



BOUSFIELDS INC.

April 28, 2021

Sent via Email: jwilloughby@shelburne.ca

Ms. Jennifer Willoughby
Director of Legislative Services/Clerk
Town of Shelburne
203 Main Street East
Shelburne, ON L9V 3K7

Dear Ms. Willoughby

Re: April 28, 2021 Special Council Meeting, Municipal Servicing Request

As you are aware, we are the planning consultants for Flato Developments Inc. ("Flato") with respect to their lands located at Fourth Line and Highway 89 in the Town of Shelburne (the "Lands").

Kindly ensure that this letter is provided to Council in advance of the Special Council Meeting on April 28, 2021.

We have prepared this letter to clarify the following matters related to Flato's servicing allocation request application that was submitted to the Town on April 19, 2021 for Flato Phase 1 Lands.

Flato's Phase 1 Development Proposal

Applications for Official Plan and Zoning By-Law Amendments and Draft Plan of Subdivision (the "Application") for Phase 1 Lands have been submitted to the Town of Shelburne on March 19, 2021, and an Official Plan Amendment application was submitted to the County of Dufferin on March 23, 2021, to permit 93 purpose-built seniors rental apartment units and a commercial plaza with 1,875 square metres of gross floor area. This proposal encompasses only the first phase of development of Flato's lands in Shelburne. Flato's April 19, 2021 servicing allocation request only applies to this proposal for the Phase 1 lands.

Capacity and Upgrades to the Town Services

Having reviewed and participated in the public sessions regarding the Municipal Class Environmental Assessments and related Council meetings, we are aware and understand that there are significant constraints with respect to servicing capacity in the Town. There

is no question that the wastewater treatment plant requires upgrades. We are aware that these constraints affect future development in the Town and are not limited to lands outside of the existing settlement area boundary.

At the April 26, 2021 meeting, Council supported staff's recommendation to allocate \$2 million to initiate the design work to upgrade the wastewater treatment plan. We understand that after the design work is complete, there will be 2 to 3 years to construct the upgrades. Flato shares Council and Staff's commitment to ensuring that adequate servicing (and reserve servicing) capacity exists in the Town's water and wastewater infrastructure to meet the Town's current and future needs.

We note that provincial policies, including the Provincial Policy Statement (2020), encourage and allow municipalities to plan for the long-term for growth and infrastructure. In this regard, the Town should be planning for the future servicing needs of the Town including the full build-out to the Town's boundaries. The cost of the upgrades to the servicing facilities could be shared across all future areas of development, not just the lands that are currently in the settlement area boundary.

Servicing Requirements for Flato's Phase 1 Development

As indicated in the Municipal Servicing Request application form (submitted to the Town on April 19, 2021) as well as in the servicing report submitted in support of Flato's Phase 1 applications, the estimated average and peak wastewater flows for Flato's proposed development apply a people per unit ("ppu") rate of 1.57 for the average household size for these purpose-built rental seniors apartments. This ppu rate is appropriate given that the units are proposed for the seniors and is also consistent with the rate applied by the Town's consultants in their calculation (in Town's Sewage Allocation Capacity staff report dated March 22, 2021, Appendix 3).

The estimated average and peak wastewater flows for Flato's proposed development in the Phase 1 area are summarized in Table 1 and Table 2, respectively.

Table 1 - Summary of Flato Phase 1 Wastewater Average Flow Requirements

	Average Flow L/S (M ³ /Day)	Infiltration L/S (M ³ /Day)	Total L/S (M ³ /Day)
Residential	0.76 (65.67)	0.31 (26.78)	1.07 (92.45)
Commercial	0.49 (42.34)	0.13 (11.23)	0.62 (53.57)
Total	1.25 (108.0)	0.44 (38.02)	1.69 (146.02)

Notes:

1. Wastewater is based on the average flows
2. The average household size for apartments is 1.57 ppu

Table 2 - Summary of Flato Phase 1 Wastewater Peak Flow Requirements

	Peak Flow L/S (M ³ /Day)	Infiltration L/S (M ³ /Day)	Total L/S (M ³ /Day)
Residential	2.89 (249.70)	0.31 (26.78)	3.20 (276.48)
Commercial	0.49 (42.34)	0.13 (11.23)	0.62 (53.57)
Total	3.38 (292.0)	0.44 (38.02)	3.82 (330.05)

Notes:

1. Wastewater is based on the peak flows
2. The average household size for apartments is 1.57 ppu

We note that Appendix 2 of the Town's March 22 report to Council identifies the remaining residential capacity (unallocated) to be 75 units (the last table in Appendix 2 of the Staff Report). With respect to this capacity, we are seeking clarification from the Town with respect to how the 75 units were calculated, specifically if the 75 units is reflective of a blended or average ppu based on different housing/unit types within the Town of Shelburne. Using only residential apartment units, as is the case with Flato's Phase 1, may increase the amount of remaining residential capacity when expressed in (unallocated) units.

Flato's Servicing Allocation Request

The following summarizes Flato's servicing allocation request. The details of Flato's servicing needs are provided in the following section.

Flato is requesting servicing allocation for their Phase 1 development proposal for 93 seniors' apartment units and a commercial plaza. This proposal addresses significant needs in the community. Recognizing that applications have recently been submitted and will be reviewed by the Town and County, Flato acknowledges that if the capacity cannot be reserved now, knowing that the Town is moving towards increasing capacity by initiating their design work on the upgrades to the wastewater treatment plant, Flato requests that the application be processed and that the allocation be provided at the time of the approval. Alternatively, if it were necessary, Flato would support the use of a holding provision when the lands are rezoned.

Servicing Allocation Approaches

At the April 12, 2021 Council meeting, Council instructed staff to review servicing allocation examples from other municipalities, including 'Use It or Lose It' approaches. Flato supports such a policy that would allow developments that are ready for construction

to proceed. Servicing allocation would expire at a specified time if it was not used. That said, with Council's support for the staff report at the April 26 Council meeting, to initiate the design work for the upgrades to the wastewater treatment plan, the Town has indicated their commitment to accommodate growth through many new areas of development in the Town. 'Use it or Lose it' may be helpful in the short-term but the Town has initiated a process for collaborative growth.

Thank you for the opportunity to continue to discuss Flato's proposal to develop senior's housing and a commercial plaza on the west side of the Town, including in the context of the servicing allocation. We look forward to continuing to discuss this matter with you and continuing to work with the Town with respect to Flato's development applications.

Yours very truly,

Bousfields Inc.



Emma West, MCIP, RPP