



Mr. Damien Schaefer
Municipal Services Office – Eastern Region
8 Estate Lane
Rockwood House
Kingston, Ontario
K7M 9A8

Attention: Mr. Schaefer, Planner

**Re: Request for Modification to County of Peterborough Official Plan
Council Adopted Version (June 2022)
William Lennox – 1052 County Rd 21, Cavan Monaghan
ERO number 019-5908 | Ministry reference number 15-OP-227956**

D.M. Wills Associates Limited (Wills) on behalf of our Client, Mr. William Lennox has prepared this letter respectfully requesting a modification to the The County of Peterborough's Official Plan as adopted by their Council on June 29, 2022, and submitted soon after to the Ministry of Municipal Affairs and Housing (MMAH) for final approval. The modification requests consideration for expanding the urban settlement area boundary of Millbrook.

KEY MAP
PART OF LOTS 14 & 15, CON. 5
TOWNSHIP OF CAVAN MONAGHAN
COUNTY OF PETERBOROUGH

Legend
 [Green Outline] Subject Property
 [Shaded Yellow] Settlement Area

Mr. Lennox is interested in becoming part of and leading solutions related to accommodating growth and the creation of complete communities within the Township of Cavan Monaghan. Wills has provided review and comment on the growth analysis as prepared under the Land Needs Assessment (LNA) portion of the MCR process undertaken by the Township of Cavan Monaghan. The intent of this letter is to demonstrate to the Ministry of Municipal Affairs and Housing how the Subject Property can support and accommodate future allocated population growth.

The following is the basis of our comments with respect to the Subject Property:

1. The Subject Property is approximately 76.0 Ha in lot area and is located immediately east of the Millbrook urban settlement area boundary.
2. The original landholding consisted of Subject Property and the lands immediately to the southeast, fronting on the north side of County Road 21. A severance application was approved to allow for the development of one residential lot fronting County Road 21. The remnant parcel located generally to the north of that severance is subject to this request.
3. As illustrated on Schedule 'A' – Land Use of the Township of Cavan Monaghan Official Plan (CMOP), the southern portion of the Subject Property is designated as 'Agricultural'. Section 5.1 'Agricultural Areas' of the Plan provides that Agricultural Areas are lands which have a high capability for agriculture. The landowner has owned the Subject Property for 29 years and has an extensive history on the farming of the Subject Property. The Subject Property is not considered as having high capability for agriculture and has not been actively farmed for a number of years. As a result, these lands are being requested for inclusion within the settlement area boundary and re-designated as Residential.
4. As illustrated on Schedule 'A' – Land Use of the CMOP, the northern portion of the Subject Property is designated 'Natural Core Areas' and 'Natural Linkage Area'. Section 6.3 'Natural Core Areas' of the CMOP directs that development and site alteration be prohibited within key natural heritage feature and their 30m vegetative protective buffer. Section 6.4 'Natural Linkages Area' of the CMOP directs that Natural Linkage Areas are to be preserved in order to maintain the environmental features and functions of the linkages. Accordingly, these lands are being requested to be included in the settlement area boundary and maintain their respective designations.
5. Growth Plan for the Greater Golden Horseshoe (August 2020) policies allow settlement areas to be expanded through a municipal comprehensive review (Growth Plan 2.2.8). Settlement areas are defined by the Growth Plan as "Urban areas and rural settlements

within municipalities (such as cities, towns, villages and hamlets)." The Village of Millbrook represents a Settlement Area as per the Growth Plan policies.

6. The Provincial Policy Statement (PPS), 2020, policies allow for the expansion through a Municipal Comprehensive Review and where the lands demonstrate that they meet the criteria prescribed by Section 1.1.3.8 of the PPS.

This request for consideration to expand the settlement boundary of Millbrook to include the Subject Property is consistent with the aforementioned applicable provincial policies as outlined above and described in further detail below.

