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February 7, 2022

Planning and Development Services Department
Region of Niagara
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To the Official Plan Team:

OFFICIAL PLAN REVIEW - LOEFFEN FARMS, WAINFLEET – REQUESTED CHANGES TO THE DRAFT REGIONAL OFFICIAL PLAN

IBI Group and Sullivan Mahoney LLP is representing John & Harold Loeffen and Loeffen Farms Ltd., the landowners of several properties in the Township of Wainfleet.

In 2013, the Region of Niagara commenced a multi-year integrated process to undertake a Municipal Comprehensive Review (“MCR”) – How We Grow, which transitioned into creating the new Niagara Official Plan, which is intended to describe the type of growth and where growth should occur in the Region. As part of this process, Niagara Region is undertaking a review of Settlement Area Boundaries as part of its new Official Plan. In December 2021, Reports PDS 41-2021 and PDS 42-2021 set out staff’s recommendations for boundary changes.

Insofar as those Staff recommended boundary adjustments and settlement plans affect a number of our client’s land holdings, the purpose of this letter is to provide an overview of proposed requests on behalf of our client and evaluate them against criteria considered by Regional Staff in assessing Rural (Hamlet) Settlement Area Expansions.

1.0 BELL ROAD, WAINFLEET

1.1 Site Location and Surrounding Uses

The subject lands are located along the north side of Bell Road between Highway 3 and Emerson Road, as depicted in **Figure 1** below (hereinafter “Bell Road Lands”). The Bell Road lands are legally described as Part of Lots 20 & 21, Concession 4, Part 1 in Reference Plan 59R4350, except Part 1 in Reference Plan 59R6578 in the geographic municipality of the Township of Wainfleet. The Bell Road lands are irregular in shape with an approximate frontage of 658 metres along Bell Road, a depth of 509 metres and an area of 346, 719 square metres. As seen in **Figures 1 - 2**, the Bell Road lands are vacant and cultivated.

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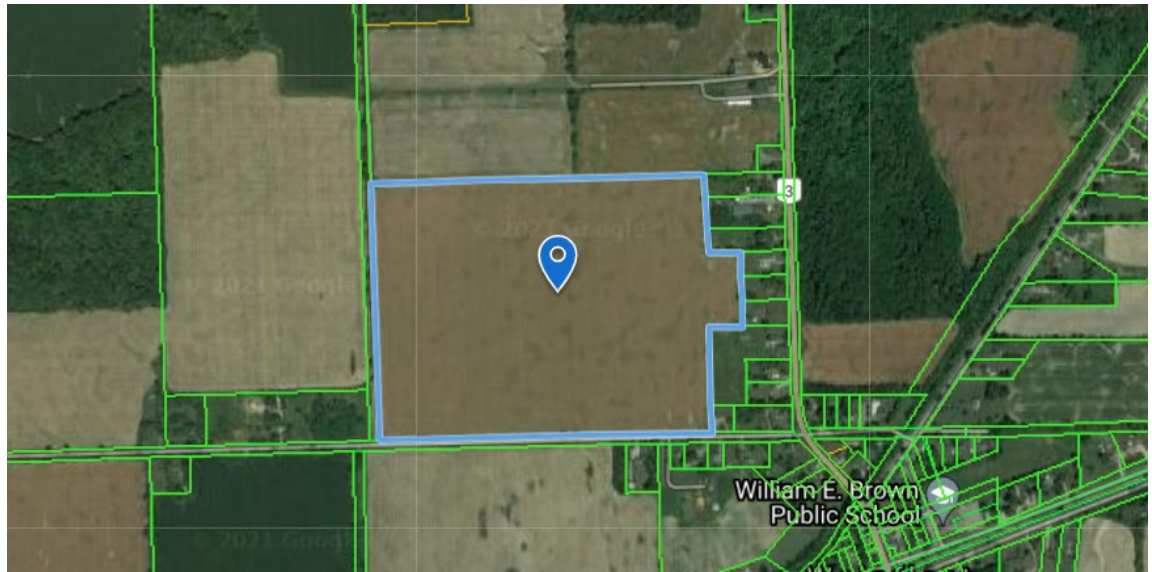


Figure 1: Aerial View of Bell Road Lands Outlined in Blue, Retrieved from Geowarehouse



Figure 2: Streetview off Bell Road, Retrieved from Google Streetview

In terms of surrounding context, the Bell Road lands are located at the north-western edge of the Village of Wainfleet, illustrated in the current Regional and Township Official Plans and in **Figure 3**. The Village of Wainfleet is the largest Hamlet in Wainfleet in terms of land area and population.

The Bell Road lands are bound by existing residential uses and Highway 3 to the east, Bell Road to the south and Emerson Road to the west. To the north, the Bell Road lands are bordered by agricultural and low-density residential uses. This development pattern continues leading to the Chamber's Corners Settlement Area. To the east, the Bell Road lands directly abut low-density residential uses along Bell Road and Highway 3, which are situated within the Wainfleet Settlement Area. On the other side of Highway 3, low density residential uses continue, while the Christ Church is located in the midst of these uses. Low density residential and commercial uses, as well as the Township Municipal Building, Fire Station, Wainfleet Arena and two elementary schools (William E. Brown Elementary School and St. Elizabeth Catholic Elementary School) are located further south-east of the Bell Road lands. The Bell Road lands are surrounded by low-density residential and agricultural uses to the south and west.

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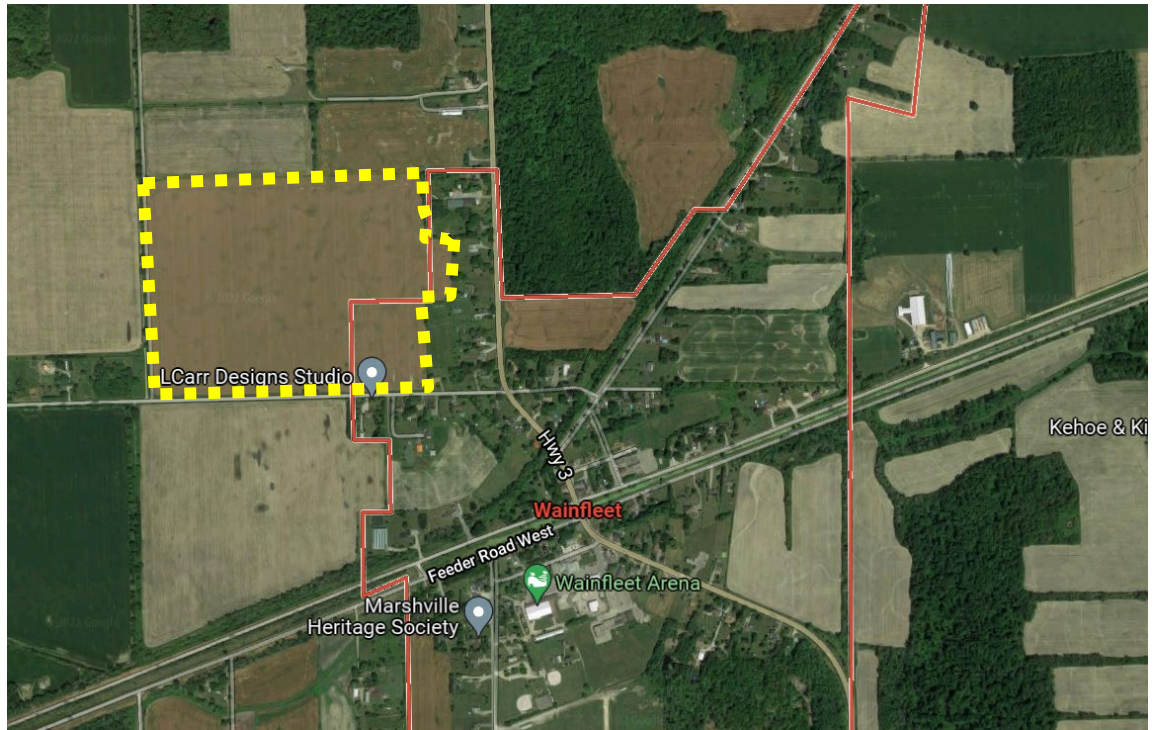


Figure 3: Bell Road Lands and Surrounding Context, Retrieved from Google Earth

1.2 Existing Planning Policy Framework

The following subsections provide an examination of the Bell Road lands against current and applicable planning policy, including the Region of Niagara Official Plan and the Township of Wainfleet Official Plan.

1.2.1 Region of Niagara Official Plan

The Region of Niagara Official Plan (ROP) was approved in 2015 and sets out policies for the physical, economic and social development within Niagara Region, which includes the Township of Wainfleet. It contains objectives, policies and mapping that implement the Region's approach to managing growth, growing the economy, protecting the natural environment, resources and agricultural land and providing infrastructure.

As seen in **Figure 4**, majority of the Bell Road lands are designated 'Agriculture', while the south-eastern portion is identified to be located within the Hamlet.

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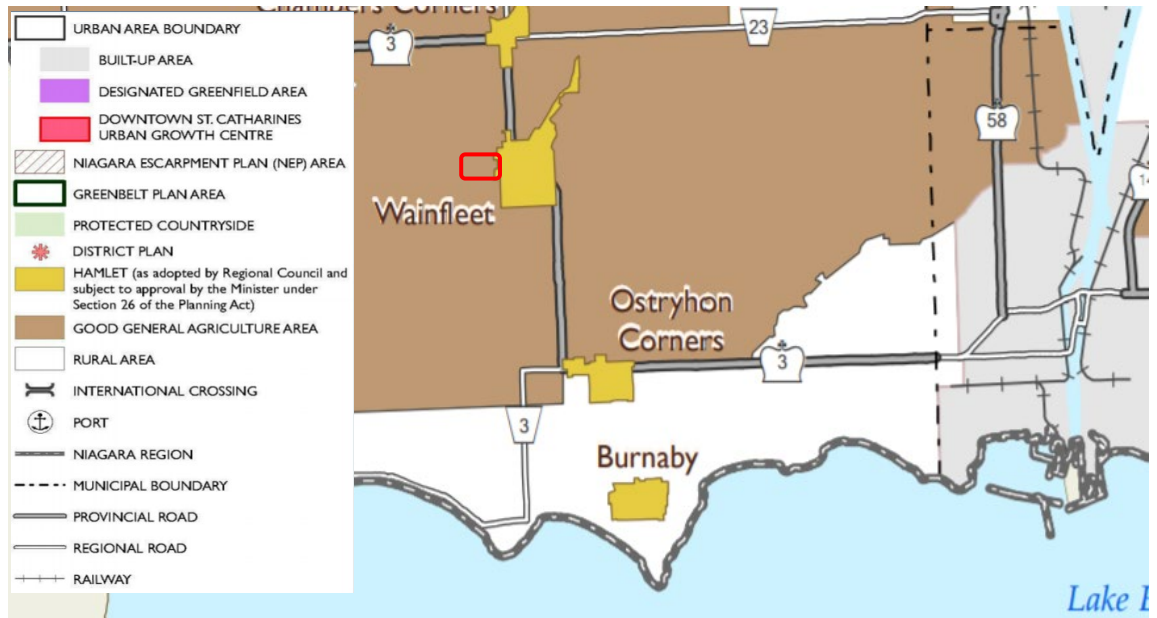


Figure 4: Excerpt of Schedule A – Regional Structure, Retrieved from Regional Official Plan

1.2.2 Township of Wainfleet Official Plan

The Township of Wainfleet Official Plan contains goals, objectives and policies to manage and direct change and its effects on the social, economic and natural environment of the municipality. The version referenced is the January 2016 Consolidation.

