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September 26, 2024

Heather James
Manager of Planning & Development
The Corporation of the Town of Aylmer
46 Talbot Street West
Aylmer, ON N5H 1J7

Re: Town of Aylmer Settlement Expansion Lands Assessment – Scoring Mechanism

Dear Heather James,

Thank you for the opportunity to review the 'Aylmer Settlement Area Boundary Expansion – Scoring Mechanism (Sept 5, 2024) prepared by Stantec. Below are comments on the criteria proposed within the Scoring Mechanism:


1. Section 1.3 notes that "All distances are measured from the centroid of the parcel to the facility or service being assessed". It is recommended that the distance be measured from the parcel boundary rather than the centroid, as parcel size and shape can vary and have an impact on weighting.
2. Under Table 2, Accessibility – Roads: It is recommended that consideration also be given to the type of road that the parcel has access to (i.e. whether it is a local road, County Road, or Provincial Road). Additionally, it is recommended the weighting be reduced for cases where a property fronts onto three and four or more roads, as there is no significant benefit of having frontage on more than two roads.
3. While the proximity to Main Intersection, Community Centre, Education Facilities, and Emergency services could be considered as criteria, they are (1) individually weighted greater than several of the land use compatibility factors (e.g. agricultural conflict, industrial conflict, environmental conflict) and (2) together are weighted nearly the same as all the Engineering criteria. These connectivity/distance factors should not be given the level of weighting currently assigned over other more critical land use planning considerations, some of which are specifically identified as factors that ought to be considered when evaluating settlement area boundary expansions (e.g. Policy 2.3.2.1 of the Provincial Planning Statement, 2024). Similarly, the weighting of connectivity to sidewalks and trail networks are also weighted higher compared to other land use compatibility factors that would have a greater impact on future development. This weighting may lead to overvaluing candidate areas that are simply closer to existing community facilities and services and understating candidate areas that may be more appropriate due to other factors.
4. It is recommended that reference of Canada Land Inventory & Soil Classifications be made for the "Prime Agricultural Area" criteria, which is consistent with the guidance provided by Provincial policy and OMAFRA guidelines.

Additionally, it is recommended that the following criteria be considered to be added to the Scoring Mechanism:

1. Consideration for any mineral aggregate resource areas located on the subject lands. This is noted within the assumptions of Section 1.1.3 of the Scoring Mechanism memo, but there is no criterion included in the Scoring Mechanism.
2. Proximity to the CN Rail corridor as a potential constraint for residential development.
3. Inclusion of the presence of natural heritage features and areas (e.g. provincially significant woodlands, wetlands, and valleylands) as a potential land use constraint.
4. Consideration for parcel characteristics, including parcel size (i.e. scoring of one large parcel higher compared to a fragmented collection of smaller parcels), shape, and constraints from topography.
5. It is noted that there are lands adjacent to the Town of Aylmer that are currently designated in the Township of Malahide Official Plan as “Suburban Area” and “Highway Commercial”, which permit industrial, commercial, and some residential uses. It may be beneficial to include criteria that would give weight to lands with these designations over lands that are designated as “Agriculture” in the Township’s Official Plan.

The Township requests that its concerns with the Scoring Mechanism be published on the Aylmer Settlement Area Boundary Expansion project page (<https://aylmer.ca/town-hall/planning-and-development/aylmer-settlement-area-boundary-expansion/>) so that the public has access to the feedback that Stantec has received from stakeholders. In the meantime, we look forward to continuing to attend the APAG meetings and working collaboratively with the Town and other members of the advisory group.

Sincerely,



Nathan Dias
CAO, Township of Malahide

Cc: APAG