



November 8, 2021

Michael Di Lullo, Chief Administrative Officer & Mayor and Members of Council
Municipality of Middlesex Centre
10227 Ilderton Road
Ilderton, Ontario, N0M 2A0
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Attention: Michael Di Lullo, Chief Administrative Officer & Mayor and Members of Council

**Re: Future Development Policy Framework and Land Use
14494 Medway Road, Part S1/2 Lot and Lot 15, Concession 7**

Thank you for the opportunity to provide further comment on the development of the Official Plan Review for Middlesex Centre. It is important to ensure that the Municipality has ample housing supply to ensure affordability is maintain for existing and new residents and we look forward to providing such housing that contributes to the anticipated housing need.

We are pleased to see that the additional lands in Arva, as shown on the attached map, have been included in the Future Expansion Area overlay. However, we believe that the policy framework and designation of future development lands should be strengthened to provide the certainty necessary to implement the outcome of the Environmental Assessment, as well as, to support the investments needed to address the housing needs of the regional market area. We offer the following for consideration and possible modification of the proposed official plan in advance of its Council approval.

The locational attributes of Arva within the municipality are significant. The northern location on the boundary of the City of London is prime to accommodate a significant portion of the potential growth anticipated for Middlesex Centre as well as growth from the City of London. The history of growth in the area was stymied in part by the lack of services but also by the inability of landowners to advance the property through the necessary planning approvals. The restriction of this type of scenario should be avoided and due to the advancement of the Environmental Assessment, there is an opportunity to advance the status of Arva from a 'Community Settlement Area' to an 'Urban

Settlement Area'. This reclassification of the settlement area hierarchy is in anticipation of full services being available and is an opportunity that anticipates additional growth be allocated to the area within the lifespan of this Official Plan (i.e. within 25 years). We suspect that even this increase in allocation will be exceeded due to the area's locational attributes and the anticipated demand for homes of all density types from migrants as well as residents from the City of London, driven by the factors outlined in the Growth Management Strategy (Watson & Associates, October 25, 2021).

We understand that there is a partnership between the private and public sectors to accommodate the Municipality's projected growth. The partnership requires that the parties to be in 'lock step' in order to deliver on the needs of the community and respond to the demand of future residents. We can state unequivocally that we are ready to assist and deliver the necessary housing for this community, however, we do see some modifications necessary in order to streamline the policy context.

Currently the 'Future Expansion Area' overlay only identifies a possible inclusion into a future expansion of a settlement area and does not recognize the land need within the 25 year horizon of the Official Plan ('OP'). The policy context should reflect the ability of the municipality to recover the significant investment in hard infrastructure through assessment growth. To provide for this approach, and ensure an effortless partnership, greater certainty is required by the private industry. To address this anticipated land and housing need, the development and modification of a supportive policy framework that recognizes the public and private investments required, and establishes certainty in process, can deliver a proper and timely outcome.

We are in full agreement that the identification of this area is suitable for future development offering an opportunity to incorporate a logical and contiguous extension of the current growth centre. It is important to recognize that certainty in the policy process is required in order to deliver significant infrastructure and housing. In order to resolve the draft OP policy dichotomy, we propose that landholdings shown as the 'Future Expansion Area' overlay be designated 'Future Development' and also be incorporated within the settlement boundary of Arva. This modification affords the municipality the ability to respond to the growth that is anticipated in this area, given the obvious locational attributes, but it also supports the hierarchical evolution of Arva to the urban community.

We believe that this approach aligns with the requirements of the Provincial Policy Statement ('PPS') as municipalities are required to ensure that lands beyond 15 years are 'designated and available' under Policies 1.1.2 and 1.4.1. Policy 1.4.1 states that "*planning authorities shall maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development.*" To ensure that lands are

'designated and available' further forward than the immediate 15 years into the future, municipalities are required to designate sufficient land to accommodate an appropriate range and mix of land uses to meet the projected needs for a time horizon of up to 25 years, informed by provincial guidelines, under Policy 1.1.2. Additional guidance on these can be found in the definition of 'designated and available' which states that these lands should be "designated in the official plan for urban residential uses." This designation is to allow time and certainty for the development community to commence the more detailed planning processes that are required for lands to be developed.

