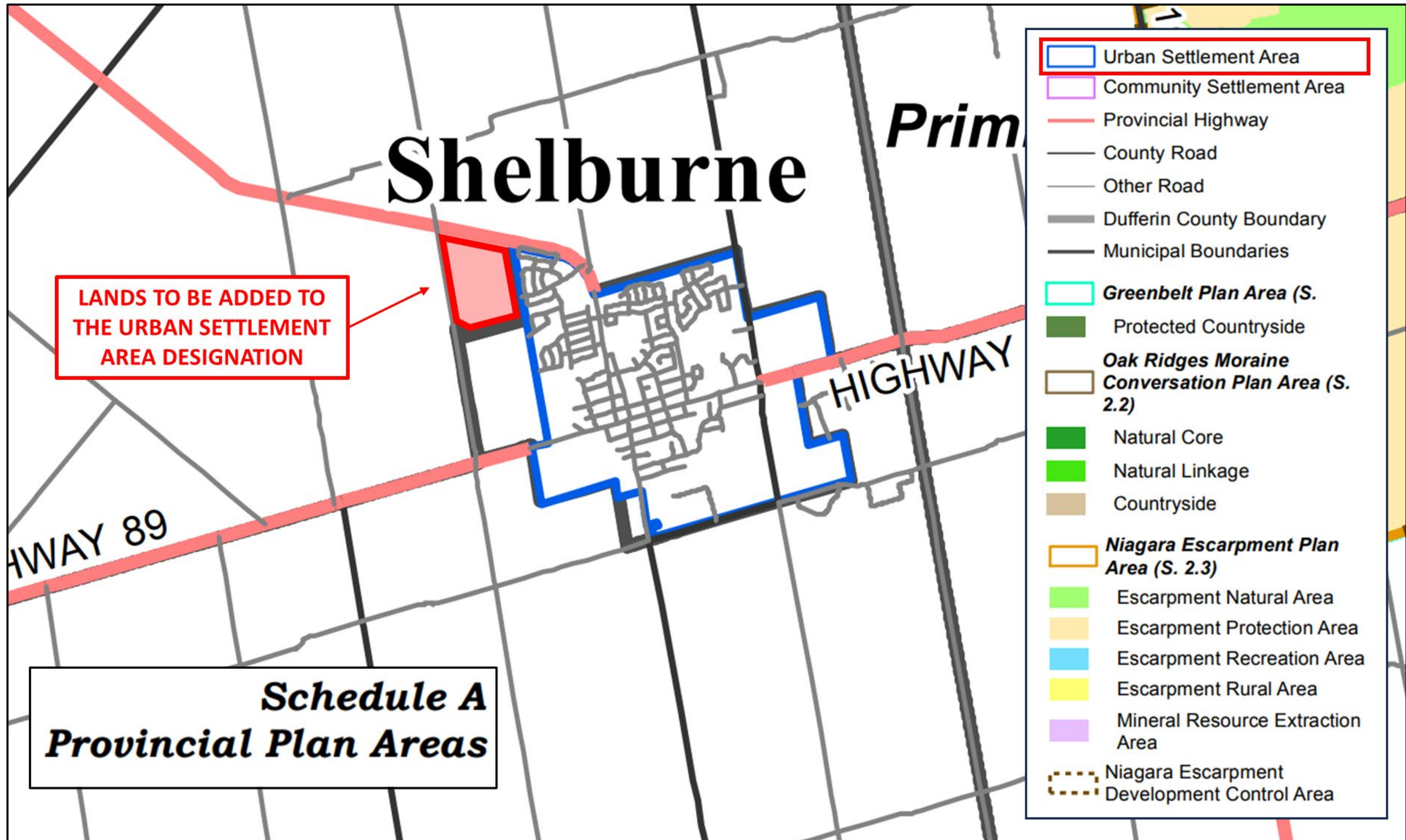






## Appendix H – Schedule A of the Dufferin County Official Plan

