

July 2, 2025

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Submitted via ERO portal.

**Re: Environmental Registry of Ontario
Planning Opinion Letter
Inclusion of 6581 Highway 6, Fergus in Settlement Area Boundary
County of Wellington Official Plan Amendment No.126
Polocorp Inc.**

This letter has been prepared with regards to County of Wellington Official Plan Amendment No. 126 ('OPA 126'), which was adopted by County of Wellington Council in order to implement its Municipal Comprehensive Review ('MCR'). OPA 126 contemplated expansions of the urban settlement areas of the Township of Centre Wellington including the Elora Urban Area and the Fergus Urban Area.

My client, Polocorp Inc. ('Polocorp'), participated in the MCR process with regards to their lands municipally known as 6581 Highway 6, Fergus ('northern lands') and 968 St. David Street North, Fergus ('southern lands'). Through OPA 126, the County has recommended the inclusion of my client's southern lands within the Fergus Urban Area, but has not recommended the inclusion of their northern lands.

This Letter has been prepared to provide a professional planning opinion with regards to the inclusion of the northern lands within the Fergus settlement area boundary. In our opinion, including these lands would enable the comprehensive development of both the northern and southern parcels as a complete community, consistent with the objectives of the Provincial Planning Statement (2024) and the applicable County and Township planning frameworks.

This Letter provides a detailed description of the lands and their context and also discusses the proposed development of these lands, including the recently submitted site specific Official Plan Amendments, Zoning By-Law Amendments and Draft Plan of Subdivision applications contemplating the comprehensive redevelopment of the lands. Further, this Letter provides an analysis of the Provincial Planning Statement "Settlement Areas and Settlement Area Boundary Expansions" policies, which were also discussed within the Planning Justification Report prepared by Up Consulting Ltd. submitted in support of the development applications.

1. Site Location and Context

The subject properties are municipally addressed as 6581 Highway 6, Fergus ('northern lands') and 968 St. David Street North, Fergus ('southern lands') and are legally described as Part Lot 17, CON 16 Nichol as in ROS228713 and Part Lot 18, CON 16 Nichol as in ROS228713.

Both the northern and southern lands each consists of one (1) single-detached dwelling and agricultural accessory uses presently, as seen in Figure 1 below. The northern and southern lands each hold a lot area of +/- 20 hectares (ha) and a frontage of +/- 407 meters (northern lands) and +/- 412 m (southern lands).

The subject lands are located on the east side of Highway 6, classified as a Provincial Highway in the County of Wellington Official Plan (Schedule B1 - Centre Wellington Land Use). Highway 6 connects Fergus to the Arthur Settlement Area to the north and the City of Guelph in the south which extends further to Highway 401. Fergus has connectivity to Belwood in the northeast via Garafraxa Street East, Elora in the west via St. Andrew Street West and Belwood Lake Conservation Area in the east via Belsyde Avenue which further connects to Orangeville.

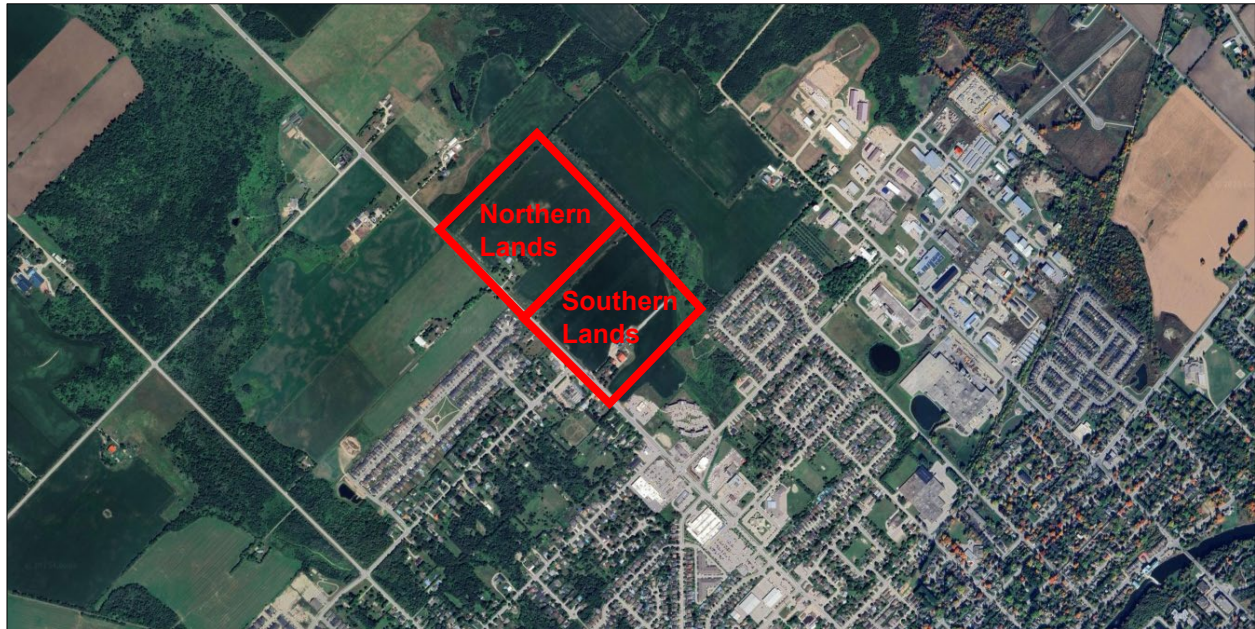


Figure 1: Aerial Image of Subject Lands (Source: Google Earth)

2. OPA 126 and Municipal Comprehensive Review Process

In response to anticipated growth with the County of Wellington, an evaluation of the existing County Official Plan policies was conducted through a Municipal Comprehensive Review (MCR) and as part of a regular 5-year review.

The County Official Plan Review was first introduced on September 12, 2019, to County and local councils. As part of the MCR, Watson and Associates was retained to assist with various components, including the hierarchy of settlement areas, land needs assessment, employment, intensification, housing and excess lands.

In April 2020, the County published its Communication and Engagement Guide. Following this Guide, in June 2021, County planning staff hosted a virtual Public Information Centre to update the public on recent growth management work and presented the Draft Phase 1 Report (Urban Structure and Municipal Growth Allocations of the MCR). Phase 1 of the MCR was subsequently finalized and approved by County Council on March 10, 2022.

In April 2022, planning staff presented the results of Phase 2 (Land Needs Assessment) and its related consultation (Report PD2022-11). The Phase 2 Land Needs Assessment technical report was finalized and approved on September 29, 2022. Wellington County Council adopted Official Plan Amendment No. 119 – “County Growth Structure” which was later approved by the Ministry of Municipal Affairs and Housing on April 11, 2023. OPA 119 was the first MCR-related amendment to the County’s Official Plan.

This MMAH decision approved the ministerial amendments for the inclusion of *both* the northern and southern lands owned by my client to be within the settlement boundary. This was part of the Ministry's approval of the County's OPA 119 with modifications which added 481 hectares of land to urban boundaries and converted 14 hectares of land from employment (i.e., industrial) to non-employment uses (e.g., residential and commercial). After the modified Official Plan was approved and in force, Polocorp worked together with the Municipality for seven (7) months on development applications for all their lands, including holding Pre-Submission Consultation meetings to discuss the applications. However, before the process was completed, the settlement area expansion modification was reversed by Bill 150.

Phase 3 of the MCR, focused on the Urban Settlement Area Study and Policy Review, which began in 2023. Official Plan Amendment 120 "County Growth Forecast" was approved by the Ministry on July 11, 2024. Phase 3 growth management of the review was divided into urban and rural components (Phase 3A and 3B).

The 2024 Provincial Planning Statement (PPS), effective October 20, 2024, has presented implications for both Phase 3A (Urban Residential Growth) and Phase 3B (Rural Residential Growth). Agricultural Mapping and Policy Review was paused due to the changes in the new PPS. Work on Phase 3A and the Settlement Boundary Expansion in Centre Wellington was expected to be completed in the Fall of 2024.

As part of Phase 3A, Official Plan Amendment 126 (OPA 126) identifies urban boundary expansions in Centre Wellington, addresses County-wide policy updates related to growth, and other changes. The County of Wellington hosted a Public meeting on March 3, 2025, to provide the public with an informal opportunity to discuss OPA 126 and identify additional planning issues that should be considered.

Phase 3A, being OPA 126, was subsequently adopted by County Council on April 24, 2025. The County has recommended the inclusion of my client's southern lands within the Fergus Urban Area, but has not recommended the inclusion of their northern lands. As such, it is understood that OPA 126 is currently with the Ministry for review and final approval. Figure 2 below provides an excerpt of Schedule "A-2" that was adopted by Council as part of OPA 126. As shown in Figure 2 below, the southern lands (outlined in red) were added to the "Prime Urban Centre" of Fergus, while the northern lands (outlined in blue) were excluded.

