

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 2nd Floor 659 Exeter Road London, ON N6E 1L3

RE: Request to Facilitate the Proposed Redesignation of the Subject Lands 73384 County Road 25, Grand Valley, 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 73384 County Road 25, Grand Valley, 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 13th, 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 57.8 hectares (142.7 acres) and are predominantly comprised of vacant agricultural land. The lands are bounded by additional agricultural lands to the north, agricultural lands and single detached dwellings within the County's rural area to the east (opposite County Road 25), an existing Urban Settlement Area Boundary directly to the south, and agricultural lands to the 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), the small northeastern parcel and two

southerly parcels 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 north of an existing Urban Settlement Area Boundary, as outlined in Figure 2 below.

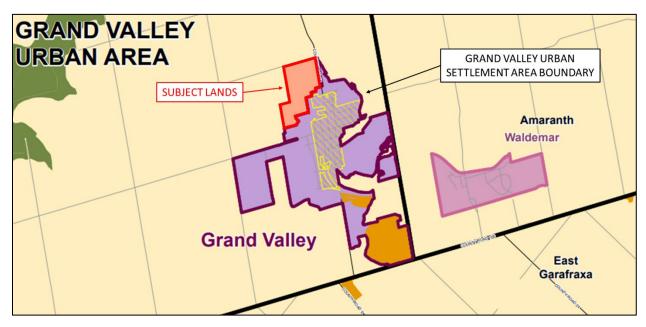


Figure 2 – Subject Lands in Proximity to the Existing Urban Settlement Area Boundary

The lands located directly south of the subject lands within the existing Urban Settlement Area are comprised of a church, cemetery, a public school, a YMCA Community Centre, a daycare, restaurants, and a newly constructed low-rise residential subdivision.

Existing Planning Policy Framework

Province of Ontario

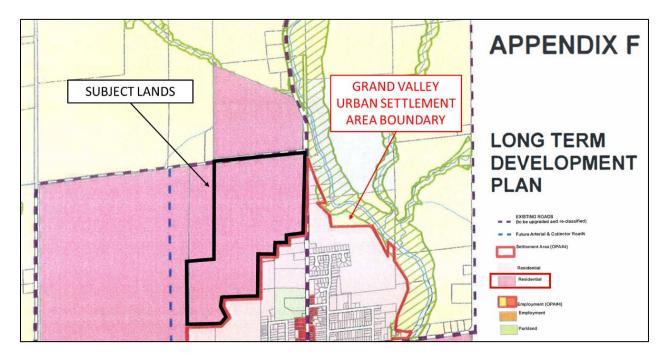
To address current housing supply concerns, the Province of Ontario has established the Housing Supply Action Plan and the *More Homes Built Faster Act;* which has been given Royal Assent. This Plan is part of a long-term strategy to help build more homes and make life more affordable for families across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

Town of Grand Valley Official Plan

The subject lands are currently designated 'Agriculture' on Schedule A-1 – Land Use and as 'Residential' on Appendix F – Long Term Development Plan of the Town of Grand Valley Official Plan. The lands are also situated directly east of a planned Arterial/Collector Road, as outlined on Appendix F (Figure 3).



 $\textit{Figure 3-Appendix F-Long Term Development Plan-Town of Grand Valley Official Plan-Town Official Plan-Town of Grand Valley Official Plan-Town Offi$

Town of Grand Valley Comprehensive Zoning By-law No. 2009-10

The subject lands are currently zoned 'Agricultural' on Schedule A-1 of the Town of Grand Valley Comprehensive Zoning By-law No. 2009-10.

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 Grand Valley's existing municipal water and wastewater system located south of the site (subject to confirmation of capacity and allocation by the Town of Grand Valley), or by having a new municipal system constructed on the subject lands to service future development on-site and within the immediate area. 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.

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):

	Total Dwelling Demand 2021 to 2051	% of Dwelling Units Outside Settlement Areas	Dwelling Units Outside Settlement Areas	Dwelling Units Inside Settlement Areas
Amaranth	1,140	19%	216	924

East Garafraxa	354	26%	92	263
Grand Valley	2,445	0%	0	2,445
Melancthon	227	43%	99	129
Mono	180	55%	98	82
Mulmur	298	26%	79	219
Orangeville	3,620	0%	0	3,620
Shelburne	2,075	0%	0	2,075
County Total	10,339	6%	582	9,757

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:

	Current DCOP Minimum Intensification Target	Proposed OPA 2 Minimum Intensification Target
Grand Valley	12%	40%
Orangeville	50%	60%
Shelburne	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 the 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 Grand Valley's Urban Settlement Area 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 south and are designated for future residential uses in the Town of Grand Valley Official Plan. 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 south of the site (subject to confirmation of capacity and allocation by the Town of Grand Valley), 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:

- 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**

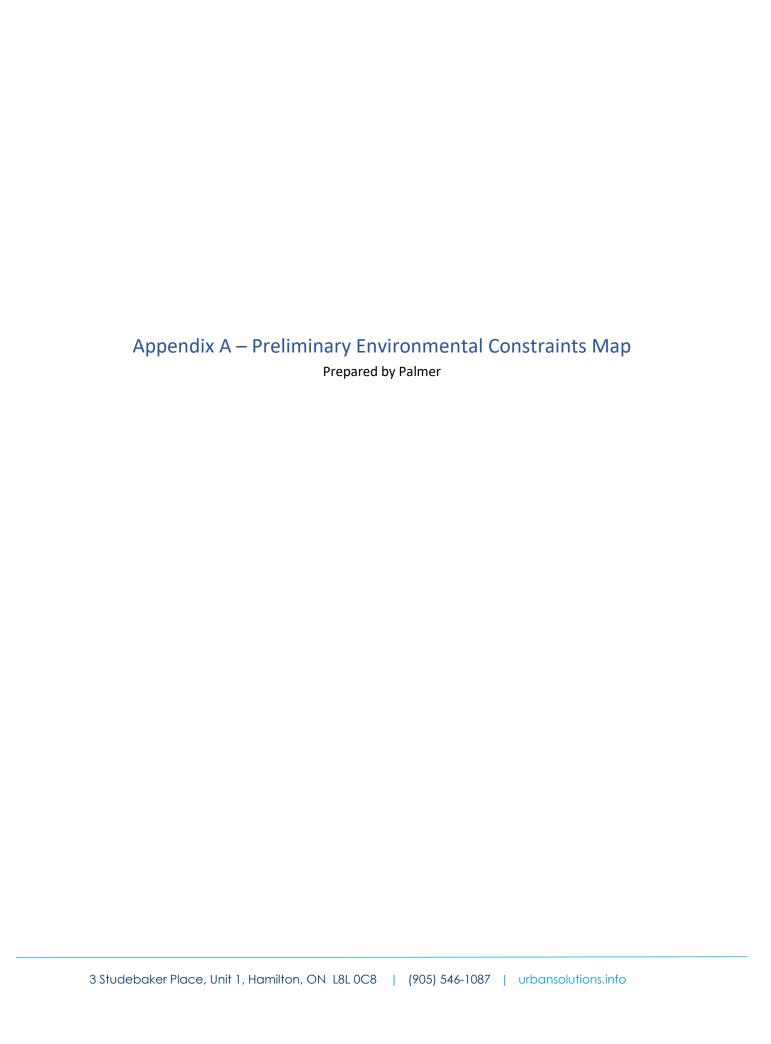
Matt Johnston, MCIP, RPP

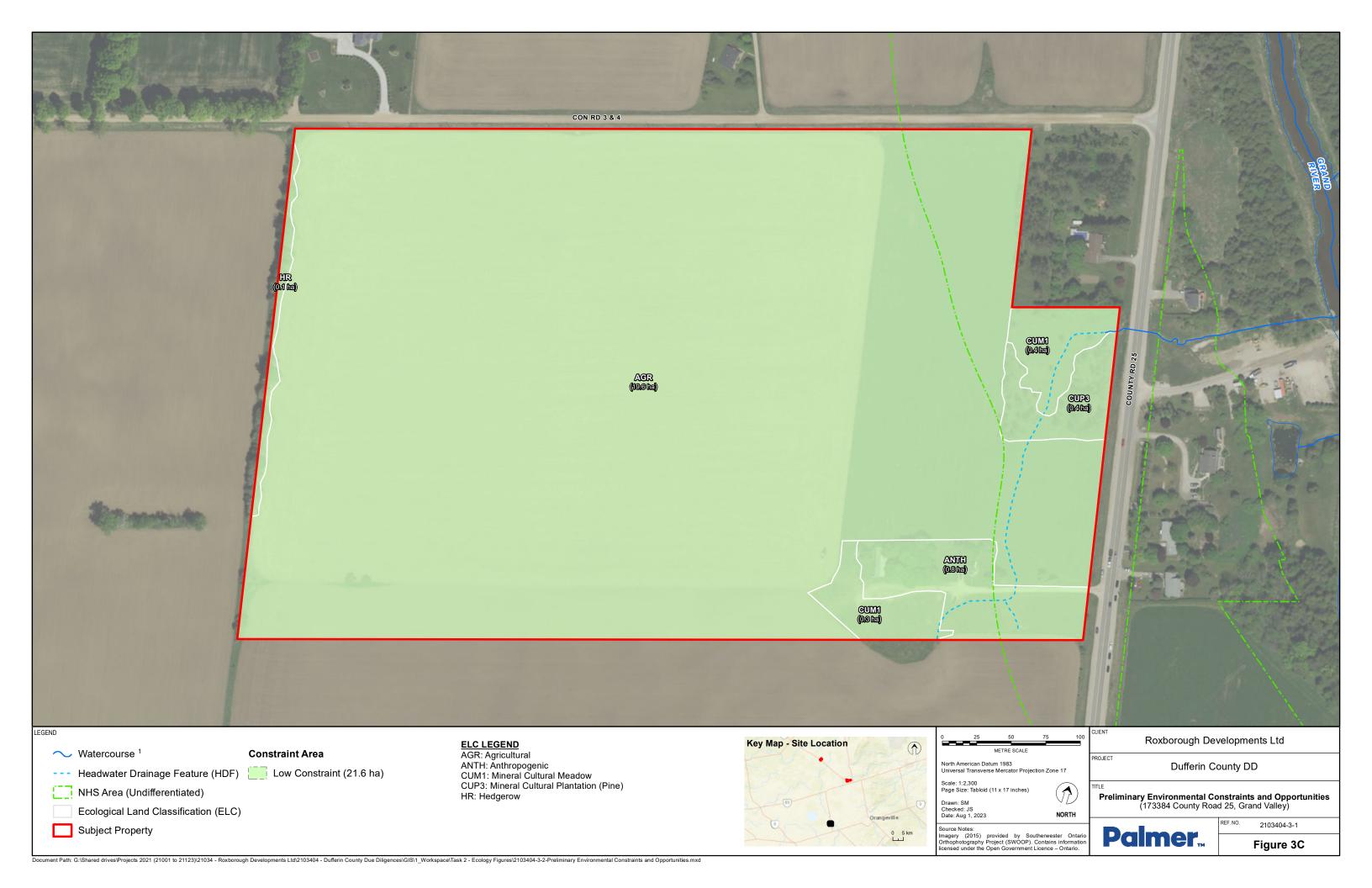
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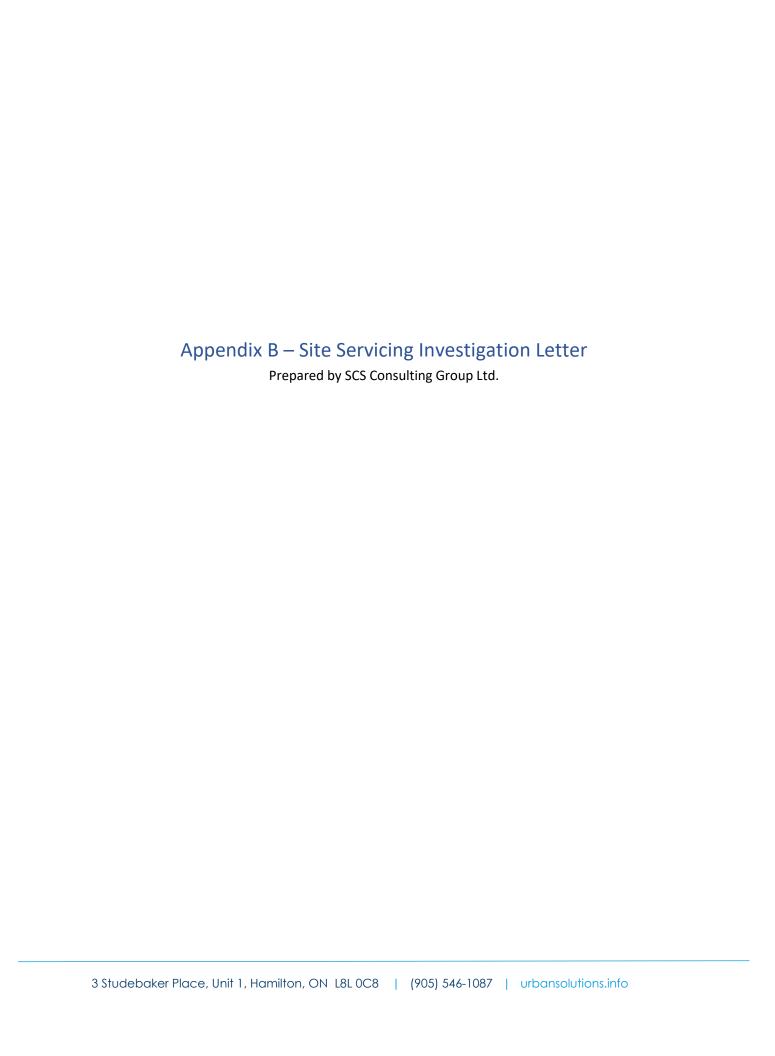
AJGL Group Inc. (via email) cc:

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

m. Le Blace









File #: 2597

Date: | February 10, 2023

Mr. Eric Silverberg

Roxborough Developments Ltd. 5734 Yonge Street, Suite 508 Toronto, Ontario, M2M 4E7

Dear Mr. Silverburg:

Re:

Proposed Site Servicing for

173384 County Road #25, Town of Grand Valley

County of Dufferin, Ontario

We are writing to provide a preliminary overview of the servicing potential for the lands located at 173384 Dufferin County Road #25, adjacent to the settlement area limit in the Town of Grand Valley in the County of Dufferin. As shown in **Figure 1** below, the site is located west of Dufferin County Road #25, south of Concession Road #4. The approximate site area is 21.65 ha (53.52 acres).