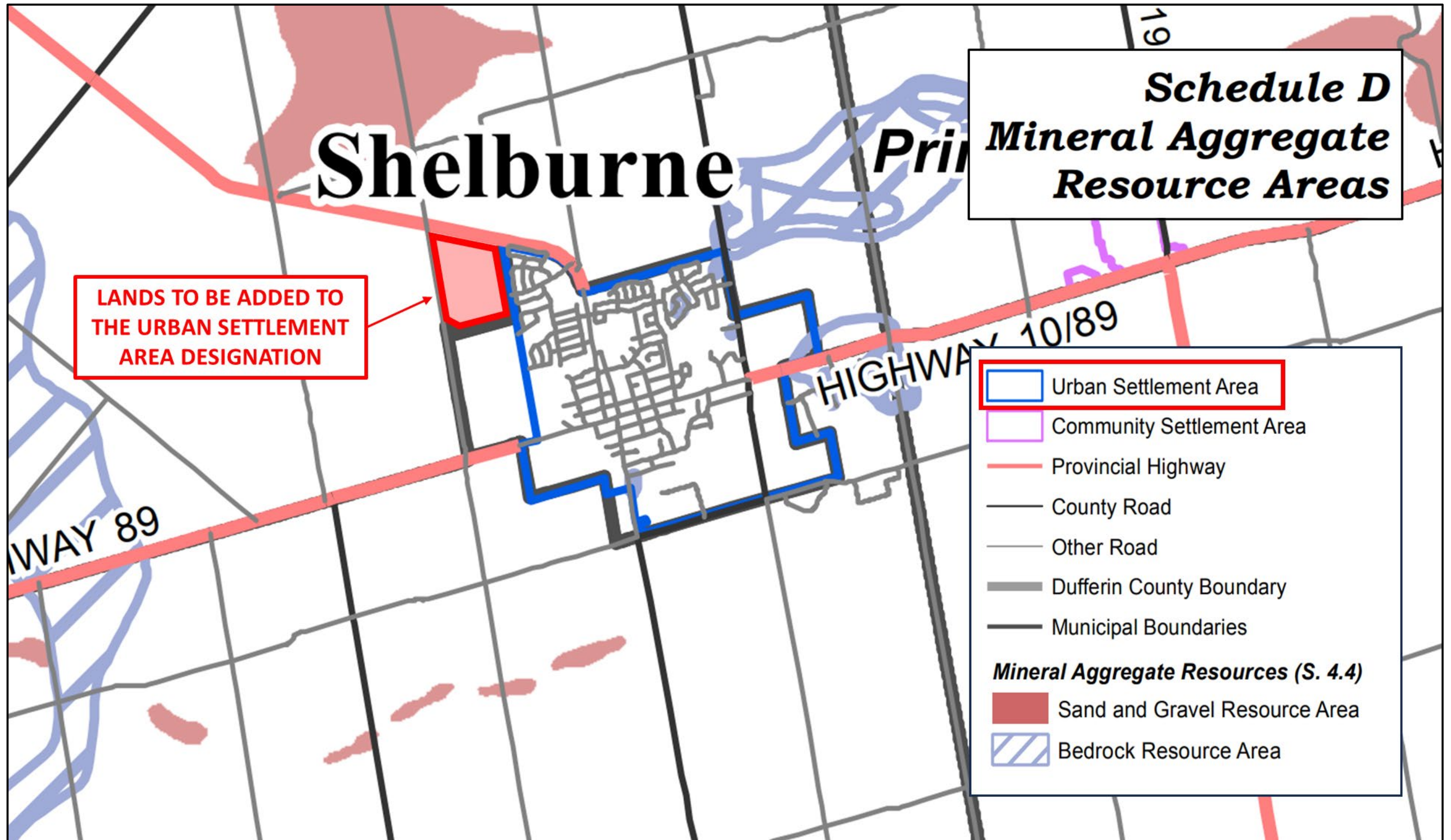
Proposed Changes to Schedule A – Provincial Plan Areas of the Dufferin County Official Plan