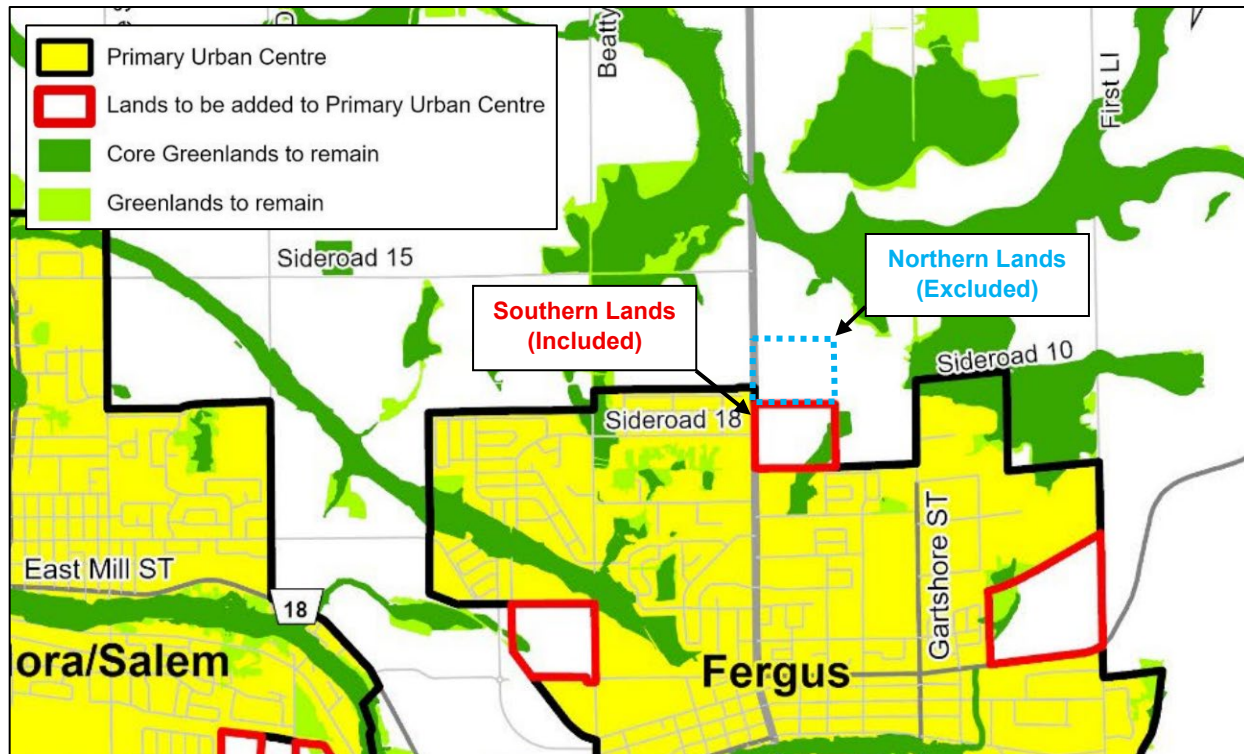


Figure 2: Adopted County of Wellington OPA 126 – Schedule "A-2"

3. Involvement of Applicant (Polocorp Inc.) in MCR Process

As previously noted, the northern lands are located outside of, and adjacent to, the Settlement Area Boundary of the Town of Fergus, while the southern lands are now proposed to be included within the Settlement Boundary Area as a result of Council-adopted OPA 126.

As part of the MCR, my client has been following the process extensively and submitted a request to the County, Township and Province in support of the inclusion of the northern lands within the Fergus Settlement Area.

Since early 2023, my client, Polocorp Inc., has been actively working with their consulting team to assess the viability of the Subject Lands for future development. Throughout the Municipal Comprehensive Review (MCR), the applicant has made several submissions for the inclusion of the Subject Lands in the Settlement Area, as well as providing comments about the MCR process. Below is a summarized chronology of the key meeting dates and submissions:

- **November 17, 2021** – Initial meeting with County planning staff to discuss Official Plan Review and its impact on the subject lands.
- **December 6, 2021** – Submitted request to include the subject lands in Fergus Urban Centre, with planning rationale.
- **May 2, 2022** – Provided MCR Phase 2 comments; supported Fergus for majority of growth (238 ha.) due to Elora's heritage constraints.
- **February 13, 2023** – Planning Justification Report submitted to ERO, supporting inclusion of lands in Settlement Area Boundary.
- **April 11, 2023** – Minister of Municipal Affairs and Housing approves Wellington Official Plan Amendment 119 with modifications to include settlement area expansions (in addition to

population growth numbers). Modification includes, among other lands, all of Polocorp lands in settlement area.

- **May 25, 2023** – Met with Township staff; discussed boundary change, servicing capacity, and phased servicing approach.
- **July 18, 2023** – Submitted pre-consultation request for OPA, ZBA, and Draft Plan of Subdivision.
- **August 23, 2023** – Participated in a pre-consultation meeting with Township and County staff; received detailed feedback.
- **August 30, 2023** – Met with MTO; next step identified as drafting support report for connecting link extension.
- **November 16, 2023** - Minister of Municipal Affairs Paul Calandra introduces Bill 150 reversing previous Minister's Approval with modifications to 12 Municipalities including Wellington Official Plan Amendment 119 settlement area expansion. Bill received Royal Assent on December 5, 2023
- **April 5, 2024** – Submitted letter to County with Evaluation Matrix, Mapping Analysis, and expert support letters.
- **May 16, 2024** - Royal Assent given to Bill 162, reversing most of Bill 150 settlement area expansion reversals, at request of Municipalities. However, no such request to restore the settlement area expansion was made with respect to Wellington Official Plan Amendment 119, delaying settlement area expansions awaiting further Municipal process.
- **October 20, 2024** – New Provincial Planning Statement comes into force. It has new policy requirements governing settlement area expansions and growth management, including direction to use Ministry of Finance Population Projections.
- **December 2024** – Retained Dillon Consulting to review Land Needs Assessments, who opined that current Provincial Policies require additional lands for growth in Centre Wellington, beyond which was contemplated by OPA 126. The additional land needs identified would be sufficient to include the entirety of Polocorp's lands.
- **March 3 & 13, 2025** – Applicant attended Public Information meetings (online and in person).
- **May 12, 2025** – Provincial Protect Ontario By Building Faster and Smarter announcement – Require Municipalities “to update their plans to align with the Ministry of Finance’s October 2024 population forecast, or approved upper tier forecasts, whichever is higher”

4. Proposed Development Concept

Polocorp is proposing the comprehensive development at 6581 Highway 6 and 968 St. David Street North with the proposed Draft Plans of Subdivision contemplating the development of a total of 756–858 dwelling units. The unit mix is comprised of 192–218 single detached dwellings, 346–384 street townhouses, 196–227 medium density dwelling units, and 22–28 dwelling units within mixed-use blocks to accommodate a range of uses.

In order to permit the proposed development in both lands, a County of Wellington Official Plan Amendment, Township of Centre Wellington Official Plan Amendment, Township of Centre Wellington Zoning By-Law Amendment, and Draft Plan of Subdivision applications were submitted by our client. Separate applications were submitted for *each* property. The applications for both the northern and southern lands have been deemed complete by both the County of Wellington and Township of Centre Wellington and are now being considered through the development review process.

In our opinion, the integration of both the northern and southern lands is critical in establishing a cohesive, well-planned community within Fergus. Together, these developments provide a coordinated layout that ensures an efficient street network, shared infrastructure systems, and a unified open space framework. The centrally located park, jointly created by blocks from both developments, offers a communal amenity hub that reinforces a sense of place and connectivity. Moreover, shared servicing strategies, such as the proposed stormwater management facility in the southern land, highlight the efficiencies gained through coordinated planning. The range of housing types across the two (2) developments enhances the diversity and inclusivity of the neighbourhood, supporting a complete community that can accommodate various household sizes and needs. In this way, the development of both parcels in tandem is essential to achieving a seamless urban fabric and fulfilling broader planning objectives for growth, livability, and sustainability.

a) Northern Lands (6581 Highway 6)

The northern lands propose to include a mix of low to medium density residential blocks comprising of a total of up to 535 units. The unit mix is comprised of 130 single detached dwellings including the existing heritage farmhouse, 266 street townhouses, 125 medium density dwelling units, and up to 14 units within a mixed-use block to accommodate a range of uses. The proposed development will also include a 0.9 hectare (2.2 acre) park space (Block 66) centrally located within the neighbourhood, and will be integrated into the South Lands park block.

The Draft Plan of Subdivision, as shown in Figure 3 below, shows the proposed blocks and lotting fabric, associated road network, and recreational areas such as park space and pathways. The proposed lot fabric also aims to facilitate connectivity to the adjacent properties for future development, notably to the southern lands.