As seen in **Figures 5 & 6**, the majority of the Bell Road lands are located within the Agricultural Area, while the south-eastern portion is situated within the Hamlet and designated 'Village Residential'.

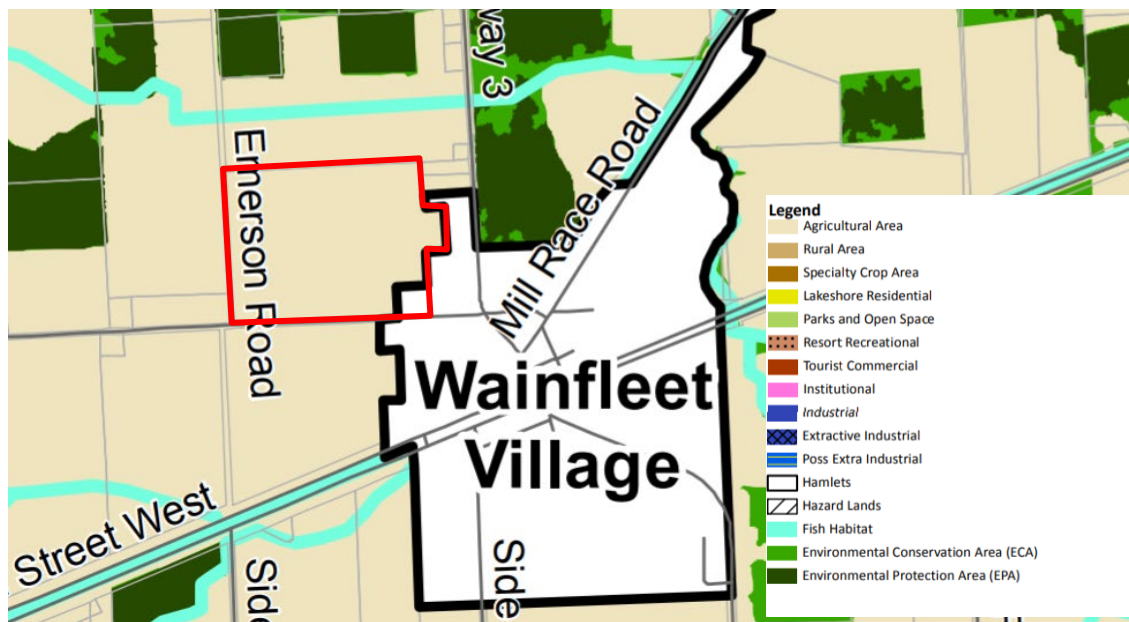


Figure 5: Excerpt of Schedule A - Municipal Structure, Retrieved from Township Official Plan

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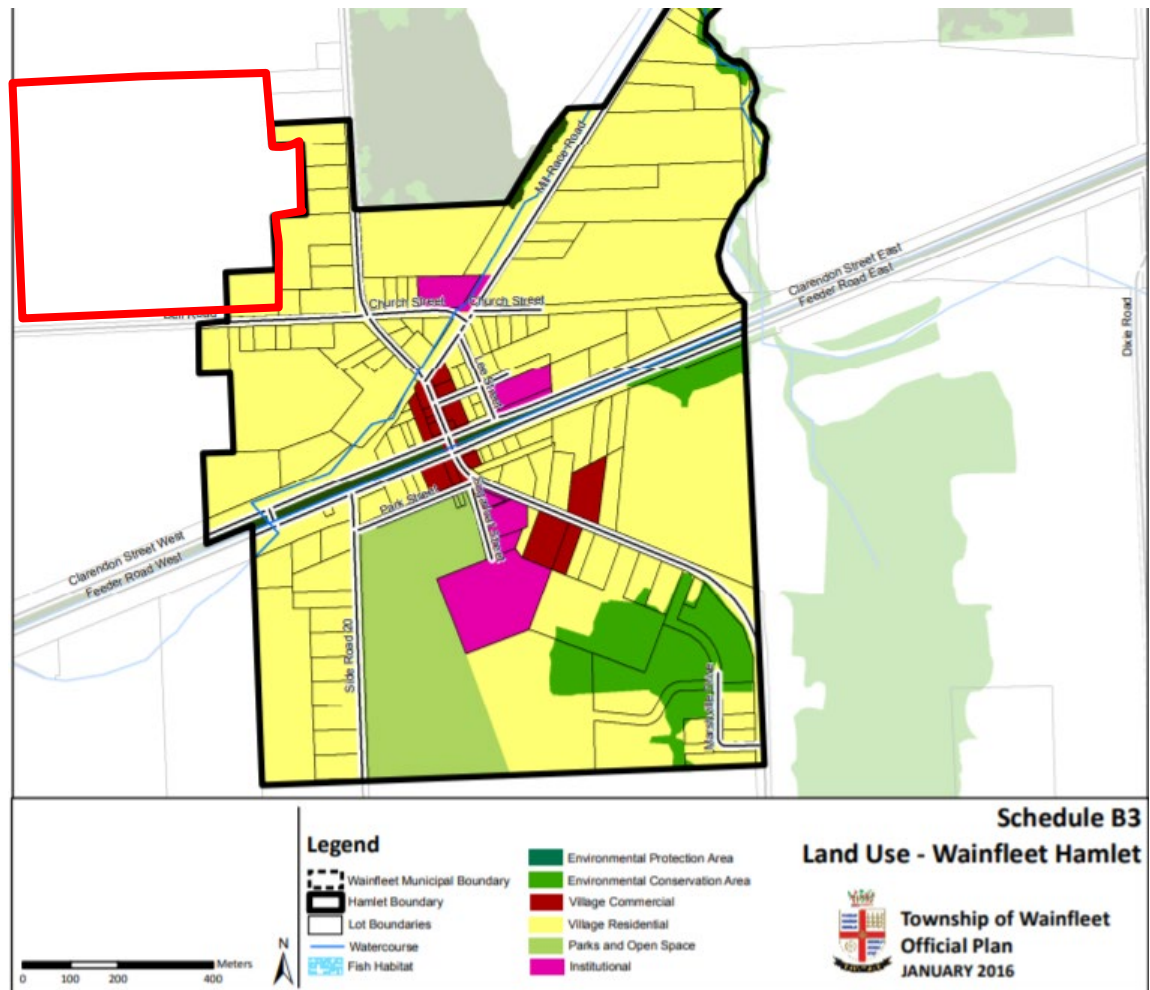


Figure 6: Excerpt of Schedule B3: Land Use – Wainfleet Hamlet, Retrieved from Township Official Plan

1.3 Request

As stated previously, in December 2021, Report PDS 42-2021 set out staff’s recommendations for boundary changes. For the Village of Wainfleet hamlet area, the Region identified two large parcels considered for inclusion, which are west of the existing Hamlet Area Boundary, and which included a portion of the Bell Road lands and the property south of Bell Road, as seen in **Figure 7**.

Regional Staff assessed the inclusion of the Bell Road lands against the evaluation criteria considered in assessing Rural (Hamlet) Settlement Area Expansions (further described in **Section 1.4** of this letter) and recommended the Settlement Area Expansion Areas shown in **Figure 8** to include the entirety of the parcel to the south of Bell Road and only the frontage of the Bell Road lands on the north side of Bell Road. The report stated that the recommendation would “*form a logical westerly boundary line and offer the opportunity to comprehensively plan the area.*”

Our proposal is to request the inclusion of the entirety of the Bell Road lands into the Wainfleet Village Hamlet Boundary, instead of just the frontage along Bell Road. The proposed request will further form a logical western boundary, which would conclude at Emerson Road. Further justification is provided in **Section 1.4** of this letter.

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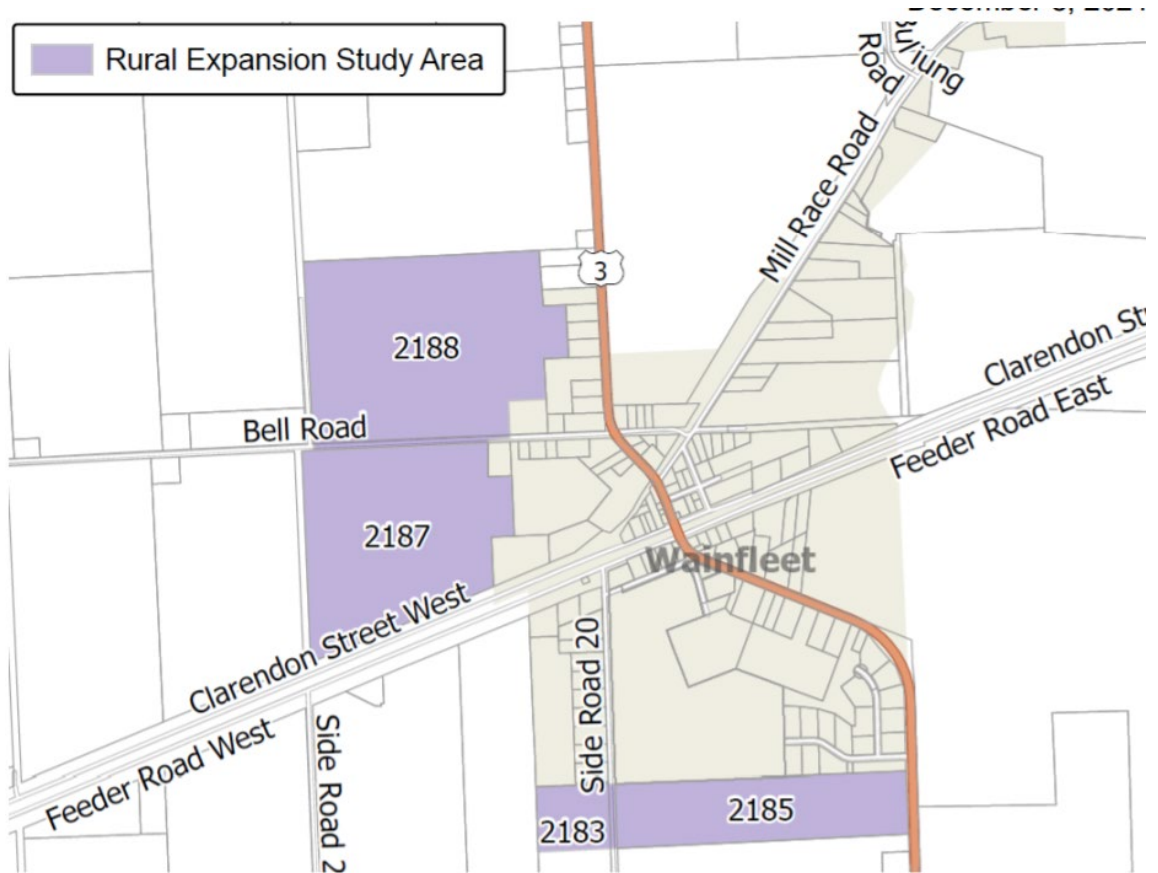


Figure 7: Identified Settlement Expansion Areas, Retrieved from Regional Website



Figure 8: Recommended Settlement Expansion Areas, Retrieved from the Regional Website

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1.4 Planning Justification

The Rural Lands Needs Assessment identified that Wainfleet needs approximately 75 hectares of land to meet its population and rural employment needs to 2051. The Staff Report identified that the lands north and south of Bell Road were assessed together against the criteria, identified in the table below.