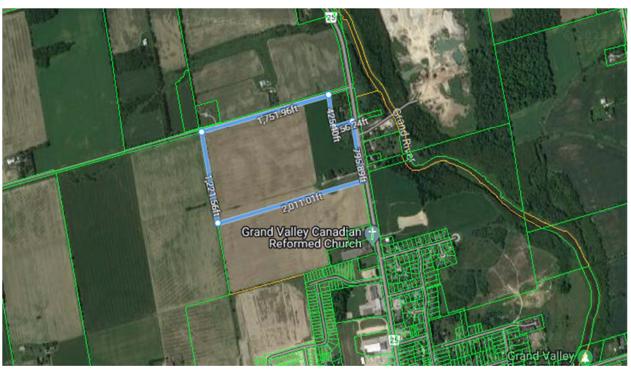


Figure 1 – Site Location (*Geowarehouse*)

Existing Topography

As shown in the figure below, the site falls from west to east. There is a high point at an approximate elevation of 480m in the south west corner of the site. The remaining area of the site falls towards County Road #25 with an elevation of approximately 465m.



Figure 2 – Existing Topography (Ontario Natural Heritage Areas, 2023)

Generic Regulation Mapping

There is a tributary to the Grand River on the eastern portion of the site that has a regulated area associated with it, refer to **Figure 3** below. The Grand River is located just east of the site.



Figure 3 – Generic Regulation Mapping (Grand River CA)

Proposed Sanitary Servicing

The subject lands can be serviced via two options, as follows.

The subject parcel can be serviced via the Grand Valley Wastewater Collection and Treatment System, by connecting to the northern end of the existing system, refer to the red line on **Figure 4**. An existing sanitary sewer extends just north of Fife Road. Connection to the existing system is subject to confirmation of capacity in the downstream system by the Town.

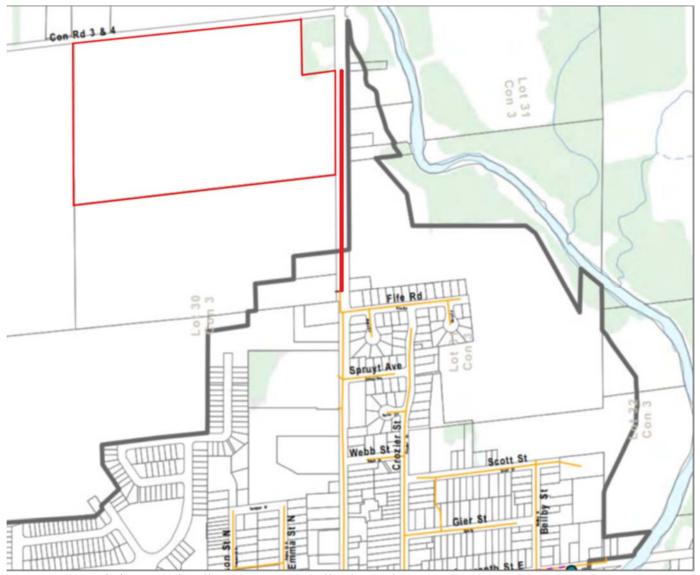


Figure 4 – Existing Grand Valley Wastewater Collection and Treatment System (*Grand Valley Master Plan Environmental Assessment*)

The existing Grand Valley Wastewater System is comprised of a gravity sewer collection, two sewage pumping stations, and a conventional Wastewater Pollution Control Plant (WPCP) located on Watson Road, with outlet directly to the Grand River. It is currently operated by Ontario Clean Water Agency (OCWA).

Alternatively, a new wastewater treatment plant can be constructed on the subject land to accept flows from this parcel and future development in this immediate area. A potential surface outlet for an on-site wastewater treatment solution would be to the Grand River, which has municipal access to the north of the subject lands, subject to an assimilative capacity assessment.

Proposed Water Servicing

The subject lands can be serviced via two options, as follows.

The subject parcel can be serviced by the Grand Valley Water Distribution System. Servicing the site will require an extension of the existing local municipal watermain north of Fife Road on County Road #25, refer to the blue line on **Figure 5**. Looping of the system will be required within the proposed development.

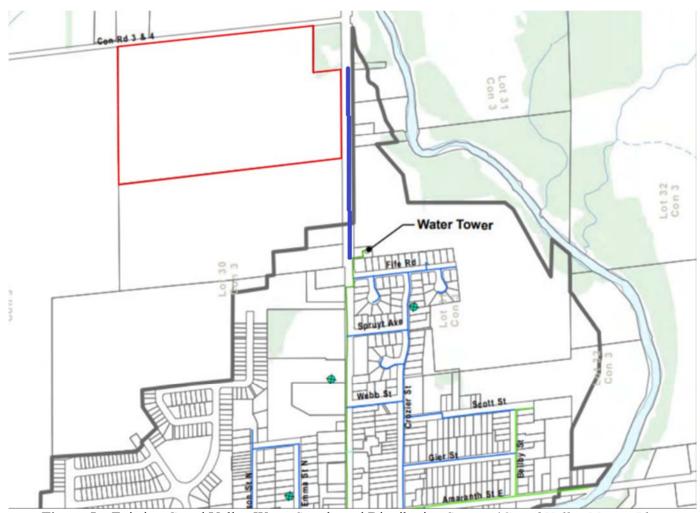


Figure 5 – Existing Grand Valley Water Supply and Distribution System (*Grand Valley Master Plan Environmental Assessment*)

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 the adequacy of the existing water storage and supply capacity.

Re: | Proposed Site Servicing for 173384 County Road #25, Town of Grand Valley County of Dufferin, Ontario File #: 2597 February 10, 2023 Page 6 of 6

The Grand Valley Water Supply System relies on four groundwater wells, three of which are currently in service. The existing water distribution system includes water storage in the form of a water tower, located on the north end of the system off County Road 25, north of Fife Road.

Summary

In summary, the site can be serviced from the existing municipal water and wastewater system, located south of the site, subject to confirmation of capacity and allocation by the Town of Grand Valley. Alternatively, a new municipal system can be designed, approved and constructed to service the subject site.

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

Sincerely,

SCS Consulting Group Ltd.