Vehicular access to the proposed development is provided from Highway 6 through a 20 metre wide street. Future access will also be provided through internal streets from the subdivision lands to the south (i.e. the southern lands). All internal streets shown on the Draft Plan are to be conveyed to the municipality as public right-of-ways.

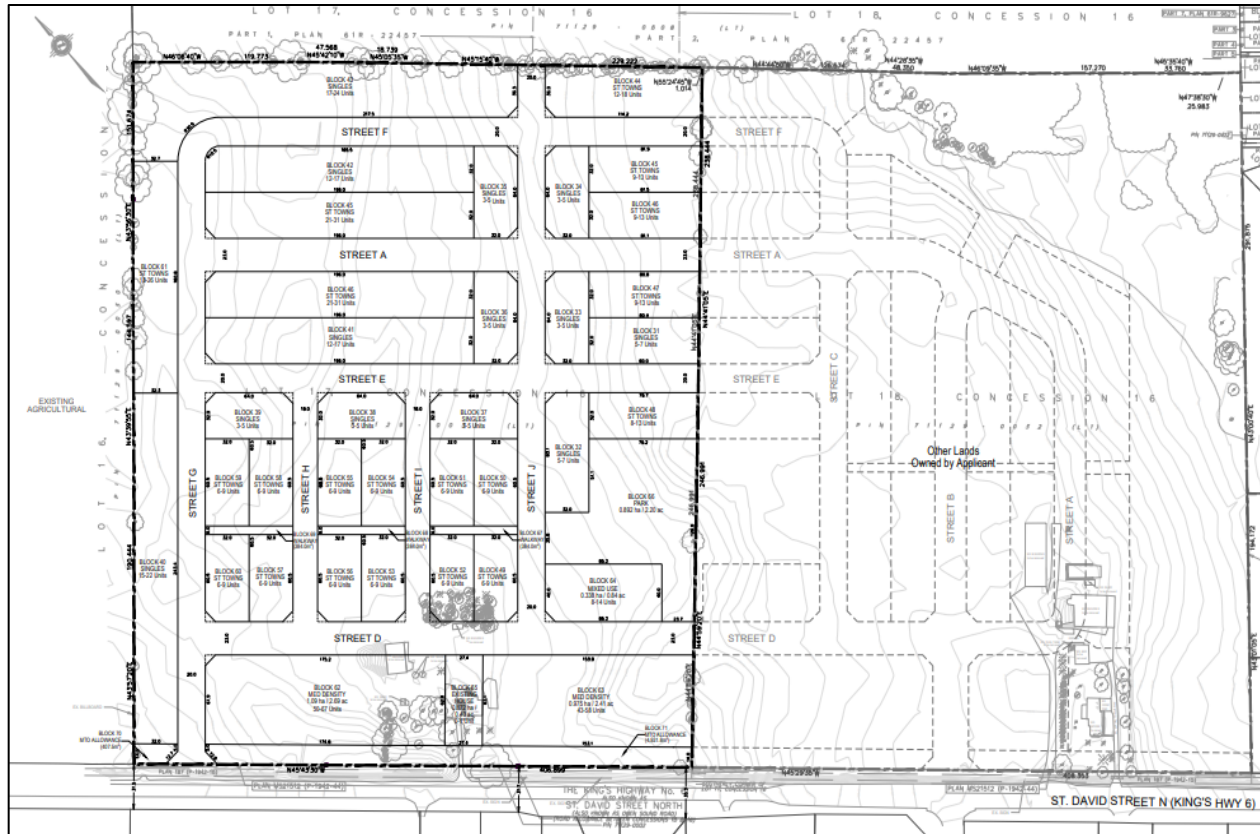


Figure 3: Proposed Draft Plan of Subdivision for Northern Lands (Source: Polocorp Inc.)

b) Southern Lands (968 St. David Street North)

The southern lands propose to include a mix of low to medium density residential blocks comprising of a total of approximately 221-323 units. The unit mix comprises of approximately 62- 88 single detached dwellings, 80-118 street townhouses, 71-102 medium density dwelling units, and 8-14 mixed-use units. The existing heritage home will remain in its own block (Block 22).

The Draft Plan of Subdivision, as shown in Figure 4 below, illustrates the proposed blocks and lotting fabric, associated road network, stormwater management facility, natural heritage feature with setbacks and recreational areas. The proposed lot fabric also aims to facilitate connectivity to the adjacent properties for future development, notably to the northern lands.

Vehicular access to the proposed development is provided from St. David Street North through a 26 metre wide street with landscaped boulevard. All internal streets shown on the Draft Plan are to be conveyed to the municipality as public right-of-ways.

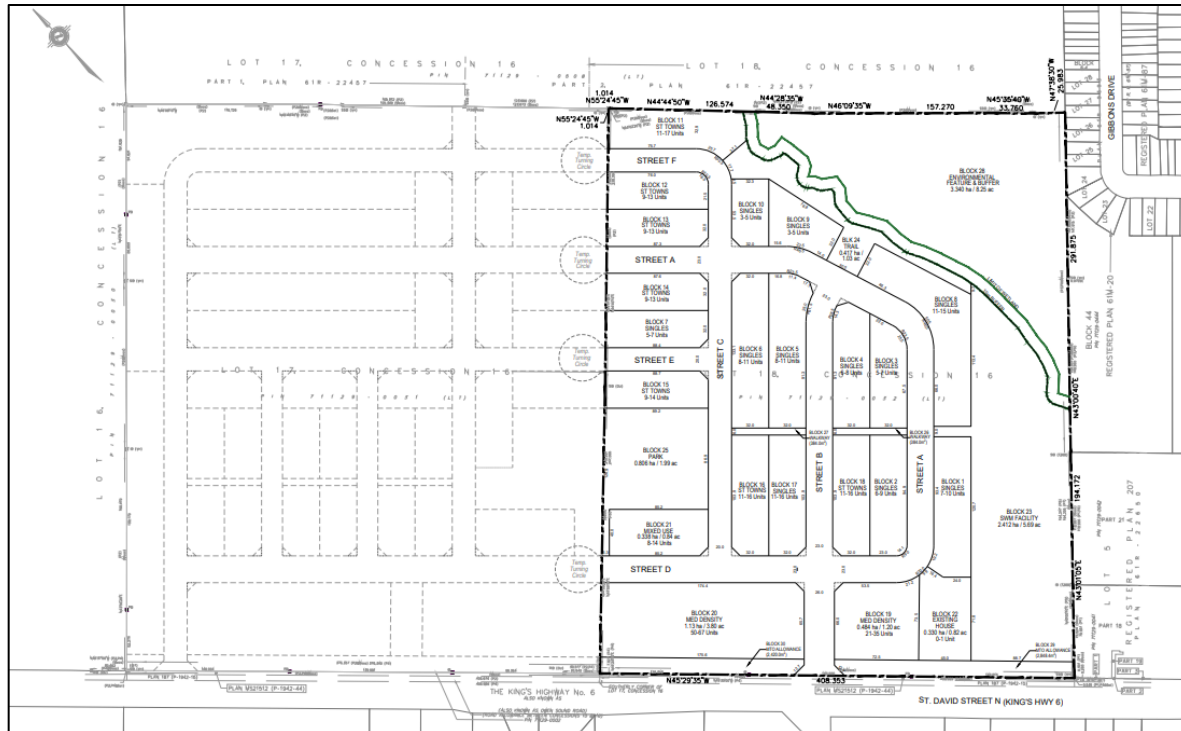


Figure 4: Proposed Draft Plan of Subdivision for Southern Lands (Source: Polocorp Inc.)

Since the submission of the applications for the northern and southern lands, my client has had discussions with the Upper Grand District School Board who have indicated that the lands would be a suitable location for a new school site given its adjacency to the existing settlement area boundary and its connectivity to existing neighbourhoods. While a location would / will be confirmed through the development review process, at this time a preferred preliminary option would be central to the development where the currently proposed central park block is located given its multiple frontages onto new streets and pedestrian connectivity to the rest of the planned subdivision. Polocorp is amenable to the inclusion of a school site within the development and making the necessary revisions to the Draft Plans of Subdivision in order to facilitate and provide additional park space elsewhere within the development.

5. Land Use Planning Rationale

The following section provides the land use planning rationale for the inclusion of the northern lands in the Fergus Settlement Area, which is a summary of the Planning Justification Reports prepared by our firm and the technical studies completed to date.

a) Municipal Comprehensive Review Process to Date

As previously mentioned, the County of Wellington initiated its MCR to address population and employment growth forecasts to 2051, as required by the Growth Plan and now reflected in the PPS 2024. The MCR evaluated land needs and recommended settlement area expansions across the County. This process led to the identification of Fergus as a logical location for growth due to its infrastructure, amenities, and role as a Primary Urban Centre.

b) Land Needs Assessment and Applicant Initiated Peer Review

The Land Needs Assessment ('LNA') completed by the County determined that Fergus indicated that approximately 90 hectares of additional land to accommodate growth. However, the analysis did not fully account for the policy direction under the PPS 2024, which emphasizes accelerating housing supply, allowing settlement boundary expansions outside of the MCR process, and providing for growth and land need to be determined in accordance with Ministry of Finance projections. This has been reinforced and strengthened by the Provincial May 12, 2025, announcement.