## Appendix I – Schedule D of the Dufferin County Official Plan

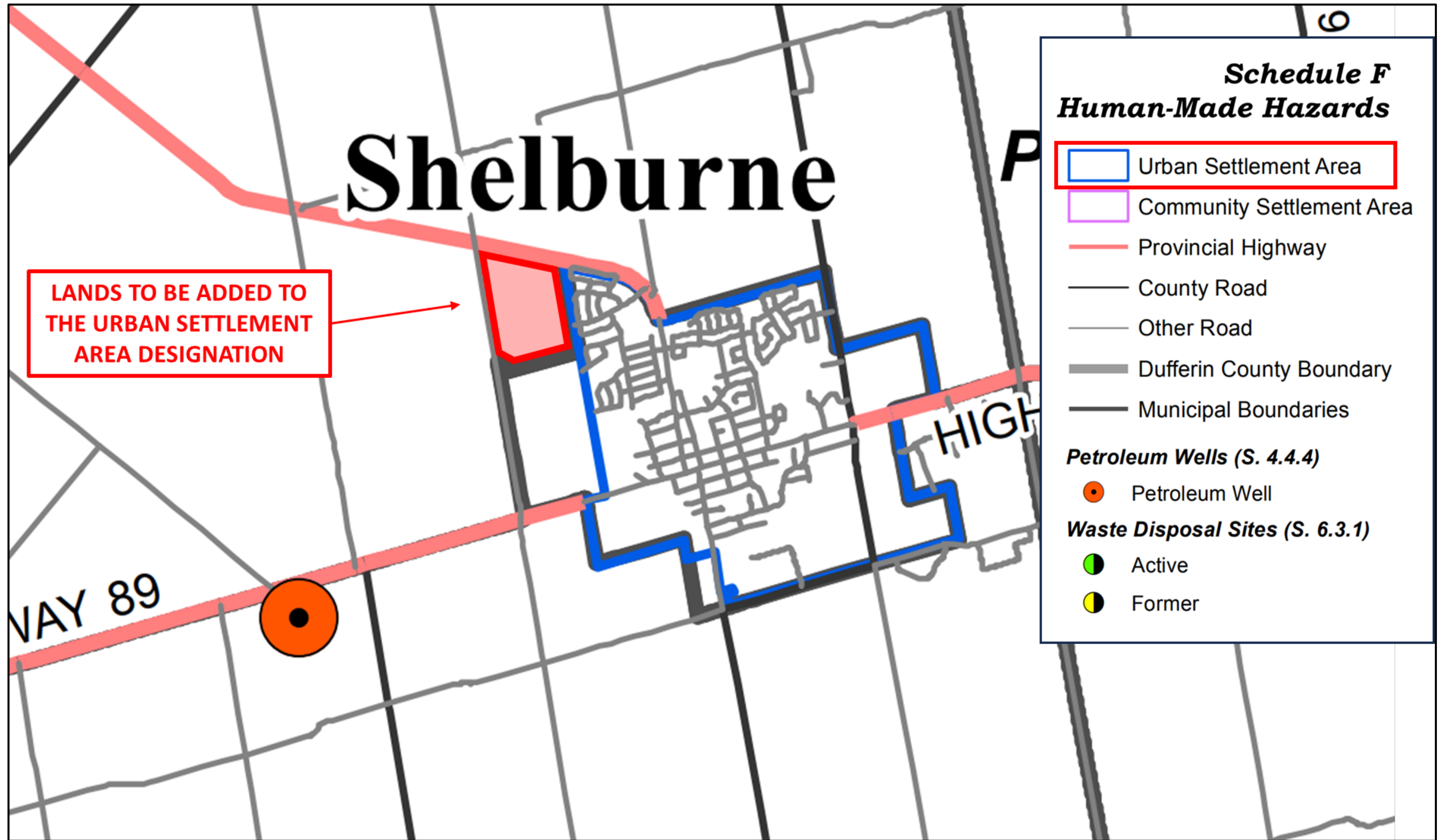
Proposed Changes to Schedule D – Mineral Aggregate Resource Areas of the Dufferin County Official Plan