Criteria	Commentary
Contribution to Rural Character	<p>Similarly concluded in Report PDS 42-2021, including these lands also has a modest impact of the existing Village Hamlet Area. The addition would not directly impact the existing built-up area of the Hamlet.</p> <p>Per the direction of the local Official Plan, the majority of growth should be directed to the Village of Wainfleet, therefore more expansion areas should be directed there. This location offers an opportunity to comprehensively plan the west side of the Hamlet through a Secondary Plan Process.</p>
Support for the Agricultural Community	<p>The Village of Wainfleet is the largest hamlet in the Township and hosts a number of services and facilities accessed by the rural community or servicing the rural community including banking, arena, sports fields, municipal hall, school, agricultural commercial and fire hall.</p> <p>Additional population related employment could be planned for this area to support the new and existing residents.</p>
Hydrogeological Considerations	<p>Highly feasible as there are no defined watercourses traversing the site.</p> <p>Private servicing through cistern being the most common water supply and septic system. There are a very limited amount of wells known in the area.</p> <p>No immediate public health concerns known.</p>
Natural Environment Impacts	<p>No immediate concerns identified for this location.</p> <p>There are no known environmental features present on the lands and the area in general and therefore the proposed expansion does not result in negative impact on the natural environment.</p>
Agricultural Impacts	<p>The lands and surrounding area are largely comprised of Class 3 soils. It does not appear that there are existing barns or livestock operations in proximity to the lands.</p>
Other Constraints/ Considerations	<p>The Bell Road lands have very good transportation connections, provide direct access along Bell Road, with immediate access to travel north, south and east along Highway 3. No impacts from noise sources are anticipated on lands.</p>

Table 1: Evaluation of Criteria Against Bell Road, Wainfleet, Retrieved from Regional Website

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As the lands to the south are being considered in its entirety, the Bell Road lands should also be considered in its entirety. We are unaware of a justification being provided within the staff report to limit the Wainfleet Hamlet Area boundary expansion to only the frontage of the Bell Road lands along Bell Road. The proposed request would form a more logical western boundary, following an identifiable feature (Emerson Road) and can be utilized to accommodate forecasted population needs to 2051. Including the entire parcel would allow frontage along both Bell Road and Emerson Road.

We respectfully request that the Region include the entirety of the Bell Road Lands within the hamlet boundary.

2.0 11629 HIGHWAY #3, WAINFLEET

2.1 Site Location and Surrounding Uses

The Highway 3 lands are located along the south side of Highway 3 between the intersections of Dixie Road (unopened) and Highway 3 in the hamlet at Ostryhon Corners, as depicted in **Figure 9** below. The Highway 3 lands are legally described as Part of Lots 16 & 17, Concession 1 as in RO569590 in the geographic Township of Wainfleet. The Highway 3 lands are irregular in shape with an approximate frontage of 468 metres along an unopened municipal road allowance and an approximate area of 250,023 square metres. While there is no direct frontage on a travelled road, the parcel to the immediate north east of these lands are also owned by our client and do have frontage along Highway 3. It is proposed that both parcels would be developed together. As seen in **Figure 9**, the Highway 3 lands are vacant, with a woodland encompassing the western portion.

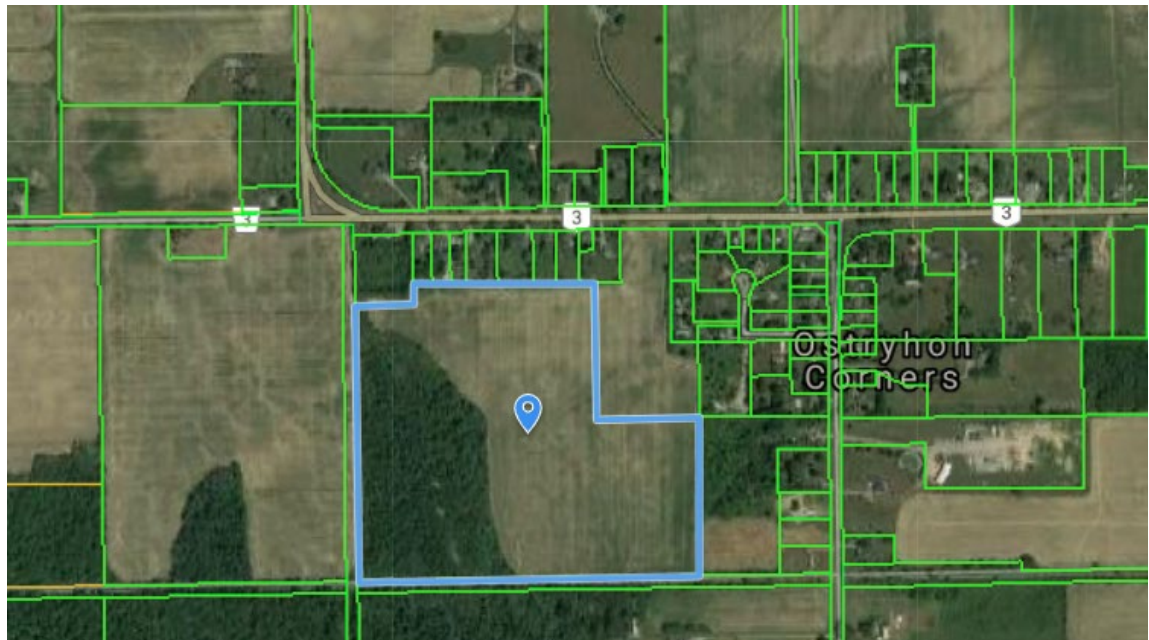


Figure 9: Aerial View of Highway 3 Lands Outlined in Blue, Retrieved from Geowarehouse

In terms of surrounding context, the Highway 3 lands are located at the south-western edge of the Ostryhon Corners Settlement Area, illustrated in the current Regional and Township Official Plans. As seen in **Figure 10**, the Highway 3 lands are bound by existing low density residential land uses and Highway 3 to the north, Elizabeth Crescent to the east, the Gord Harry Conservation Trail to the south, and Station Road further to the west. To the north and east, the Highway 3 lands are surrounded by low-density residential uses, situated within the Settlement Area. An Esso Gas

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Station and restaurant is situated further north-east at the corner of Burnaby Road and Highway 3. The Gord Harry Conservation Trail is situated south of the Highway 3 lands. Agricultural and low-density residential uses predominate west of the Highway 3 lands.

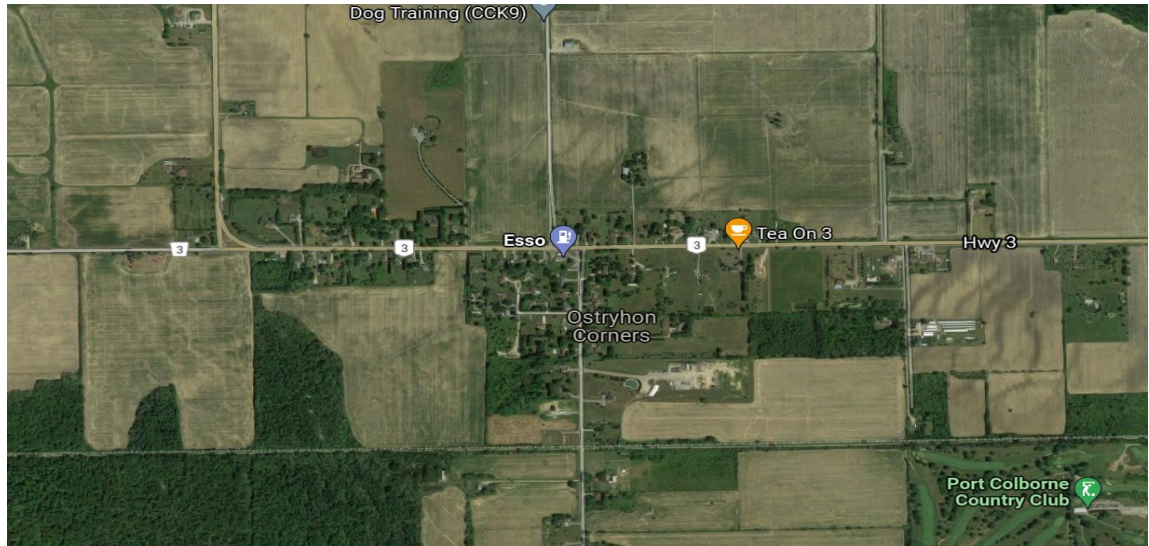


Figure 10: Highway 3 Lands and Surrounding Area, Retrieved from Google Earth

2.2 Existing Planning Policy Framework

The following subsections provide an examination of the Highway 3 lands against current and applicable planning policy, including the Region of Niagara Official Plan and the Township of Wainfleet Official Plan.

2.2.1 Region of Niagara Official Plan

As seen in **Figure 11**, the Highway 3 lands are designated 'Rural' and directly about the Ostryhon Corners Hamlet, including the parcel already owned by our client.