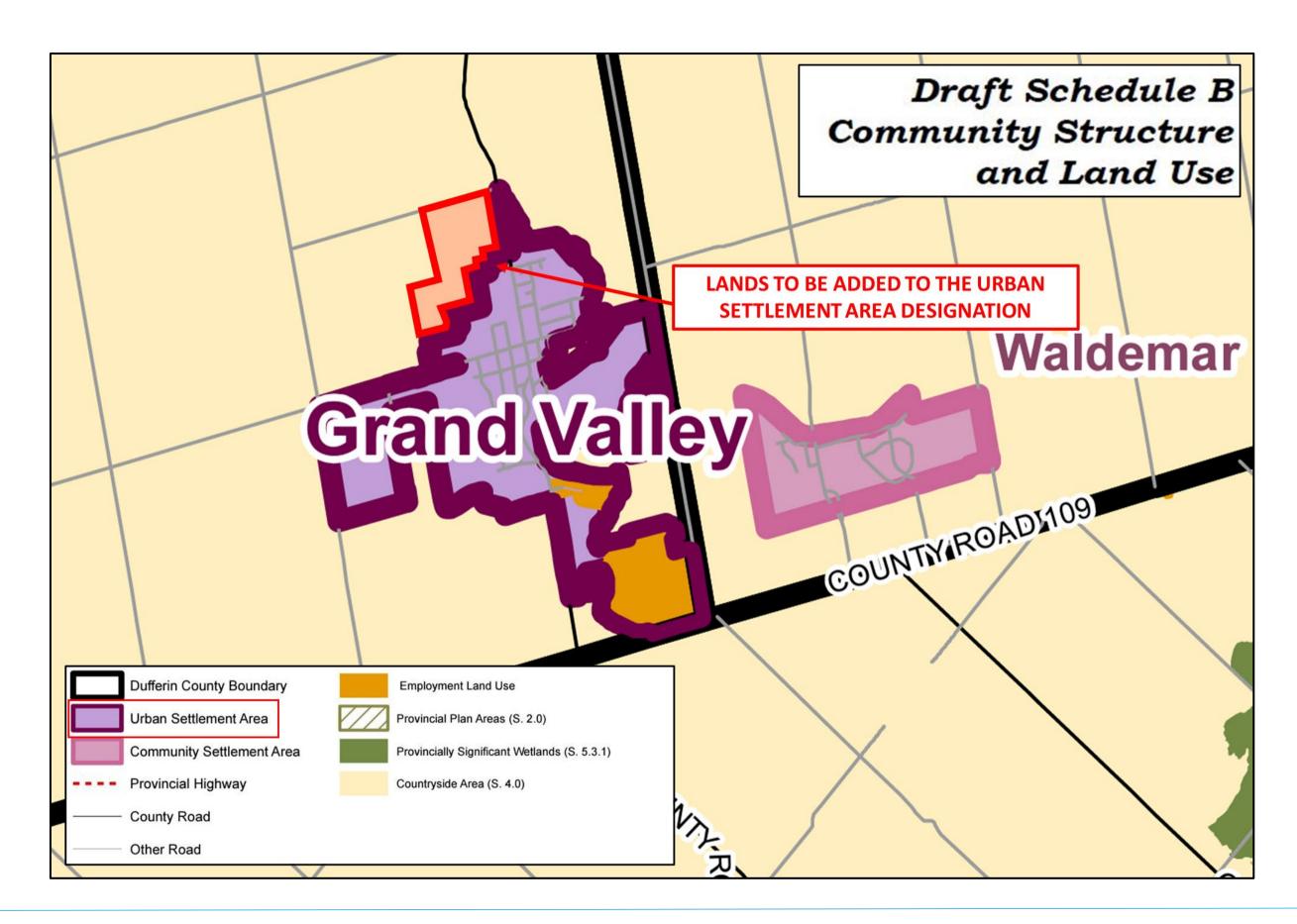
Steve Schaefer, P. Eng.

Principal

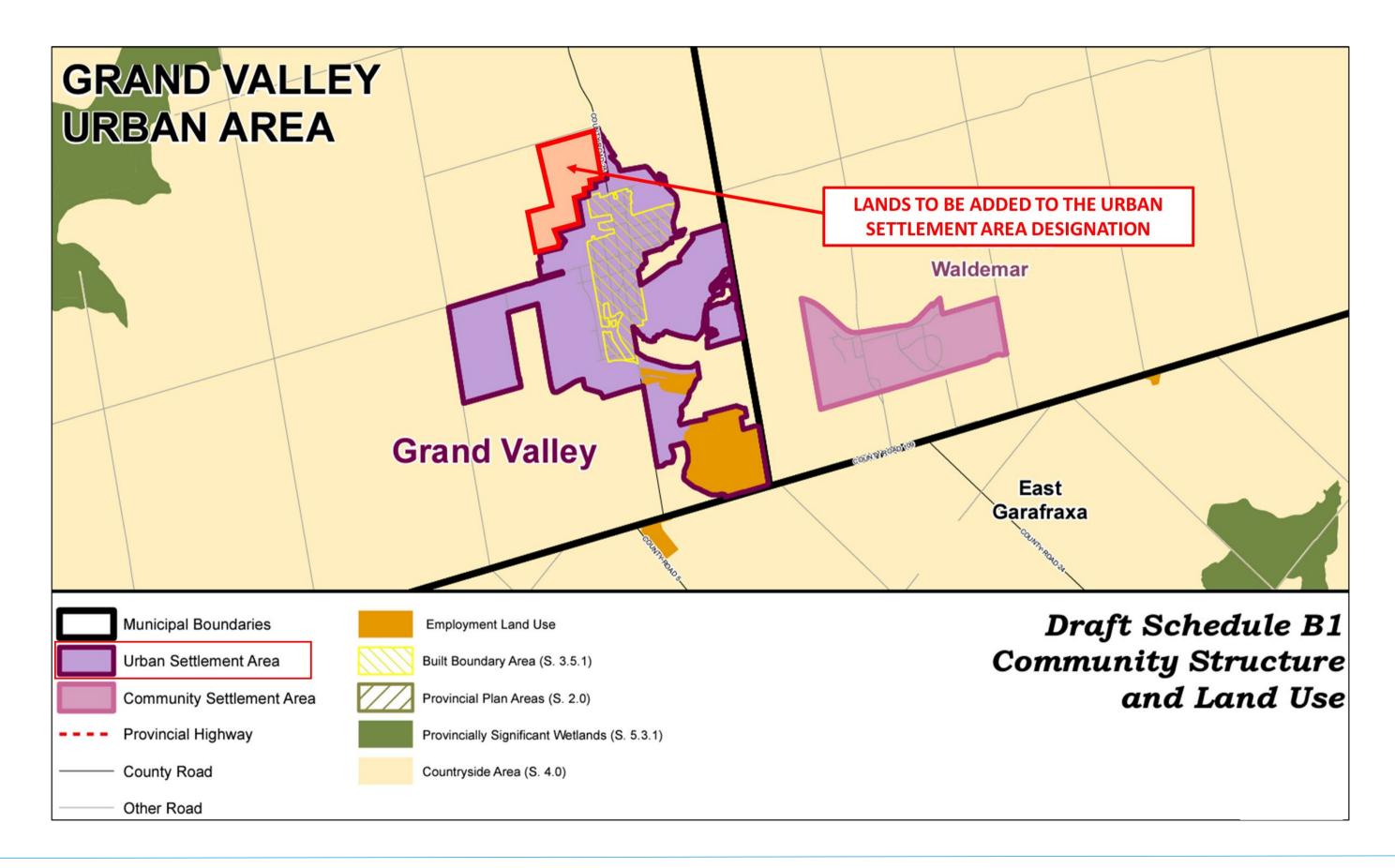
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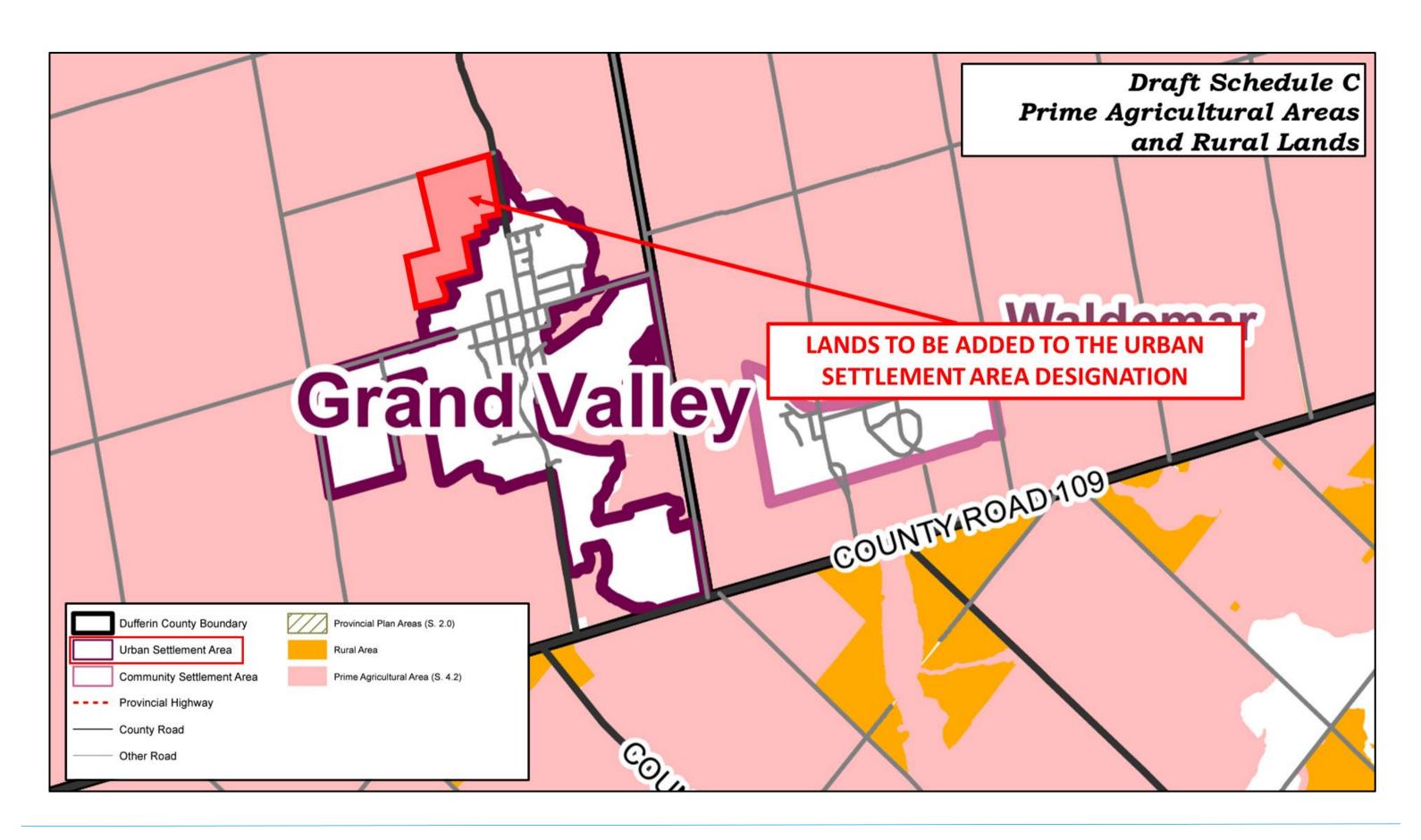
Appendix C — Draft Schedule B of Dufferin County's New Official Plan Proposed Changes to Draft Schedule B — Community Structure of Dufferin County's New Official Plan



