

Mayor Martin and Members of Council
Norfolk County
County Administration Building
50 Colborne St. S
Simcoe, ON
N3Y 4H3

Date: April 15, 2024

Our Ref: 146788

Subject: Municipal Comprehensive Review Phase 1 Official Plan Amendment, CD-24-053 - Urban Boundary Expansions – Delhi; Scotts Canada, 1 Arnold Sayeau Drive/91 HWY 59, Delhi

Dear Mayor Martin and Members of Council,

We are the planning consultants retained by Scotts Canada Ltd. (“Scotts”) to provide professional planning services with respect to their lands located at 1 Arnold Sayeau Drive/91 HWY 59 in Delhi (“subject lands”), which are identified in **Figure 1 and 2** below. Our client owns lands municipally addressed as 1 Arnold Sayeau Drive/91 HWY 59, Delhi, and currently operates a soil mixing, bagging and distribution facility, together with associated fertilizer storage and distribution operations on the subject lands, which includes activities within the main plant building as well as outdoor storage and lands immediately adjacent the plant. This facility was originally constructed in 1986, operating as a metal stamping plant. The plant was shut down and was purchased by Scotts in 2005. Since that time, Scotts has increased production and activity at this location, including the aforementioned physical expansion, and is an important contributor to the County economy.



Figure 1 - Location and Extent of Subject Lands; Sourced from Norfolk County Online Mapping



Figure 2 - Location and Extent of Subject Lands; Sourced from Norfolk County Online Mapping

By way of background, we supported and assisted Scotts in securing planning approvals for an expansion of operations onto acquired lands at the time of the County’s previous Growth Management and Official Plan Update exercise (orange area with black outline in **Figure 2** above). At that time, an Urban Boundary Expansion (“UBE”) was proposed and adopted through an OPA and Zoning Amendment (“ZBLA”), and the expansion of site operations for primarily outdoor storage was implemented through a site plan application. The images above depict the site operations as they generally exist today.

As part of the current and ongoing Growth Management Study (“GMS”) and Municipal Comprehensive Review (“MCR”) process, we appreciate the opportunity to review and provide comment on the Draft Official Plan Amendment (“OPA”), associated mapping, staff report, and various attachments ahead of the upcoming Special Council meeting on April 16, 2024. **On behalf of Scott’s, please accept this letter in support of the proposed UBE request specifically identified as Parcel ID:28 on Schedule 9, as well as the staff proposed 22 ha UBE shown on Schedules 2A and 2B respectively, in the community of Delhi.** We have identified these specific areas on excerpts of the schedules provided in Figures 3-5 below respectively, with the expansion areas outlined in a dashed red circle. We make no comments on any other proposed UBEs in Delhi or elsewhere in the County.