Section 1.1.3 of the PPS, identifies the importance of the vitality and regeneration of Settlement Areas stating that "*Settlement areas shall be the focus of growth and development*" (1.1.3.1) and "*planning authorities should establish and implement phasing policies to ensure that specified targets for intensification and redevelopment are achieved prior to, or concurrent with, new development within designated growth areas; and the orderly progression of development within designated growth areas*" (1.1.3.7). Growth and Development shall be directed to the Millbrook Settlement Area, however there is limited developable lands remaining to accommodate this growth. In accordance with the PPS policies, expansion to settlement area boundaries to accommodate intensification and redevelopment within the Millbrook Settlement Area may be permitted through a MCR, where the following is demonstrated (1.1.3.8):

- a) *efficiently use land and resources;*
- b) *are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*
- c) *minimize negative impacts to air quality and climate change, and promote energy efficiency;*
- d) *prepare for the impacts of a changing climate;*
- e) *support active transportation;*
- f) *are transit-supportive, where transit is planned, exists or may be developed; and*
- g) *are freight-supportive.*

Section 1.4.1 of the PPS provides housing policy and identifies the need to provide for "*an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area*". A range and mix of housing is intended to be achieved through the following policy objectives in Section 1.4.3 of the PPS, which require;

- a) *establishing and implementing minimum targets for the provision of housing which is affordable to low- and moderate-income households and which aligns with applicable housing and homelessness plans. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;*
- b) *permitting and facilitating:*
 - 1. *all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and*
 - 2. *all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;*
- c) *directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;*
- d) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;*
- e) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and*
- f) *establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.*

The relevant policies of the Growth Plan direct the majority of growth to settlement areas (2.2.1.2). The Growth Plan manages growth by establishing population forecasts that are intended to be further evaluated by upper- or single-tier municipalities through their MCR's. The population forecasts are intended to establish a hierarchy of settlement areas where population growth will be directed in order to make efficient use of infrastructure, provide direction on urban form and support environmental and agricultural protection (2.2.1.3).

The Growth Plan requires a land needs assessment to be undertaken by upper- or single-tier municipalities through their MCR's in order to determine the amount of land required to accommodate forecasted growth (2.2.1.5). The County of Peterborough is currently in the process of completing a land

needs assessment, in support of their MCR project to determine where expansion of the current settlement area boundaries should occur.

The Growth Plan also promotes the provision for a range of housing types and density that supports housing choice and achieving complete communities (2.2.6). In order to implement these policies municipalities shall provide support by (2.2.6.2):

- a) planning to accommodate forecasted growth to the horizon of this Plan;*
- b) planning to achieve the minimum intensification and density targets in this Plan;*
- c) considering the range and mix of housing options and densities of the existing housing stock; and*
- d) planning to diversify their overall housing stock across the municipality.*

With respect to the County of Peterborough current Official Plan, all lands located outside of identified settlement areas are described as Rural and Cultural Landscape (4.3). The Subject Property is described as Rural and Cultural Landscape, however, does not function in a rural capacity given the limitations to farming and supporting local farming operations. As the Subject Property remains vacant and underutilized, consideration must be given to the proper use and designation of these lands including supporting future housing needs within the County. Given the rate of growth within Millbrook and the Subject Property's location, it is appropriate to review these lands as part of the Millbrook settlement area boundary.

The new County of Peterborough Official Plan was adopted by Council on June 29, 2022 and is now under review by the Ministry of Municipal Affairs and Housing for final approval. The Township of Cavan Monaghan Council made a decision following the adoption of the new Peterborough County Official Plan to maintain their own local level Official Plan document. Therefore, the schedules for Cavan Monaghan do not include land use designations. However, the County is required by the Provincial Growth Plan to identify the agricultural system for the Township and delineate the settlement area boundary for Millbrook, which has been included in a schedule in the new County of Peterborough Official Plan. The Subject Property has not been included in the proposed Millbrook Settlement Area boundary. Therefore, we are respectfully requesting a modification to the proposed Millbrook Settlement Area to include the Subject Property.

With respect to the CMOP policies, the Subject Property is designated Agricultural, Natural Core Area and Natural Linkage Area. Through the MCR process this request will also have the effect of re-designating the lands from

Agricultural to Urban in order to accommodate future residential growth in Millbrook.

In summary, the Subject Property is considered as agricultural land based on historical farming. However, the property has not been actively farmed for several years due to the lack of adequate drainage and soil necessary for prosperous farming operations. As a result, the Subject Property is currently vacant and underutilized. The inclusion of the Subject Property with the Millbrook Settlement area will allow for a more efficient use of the land and a logical extension to growth and development given its proximity to the Millbrook Settlement Area and access to municipal services.

We look forward to working with MMAH and County staff as the process proceeds and further details are available with respect to growth management on a community basis.

Respectfully Submitted,

Written By:



Marnie Saunders, B.E.S., CPT.
Land Use Planner

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