In November 2024, Polocorp retained Dillon Consulting Ltd. ('Dillon') to review the County's LNA on its behalf. Dillon undertook a review of the County's LNA work from a land economics and urban land needs perspective, and considered the implications of recent changes to the Province's land use planning framework, including the direction set out in the recently issued Provincial Planning Statement. A letter prepared by Dillon and dated November 29, 2024 concluded that "further Settlement Area Boundary Expansions (SABE) are warranted and appropriate" and that "in our [Dillon's] view, this approach is required to reflect the intent of the new PPS, especially in locations where significant shares of growth have been allocated, in the Township of Centre Wellington and Fergus Urban Centre."

On March 27, 2025, a Technical Memo was then prepared by Dillon to accompany the Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision applications that were submitted for the northern lands. The purpose of this memorandum was to describe the results of Dillon's review of the Land Needs Assessment (LNA) completed as part of the County of Wellington's Municipal Comprehensive Review process, and to provide a follow-up assessment of "alternative growth scenarios for the Township of Centre Wellington, and subsequent County adjustments to land need". Similar to the initial November 2024 letter, the Memo concluded that further Settlement Area Boundary Expansions are warranted beyond those identified by the County in order to reflect the "primary intent of new Provincial planning policies, which is to increase the supply of housing and address the current affordability challenge". The Memo found that when accounting a more reasonable mix of housing growth based from the Hemson 2020 report, a shortfall of approximately 25 hectares of residential land in Fergus, which could be addressed through inclusion of the northern lands.

On June 26, 2025, Dillon issued an updated Technical Memo as a follow-up to their original March 2025 submission. The purpose of the updated Memo "is to update the results of our previous review of the Land Needs Assessment (LNA) work completed for the County of Wellington Official Plan (OP) update and Municipal Comprehensive Review (MCR) to 2051". The Memo confirmed that the core findings of their March 2025 analysis remained valid and unchanged in that there is a need for additional SABE lands to satisfy demand to the year 2051. The Memo provides "updates to our [Dillon's] previous land need estimates to fully incorporate the 2024 Ministry of Finance projections" and that and provides an "updated estimate of the potential 'spillover' or "displaced demand" from the City of Guelph is also provided to illustrate how long-range land needs are likely to be even higher than shown previously."

The Memo provides that "under either the forecasts incorporated into the County LNA report or those associated with the 2024 Ministry of Finance Projections:

- For Wellington County as a whole, updated analysis indicates that future land need is increased to approximately 478 ha over the period to 2051.

- For the Fergus Urban Centre, future land needs are increased to 137 ha within the context of the updated County land needs; and
- Including a conservative estimate of potential displacement demand from the City of Guelph would add 189 ha to Fergus land needs, with the result that 326 ha of additional residential SABE lands are required in the Fergus Urban Centre. “

The Memo concludes that Dillon maintains the view that further urban boundary expansions are appropriate and warranted, and that in their professional opinion that both entirety of the Subject Lands (northern and southern parcels) should be included in the expanded Settlement Area boundary.

County of Wellington OPA 126

OPA 126 proposes a settlement area expansion that includes the southern lands but excludes the adjacent northern lands, despite both forming a unified development concept. The division is inconsistent with the original ministerial amendment to OPA 119, which included both parcels. It is my opinion that the separation undermines the logical and comprehensive planning framework envisioned for the area. The applicant’s planning analysis indicates that excluding the northern lands creates an artificial boundary and ignores infrastructure, servicing, and community integration considerations.

c) SABE Suitability Analysis

On February 8, 2024, the County of Wellington released its Urban Boundary Expansion Review Framework, detailing the criteria for evaluating the appropriateness and suitability of lands for boundary expansion. This framework presented three (3) focus areas for consideration, including sustainability, complete and healthy communities, and efficient infrastructure and growth management. As a result, the applicant conducted a detailed assessment, applying the County’s evaluation criteria to the Subject Lands with guidance from qualified professionals, including experts in transportation modeling, civil engineering, geotechnical assessments, heritage conservation, and land use planning.

The table contained in Appendix A of this Letter discussed the SABE criteria used by the municipality in order to assess the appropriateness of expansion area criteria for candidate lands. Within the table in Appendix A, the italicized text provides the commentary from the Township Staff Report (PLN2024-38) with regards to “SABE Area E” (the southern lands), with additional commentary from our firm provided in bolded text. Figure 7 below illustrates “SABE Area E” from the Staff Report. As detailed in this table it is our opinion that both the southern and northern lands satisfy the criteria relied upon by the municipality.

1. As a summary to this assessment it is out professional opinion that the subject lands provide an appropriate and strategic location for settlement area expansion relative to other submissions considered through the County’s review process. The lands have consistently performed well through municipal evaluation criteria and were assigned a high score by both the Township and the County based on factors such as location, servicing feasibility, and alignment with policy direction. This strong technical performance underscores their suitability for inclusion.
2. A key advantage of the subject lands is the availability of municipal servicing infrastructure, which positions them for timely development. The lands are situated adjacent to existing built-up areas with logical and efficient extensions of water and wastewater services. From

a planning and implementation standpoint, this allows for the lands to be serviced more efficiently without the need for complex or long-term infrastructure upgrades, thereby supporting near-term housing delivery.

3. Unlike other areas considered for expansion, the subject lands are subject to a comprehensive and fully submitted planning application, including an Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision. These applications complete applications reflect a coordinated proposal for development supported by technical studies. The advancement of these applications demonstrates a level of planning readiness that supports the lands being integrated into the settlement area with minimal delay.
4. It is further noted that other lands previously considered for expansion were ultimately not advanced through the County's Official Plan Amendment process. The subject lands provide a more immediate and implementable opportunity to accommodate forecasted growth in a manner consistent with the principles of complete community planning.

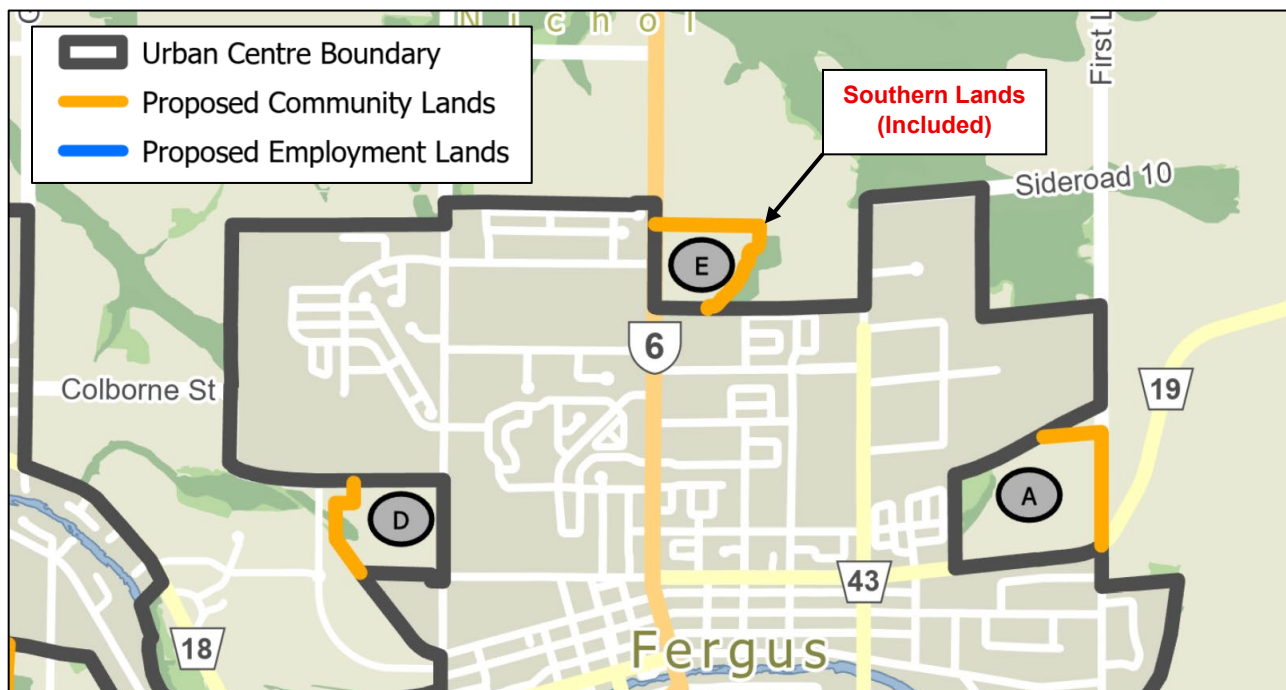


Figure 7: Excerpt from Township of Centre Wellington Staff Report PLN2024-38 Identifying 'SABE Area E' (Southern Lands)

Further, as noted in Section 3 of this Letter, a series of Settlement Expansion Requests were made to include the Northern Lands within the Fergus Settlement Area. On October 10, 2024, a letter was submitted by our firm to Township of Centre Wellington in response to Staff Report PLN2024-35, expressing support for the inclusion of the southern lands, but strongly recommended the inclusion of the adjacent northern lands.

