

January 3, 2023

Ministry of Municipal Affairs and Housing
Municipal Services Office – Western Ontario
659 Exeter Road, Floor 2
London, Ontario N6E 1L3
gabriel.kim@ontario.ca

Attention: Gabriel Kim

Dear Mr. Kim

RE: ERO Posting No. 019-5952
Ministry Reference No. 30-OP-222206
1830 Wrigley Road, Township of North Dumfries
TBG Project No. 22933

We have reviewed the proposed Regional Official Plan Amendment No. 6 (ROPA 6) adopted August 18, 2022 by Regional Council, and respectfully submit this letter as our formal comments.

We have reviewed the proposed policies and associated mapping, and although we support in principle the document, we are requesting modifications to the proposed mapping with respect to the boundary surrounding the community of Ayr within the Township of North Dumfries. Specifically, we are requesting that 1830 Wrigley Road, identified in the figure below, be included within the urban boundary of Ayr.

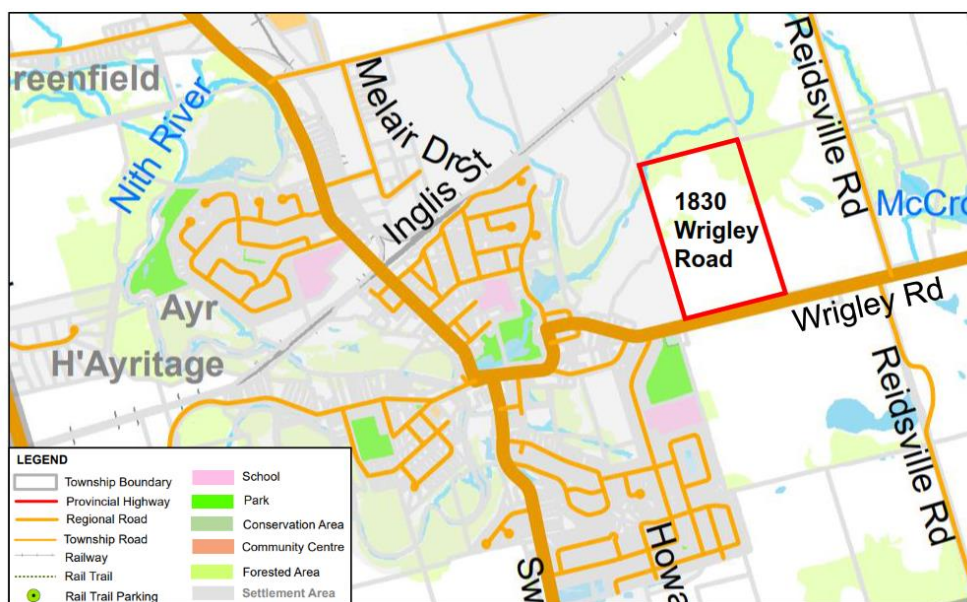


Figure 1: Property location

This property is adjacent to the existing urban boundary and is currently designated as 'Rural'. It is also adjacent to municipal facilities, including: the Fire Station, Schmidt Park, and Cedar Creek Public School and lands that are currently being proposed for residential development. The Region of Waterloo's Official Plan designation of 'Rural' on the property allows for agricultural uses, but does not provide it with the highest priority for agricultural preservation, those being Prime Agricultural areas with Classes 1-3 soils. The Province has identified that any expansions to urban areas should occur on lands that have not been deemed Prime Agricultural in local Official Plans. As these lands have been designated as 'Rural' it would be appropriate to include them within the urban area of Ayr.

The lands are currently outside of the urban boundary, but the development of the lands can be accommodated within the growth plan to 2051 as the growth numbers provided by the Ministry are minimums, not maximums. The inclusion of these lands for residential development will not impact the ability to achieve the Region's growth targets and will assist in the creation of a complete community within the community of Ayr.

Based on our review of the property, there are existing aggregates present which have not been extracted, being approximately 9 million tonnes. The intent is to extract the aggregates in an expeditious manner prior to the development of the lands for residential purposes. This strategy is consistent with the policies in the Region of Waterloo's Official Plan, as well as the policy directives of the Province. Our review of the Region's Official Plan has identified that it would allow for resource extraction to occur on lands within an urban boundary, which is consistent with the approach taken with lands immediately to the west which are currently part of the urban area and were used for aggregate extraction. Aggregate extraction is considered an interim land use by the Province and the Region of Waterloo's policies are consistent with this approach. Both the Region and the Province also highlight the importance of aggregate extraction and the wise use of resources. It is our opinion that the inclusion of this property within the urban area of Ayr will not prevent the extraction of aggregate resources and will not have any negative impacts on surrounding land uses.

We respectfully request that the property located at 1830 Wrigley Road, Township of North Dumfries be included within the urban boundary of Ayr as part of the approval of the Region of Waterloo's ROPA 6.

Sincerely,



Rachelle Larocque, BES, M.Sc., MCIP, RPP
Senior Associate

cc. Lucy Stocco
Region of Waterloo Planning Department
Township of North Dumfries Planning Division