Therefore, we note that nothing in the PPS restricts Middlesex Centre from the inclusion of the lands currently identified as the "Future Expansion Area" overlay for the Arva Community Settlement Area as part of the boundary with a supportive Environmental Assessment. The ability of the Official Plan to enable the necessary planning work to begin, based on the forecasted population and housing growth, and anticipated servicing, is important and consistent with the PPS.

There is no question that Arva, and in particularly these lands, will contribute immediately to the assessment growth of the municipality and upon approvals, contribute not only to the assessment base, but also to the lifestyle of its current and anticipated residents. It is our desire to incorporate a sustainable community and develop the lands with the objective of an integrated neighbourhood, provide ample open space linkages and amenities for residents but also enable residents to "age in place", offering various housing forms and tenures to assist in this ability to stay within their community. The ability to plan and to invest with the understanding that the process outcomes have been endorsed by Council is a certainty that is needed to have a seamless evolution of the Arva planning area. We would like the development process to proceed with minimal approval lags or delays. Having a supportive policy framework that would serve to reduce the pressures on the municipality in meeting the requirements of the PPS regarding supply and affordability (i.e. Policy 1.4) while providing process certainty is necessary given the context of Middlesex Centre's recent surge in anticipated growth.

We would therefore respectfully request Council to direct WSP to revise the policy structure associated with "Future Expansion Area" overlay and include these lands within the Arva Settlement Area Boundary, as outlined in Draft Schedule "A-1", to reflect the hierarchical evolution of Arva and the infrastructure investments for this community and provide the required certainty of process. In addition, we request that this property also be identified as a "Future Development Area" as a Land Use Designation on Schedule "A-1" and develop a policy framework to guide the planning and review of future applications, including an 'approvals framework' which identifies requirements of an OPA for development applications. This policy framework could require that future development be contingent of the delivery of full municipal services and satisfy

the overall planning objectives of the Plan. Note that we are able to provide a follow-up letter that can provide specific details on our requested changes to the policies presented in the Redlined Version of the Middlesex Centre Official Plan, as presented through the Official Plan Review process.

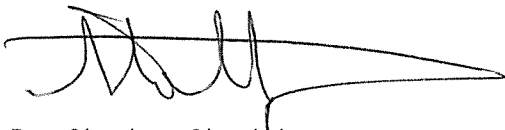
There is a realistic expectation that the process will take a number of years and the construction of the servicing outcome for Arva. This will undoubtedly correspond to a future need for new housing units and the timelines will dovetailed with the required approval processes which the new policy framework can initiate and progress. The proposed synchronized processes will enable delivery of housing more efficiently and provide the necessary clarity and certainty required to make the significant investments by both the private and public sectors and will assist with a healthy housing partnership.

In summary our request is to establish greater certainty that the lands located at 14494 Medway Road will be designated and available for development within the horizon of this Official Plan by:

- Renaming the designation as a "Future Development Area" and
- Expanding the Arva Settlement Area boundary to include this property.

We would be pleased to discuss the above noted policy framework further with staff and WSP and look forward to working with everyone in Middlesex Centre on the finalization of this Official Plan.

Yours truly,
Auburn Developments Inc.



Per, Stephen Stapleton,
Vice President

Attached: Draft Schedule "A-1" Arva Community Settlement Area

CC:

Marion Cabral, Middlesex Centre Planner (mcabral@middlesex.ca)
 Durk Vanderwerff, Director of Planning, County of Middlesex (dvanderwerff@middlesex.ca)
 Matt Alexander, Project Manager, WSP (Matt.Alexander@wsp.com)
 Amelia Sloan, Stantec Consulting Ltd. (amelia.sloan@stantec.com)
 Mayor and Members of Council c/o Municipal Clerk, James Hutson
 (hutson@middlesexcentre.on.ca)
 Aina DeViet, Mayor (deviet@middlesexcentre.on.ca)



Schedule A-1

Arva

Community Settlement Area

Legend

Land Use Designations

	Residential		Settlement Boundary
	Medium Density Residential		Middlesex Centre Boundary
	Hamlet		Aggregate Overlay
	Settlement Commercial		Hazardous Lands Overlay
	Rural Commercial		Future Expansion Area
	Village Centre		
	Rural Industrial		
	Settlement Employment		
	Strategic Employment Area		
	Parks and Recreation		
	Natural Heritage Enhancement Area		
	Natural Environment		
	Agricultural		

N

0 125 250 500 Meters

0 5 10 20 km

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Date: October 2021