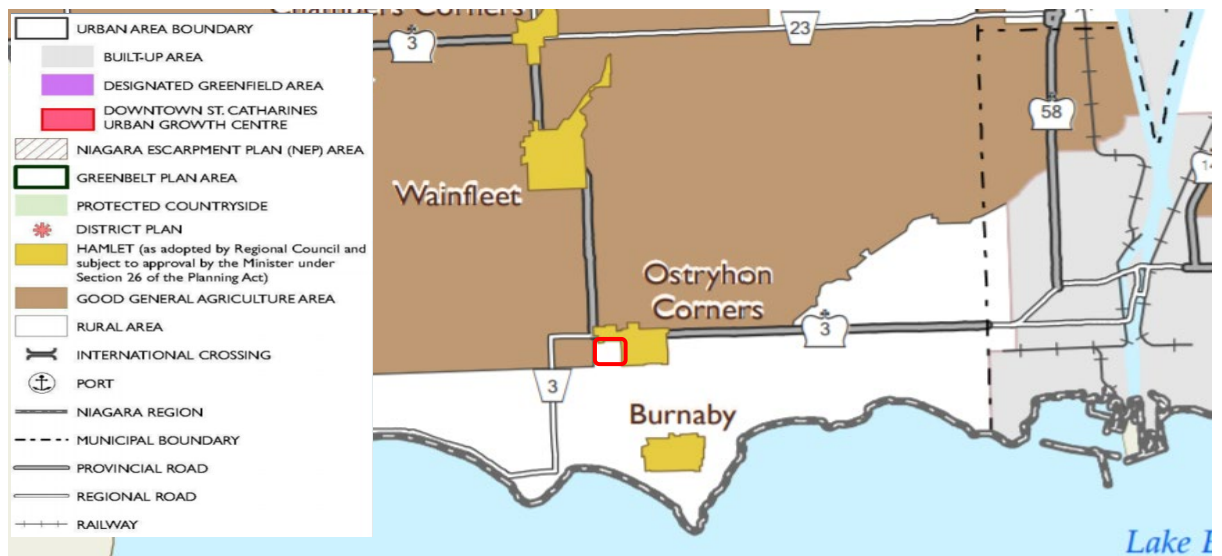


Figure 11: Excerpt of Schedule A – Regional Structure, Retrieved from Regional Official Plan

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2.2.2 Township of Wainfleet Official Plan

As seen in **Figure 12**, the eastern portion of the Highway 3 lands are designated 'Agricultural' while the western portion is designated Environmental Protection Area.

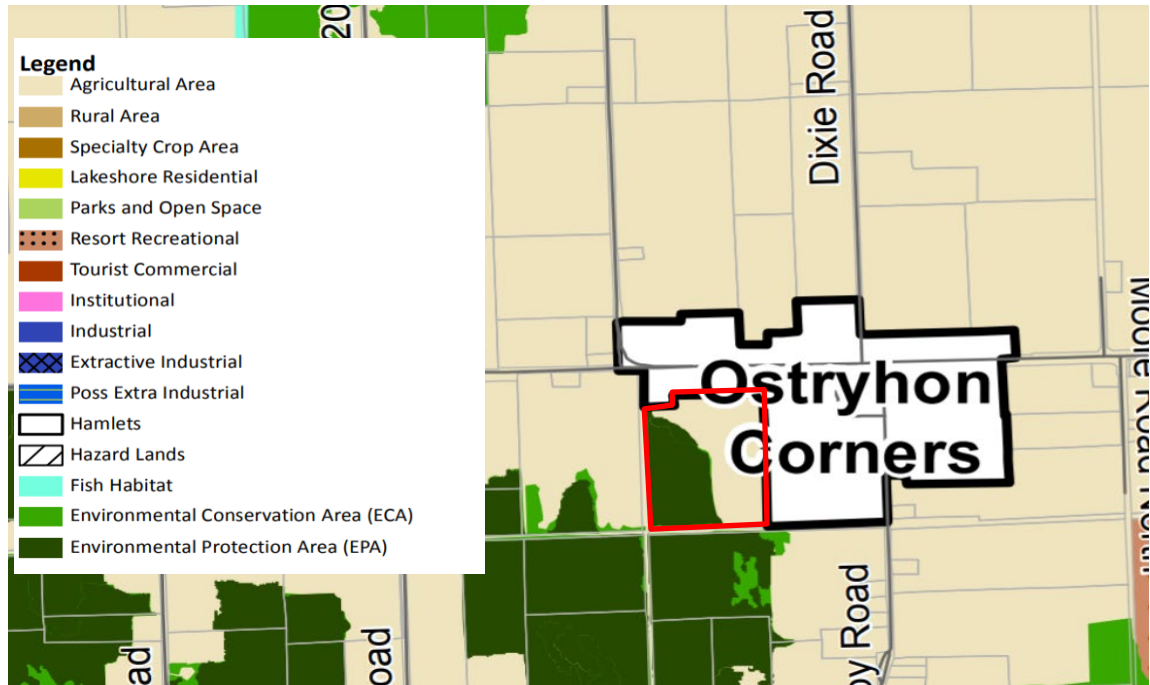


Figure 12: Excerpt of Schedule A - Municipal Structure, Retrieved from Township Official Plan

2.3 Proposal

For the Ostryhon Corners Settlement Area, the Region identified three parcels considered for inclusion, which included the Highway 3 lands, lands immediately to the west and a property along the eastern side of Burnaby Road, as seen in **Figure 13**.

Staff assessed the inclusion of the Highway 3 lands against the evaluation criteria considered in assessing Rural (Hamlet) Settlement Area Expansions (further described in **Section 3.4** of this letter) and recommended that this location not be considered for expansion due to the identified provincially significant woodlot and wetland. Unfortunately, the Region's staff did not consider the Highway 3 lands independent of the parcel to the west, which we understand has different characteristics and has serious water issues.

As there are environmental constraints on the Highway 3 lands, our proposal is to expand the Ostryhon Corners Settlement Area Boundary to include the Highway 3 lands only to the limits of the provincially significant features, shown in **Figure 14**. These features would be properly delineated through supporting studies. The proposed request would form a logical and identifiable western boundary. Further justification is provided in **Section 3.4** of this letter.

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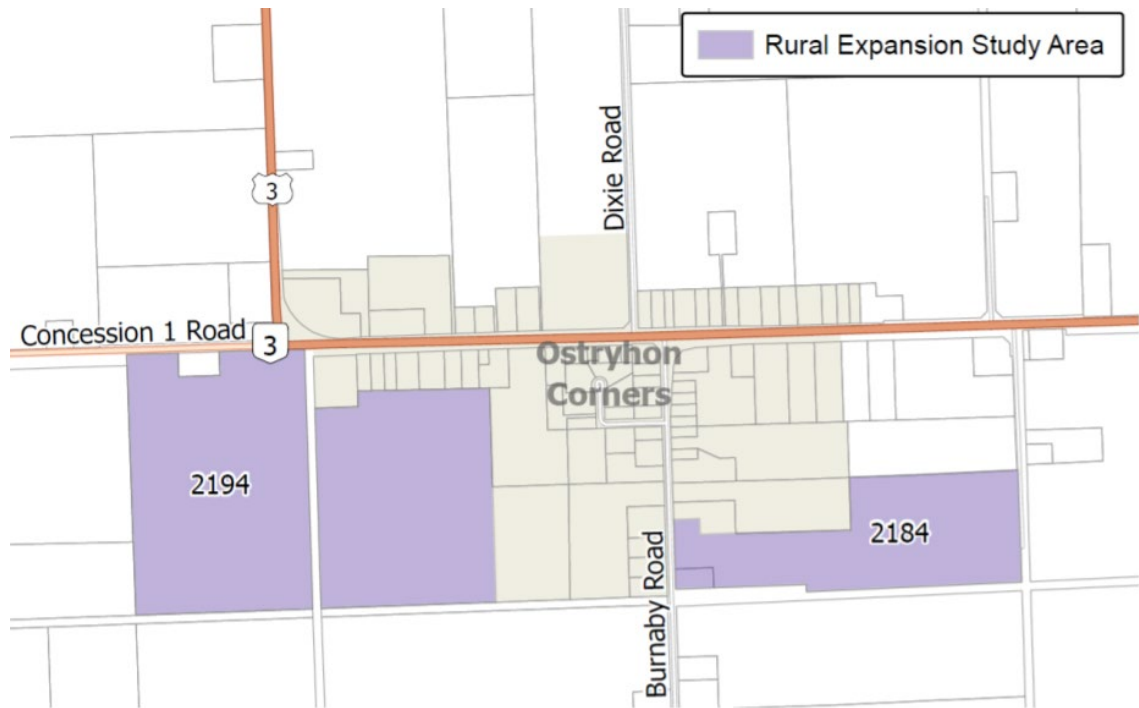


Figure 13: Identified Settlement Expansion Areas, Retrieved from Regional Website

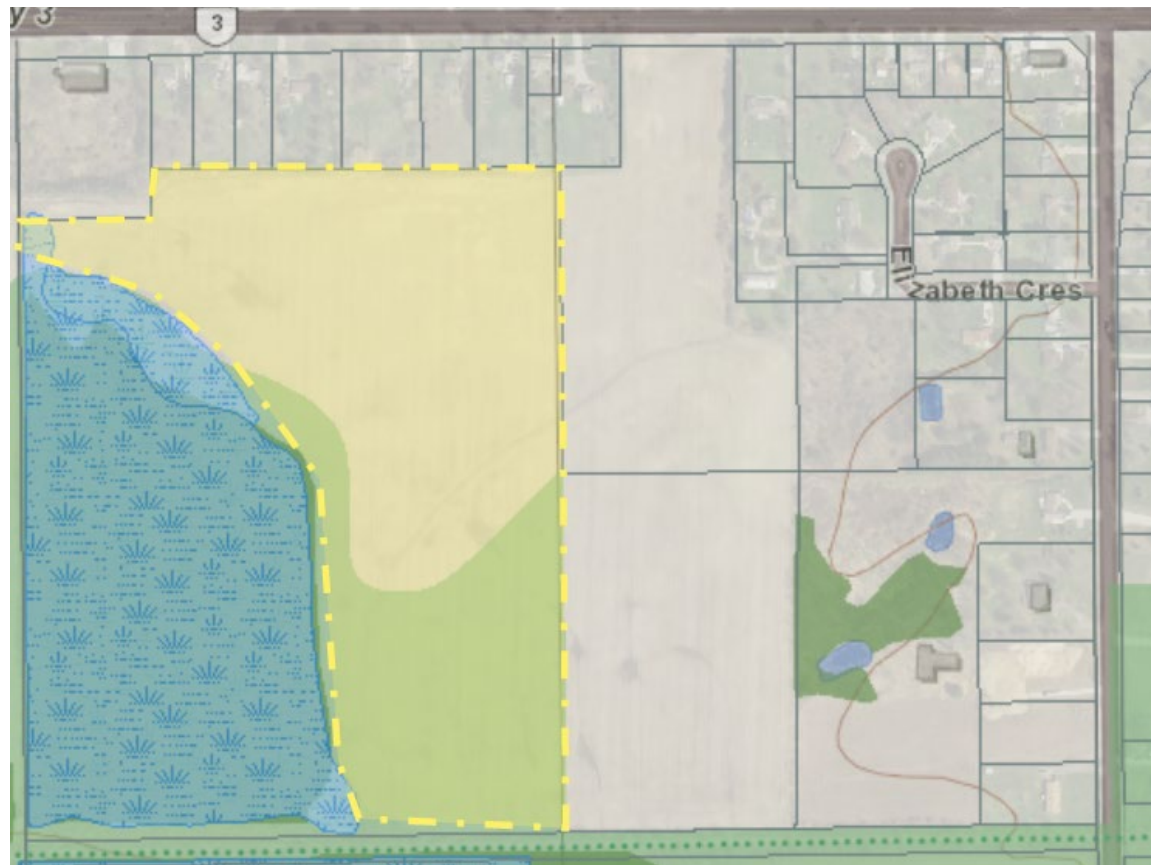


Figure 14: Proposed Request Mapping, Retrieved from Natural Heritage Mapping

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2.4 Planning Justification

The Staff Report identified that the lands east and west of the unopened road allowance were assessed together against the criteria, identified in the table below.