On October 25, 2024, a follow-up letter was submitted by our firm to the Township of Centre Wellington providing expanded planning justification for inclusion of the northern lands. It reiterated support for the southern lands and strengthened the case for the northern portion by referencing new policy alignment with the PPS 2024, which had just come into force and effect at that time.

On December 18, 2024, a letter was submitted by our firm to the County of Wellington in response to Staff Report PD2024-40 for OPA 126 urban boundary expansions. Again, this Letter reiterated our support for the inclusion of the southern lands, but provided planning rationale for the inclusion

of the northern lands too in order to create a complete community that is consistent with the PPS 2024.

As part of the Settlement Area Boundary Expansion (SABE) analysis undertaken by the municipalities, Triton Engineering Services Limited (Triton) was retained by the municipal parties to complete a qualitative assessment of the serviceability of several development parcels proposed for inclusion within the expanded Municipal Urban Boundary of Centre Wellington, specifically in the Fergus and Elora areas. This assessment was prepared in a Memo dated June 7, 2024. The parcels under review were identified in Figure 5 below. More specifically, the subject lands, both the northern and southern lands, were identified as “SABR-022 (Parcel ID #10/11)” in the assessment.

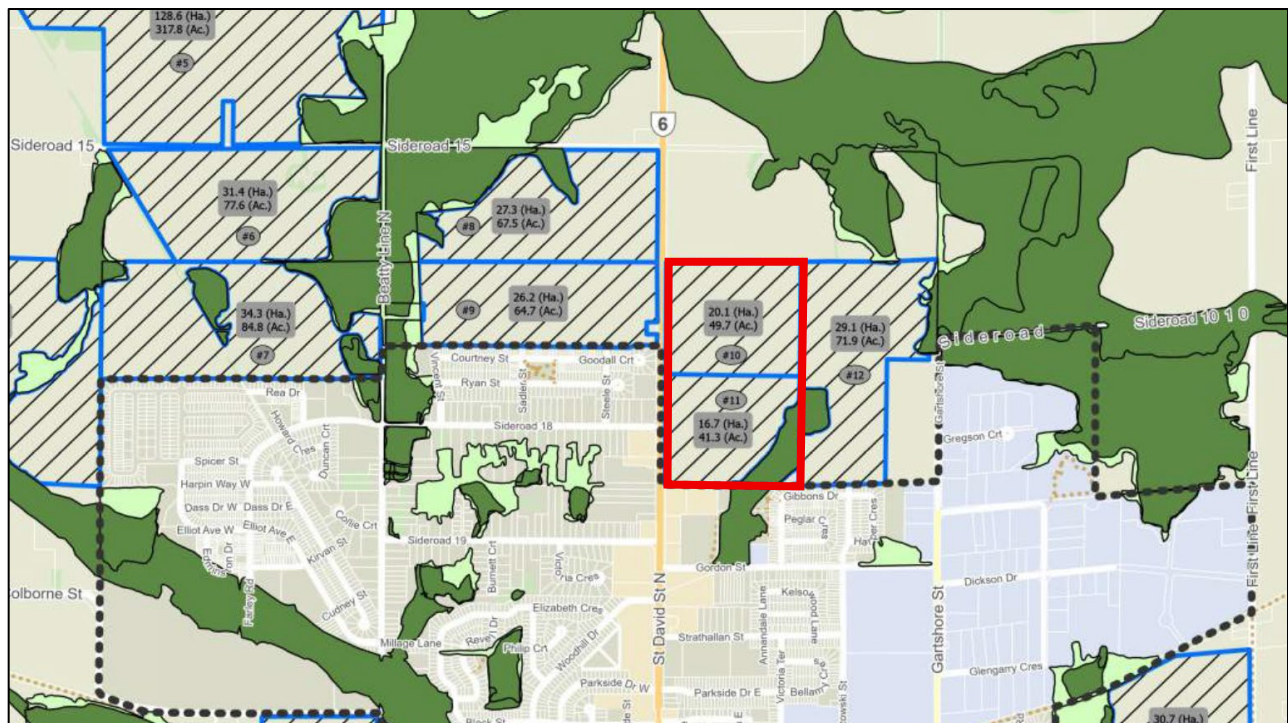


Figure 5: Excerpt of “Developable Land Area” Figure from Triton Memorandum with Subject Lands in Red

The purpose of the evaluation was to assess each parcel’s viability for urban expansion based on key servicing parameters, including potable water supply, sanitary servicing, and transportation access. The process was structured in two phases. Step 1 served to screen out parcels lacking existing or planned servicing connections, while Step 2 focused on evaluating the remaining parcels using water and sanitary servicing models to determine feasibility and infrastructure readiness.

The memo acknowledged that not all candidate parcels were suitable for boundary expansion, particularly those without adequate service infrastructure. The findings of the assessment informed the broader land use planning process by identifying technically viable lands for potential inclusion in the urban boundary.

Table 1 below shows the results of the assessment, sorted by the highest to lowest score. Based on the assessment, the subject lands demonstrated a high level of suitability for potential inclusion within the expanded urban boundary, based on their results in the Step 2 serviceability evaluation. The parcel received a total score of 24 out of 26, placing it among the highest-ranking candidates

evaluated and indicating a strong degree of readiness from a servicing and infrastructure perspective.

Sanitary servicing considerations were particularly favourable. The lands were anticipated to be serviceable by gravity, meaning a sewage pumping station would not be required. This condition generally reduces the complexity of implementation and limits future capital infrastructure needs. Additionally, the existing and future sanitary conveyance systems associated with the subject lands were projected to operate within available capacity, suggesting that major upgrades were unlikely to be necessary.

From a water servicing perspective, the parcel received a strong score related to flow, reflecting proximity to trunk mains or adequate network looping. Although the pressure score was more modest (1 out of 5), this was identified as a localized issue that could typically be addressed through minor upgrades and was not expected to present a constraint to development.

The subject lands also performed well in the transportation evaluation, receiving full marks (5 out of 5) based on its direct access to existing arterial or collector roadways in satisfactory condition. This level of access supported integration into the municipal road network and was considered beneficial to both construction logistics and long-term mobility needs.

Notwithstanding receiving the second highest rankings for both the northern and southern lands, as indicated previously only the southern lands have been included within the expanded settlement area boundary as now contemplated by OPA 126.

Based on the assessment, SABR-022 is positioned in a manner that offers spatial and infrastructure connectivity advantages relative to other parcels. These attributes aligned with the broader servicing and land use planning objectives of the municipality. Based on these considerations, the parcel was considered a technically suitable and infrastructure-ready location for accommodating future growth.

We also understand that site-specific requests have been made by other property owners to include their lands within the Fergus Settlement Area boundary by way of privately initiated land use planning applications, which we understand have not yet been deemed complete by the County or Township. These sites include SABR-063 (Parcel ID #6) and SABR-019 (Parcel ID #7).

While Parcel ID #7 had the same total score of 24 as Polocorp's lands, the transportation score was noted as 3/5 given the sites disconnect relative to the existing road network. In contrast, the Polocorp's lands are immediately adjacent to Highway 6. Parcel ID #6 was also screened out as part of Step 1 in the Triton assessment, and therefore did not qualify for the Step 2 assessment (i.e. Table 1 below). Based on our review of these sites included as part of the Triton assessment, it is our opinion that Polocorp's lands are better positioned to be included within the settlement area boundary from a servicing and transportation perspective which are key metrics in the determination of suitable lands for settlement area boundaries.

