

October 30, 2024

Peter Young
Director of Planning and Economic Development Services
United Counties of Stormont, Dundas and Glengarry
26 Pitt Street
Cornwall, ON K6J 3P2

Dear Peter Young,

**RE: Cover Letter: Draft Plan of Subdivision Redline Revision Submission
File No. 01-SS-S-2023 | CAMINO LVS Inc.
LOTS 1, 2, & 3, RP 276 AND PT LOTS 31, 32, 34, 36, 37, & 38, CON 5**

This cover letter is intended to accompany a request for approval of a revision to the draft plan of subdivision approved on April 15, 2024 (File No. 01-SS-S-2023), the proposal of which is described and supported in the following documents:

- *Revised Draft Plan of Subdivision, prepared September 10, 2024, by Annis, O'Sullivan, Vollebekk Ltd.*
- *Draft Plan of Subdivision Before/After comparison, prepared September 10, 2024, by Annis, O'Sullivan, Vollebekk Ltd.*
- *Avenue 31 Camino Conceptual Site Plan, prepared August 30, 2024, by Ware Malcomb*
- *Updated Traffic Impact Study, prepared September 9, 2024, by C.F. Crozier & Associates Inc.*

This letter will provide an overview of the proposed development, proposed changes to the draft plan of subdivision, as well as a rationale for the changes. Please note that, unless otherwise indicated, this letter should be read in conjunction with the original supporting information submitted with the draft plan of subdivision, which speaks to planning merits, potential impacts, and other considerations associated with the proposed development.

Overview of Proposed Development

This subdivision application is intended as the first step in facilitating the creation of a new intermodal logistics and industrial park on the subject lands. The proposal seeks to create a number of industrial lots varying in size, as well as a new rail yard and intermodal laydown facility, all accessed by a new internal public road bisecting the lands and connecting Avonmore Road with Moulinette Road. The site is bordered on the north by Highway 401, the south by a CN main rail line, Moulinette Road on the west, and Avonmore Road on the east. The subject lands are designated for employment in the United Counties of SDG Official Plan and zoned for heavy industrial uses in the Township's zoning by-law. The proposal seeks to leverage the site's excellent access to high-capacity road and rail infrastructure for industrial users desiring proximity to this infrastructure. Please refer to the January 2023 Planning Rationale, prepared by Re:Public Urbanism, for more information on applicable policy and in-depth review of the proposed development.

Summary of Proposed Changes to Plan of Subdivision

The revised draft plan of subdivision, as prepared September 10, 2024, by Annis, O'Sullivan, Vollebakk Ltd., proposed several changes to the original draft plan (reasoning provided in following section). The following details are of specific note:

- The internal public street bisecting the lands has been shifted north, generally increasing southerly block sizes and decreasing northerly block sizes. This has also resulted in a northerly shift of the intersection with Avonmore Road.
- Despite the shift above, the total number of blocks is unchanged at 19, which does not include the internal public street.
- 1 block is still intended for the development of the rail yard and intermodal laydown facility. The location of the rail yard has been shifted slightly to the east, with an increase in frontage along the CN Main Line spanning almost the entire length of the rail frontage. This is to allow for future unimpeded access for maintenance.
- The location of the primary drain (now contained in Block 15) has been shifted slightly to the east to align with the relocation of the rail yard.
- 13 blocks are intended as industrial development lots, 2 less from the original draft plan.
- 2 blocks are intended to accommodate natural feature(s), drainage facilities, and/or constraints.
- 3 blocks are proposed to account for future Highway 401 widening, improvements to the Moulinette Road/Highway 401 interchange, and maintenance access to the rail line along Moulinette Road. The Highway 401 widening block is the most significant of the three.
- Also of note, Block 16, immediately adjacent to the Moulinette/Highway 401 interchange, has taken on an elongated shape to account for potential interchange upgrades/additional land dedication to MTO in the future, while still allowing for commercial/industrial development on the east side of the lot.

It is in our opinion that the overall development intent and principles of the original draft plan is maintained in the proposed revision. Please refer to the Draft Plan of Subdivision Before/After comparison attached to this letter for a direct comparison between the original and revised draft plans.

Reasons for Proposed Revisions

There are generally two main factors that triggered the need to revise the original draft plan.