Criteria	Commentary
Contribution to Rural Character	<p>Addition of these lands would add to potential of lands presently in the vacant supply and have potential for sizable residential or commercial supply with negligible impact to hamlet character. The northerly portion of the lands owned by our client is already within the Hamlet Boundary, so once those are developed, the reduction in area and the environmental lands to the west would diminish the agricultural viability of the parcel. It is better planning practice to allow these lands to be developed for rural settlement purposes.</p> <p>The boundary would be further constrained from expansion by the existing environmental features.</p>
Support for the Agricultural Community	<p>Hamlet is predominantly a rural residential community. Some under-utilized highway commercial sites are located outside of the hamlet to the east, including a gas station serving the area, café and satellite beer/liquor store. Generally limited offerings leading to reliance on other hamlets or urban areas.</p> <p>The recommended expansion does not remove a significant amount of land from agricultural production or impact agricultural operations. Once the environmental feature is removed, along with the parcel already within the settlement area, the amount of viable farmland is significantly reduced.</p>
Hydrogeological Considerations	<p>Assessed as feasible with sizable wetland on the westerly portion of the site but could be appropriately buffered. Highly vulnerable aquifer is found north of the site and to northeast.</p> <p>Feasible only due to cistern being the most common water supply. There are a very limited amount of wells known in the area. No immediate concerns known for this location within the municipality.</p>
Natural Environment Impacts	<p>Significant environmental features identified on the subject land, including a Provincially Significant Wetlands. Lands to the west and south cannot be considered for development as natural features are present. These lands are proposed to be avoided</p>
Agricultural Impacts	<p>The soils are Class 3. Potential active poultry operation approximately 260m northwest and a small poultry 500 m west of the site.</p>
Other Constraints/ Considerations	<p>There are no identified aggregate resources on the site or active operations in close proximity. There are small sand and gravel resources close by north of the site.</p>

Table 2: Evaluation of Criteria Against 11629 Highway 3, Wainfleet

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The expansion request in the Staff Report includes the Highway 3 lands in its entirety, less the lands that include the environmental feature. The only reason identified against the inclusion of the Highway 3 lands into the Settlement Area Boundary are the environmental constraints, but those appeared to be more focused on the adjacent property to the west. Therefore, the issue is resolved if the expansion is limited to the area outside and to the east of the natural heritage feature abutting existing development. The proposed request would form a more logical western boundary, following an identifiable feature and can be utilized to accommodate forecasted population needs to 2051.

We respectfully request that the Region include the entirety of the Highway 3 lands, with the exception of the environmental features within the Ostryhon Corners hamlet boundary.

3.0 44088 HENDERSHOT ROAD, WAINFLEET

3.1 Site Location and Surrounding Uses

The Hendershot lands are located at the south-west corner of Hendershot Road and Highway 3, as depicted in **Figures 15 & 16 below**. The Hendershot lands are legally described as Part of Lots 40 & 41, Concession 4, Part 1 in Reference Plan 59R4393, Part of Lot 40, Concession 4 as in RO209288, except AA54172 subject to WF13379, WF13392 in the geographic Township of Wainfleet. The entire Hendershot lands are irregular in shape with an approximate frontage of 274 metres along Highway 3, a depth of 1,307.9 metres along Hendershot Road and an area of 50 hectares. As seen in **Figures 15 – 18**, majority of the Hendershot lands are vacant and cultivated, while portions along Hendershot Road contain farm structures and grain elevators. A municipal drain splits the property on the northerly end of the Hendershot Lands, near the grain elevators.



Figure 15: Aerial View of Hendershot Lands Outlined in Blue, Retrieved from Geowarehouse

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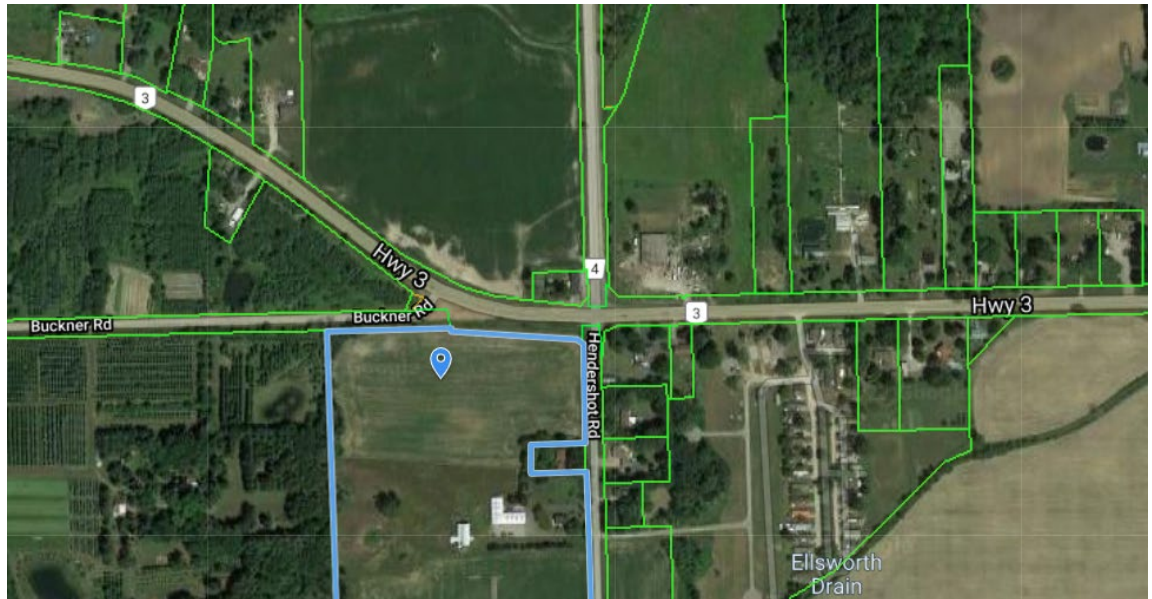


Figure 16: Zoomed in Aerial View of Hendershot Lands Outlined in Blue, Retrieved from Geowarehouse



Figure 17: View of Hendershot Lands at the Corner of Highway 3 & Hendershot Road, Retrieved from Google Streetview



Figure 18: View of Hendershot Lands along Hendershot Road, Retrieved from Google Streetview

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In terms of surrounding context, the Hendershot lands are located at the south-western edge of the Hendershot Corners Hamlet Area, illustrated in the current Regional and Township Official Plans. As seen in **Figure 19**, the Hendershot lands are bound by Highway 3 to the north, Hendershot Road to the east and Wainfleet – Dunnville Road to the west. To the north, the Hendershot lands are surrounded by low-density residential and agricultural uses. A trucking company is situated further north of the Hendershot Corners Settlement Area. Low density residential and commercial uses are located on the opposite side of Hendershot Road. This development pattern continues further east along Highway 3, including a proposed development of a mobile home park that will increase the overall number of dwellings. Agricultural uses are located to the south and west of the Hendershot lands.

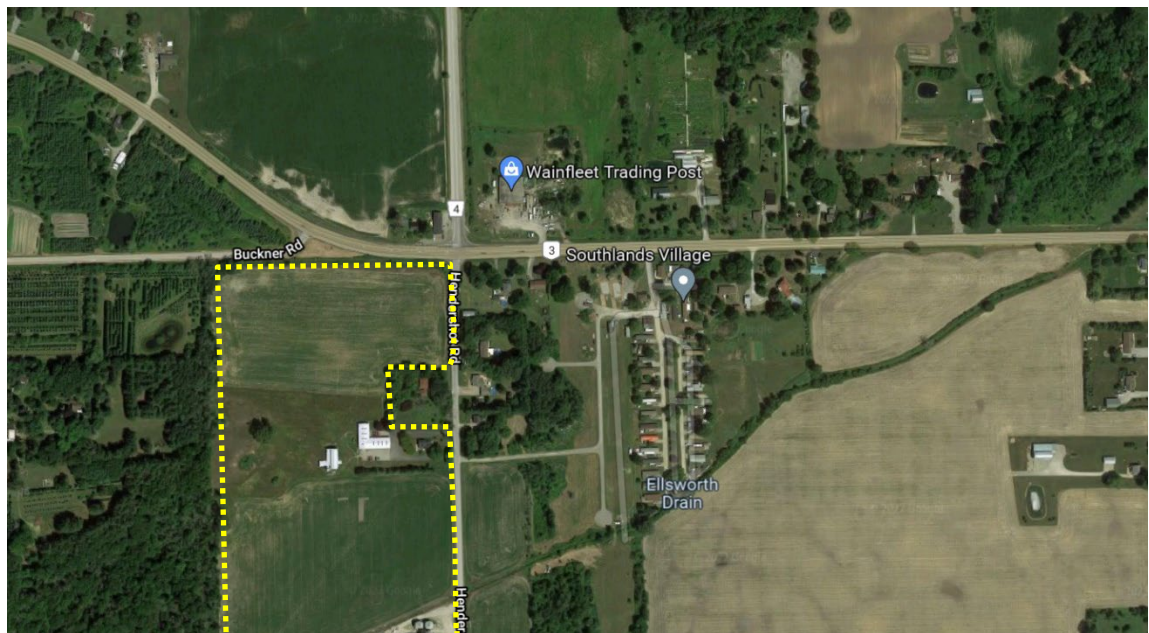


Figure 19: Hendershot Lands and Surrounding Area, Retrieved from Google Earth

3.2 Existing Planning Policy Framework

The following subsections provide an examination of the Hendershot lands against current and applicable planning policy, including the Region of Niagara Official Plan and the Township of Wainfleet Official Plan.

3.2.1 Region of Niagara Official Plan

As seen in **Figure 20**, the majority of the Hendershot lands are designated 'Agriculture', while the north-eastern portion is identified to be located within the Hamlet.