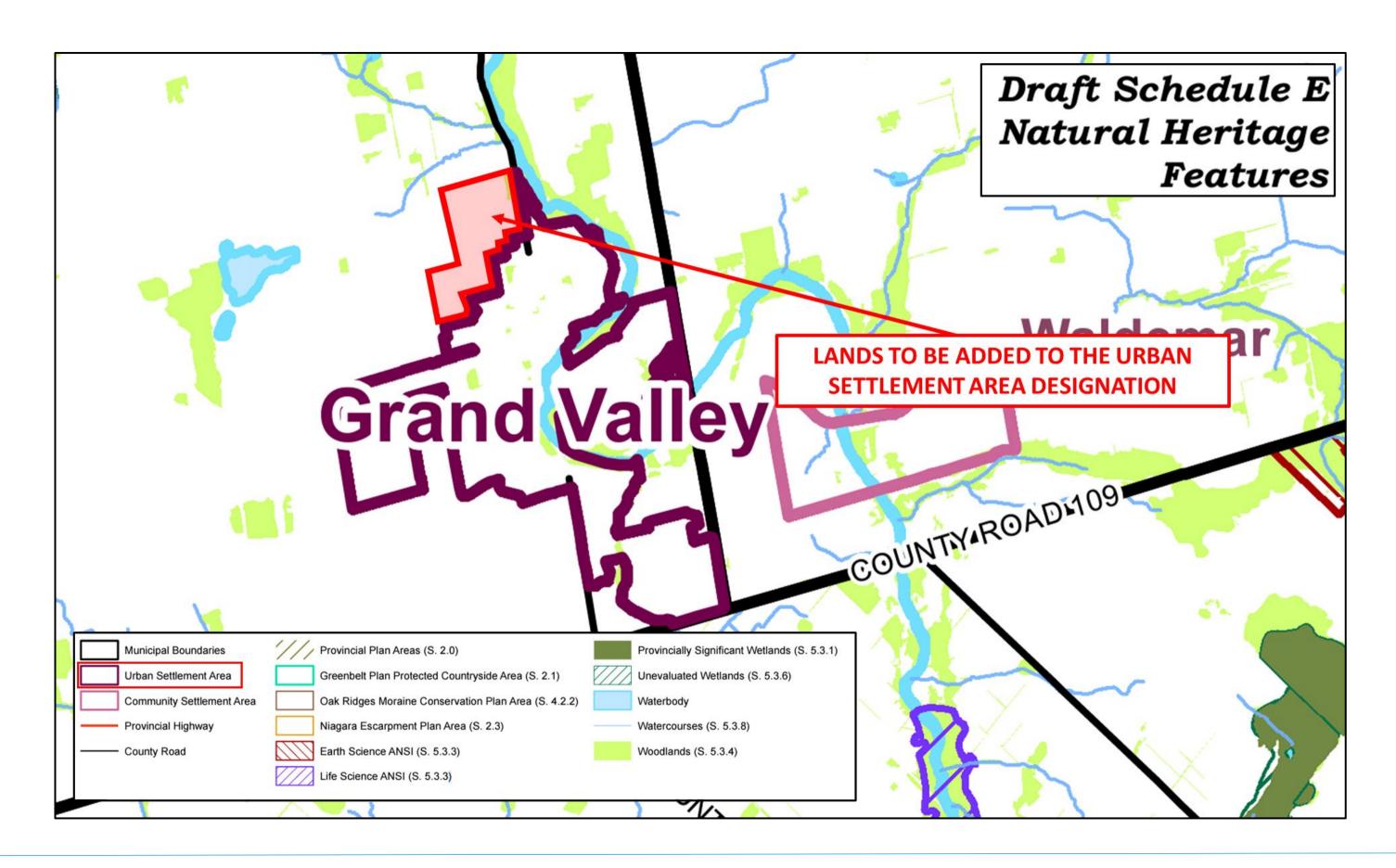




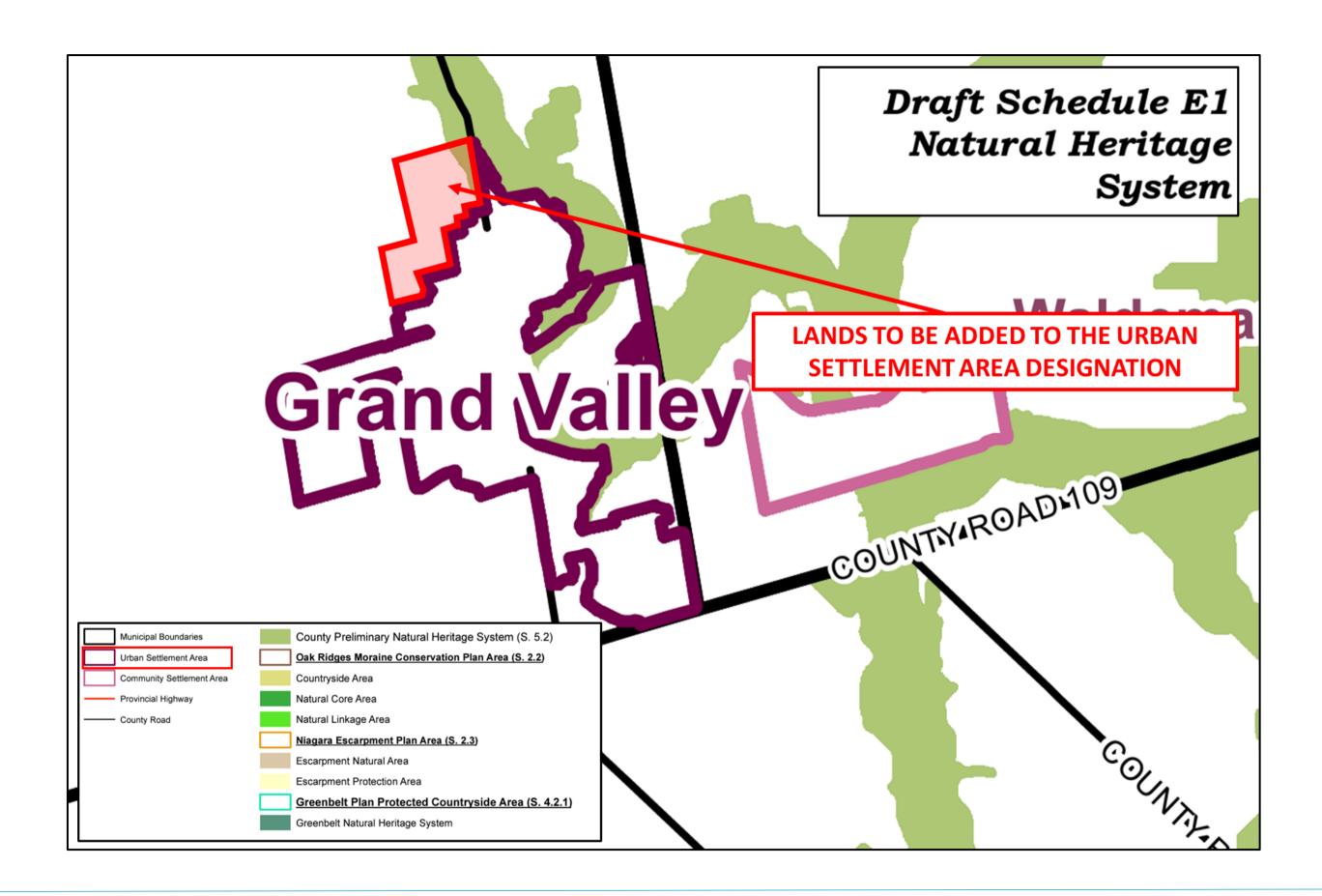




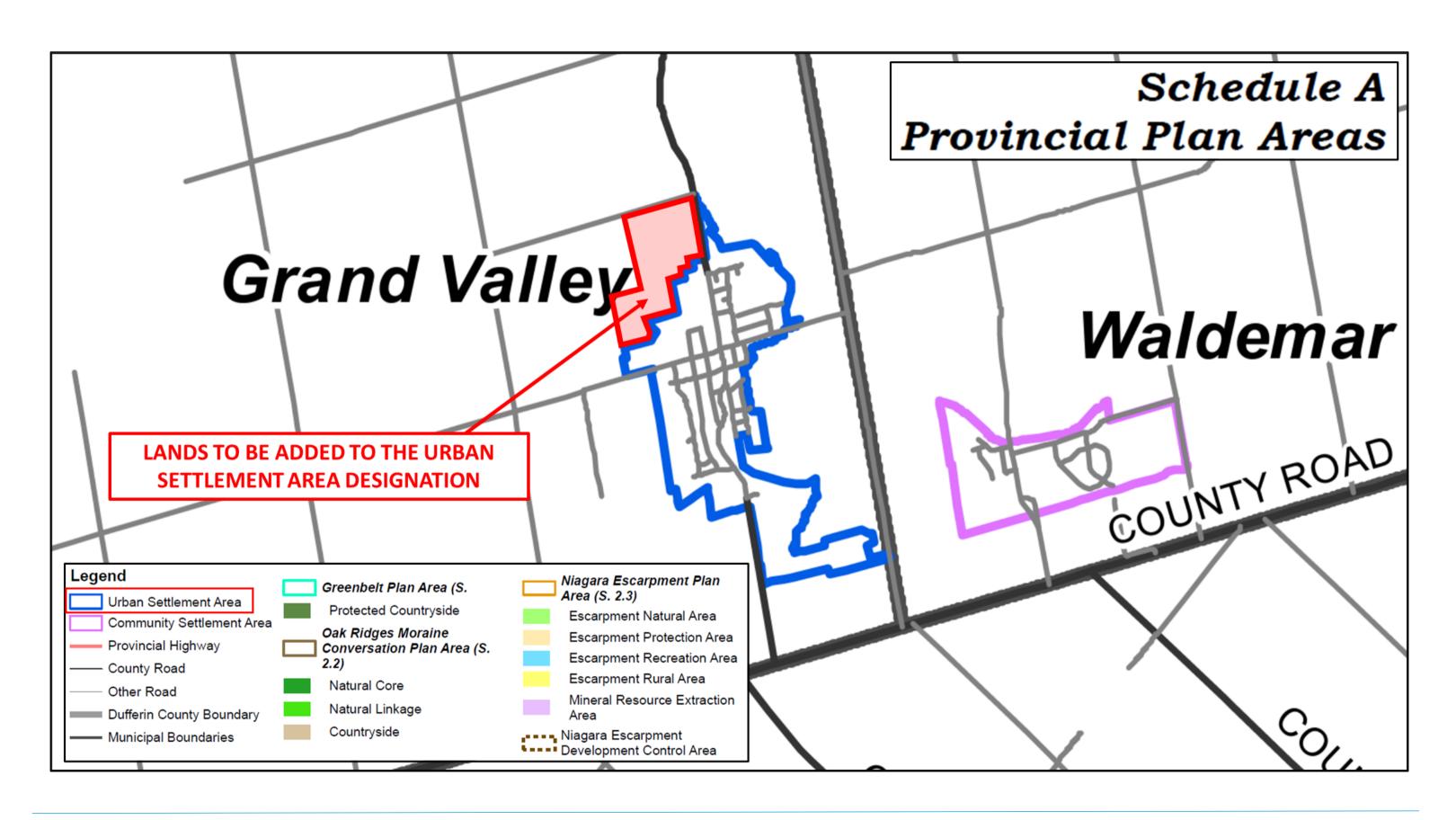
Dufferin County's New Official Plan eritage Features of Dufferin County's New Official Plan