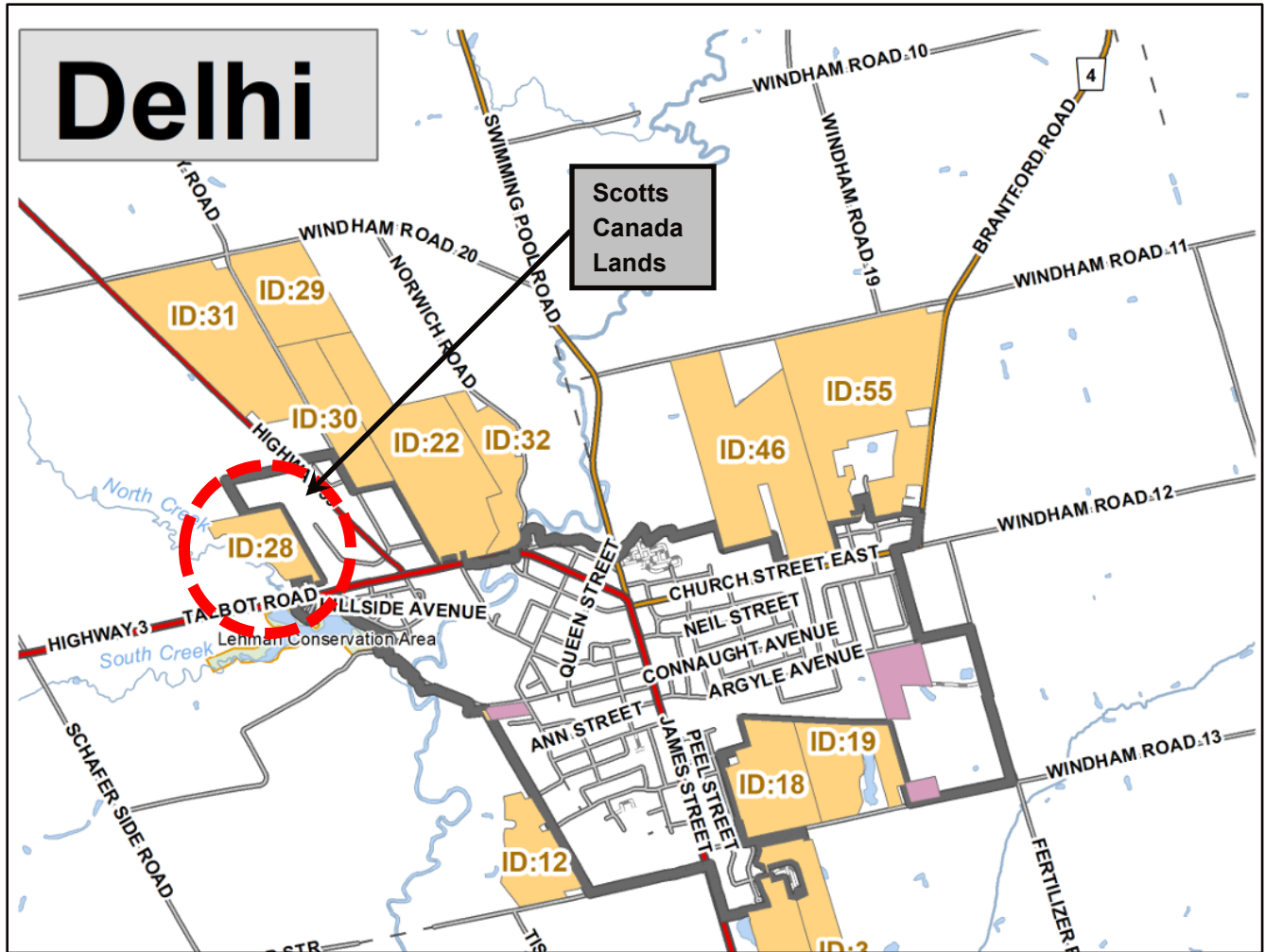


Figure 3 - Excerpt From Schedule 9

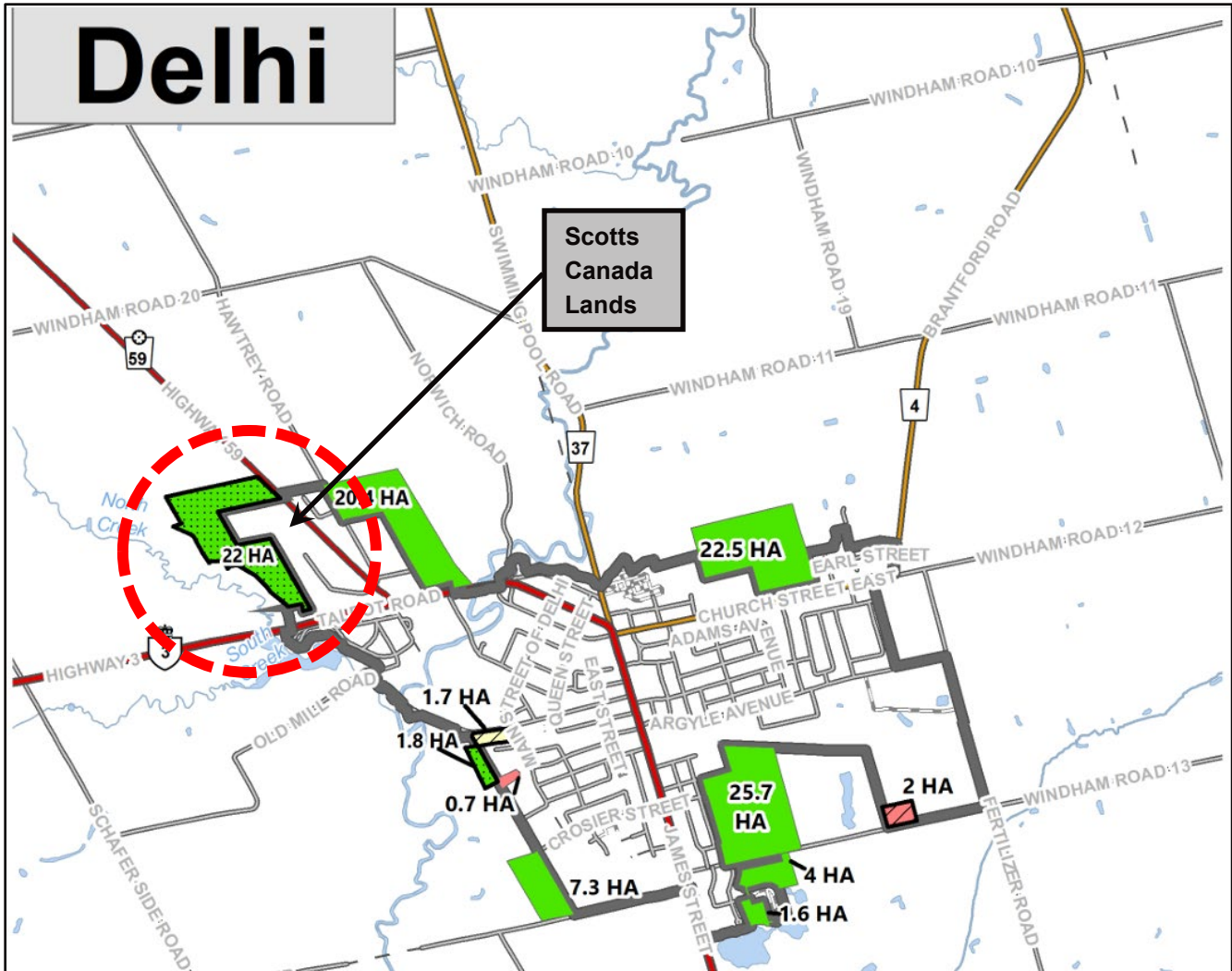


Figure 4 - Excerpt from Schedule 2A - Option 1

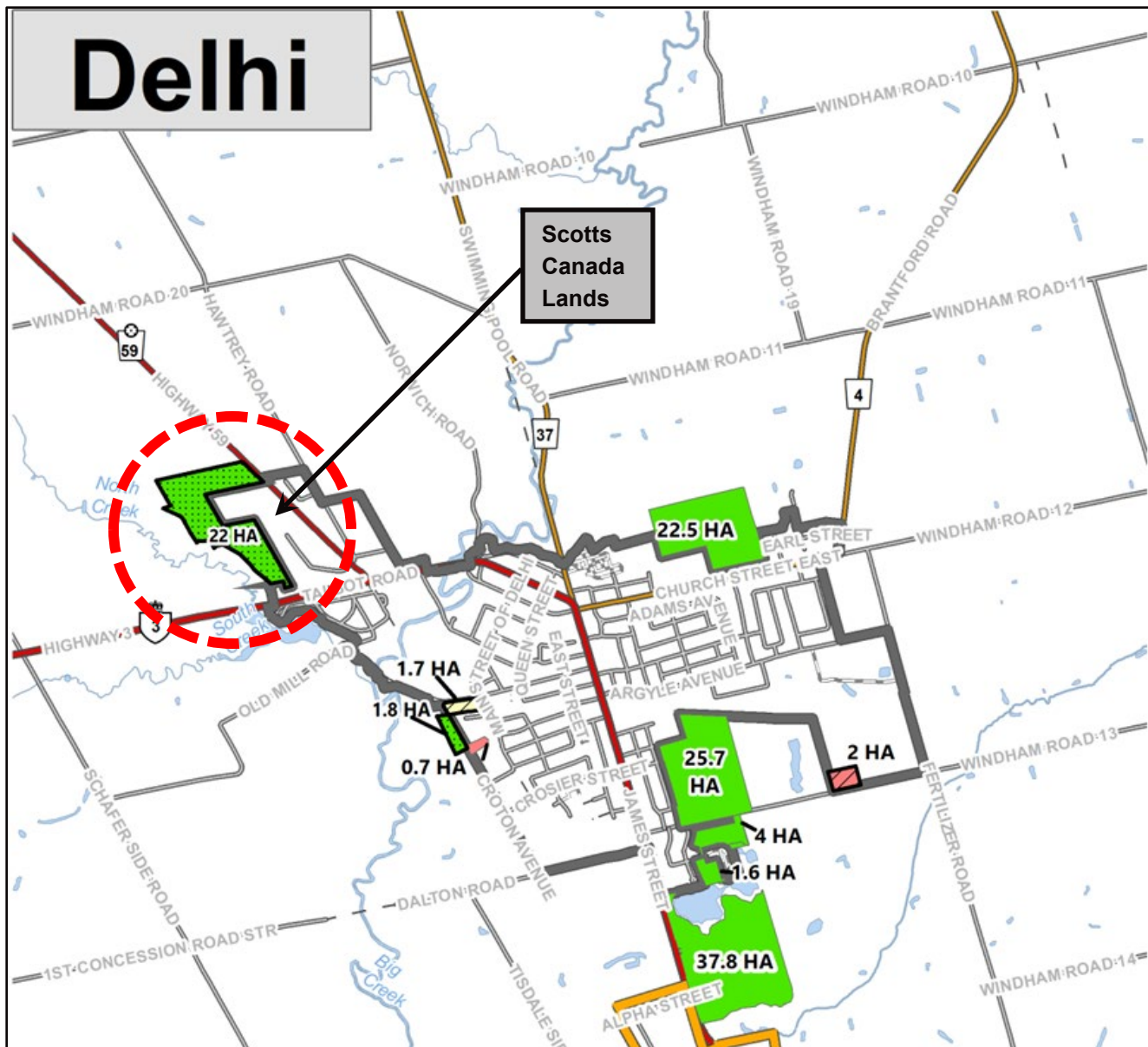


Figure 5 - Excerpt from Schedule 2A - Option 2

It is our understanding the County has received correspondence dated April 1, 2024, regarding the ID:28 expansion request, which supports the inclusion of these lands (along with a request for the inclusion of additional lands) into the Delhi Urban Boundary. In a letter on behalf of the landowner, Bob Kowtaluk, Alamac Planning have expressed an independent professional planning opinion that the addition of parcel ID:28 would represent a logical extension of the existing Protected Industrial lands to support forecasted employment growth and the expansion of the existing industrial park. We agree with this opinion and specific request. The intent of this letter is to express support for the request, as well as the 22-ha expansion identified by staff in both Option 1 and 2 for Delhi for the reasons outlined in the following paragraphs. This letter should be received as separate from the request made on behalf of Mr. Kowtaluk.