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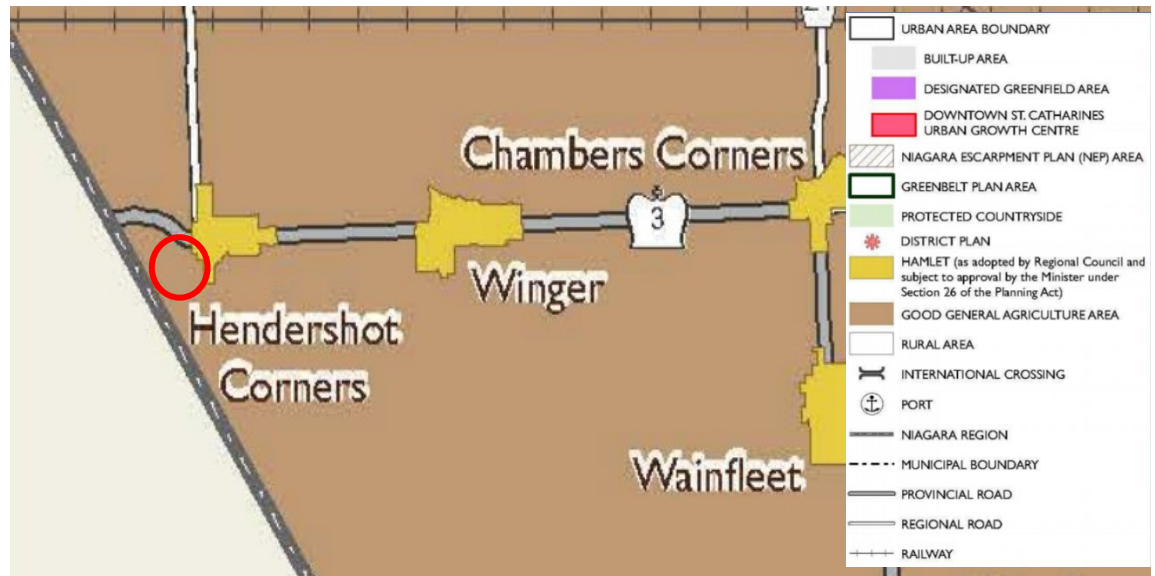


Figure 20: Excerpt of Schedule A – Regional Structure, Retrieved from Regional Official Plan

3.2.2 Township of Wainfleet Official Plan

As seen in Figures 21 & 22, majority of the Hendershot lands are located within the Agricultural Area, while the north-eastern portion is situated within the Hamlet and designated ‘Village Residential’.

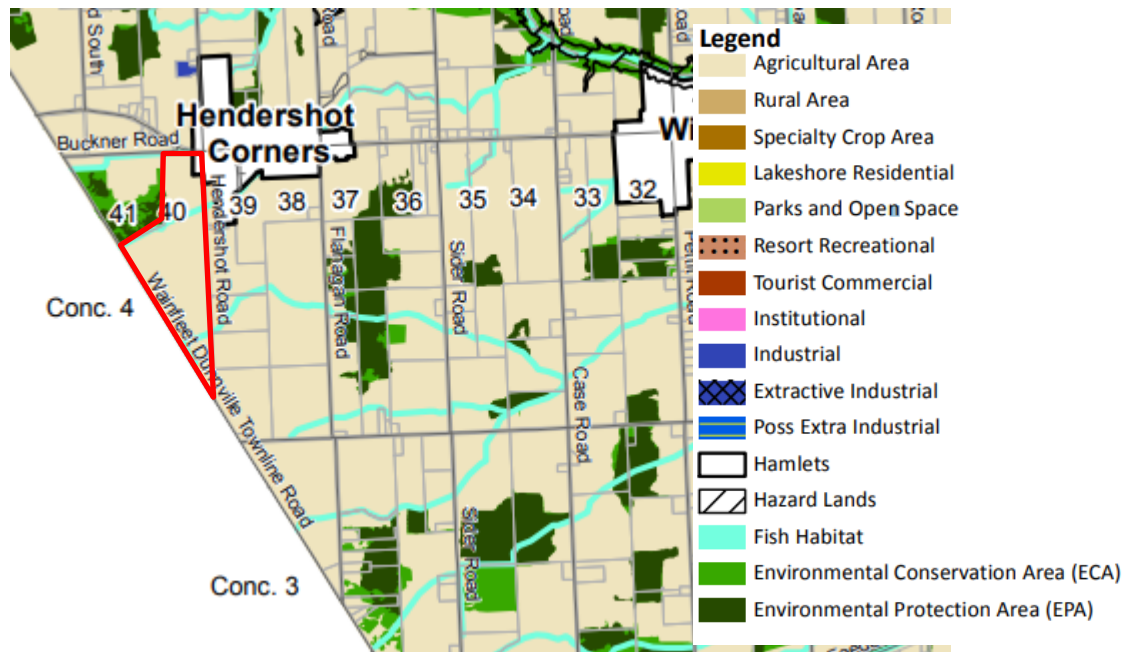


Figure 21: Excerpt of Schedule A - Municipal Structure, Retrieved from Township Official Plan

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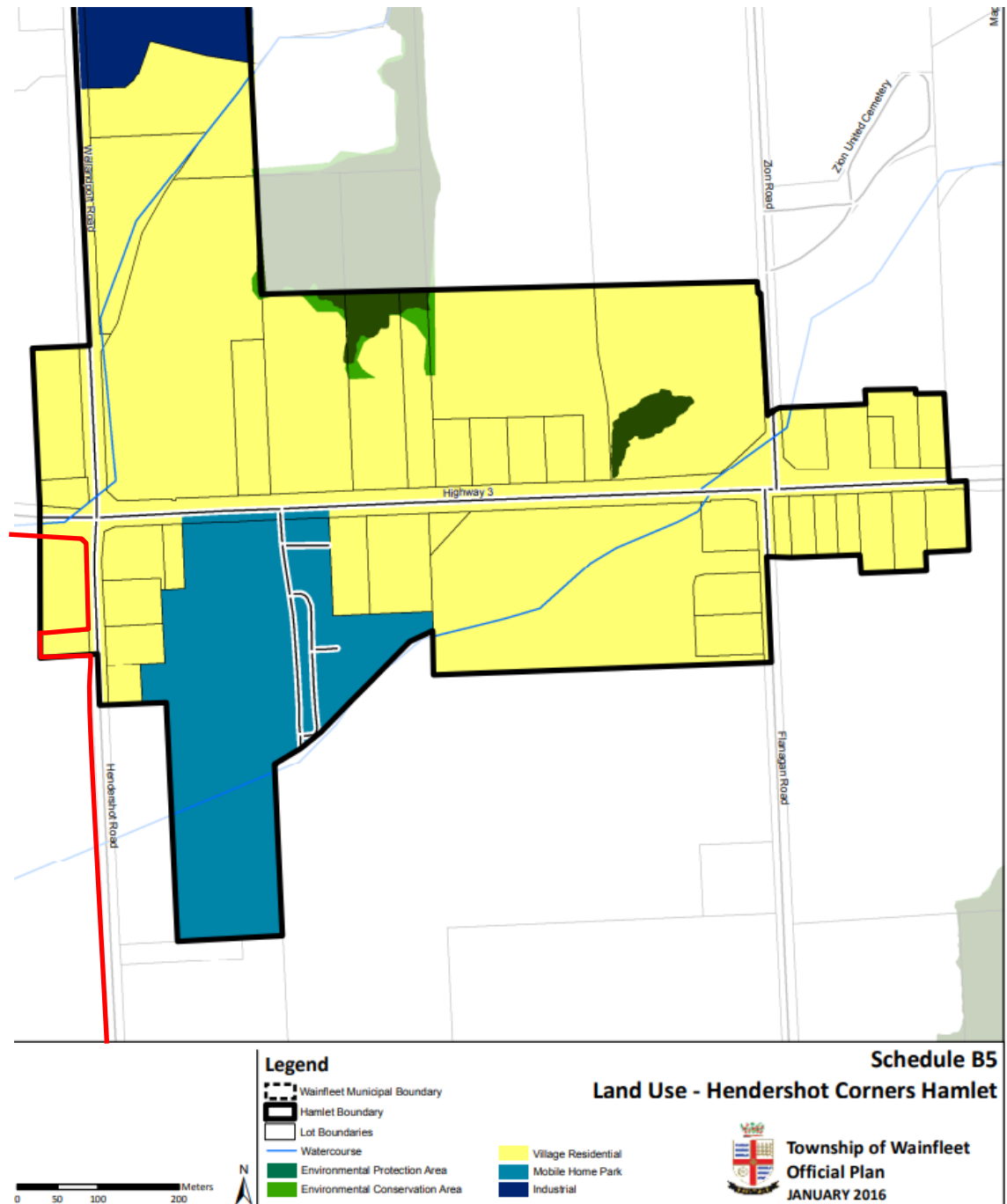


Figure 22: Excerpt of Schedule B5: Land Use – Hendershot Corners Hamlet, Retrieved from Township Official Plan

3.3 Proposal

As stated previously, in December 2021, Report PDS 42-2021 set out staff’s recommendations for boundary changes. Staff stated that no boundary expansions were requested or considered for Hendershot Corners as lands are highly constrained by a highly vulnerable aquifer area and that there were more feasible and appropriate locations to consider in other Hamlets.

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Our proposal is to request the inclusion of the entire northly portion of the Hendershot Lands to approximately the municipal drain into the Hendershot Corner Settlement Boundary, instead of just the north-eastern portion at the corner of the intersection, illustrated in **Figure 23**. The proposed request would push the Settlement Area Boundary to around the Buckner Road and Highway 3 intersection, which would form a more identifiable boundary along with the natural features present beyond the Hendershot Road Lands. Further justification is provided in Section 2.4 of this letter.



Figure 23: Proposed Request Mapping, Retrieved from Niagara Navigator

3.4 Planning Justification

The Rural Lands Needs Assessment identified that Wainfleet needs approximately 75 hectares of land to meet its population and rural employment needs to 2051. The Staff Report stated that no boundary expansions were requested or considered for Hendershot Corners as lands are highly constrained by a highly vulnerable aquifer area and that there were more feasible and appropriate locations to consider in other Hamlets. As per the Township Official Plan, Policy 4.2.1 states that Development and Site Alteration shall be restricted in the vicinity of areas of high aquifer vulnerability, so that the safety, quality and quantity of ground water is protected. The policies do not strictly prohibit development. In addition, any development proposed will have to go through the municipal process and would be qualified by supporting studies, including a Hydrogeological Assessment to ensure that there are no negative impacts on ground water. We understand this to be very typical in the entire Township.

Furthermore, the existing north-western portion located with the Hamlet has an approximate area of 0.6 hectares. The Regional and Township Official Plans state that the minimum lot area within the Settlement Area has to be approximately 1 hectare. The proposal to include the frontage of the Hendershot lands would meet the minimum lot area standards for a single detached dwelling.

The proposed request will further form a logical and identifiable western boundary at the Buckner Road and Highway 3 intersection, which coincides with the approximate boundary of the Hendershot lands and adjacent agricultural uses.