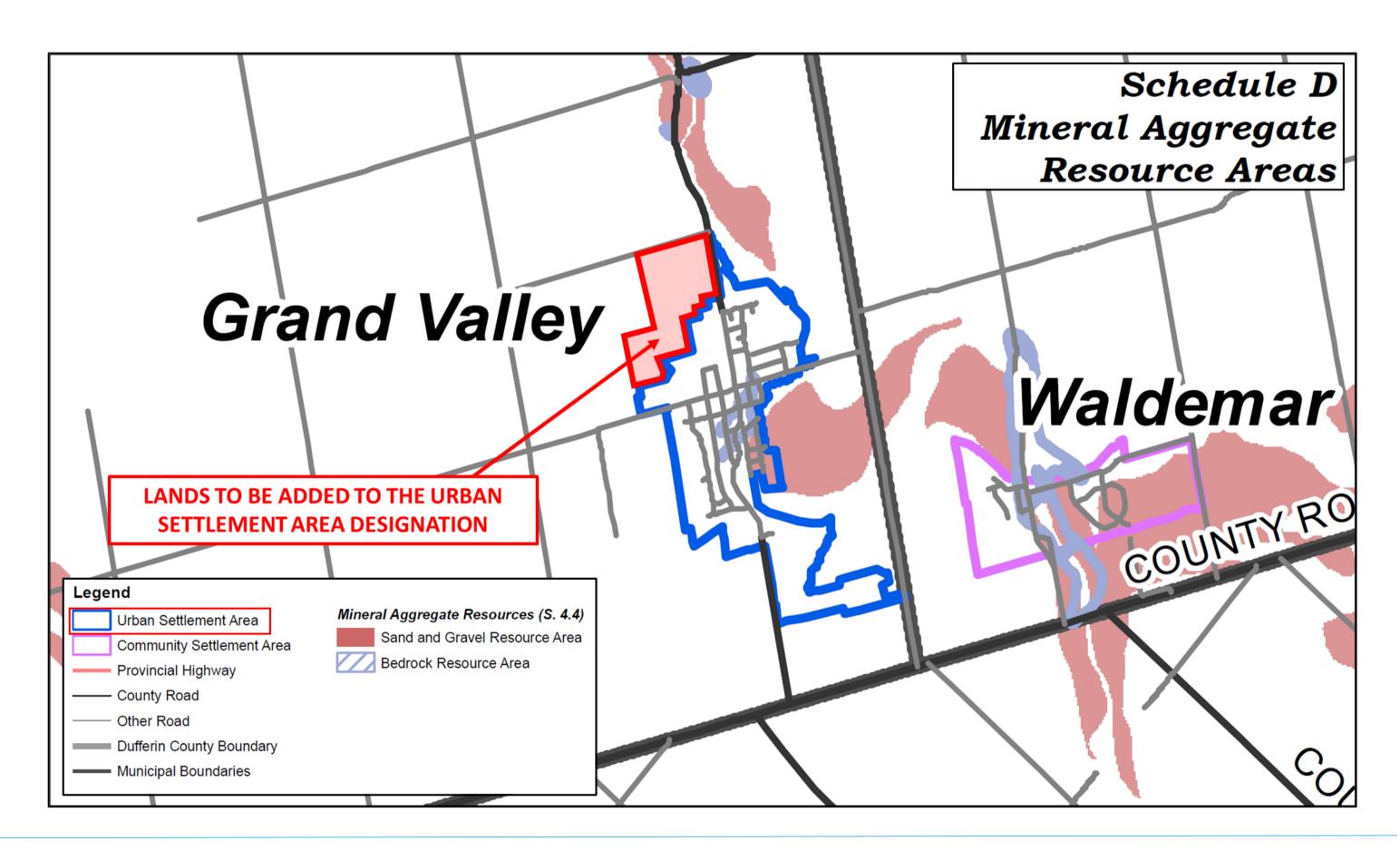
Appendix G — Draft Schedule E1 of Dufferin County's New Official Plan Proposed Changes to Draft Schedule E1 — Natural Heritage System of