## Appendix J – Schedule F of the Dufferin County Official Plan

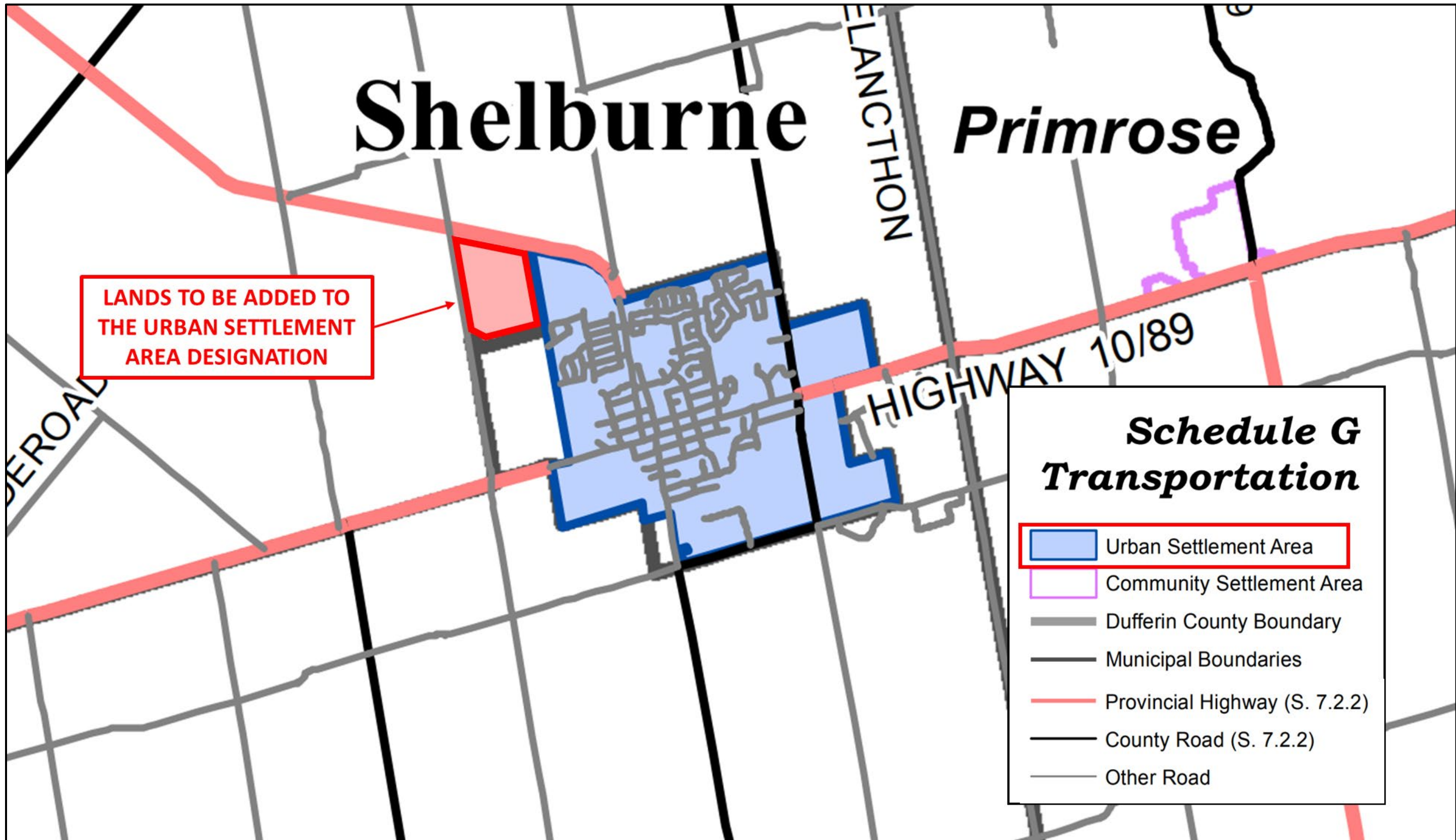
Proposed Changes to Schedule F – Human Made Hazards of the Dufferin County Official Plan