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The following table will outline the proposal against criteria considered by Regional Staff in assessing Rural (Hamlet) Settlement Area Expansions.

Criteria	Commentary
Contribution to Rural Character	<p>The addition of the frontage of the Hendershot lands along Highway 3 would add to an existing lot to increase development potential and meet minimum lot area standards.</p> <p>Including these lands has a modest impact of the existing Hendershot Hamlet Area. The addition would not directly impact the existing built-up area of the Hamlet and would provide a Hamlet Settlement Area frontage coincident with the lands found to the east of Hendershot Road.</p>
Support for the Agricultural Community	<p>The Hamlet is predominantly a rural residential community. A commercial use is located at the north-east corner of Highway 3 and Wellandport Road.</p> <p>The Hamlet of Winger is located approximately 3.4 kilometres from the Hendershot lands and contains the Winger School, church, garden centre, and garage.</p>
Hydrogeological Considerations	<p>Highly feasible as there are no defined watercourses traversing the site. The proposed request would extend the Settlement Area to the existing municipal drain.</p> <p>Private servicing through cistern being the most common water supply and septic system.</p> <p>Though the Hendershot lands are located in a Highly Vulnerable Aquifer, any development proposed will have to go through the municipal process and would be qualified by supporting studies, including a Hydrogeological Assessment to ensure that there are no negative impacts on ground water.</p>
Natural Environment Impacts	<p>No immediate concerns identified for this location, as seen in Figure 24. There is limited environmental features present on the lands and the area in general. Some buffering may be required along the edges of the property along the westerly edge; however, these features are clearly defined. Mitigation from these features is highly feasible and would be reviewed through future study.</p>
Agricultural Impacts	<p>The lands and surrounding area are largely comprised of Class 1 & 2 soils. It does not appear that there are existing barns or livestock operations in proximity to the lands.</p>
Other Constraints/ Considerations	<p>The lands provide direct access along Hendershot Road, which provides connections to Highway 3. No impacts from noise sources or aggregate operations are anticipated on lands.</p>

Table 3: Evaluation of Criteria Against 44088 Hendershot Road, Wainfleet

We respectfully request that the Region include the entirety of the Hendershot Road Lands within the Hendershot Corners hamlet boundary.

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Figure 24: Natural Heritage Mapping of Hendershot Lands, Retrieved from Provincial Natural Heritage Mapping



Figure 25: Soil Capability for Agriculture Mapping of Hendershot Lands, Retrieved from AgMaps Ontario

4.0 12017 STATION ROAD, WAINFLEET

We note that the requests set out above related to the inclusion of certain lands within the Rural (Hamlet) Settlement Area Boundary Review. We wish to make a further submission related to additional lands owned by our client that are outside of the hamlet area, but are currently designated Agricultural. We are respectfully requesting the Region redesignate a small southerly portion of 12017 Station Road, Wainfleet (“Station Road Lands”), to facilitate some very modest residential uses in an area that is predominately used for residential.

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4.1 Site Description and Surrounding Uses

The Station Road lands are located at the northeastern corner of the Station Road and Lakeshore Road intersection and primarily fronts onto the eastern side of Station Road, as depicted in **Figure 26** below. The Station Road lands are legally described as Part of Lot 19, Concession 1, Part 1 in Reference Plan 30R13314 in the geographic Township of Wainfleet. The Station Road lands are rectangular in shape with an approximate frontage of 2,039 metres on Station Road, 103 metres along Lakeshore Road with an approximate lot area of 402,420 square metres. As seen in **Figures 26 & 27**, the Station Road lands are predominantly comprised of agricultural crop land. At the southwestern portion of the Station Road lands, there is a single-detached single storey residential dwelling and barn structure. Two windmills are located in the northern half of the property, each of which have an access road connecting to Station Road.

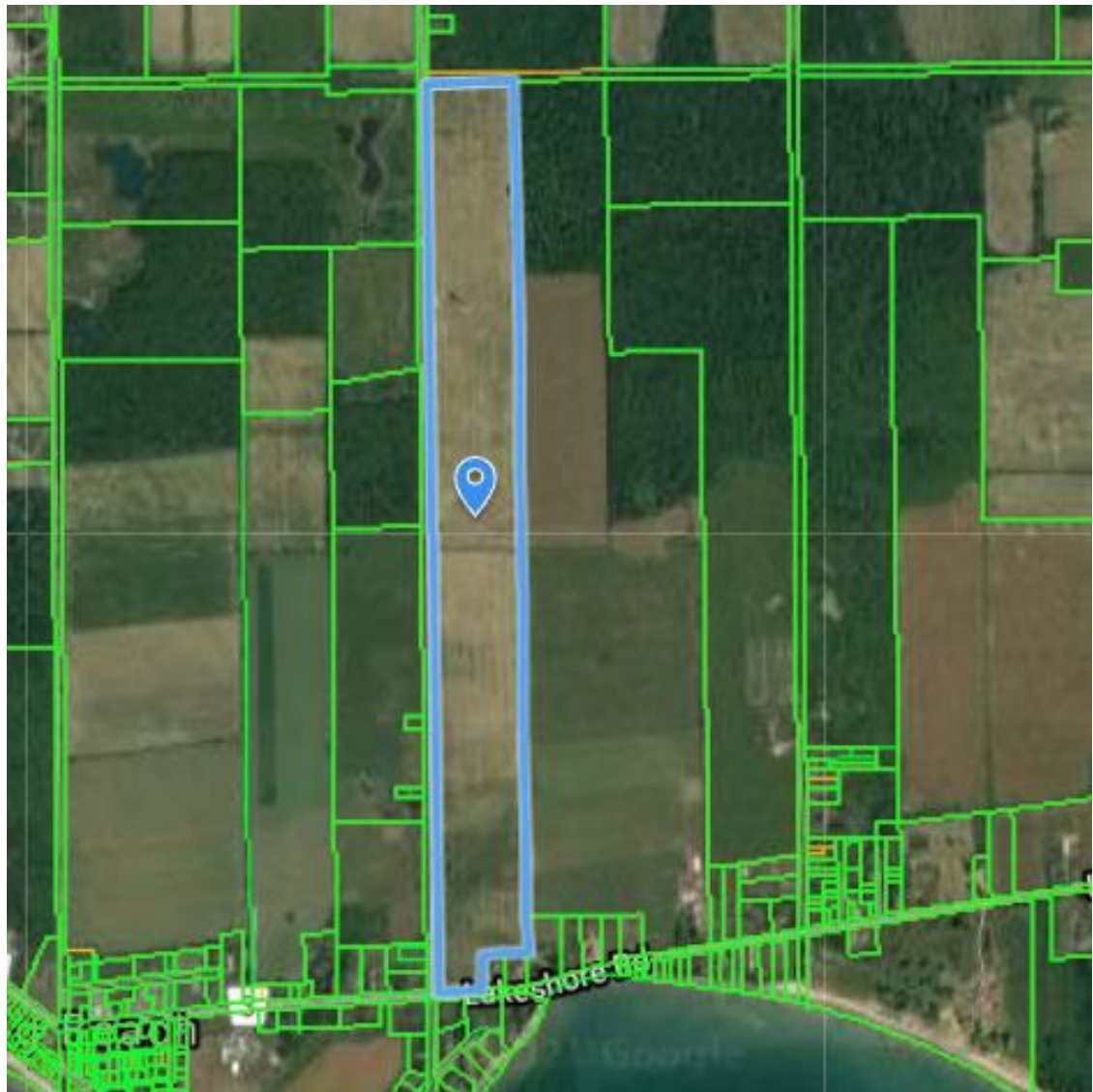


Figure 26: Aerial View of Station Road Lands Outlined in Blue, Retrieved from Geowarehouse

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Figure 27: View of Single Detached Residential along Station Road, Retrieved from Google Streetview

In terms of surrounding context, the most southerly portion of the Station Road Lands are located in midst of an established Residential Area concentrated along Lakeshore Road leading towards Long Beach, as seen in **Figure 28**. The Station Road lands are bound by the Gord Harry Conservation Trail to the north, Side Road 18 to the east, Lakeshore Road to the south and Erie Street to the west. To the north, the Station Road lands are surrounded by agricultural uses. To the east and south, it is characterized by low-density residential along the shoreline of Lake Erie. Commercial, low-density and recreational uses predominate west of the Station Road lands. With the exception of the frontage of the Station Road lands on Lakeshore Road, the entire area is comprised of rural lots with road frontage.

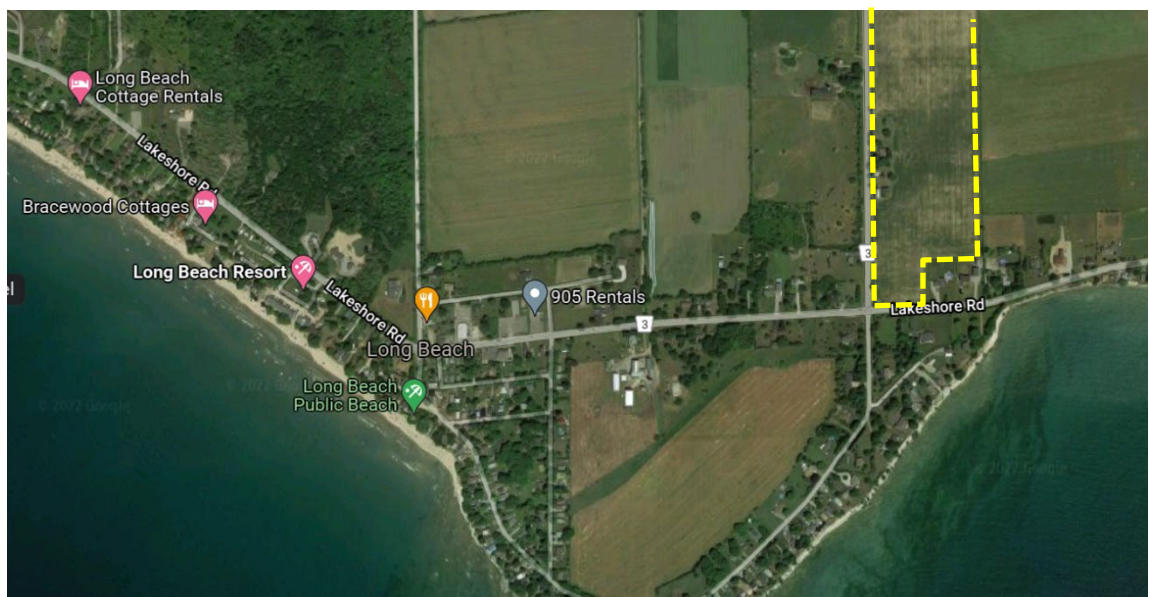


Figure 28: Station Road Lands and Surrounding Area, Retrieved from Google Earth

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4.2 Existing Planning Policy Framework

The following subsections provide an examination of the Station Road lands against current and applicable planning policy, including the Region of Niagara Official Plan and the Township of Wainfleet Official Plan.

