



Township of Elizabethtown-Kitley
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June 6, 2024

Ministry of Municipal Affairs and Housing
Municipal Services Office – East
Attn: Jen Liptrot, Regional Director, Eastern Municipal Services Office
Michael Elms, Manager, Community Planning & Development
Damien Schaefer, Municipal Planner

Dear Jen, Mike and Damien,

Re: Response Summary to Questions Posed by MMAH regarding the Minister's consideration of an MZO Order for the proposed Campus Elizabethtown Development at Rows Corners (3826 County Road 6)

Firstly, thank you for taking the time to meet with Mayor Brant Burrow, Planners Jim Hutton, Michael Czarny and myself on May 30, 2024, to discuss next steps on the proposed Campus Elizabethtown MZO.

In addition to the comprehensive details submitted as part of our CIHA Request on February 20, 2024, we are pleased to provide additional information based on the new zoning order framework for Minister Calandra's consideration.

Question No. 1: Rationale for why the project requires ministerial zoning relief rather than following municipal planning processes

Response: The proposed development on the subject site, known locally as Rows Corners Fairgrounds, a 30-acre parcel of land located at 3823 County Road 6, is made up of 14 - 3 story residential type buildings with an approximate building area of 600m² each, containing a variety of 1-, 2- & 3-bedroom apartments for a total of 320 apartments (representing well over 600 individual "suites" / beds). Additionally, the project proposes construction of a commercial building fronting onto County Road 6. The proposed development will provide on-site car parking using at grade parking lots. As the scale of the site is large (12 ha), the development proposes a new interior ring road surrounding a central park area to provide amenity space to each individual building cluster and encourage ample green space for use by the site occupants. The design also incorporates several recreational amenities.

In alignment with the Township's Strategic Plan, Provincial Policy Statement and Provincial government's housing priorities, this development will bring to the region a desperately needed housing solution of scale which is specifically targeted at local workforce needs and aligns with CMHC affordability guidelines.

The lands are currently designated Rural in the Township Official Plan and zoned Open Space (OS) in accordance with the Township Zoning By-law. During the development pre-consultation phase with the United Counties of Leeds and Grenville in December 2023, it was determined that this proposed development aligned with the priorities of the provincial MZO framework.

Shortly thereafter however, during a meeting with MMAH East Region staff, the Township and Counties were notified that the MZO Framework had been paused, and the Township was encouraged to explore the CIHA option to support expediting the project. Without support from the province, the development, which is a necessity today due to the housing crisis, would be subject to approximately 18-months of approvals (Township Official Plan Amendment, Township Zoning By-law Amendment and County Official Plan Amendment).

Given that all stakeholders (Township, United Counties, City of Brockville, Campus Habitations, St. Lawrence Economic Development Commission, neighbouring municipalities, local industry + employers) are eager to see this development come to fruition, ideally commencing in 2024, the order was sought from the Minister of Municipal Affairs and Housing to seek relief from the United Counties of Leeds and Grenville Official Plan and Township Official Plan and Zoning By-law.

It is our opinion that the proposed development is in line with the intention of the planning documents guiding development with the Province of Ontario, United Counties of Leeds and Grenville and the Township of Elizabethtown-Kitley. The project reflects good planning practice and is an example of the types of development that are being successfully implemented in other areas within the province and neighboring provinces.

The project responds to a number of planning documents enacted by the Township of Elizabethtown-Kitley including the Official Plan, and Provincial Policy Statement which encourage increased efforts for housing development strategies. This project also responds to the needs of the Township, adjacent City of Brockville and Region in providing much need housing stock.

Although revisions are sought for a number of provisions in the Official Plan and Zoning Bylaw this development does not propose structures which will negatively impact the surrounding areas. The revisions to the OP and ZBL would also not set a negative precedent for future development.

We note that our public consultation on this development has been extremely robust and that there is broad support for the proposal, save and except for a small number of localized concerns from immediate neighbours. In our experience, the proponent has been consistently responsive to feedback on their proposal, and we appreciate their commitment to practical mitigation measures which will address the concerns raised.

It is our collective hope that zoning relief would reduce the approval processing timeframe for this important regional development from approximately 18-months to 6-8 months.