## Appendix K –Schedule G of the Dufferin County Official Plan

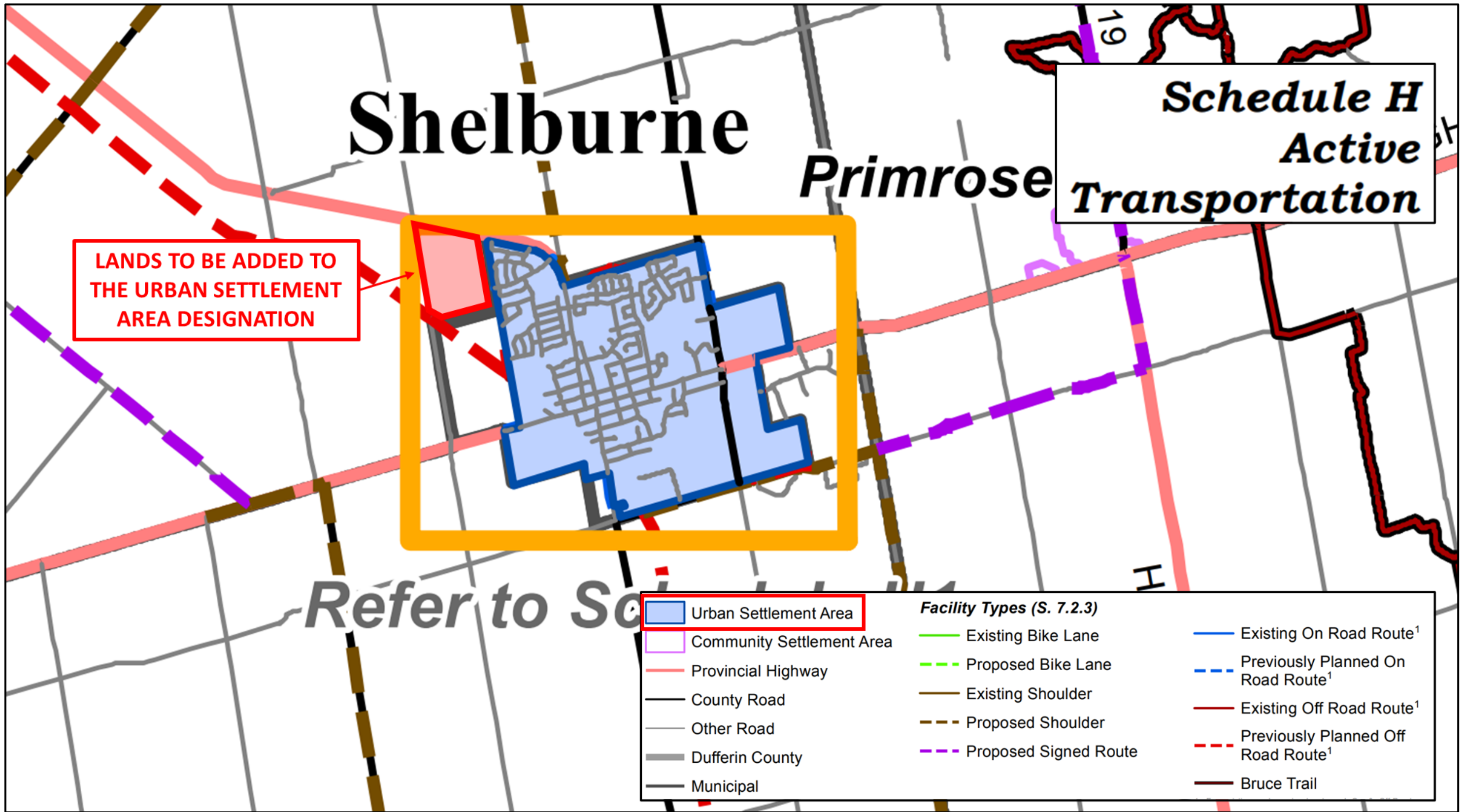
### Proposed Changes to Schedule G –Transportation of the Dufferin County Official Plan