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The 22 ha UBE proposed by staff that would consist of additional Protected Industrial lands in Delhi directly abuts the lands owned by our client. In this context, Scotts advises Council and staff of a planned operation expansion within the next 1-2 years, and therefore desires to have designated Protected Industrial lands to allow for such an expansion. Scotts advises that it is their intention to purchase all or portions of abutting lands following inclusion of said lands into the Urban Boundary, in order to expand for plant operations, outdoor storage, and related activities and uses. Based on our review of the existing Protected Industrial designation, and our experience with the previous facility expansion, it is our opinion that the existing plant and associated storage areas are a permitted use as per section 7.12.1 of the County's Official Plan. Based on our review and a brief analysis of the uses permitted within the existing Protected Industrial policies of the County's OP, it is our opinion that the proposed 22 ha expansion of Protected Industrial designation proposed by staff and partly captured by request ID:28 would be beneficial to the continued operation and expansion of our client's business, and that the land use would conform to and implement industrial options planned for and permitted by the Protected Industrial designation, pending no future policy changes that alter the use permissions under a separate OPA.

In the context of the MCR and proposed OPA, the need for additional Protected Industrial land has been identified through the supporting technical analysis as required by the Provincial Policy Statement 2020 ("PPS") and recommended through the planning analysis and reporting prepared by staff. The staff proposed 22 ha UBE and request ID:28 each represent good land use planning consistent with the PPS by providing sufficient lands designated and protected for employment use to meet forecasted needs. With respect to our clients' lands, expanding the existing industrial park will allow for facility and operation expansion in a timelier manner, providing a level of certainty that planned expansion can proceed.

For these reasons, we respectfully submit this letter in support of the 22 ha UBE for Protected Industrial lands proposed by staff in both Options 1 and 2 in the community of Delhi, as well as the specific UBE request identified as ID:28. We trust this letter is of assistance in making an informed decision on this important planning initiative.

Sincerely,
Arcadis Professional Services (Canada) Inc.



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