Table 1: Triton Memorandum Rankings – Step 2 (Sorted from Highest to Lowest Total Score)

MCR Designation	Parcel ID	Water		Sanitary Connection	Sanitary Conveyance		Transportation Score	Total Score
		Pressure	Flow	Gravity or SPS	Sanitary Existing	Sanitary Future		
SABR-020	13	3	5	3	5	5	5	26
SABR-022	10/11	1	5	3	5	5	5	24
SABR-019	7	3	5	3	5	5	3	24
SABR-043	9	0	5	3	5	5	5	23
SABR-062	32	5	5	0	5	5	3	23
SABR-007	29	3	3	3	5	5	3	22
SABR-006	30	3	3	3	5	5	3	22
SABR-035	18	1	5	3	5	5	3	22
SABR-026	25	3	5	0	5	3	5	21
SABR-033/34	12	3	5	0	5	5	1	19
N/A	22	3	3	0	3	3	5	17
N/A	23	3	3	0	3	3	5	17
SABR-039	21	3	3	0	3	3	3	15
N/A	24	3	3	0	3	3	3	15
SABR-060	19	1	3	0	3	3	3	13
SABR-038	20	1	3	0	3	3	3	13
SABR-061	31	5	5	0	0	0	3	13
SABR-025	3	1	5	3	0	0	3	12
SABR-037	4	3	3	0	0	0	3	9
SABR-051	1	3	3	0	0	0	3	9
SABR-023	2	1	3	0	0	0	3	7

In addition to the Triton engineering assessment, the County of Wellington retained Colville Consulting Inc. (Colville) to prepare an Agricultural Impact Assessment (AIA) dated September 2024. The intent of the AIA was to assist in identifying potential areas for settlement area boundary

expansion. The work was completed in two (2) phases. The first phase involved an MDS Study to identify development constraints and refine the study area, resulting in the identification of eight (8) Potential Expansion Areas (PEAs) adjacent to the existing boundaries of Fergus and Elora.

The second phase addressed the Agricultural Resources criteria outlined in the County's Urban Boundary Expansion Framework. These criteria aimed to protect prime agricultural land, minimize fragmentation of contiguous farmland, ensure compliance with MDS Formulae, and avoid or minimize impacts on the agri-food network. To support this analysis, the AIA aimed to provide a comparative review of each PEA to assist in identifying the most suitable location for expansion.

The subject lands were identified within PEA 'D' shown in Figure 6 below. A total of eight (8) PEAs were identified. PEA 'D' also included the lands directly across from the subject lands, municipally addressed as 6585 Highway 6. The information gathered throughout the AIA was used to compare the eight (8) PEAs to determine which potential SABLE locations are most preferred, from an agricultural perspective.

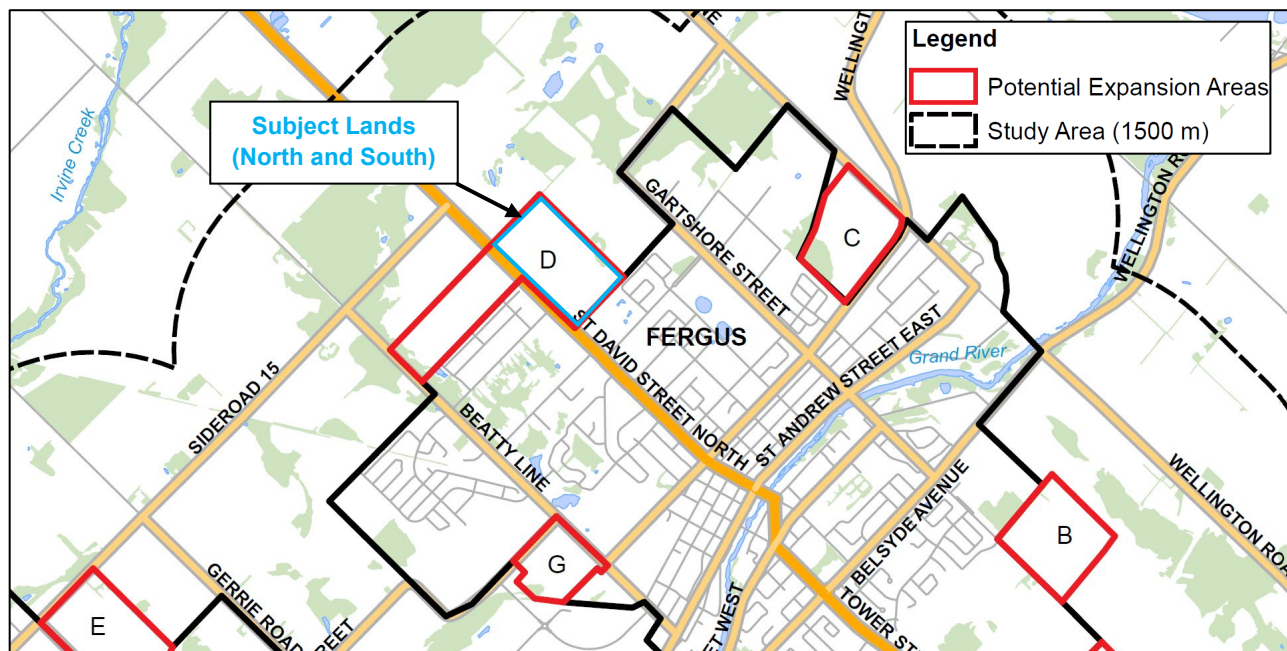


Figure 6: Excerpt from Colville AIA Identifying 'Location of Potential Expansion Areas' with Subject Lands in Blue

Based on the comparative analysis, PEA 'D' ranked 6 out of 8. This score was namely influenced by the MDS I constraints, however, this constraint specifically came from the adjacent property 6585 Highway 6, as mentioned earlier. Given PEA 'D' included *both* Polocorp's lands and the neighbouring lands, the MDS I constraint influenced the overall area. Further, the score was also influenced by the potential for MDS II constraints, being that three (3) agricultural lots were included in PEA 'D', along with agricultural infrastructure such as 3 barns, 1 implement shed, 1 Quonset hut.

As part of the Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision Applications submitted for the subject lands, Polocorp submitted an AIA prepared by Stantec Consulting Ltd. (Stantec). The Stantec AIA found two (2) properties *may* have potential to impact the northern lands if occupied at 100% barn capacity. However, based on verbal confirmation with the property owners, the livestock barns capacities and usage were confirmed. The assessment

found the encroachment to be negligible, which would comply with the MDS Formulae and are suitable lands to be included within the settlement boundary.

Further, the Stantec AIA concluded that the lands are anticipated to be an extension of an immediately adjacent urban area, and thus their development will not result in fragmentation of the agricultural land base. There is no processing, agricultural infrastructure, agriculture services, distributors, farm markets or similar uses key to the agri-food network that would be lost through the development of the northern lands. As such, the development of the land will have little to no negative impact on the Agricultural system.

Based on the independent AIA prepared by Stantec, the northern lands were found to be a suitable candidate for inclusion within the Fergus settlement boundary. As such, the development of the northern lands is not anticipated to generate adverse impacts on surrounding agricultural operations and is considered appropriate from an agricultural policy and land use compatibility perspective.

d) Provincial Planning Statement 2024

As discussed within the Planning Justification Report prepared by Up Consulting Ltd. that was submitted in support of the development applications, it is our opinion that the inclusion of the northern lands within the Fergus settlement area boundary is consistent with the PPS 2024. More specifically, it is our opinion that the proposed development and inclusion of the northern lands addresses Section 2.3.1.2 of the PPS as follows:

Land use patterns within settlement areas should be based on densities and a mix of land uses which:

a) efficiently use land and resources;

The proposed residential and mixed-use development promotes efficient use of land through compact built form to optimize the use of the lands that is directly adjacent to the settlement area boundary.

b) optimize existing and planned infrastructure and public service facilities;

The proposed development contemplates extending existing water and sanitary services along Highway 6 and integrates public service facilities and recreational areas, minimizing additional infrastructure demands.

c) support active transportation;

The inclusion of the mid-block pedestrian pathways, sidewalks, and central amenity areas that encourage walkability within the community supports active transportation.

d) are transit-supportive, as appropriate; and

The development supports transit supportive densities for future provision of public transit within the Township, as it is not currently available.

e) are freight-supportive

Highway 6 remains unchanged as a main arterial. As per the Transportation Impact Assessment prepared by Paradigm Transportation Solutions, it concluded that impacts on existing transportation patterns will not have adverse effects.

Further, it is our opinion that the proposed development inclusion of the northern lands is consistent with Section 2.3.2.1 of the PPS as follows:

In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:

- a) *the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;*

The Technical Memorandum re: OPA 126 Urban Boundary Expansion prepared by Dillon Consulting Ltd. and included as part of the complete applications, identifies that at least an additional 25 ha of land is required in Fergus to satisfy the PPS requirement in policy 2.2.1 to provide for the needs of current and future residents for each type of housing, including grade-related forms.

The memo also describes the 2024 PPS policy direction to accelerate housing and land supply as being a fundamental shift away from what has historically been a more restrictive approach to managing growth and urban expansion.

The proposed development of the northern lands, with its diverse mix of single-detached dwellings, townhouses, and mixed-use units, would support the Township and County's visions of meeting community land need targets by offering a range of housing options that accommodates a variety of demographic groups.

Moreover, one (1) mixed-use block is proposed to include employment and residential uses near dedicated community amenity spaces, and parks and trails within the development to support future and existing residents in the Township. The proposed development of the northern lands intends to connect to the proposed Draft Plan of Subdivision to the southern lands for a cohesive and complete community.