MTO Corridor Planning

The subject lands are flanked on the north by Highway 401 and will seek to leverage this corridor as an integral part of the industrial operations on the site, as such, the Ontario Ministry of Transportation (MTO) was intimately involved in the design, review, and approval of the original draft plan of subdivision. However, following approval, there have been further discussions on MTO's plans for the interchange and highway infrastructure at this location. The MTO has expressed a need for the subdivision to account for future improvements to the Moulinette/Highway 401 interchange, as well as the need for future road widening of Highway 401 along the north side of the site. Given these circumstances, the layout of the subdivision was revised to reflect these needs. Block 19 has been dedicated along the north boundary of the site to allow for future road widening, with two additional blocks (Blocks 17 & 18) being dedicated along the west boundary of the site to account for future improvements to the interchange. Further, Block 16 has an elongated shape, allowing for any future interchange improvements to be accounted for on the west side of the site (e.g., land dedication, influence area setbacks), while allowing for the east portion to be

developed. These changes, combined with the relocation of the bisecting public street further north result in a significantly reduced lot sizes north of the street.

Changes in Market Conditions

As part of the considerations for MTO infrastructure, the applicant has subsequently revisited market demand and trends for industrial development lots in the region. At the time of the original submission, the subdivision was designed to accommodate large-scale industrial operations. After receiving feedback on from prospective tenants and considering recent market shifts in demand and a re-evaluation of the site's strategic potential, it was determined that a greater variation in lot sizes would allow for more diverse development opportunities. Therefore, the lots located north of the internal public street (already reduced in size by Block 19 – MTO's Highway 401 widening requirements) have been further reduced in size through a northern shift of the street. This move has generally increased the sizes and viability of the lots on the south side to accommodate larger scale industrial operations benefiting from access and proximity to the rail yard, while allowing for smaller/mid-size operations to locate along the north. Again, this diversity in lot sizes will allow for greater flexibility in addressing market demand for industrial sites in the region.

Analysis & Conclusion

Internal Road Relocation

As part of the revised submission, the applicant was required to evaluate the need for any changes to the traffic impact study (TIS) submitted with the original draft plan. Following a review of the original TIS by the author, C.F. Crozier & Associates Inc. ("Crozier"), it was determined that an Access Safety Review Letter would be prepared to address the shifting of the intersection between the new internal street and Avonmore Road (County Road 15), as shown in the revised draft plan. This letter was appended to the original TIS, and Crozier notes that no changes to the traffic analysis or findings of the original Study are expected (largely given the anticipated level of development potential/intensity would be unchanged from the original). Notwithstanding this, a full revised version of the TIS has been submitted in the support of the redline revisions, including the Access Safety Review Letter.

The Access Safety Review Letter reviewed the proposed internal road's access connection to Avonmore Road, with a focus on assessing sightline adequacy given the vertical curvature on segments of Avonmore Road (i.e. Avonmore Road rises to the northbound direction, bringing sightline adequacy into question). According to Crozier, the exercise determined that no safety concerns related to sight distance are expected, and therefore, the proposed site access is supportable from a traffic safety perspective.

Subdivision Block Reorganization

It is in our opinion that the proposed changes to the draft plan sufficiently address MTO's need to consider future improvements to their highway infrastructure and would not otherwise constitute a significant departure from the intent of the original draft plan. The reorganization of the blocks within the draft plan would serve a broader economic market for industrial users, and the overall development itself would continue to remain aligned with the Provincial, County, and Township goals for leveraging major transportation infrastructure for achieve economic development goals for the community.

Following a review of the proposed changes against the original draft plan and conclusions contained in Re:Public's January 2023 planning rationale (as well as other supporting studies and information) submitted in support of the original draft plan of subdivision, it is in our opinion that the revised draft plan represents a minor departure from the original draft plan approval, and would remain consistent with the Provincial Policy Statement, conforms to the United Counties of SDG Official Plan, would facilitate development in conformity with the Township's Zoning By-law, and would serve the public interest in the creation of significant economic development and employment opportunities within the Township and broader Eastern

Ontario region. For these reasons, we are in support of the proposed revisions and would recommend that they be approved by the United Counties of SDG.

Should you have any questions or concerns about any of the information presented herein, please do not hesitate to contact me.

Sincerely,



Paul Hicks, MCIP, RPP
Principal | Urban Planner
Re:Public Urbanism

cc karl@southstormont.ca, Township of South Stormont

Attachments

- *Revised Draft Plan of Subdivision, prepared September 10, 2024, by Annis, O'Sullivan, Vollebakk Ltd.*
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