4.2.1 Region of Niagara Official Plan

As seen in **Figure 29**, the Station Road lands are currently designated 'Rural'. The area's predominant use of land is agriculture with some non-farm related development permitted. Non-farm related development can include non-farm residential uses, subject to a rezoning or consent.

However, we confirmed that the Station Road lands are expected to be changed to the 'Agricultural' Designation in the Draft Regional Official Plan, illustrated in **Figure 30**.

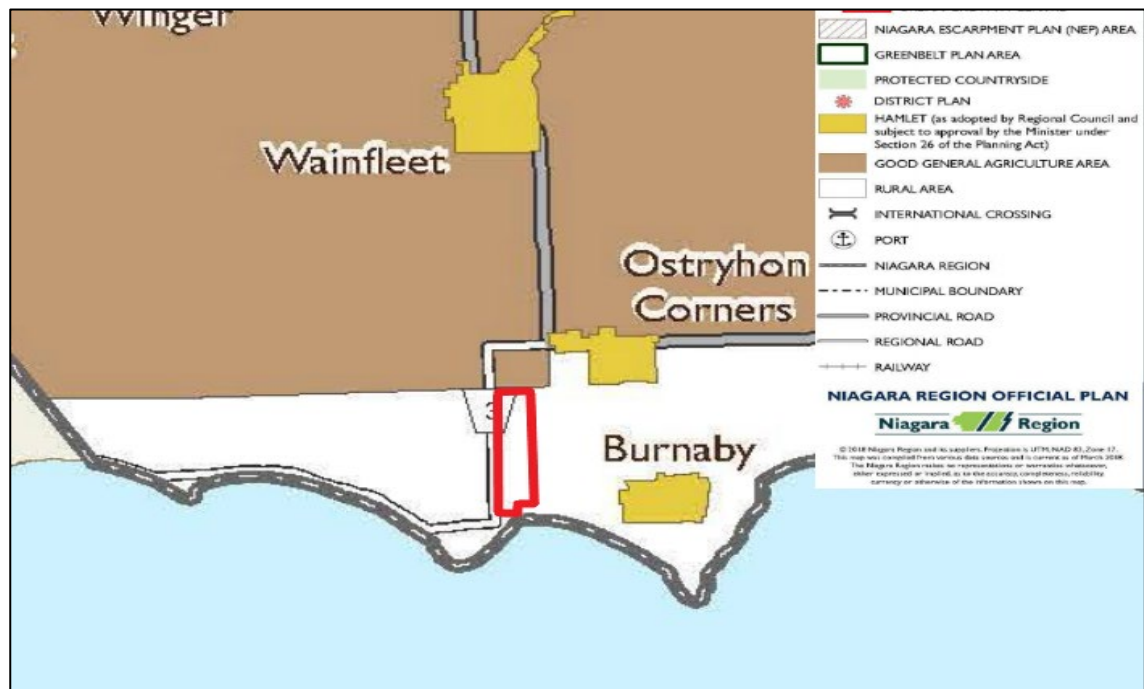


Figure 29: Excerpt of Schedule A – Regional Structure, Retrieved from Regional Official Plan

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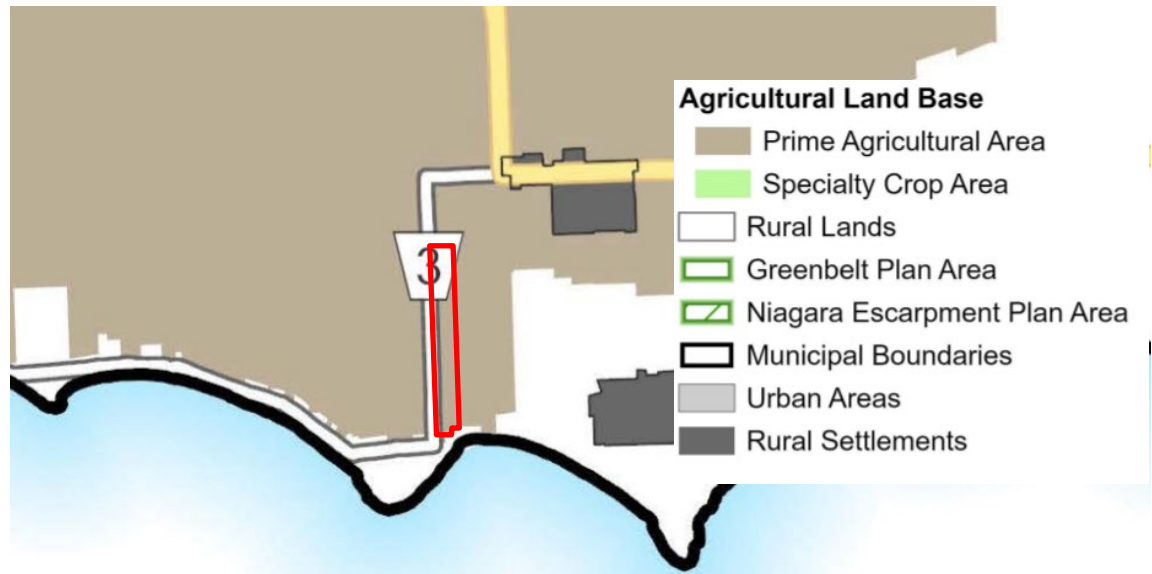


Figure 30: Draft Agricultural Land Base Mapping, Retrieved from Regional Website

4.2.2 Township of Wainfleet Official Plan

The Township of Wainfleet Official Plan contains goals, objectives and policies to manage and direct change and its effects on the social, economic and natural environment of the municipality. The version referenced is the January 2016 Consolidation.

As seen in **Figure 31**, the Station Road lands are currently designated ‘Agricultural Area’.

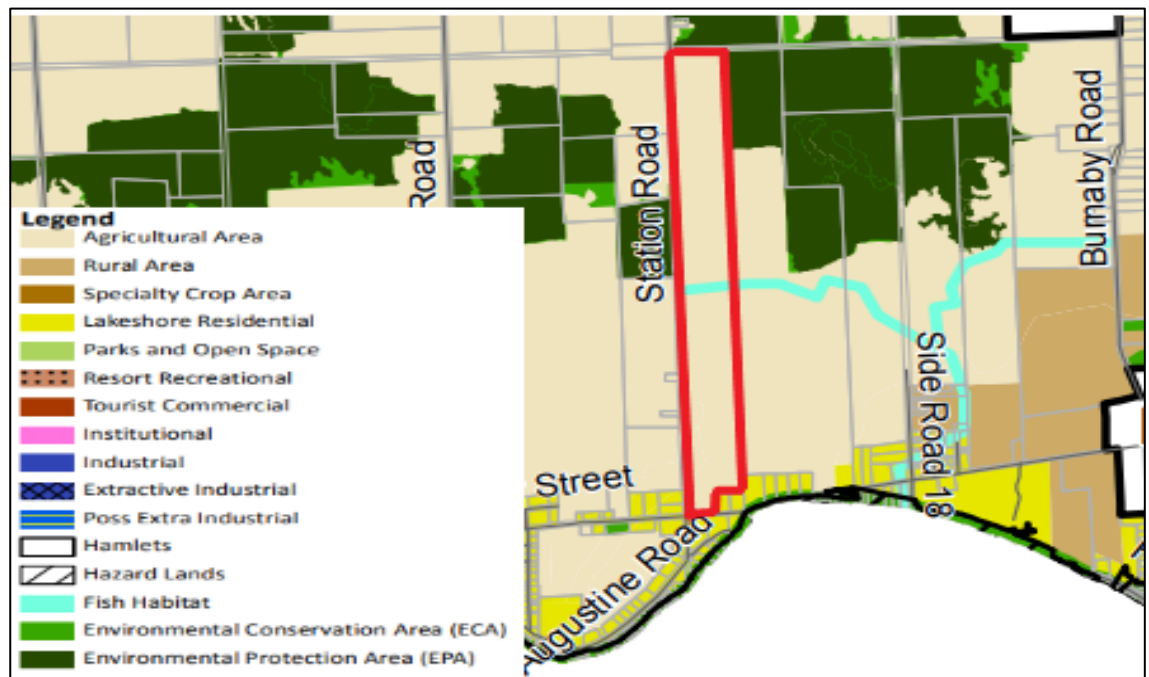


Figure 31: Excerpt of Schedule A - Municipal Structure, Retrieved from Township Official Plan

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4.3 Proposal & Planning Justification

As identified in the Draft Regional Official Plan, the Station Road lands are intended to be re-designated to 'Prime Agricultural Area'. While we agree that majority of the Station Road lands are utilized for agricultural uses, the southern portion of the Station Road lands are nestled in between lakeshore residential uses and should remain in the Rural Designation similar to the other lots along Lakeshore Road. This would allow for minor infilling to support the Long Beach Recreational Area and would be consistent with the surround lotting fabric and built form. The proposed request would form a logical and identifiable southern boundary of the Prime Agricultural Area and allow for the southern portion to be congruent with existing lots along Lakeshore Road.

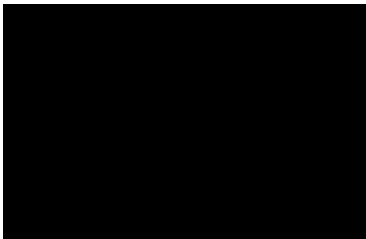
5.0 CONCLUSION

As part of the ongoing Municipal Comprehensive Review and comments on the Draft Region of Niagara Official Plan, we respectfully ask the Region to consider our client's proposed requests. The purpose of this letter is to offer a planning justification for the inclusion of each of the identified lands within the respective Settlement Area and Designation Boundaries under the Official Plan Review in accordance with the criteria set out by Regional Staff.

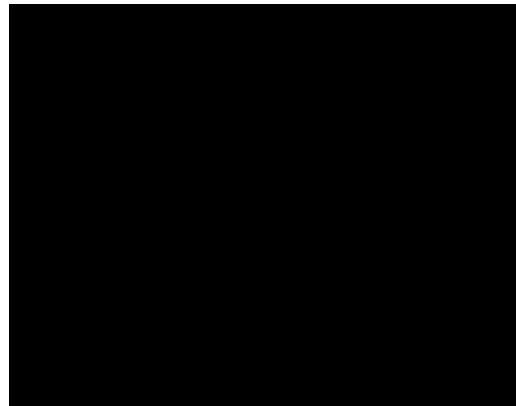
We trust the information and plans contained herein are sufficient to provide staff with sufficient information. If you require any additional information, or have any questions, please do not hesitate to contact the undersigned. We would welcome the opportunity to expand on our client's request.

Yours Truly,

IBI Group



Ritee Haider BES RPP MCIP
Planner



Scott Arbuckle RPP MCIP
Director | Senior Practice Lead - Planning