- b) *if there is sufficient capacity in existing or planned infrastructure and public service facilities;*

As outlined within the County's Growth Management Strategy, Settlement Area Boundary Expansions should be directed to locations that can be efficiently serviced by existing or planned infrastructure and public service facilities.

The Functional Servicing and Stormwater Management Design Report by GEI Consultants Canada Ltd. in support of the development applications confirmed that the existing municipal water and sanitary services on St. David Street North has sufficient capacity to accommodate the proposed expansion.

The proposed development of the northern lands also intends to connect to the stormwater management pond and facility proposed in the southern lands in order to provide a comprehensive development and minimize the County's costs associated with infrastructure expansion.

- c) *whether the applicable lands comprise specialty crop areas;*

Not applicable. The subject lands are not located within a *specialty crop area*.

- d) *the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;*

The PPS prioritizes directing growth to urban areas with limited agricultural impact. The northern lands are located on the northwestern edge of the Fergus settlement area, adjacent to the existing and proposed urbanized areas. This strategic location minimizes intrusion into prime agricultural areas and ensures that growth is concentrated in areas that are already transitioning to urban uses and will utilize existing municipal infrastructure. By focusing development adjacent to existing urban areas and highways, the County's approach aligns with the PPS directive to avoid unnecessary fragmentation of agricultural lands.

As per the Land Use map (Schedule B1) of the County's Official Plan, the majority of lands surrounding the Fergus Settlement Area are classified as "Prime Agricultural Areas". There are no large tracts of non-prime agricultural lands immediately adjacent to the boundary of the Fergus Settlement Area, which creates difficulty in identifying alternative locations that would completely avoid the loss of agricultural lands. The Township noted in an October 28, 2024, Settlement Area Boundary Expansion Recommendation Report that expanding into Prime Agricultural Areas cannot be avoided, as all land outside the Fergus Urban Centre is a Prime Agricultural Area. Therefore, any Settlement Area Boundary Expansion within the Fergus Settlement Area will result in the conversion of prime agricultural lands.

While there is a need to minimize the impact of development on prime agricultural areas, the northern lands, being located at the northwestern edge of the Fergus Settlement Area, is adjacent to existing urbanized areas, highways and public infrastructure. The location of the proposed development supports a logical location for expansion of the Settlement Area Boundary, as compared to other potential sites being isolated and thus cause greater fragmentation of agricultural lands. The location of the northern lands is contiguous to existing Built-Up areas, which confines urban growth to be more compact, thereby preserving the agricultural viability of other surrounding lands to the greatest extent possible.

Further, the Township noted in an October 28, 2024, Settlement Area Boundary Expansion Recommendation Report that expanding into Prime Agricultural Areas cannot be avoided, as all land outside the Fergus Urban Centre is a Prime Agricultural Area.

- e) *whether the new or expanded settlement area complies with the minimum distance separation formulae;*

There are few known livestock operations in proximity to the northern lands, some of which are vacant or non-operational.

The Agricultural Impact Assessment prepared by Stantec Consulting Ltd. in support of the development applications found two (2) properties *may* have potential to impact the northern lands if occupied at 100% barn capacity. However, based on verbal confirmation with the property owners, the livestock barns capacities and usage were confirmed. The assessment found the encroachment to be negligible, which would comply with the Minimum Distance Formulae and are suitable lands to be included within the settlement boundary.

- f) *whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an*

*agricultural impact assessment or equivalent analysis, based on provincial guidance;
and*

The PPS definition of agricultural system has two components: a) agricultural land base; and b) agri-food network. The PPS definition of agri-food network includes elements like infrastructure, processing, agricultural services, farm markets, distributors, etc.

An Agricultural Impact Assessment was prepared by Stantec Consulting Ltd. in support of the development applications. In the case of the northern lands, the report concluded that the lands are anticipated to be an extension of an immediately adjacent urban area, and thus their development will not result in fragmentation of the agricultural land base. There is no processing, agricultural infrastructure, agriculture services, distributors, farm markets or similar uses key to the agri-food network that would be lost through the development of the northern lands. Thus, the development of the land will have little to no negative impact on the Agricultural system.

The assessment concludes that the northern lands would be a good candidate for inclusion, as the northern lands represent lower priority prime agricultural lands given it is adjacent to the recently expanded Settlement Area Boundary and its potential for continued phased development.

g) the new or expanded settlement area provides for the phased progression of urban development.

The County of Wellington's Official Plan emphasizes the importance of a staged approach to urban growth. The northern lands support a phased progression by concentrating growth adjacent to existing built-up areas, leveraging nearby capital projects, and thereby allowing for an efficient extension of services and minimizing fragmented development. The northern lands also consider the phased future development of the adjacent properties should they obtain the necessary planning approvals to permit these properties to be developed.

The County's MCR process highlights the importance of logical growth patterns that make use of existing infrastructure and services, which is consistent with the intent of the development to enhance the existing urban fabric of the Fergus Settlement Area, rather than create isolated pockets of new development.

e) Appropriateness of Proposed Official Plan Designations

The proposed redesignation of the northern lands to "Residential" is appropriate and aligns with the adjacent approved designations. The proposed development provides a mix of low to medium density residential uses, a central park, and compatible mixed-use opportunities. This designation supports the objectives of the County and Township Official Plans and helps achieve growth targets, housing diversity, and complete community principles. In the event that a new school is requested to be provided (as currently indicated by the local school board), an addendum to the proposed Official Plan designations may be required to appropriately designate the school site within the Township Official Plan.

f) Appropriateness of Proposed Zoning

The proposed zoning for the northern lands mirrors the proposed zoning for the southern lands, ensuring consistent development standards and land use compatibility. The zoning includes a mix of residential zones (R2 to R6) and open space zones to reflect the planned built form and

recreational amenities. This zoning framework allows for flexibility and supports the delivery of a range of housing options in line with PPS 2024 policy directions. Similar to the above, in the event that a new school is requested to be provided (as currently indicated by the local school board), an addendum to the proposed Zoning may be required to appropriately zone the school site within the Township Zoning By-Law.

g) Studies Demonstrating Development Feasibility

Comprehensive technical studies, including servicing, transportation, environmental, hydrogeological, agricultural impact, and heritage assessments, have confirmed the feasibility and appropriateness of developing the northern lands. These studies support the conclusion that the lands can be developed without adverse impacts and align with the goals of the County and Township for sustainable growth.

h) Serviceability of Subject Lands

The northern lands can be efficiently serviced by existing and proposed infrastructure. A Functional Servicing Report prepared by GEI Consultants confirms there is capacity in the municipal systems. Servicing infrastructure planned in the southern lands has been designed to accommodate the northern lands, creating efficiencies and minimizing public investment. The shared servicing strategy further reinforces the need for both lands to be developed in a coordinated manner. The suitability of the both the northern and southern lands from a servicing perspective was also affirmed through Triton Engineering's SABE evaluation which score both portions of the site very favourably from a servicing perspective.

i) Complete Communities

The inclusion of the northern lands is necessary to realize a complete community in this area of Fergus. Together with the southern lands, the development forms a contiguous subdivision with shared park space, integrated road networks, and diverse housing options. The coordinated design promotes walkability, active transportation, and infrastructure efficiency. Without inclusion of the northern lands, the southern development becomes fragmented and less functional.

Notably, Ruchika Angrish, Manager of Planning for the Upper Grand District School Board, expressed interest in locating a future school within the subject lands. The potential school site would straddle the northern and southern parcels, centered on the centrally located park block. From a planning perspective, the ability to co-locate educational and recreational amenities within a walkable neighbourhood directly supports the principles of complete community design, as outlined in the PPS. The applicant is committed to collaborating with the school board and municipality to facilitate the delivery of this community infrastructure. The inclusion of the northern lands would facilitate a functional layout required to accommodate the potential school site within a central, accessible, and connected location.

j) Achievability of Delivering Housing Supply

Given the current Provincially and locally recognized housing crisis, an increasingly important consideration in approving new growth areas must be an evaluation of whether the land use approval will actually result in the delivery of housing within the planning horizon. Given Polocorp's advancement of the site specific planning applications – and initiation of the process following the previous inclusion of the lands within the settlement area by way of a previous Provincial modification of the Official Plan – it is our opinion that the development of the lands is well advanced

from a procedural standpoint. Likewise, in the event the northern lands are added to the settlement area boundary, Polocorp is well positioned to advance the development of the lands in the near term.

Polocorp has an established track record as a successful home builder in Southwestern Ontario, having developed and constructed over 1000+ new homes for families for over 40 years. Inclusion of all the northern lands, for which considerable detailed planning to the subdivision level has already been undertaken, means that their inclusion in settlement area has a high likelihood of delivering on Provincial Policy objectives to encourage more housing construction in the immediate future.

6. Conclusion

As detailed throughout this Letter, it is our opinion that the inclusion of both our clients southern and northern lands is justified. Moreover, it is our opinion that the need for additional land needs has been clearly established, and that the northern lands represent the logical expansion of the Fergus Settlement Area.