## Appendix L – Schedule H of the Dufferin County Official Plan

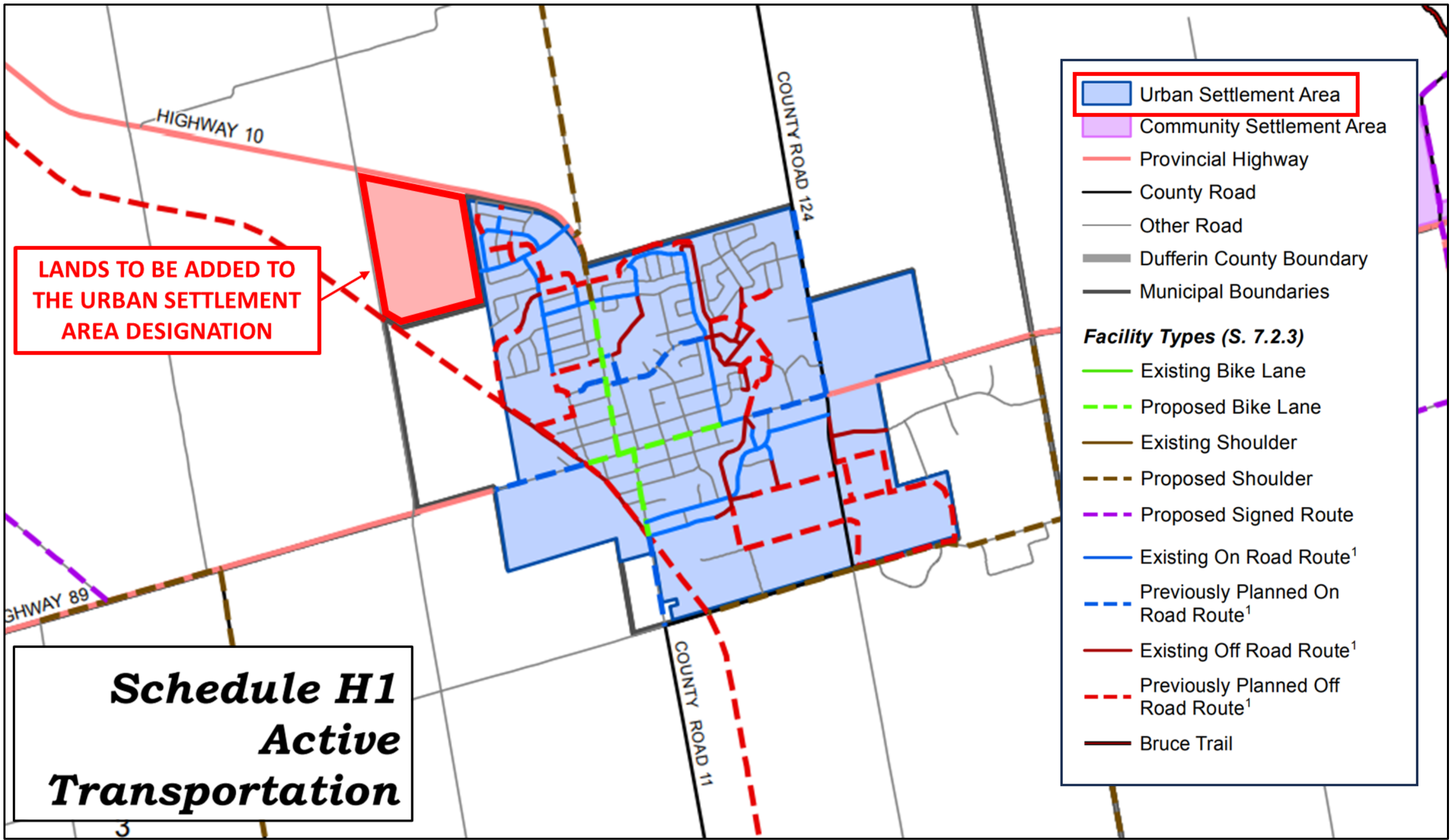
Proposed Changes to Schedule H – Active Transportation of the Dufferin County Official Plan



## Appendix M – Schedule H1 of the Dufferin County Official Plan

Proposed Changes to Schedule H1 – Active Transportation of the Dufferin County Official Plan





## Appendix N – Appendix 3 of the Dufferin County Official Plan

Proposed Changes to Appendix 3 – Potential Forest Hazard Classification for Wildfire of the Dufferin  
County Official Plan