Dufferin County's New Official Plan



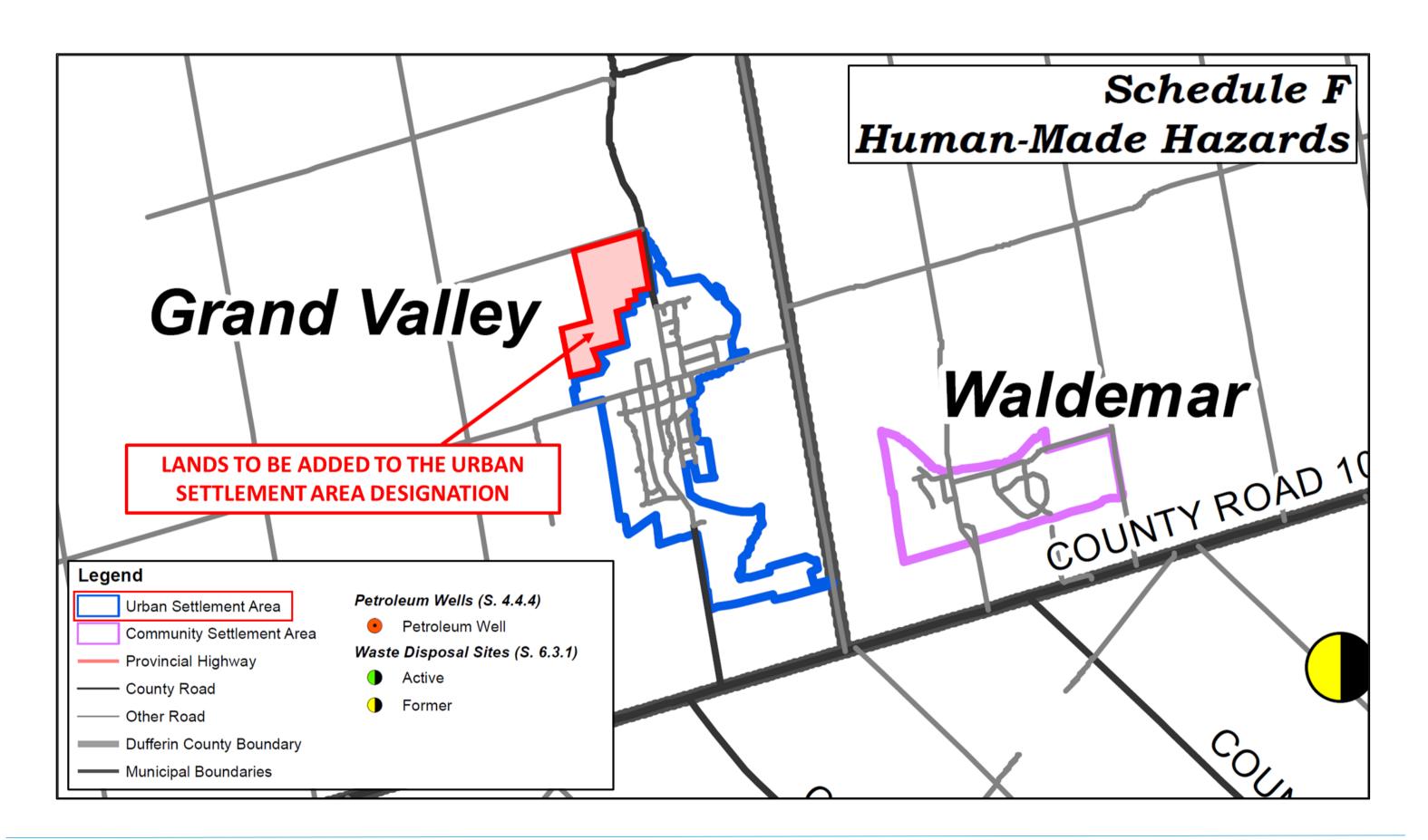
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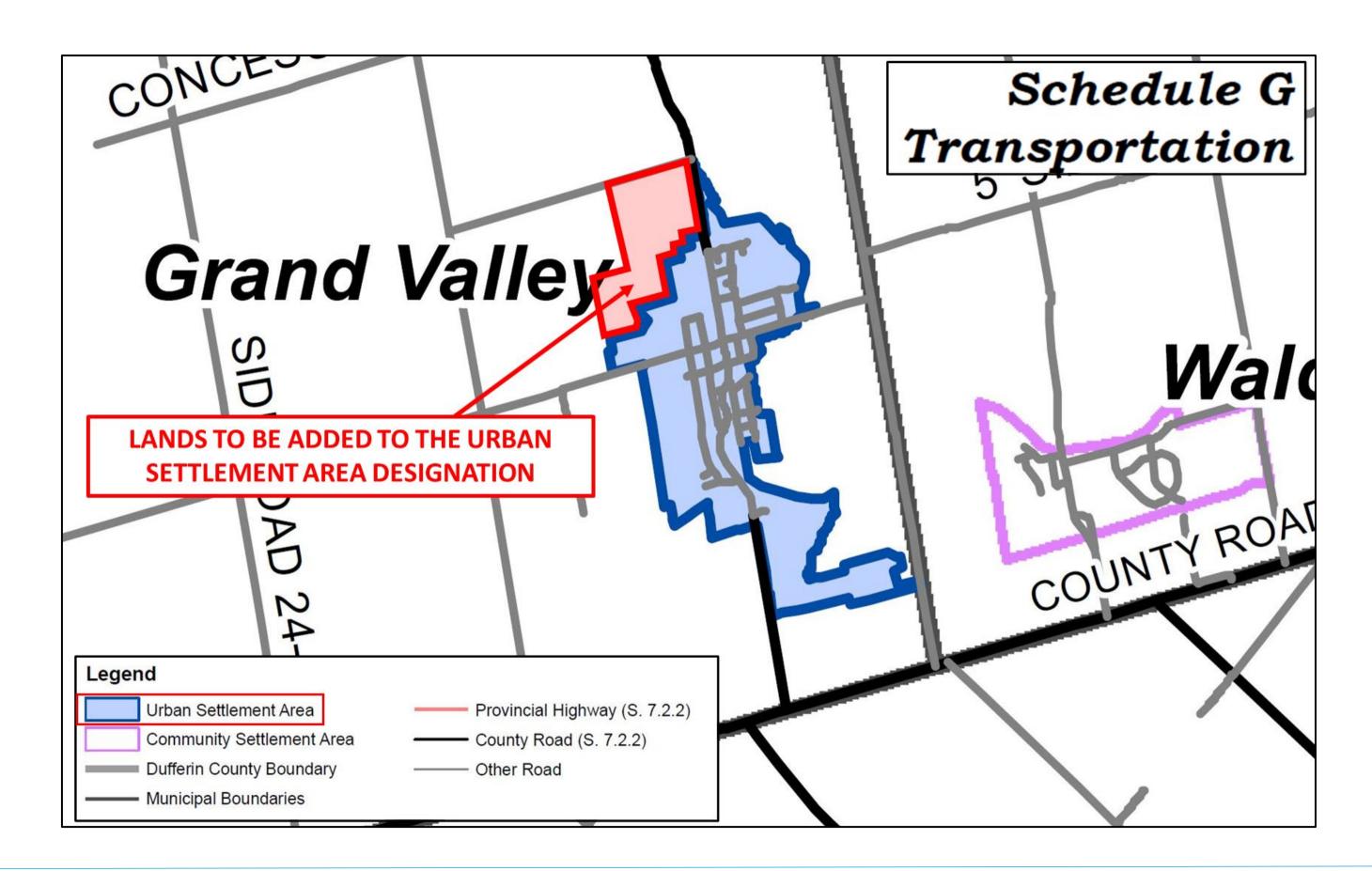