As mentioned previously, this Letter has been prepared to provide a professional planning opinion in support of the inclusion of the northern lands within the Fergus settlement area boundary. In our opinion, including these lands would enable the comprehensive development of both the northern and southern parcels as a complete community, consistent with the objectives of the Provincial Planning Statement and the applicable County and Township planning frameworks.

We kindly request receipt of this submission and should you have any questions I would be happy to respond.

Sincerely,

 up consulting

David Galbraith MCIP RPP

President, UP Consulting

APPENDIX A

PROPOSED SABE AREA E	
Agricultural Resources	
Avoid Prime Agricultural Areas	<i>Prime Agricultural Areas cannot be avoided. All land outside the Fergus and Elora-Salem Urban Centres is a Prime Agricultural Area To mitigate loss of farmland, development should be phased, and prime agricultural lands should be kept in agricultural production until the land is needed for development.</i> It is our opinion that the northern lands also satisfy this criteria, with our client open to a discussion regarding phasing of development.
Minimize Fragmentation	<i>All areas proposed for SABE are immediately adjacent to an urban centre boundary, which have been developed for a number of non-agricultural uses. A relatively high level of fragmentation already exists. Eventual development of SABE land for non-agricultural land uses will lead to further fragmentation of the already fragmented agricultural land base in this area.</i> It is our opinion that the northern lands also satisfy this criteria.
Minimum Distance Separation	<i>MDS I encroachments identified related to existing equestrian operation to the north and an empty livestock facility to the west.</i> It is our opinion that this also applies to the northern lands. MDS analysis has been completed with respect to the proposed by Stantec Engineering which is aligned with this analysis.
Impact on Agri-Food Network	<i>Loss of cultivated land. To mitigate this loss, lands should be left in agricultural production until the lands are to be developed. Potential for MDS II constraints on adjacent operations were identified. Recommendations of the Agricultural Impact Assessment should be implemented to minimize potential impacts of SABE.</i> It is our opinion that the northern lands also satisfy this criteria and that the lands can continue to be cultivated until such time as they are to be redeveloped.

Natural Heritage and Water	
Water Resource System	<i>Stormwater management should assist in managing the existing quantity and quality of stormwater runoff to receiving natural watercourses, wetlands and recharge facilities by replicating pre-development hydrologic processes (match pre to post infiltration, rate, volume) as well as protect, maintain and enhance natural features and functions such as wetlands, and watercourses.</i> <i>Appropriate studies will be required to ensure pre-development groundwater recharge function is maintained or improved, including a water balance assessment and modifications to the design of the developments, including Low Impact Development measures.</i> It is our opinion that the northern lands also satisfy this criteria. The proposed draft plan of subdivision included as part of this submission contemplates the comprehensive management of stormwater throughout the entire consolidation.
Natural Heritage System	<i>No parcels proposed for urban expansion include land identified in the draft Growth Plan Natural Heritage System. It should be noted that the Growth Plan NHS will not be carried forward to the PPS 2024. Area E contains elements of the County Natural Heritage System.</i> No natural heritage system elements are located on the northern portion of the lands. It is noted that SABE Area E does not include the natural heritage system elements located on the southern lands. In order to ensure that this is defined appropriately, it is recommended that this be based on a survey boundary.

Climate Change	<i>The Township of Centre Wellington has undertaken a Stormwater Management Master Plan (SWM-MP) for the primary communities of Elora, Salem and Fergus. The primary objective of the SWM-MP is to develop a long-term plan for the safe and effective management of stormwater runoff while maintaining, and where possible improving, the associated ecosystem health and ecological sustainability of the Township's water resources. The SWM-MP takes into consideration contemporary asset management principles, climate change influences, and contemporary Provincial criteria. Future stormwater assessments will utilize updated rainfall intensity-duration frequency (IDF) curves which reflect forecasted increases due to climate change. The Township has hired a Climate Change Coordinator to develop and implement effective climate and energy initiatives, including review of mitigation and adaptation measures.</i> <i>In addition, the County of Wellington and local municipalities are collaborating on Green Development Standards (GDS). GDS will be used as a tool for municipalities to achieve their greenhouse gas (GHG) reduction targets and support climate adaptation. With GDS in place, municipalities can ensure that buildings and infrastructure are constructed to be more resilient to disruptions from extreme weather events.</i> Acknowledged. As noted previously the included conceptual subdivision plan contemplates the comprehensive management of stormwater across the entirety of the consolidation supporting the efficient management of stormwater. As part of future development applications the Township Green Development standards will be considered and applied as applicable.
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Source Water Protection	
Impact on Source Protection Plan	<i>Water quality and quantity controls will apply to this WHPA.</i> <i>This area is located within a Significant Groundwater Recharge Area. Future development will need to ensure that appropriate studies are completed to ensure pre-development groundwater recharge function is maintained or improved.</i> This would also apply to the northerly lands. As part of future

	development applications appropriate studies will be completed to ensure that recharge functions are maintained or improved.
Aggregate Resources	
Hinder the Expansion or Continued Use of Existing Operations	<i>No nearby operations.</i> This would also apply to the northerly lands
Deposits of mineral aggregate resources	<i>No deposits.</i> This would also apply to the northerly lands
Cultural Heritage/Archaeology	
Impacts to significant built heritage resources or cultural heritage impacts	<i>No resources present.</i> This would also apply to the northerly lands. Appropriate heritage and archaeological studies would be completed as part of future development applications.
Archaeological potential	<i>Site is within 300 m of a water source therefore an archaeological investigation would be required prior to any site alteration associated with future development.</i> This would also apply to the northerly lands. Appropriate heritage and archaeological studies would be completed as part of future development applications.
Complete and Healthy Communities	
Range and mix of housing options	<i>The site can accommodate a variety of housing types and densities, as well as mixed use development as it is adjacent to Highway Commercial lands on Highway #6.</i> As shown on the proposed conceptual plan of subdivision, the lands have been designed to accommodate a wide range and mix of housing options. Inclusion of the northern lands will support the provision of this range of housing that is well connected to Highway 6.
Compact Form	Anticipated greenfield density target can be achieved. This would also apply to the northerly lands.
Transportation Linkages	Adjacent to Highway #6, a Provincial Highway corridor. This would also apply to the northerly lands.

Access to necessities for daily living	<i>Retail and service commercial development to the west and south on St. David Street North. Northeast Fergus employment land to the east. Institutional and recreational uses are located nearby.</i> This also applies to the northerly lands.
Integrate parks, open space and trails	<i>Area is adjacent to existing Gibbons Park with opportunities to connect to parks/trail system.</i> This would also apply to the northerly lands. As shown on the draft plan of subdivision drawing, the concept contemplates a large central park which could serve as a pedestrian node and central park space in the northern area of Fergus. This park is contemplated to be connected to Gibbons Drive Park by a series of pedestrian pathways.
Tree Canopy	Limited tree canopy exists on the site, except for the wetland and associated woodlot which would be retained based on natural heritage policies. This also applies to the northerly lands.
Public Health, Active Living	Area is adjacent to existing commercial use corridor, park, and is near institutional and other uses. This also applies to the northerly lands.
Water, Wastewater, Roads and Financing	
Optimize use of existing or planned infrastructure	Access to Existing Arterial or Collector Roads in satisfactory condition to support development. Direct access to existing sanitary sewer. Direct access to existing watermain. This also applies to the northerly lands.

Cost effective or financially viable infrastructure	<i>The Township adopted an Asset Management Plan in 2022. The financing strategy for an asset management plan outlines the key funding sources used to finance asset management related costs, including methodologies and strategies proposed for each funding source. Where infrastructure is already in place – The asset infrastructure is in place and incorporated into the Township’s Asset Management Plan for future operations, maintenance, rehabilitation, and replacement. If the infrastructure is in the DC Study - The asset infrastructure is planned for in the Township’s Development Charges Background Study. This Study requires the Township to ensure this future planned infrastructure is financially sustainable over their full life cycle through asset management planning. The Township’s Development Charges Study will be updated where necessary to incorporate the necessary infrastructure to accommodate future development.</i> This also applies to the northerly lands.
Growth Management	
Logical and Orderly Progression of Development	<i>Adjacent to existing Urban Centre boundary, to south and west.</i> This also applies to the northerly lands.
Transportation System	<i>Adjacent to Highway #6.</i> This also applies to the northerly lands.
Protect Employment	<i>No impact on existing or future employment areas.</i> This also applies to the northerly lands.
Protect Highway Corridors	<i>No highway is planned through this parcel.</i> This also applies to the northerly lands.
Protect Rail Corridors	<i>No rail corridors remain in Centre Wellington.</i> This also applies to the northerly lands.
Local Conditions	
Land Use Conflicts	<i>No known land use conflicts.</i> This also applies to the northerly lands.
Site Constraints	<i>No known site constraints</i> This also applies to the northerly lands.