Question No. 2: Description of any downstream approvals required

Response: The Township's Planning team continues to actively work through the site plan application and has circulated the plan and respective reports to internal and external agencies for comments. The draft site plan was supported by the following reports:

- Planning Rationale
- Environmental Impact Statement
- Geotechnical Investigation
- Traffic Impact Study
- Conceptual Servicing and Stormwater Management Report

The subject site is located near the boundaries of a Provincially Significant Wetland and Provincially Significant Woodland. In accordance with the PPS, an Environmental Impact Statement was conducted and concludes that:

- No negative impacts on the integrity of the local and significant wetlands or fish habitat are anticipated as a result of the proposed development provided all recommended mitigative measures are enacted and best management practices followed.
 - No development is slated to occur within significant woodlands. As such, woodlands on-site will continue to meet the significant woodlands status based on contiguous size and ecological function.
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Question No. 3: Justification for the exemption of the application of provincial and local land use policies to downstream approvals

Response: None requested.

Question No. 4: Anticipated timelines for downstream approvals

Response: It is anticipated that site plan approval, inclusive of all recommendations within the submitted studies, will be granted by Township officials by the end of June 2024.

Upon receipt of building permit application(s), the Township's Building Department is committed to review and issue approvals within the mandated timeframes of the Ontario Building Code.

The Township of Elizabethtown-Kitley and the City of Brockville submitted a joint application through the provincial government's Housing Enabled Water Systems (HEWS) Fund in April 2024. The purpose of this application is to financially support the extension of City of Brockville water and wastewater services to the site for development. The province has indicated that successful proponents will be notified later this month, or in July.

While we await news on the HEWS funding, and to ensure that the proposed development remains progressive in order to facilitate the developer's ability to have shovels in the ground this fall, the collective stakeholders have been actively working on alternate options for servicing, should funding not be available.

One example is split servicing through the installment of a Newterra wastewater treatment system with localized discharge. These systems are a proven technology; however, they typically get caught up in a long approval process. We understand that efforts are underway to reduce the red tape associated with the deployment of these systems, but the updating of the regulations remains in the early stages (if it has begun at all). This type of delay remains an identified risk should HEWS funding not materialize. Unfortunately, we are powerless to mitigate the delays in this type of scenario as the approval process rests with the Province.

In the event of a split system approach, it would still remain favourable to derive "source" water by way of a service extension of the nearby municipal service in the City of Brockville. Hydrogeological studies have suggested that it would be otherwise challenging to meet the required fire suppression flows using local wells and aquifers. Although the extension of water service from the City of Brockville would not be a trivial expense, the extent of excavation required would be dramatically reduced (compared to a full water/sewer service) since the water service is fully functional when buried closer to the surface – whereas the wastewater requires

depths reaching 7-8 meters. The terrain in our area involves a significant amount of rock just below the surface.

Again, the timelines to acquire approval from the Province for a split system approach are beyond our control.

Question No. 5: Anticipated timing for project completion

Response: Q3 2024 – Phase 1 construction starts concurrent with infrastructure start, consisting of 5 building, 140 units and 248 suites, to be completed and ready for tenant move-in, including the central campus amenities by Q4-2025 (latest being Q1-2026)

It is worth noting that the proponent is eager to accelerate their full build-out in the event that some nearby transformative economic development opportunities of scale (billions of dollars of investment, with hundreds of jobs) come to fruition. These initiatives are nearing the completion of their due diligence efforts, and the associated jobs will create further demand and opportunity in the housing sector throughout the region.

Question No. 6: Commitment that if a zoning order is made, the landowner will notify the minister 30 days in advance of the sale of any land it applies to

Response: The Township of Elizabethtown-Kitley owns the subject property. In January 2024, the Township executed a long-term land lease of Rows Corners with Campus Habitations. The lease includes provisions for annual rent payments, utilities, taxation, and potential purchase options. The Township commits that if a zoning order is made, we will notify the minister 30 days in advance of the sale of any land it applies to. Should Campus Habitations choose to exercise their purchase option, the Township will ensure that this commitment is part of the land sale.

Once again, we thank you for the opportunity to provide additional information for consideration by Minister Calandra. Should further details be required, please do not hesitate to reach out.

Yours sincerely,



Leslie Drynan
Administrator/Clerk

cc: Hon. Steve Clark, MPP Leeds-Grenville-Thousand Islands & Rideau Lakes
Cherie Mills, Manager of Planning Services, United Counties of Leeds and Grenville
Jim Hutton, Planner, Township of Elizabethtown-Kitley
Michael Czarny, Planner, Township of Elizabethtown-Kitley
Raffaele Freddi & Marc Koran, Campus Habitations