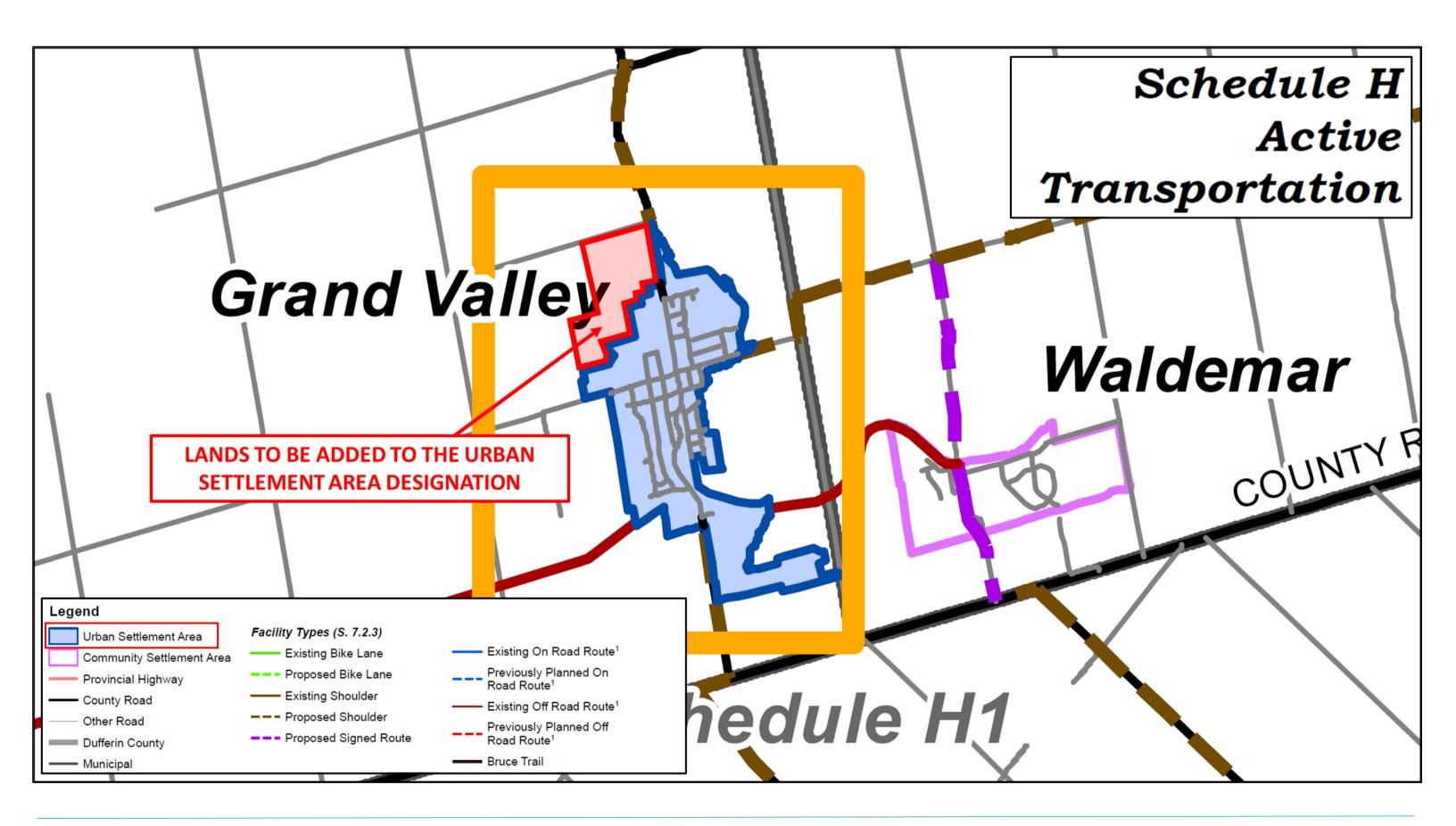
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Appendix K – Schedule G of the Dufferin County Official Plan Proposed Changes to Schedule G – Transportation of the Dufferin County Official Plan



Appendix L —Schedule H of the Dufferin County Official Plan Proposed Changes to Schedule H — Active Transportation of the Dufferin County Official Plan	n



Appendix M — Proposed Changes to		n County Officia the Dufferin County O	

