

# Planning Justification Report

## 14000 Belmont Road

Belmont Farm Supply Inc.

Elgin County

Official Plan Amendment  
Zoning By-law Amendment

October 2023



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**Prepared for:**

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14000 Belmont Road  
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# 1. Introduction

## 1.1 Overview

GSP Group has been retained by Belmont Farm Supply Inc. to provide planning justification in support of applications for Official Plan and Zoning By-law Amendments required to permit the proposed development of the property municipally known as 14000 Belmont Road (the “Site”) and legally described as PLAN 231 PT LOTS 28 TO 30, AND 32 RP 11R1214 PARTS 1 TO, 3 RP 11R5071 PARTS 1 TO 3, AND RP 11R10278 PART 1.

The Site is located on east side of Belmont Road and is adjacent to Ontario Southland Railway Inc. tracks that run along the southern side of the Site. The Site is irregular in shape and approximately 3.44 hectares (8.5 acres) in size with approximately 57.6 metres of frontage on to Belmont Road. The Site is currently occupied by Belmont Farm Supply Inc.

The proposed development of the Site includes the construction of a new, small seed and fertilizer warehouse on the east-most side of the property, within the alternatively designated portion of the Site (the “Proposed Development”). The portion of the Site containing the proposed, new warehouse was formerly owned by the Municipality of Central Elgin and was conveyed to Belmont Farm Supply in 2018.

## 1.2 Proposed Applications

The majority of the Site is designated “Commercial – Industrial” in the Municipality of Central Elgin Official Plan and the rear portion of the Site, where the new warehouse is proposed, is designated “Community Facility” and “Natural Heritage”.

An application for Official Plan Amendment is required to redesignate the rear portion of the Site the “Commercial – Industrial” to permit the proposed new warehouse.

The majority of the Site is zoned “General Industrial (M)” in the Village of Belmont Zoning By-law 91-21, which permits a range of industrial uses. The rear portion of the Site, which is intended to accommodate the proposed new warehouse, is zoned “Park (P)”.

An application for Zoning By-law Amendment is required to rezone the rear portion of the Site to permit the new proposed warehouse.

## 1.3 Report Context and Structure

This report has been prepared to provide planning justification in support of applications for Official Plan and Zoning By-law Amendment required to facilitate the Proposed Development. The objectives of this report are as follows:

- Provide an overview of the Site, including a property description and summary of the surrounding uses and community context;
- Provide an overview of the Proposed Development;
- Provide a summary of applicable Provincial, Elgin County (“County”) and Municipality of Central Elgin policy and regulatory considerations along with planning justification and commentary in support of the Proposed Development;
- Provide a summary of the technical reports and studies prepared in support of the Proposed Development; and
- Provide an overview of the proposed Official Plan and Zoning By-law Amendments.

In addition, this report includes a summary of the anticipated public consultation and community outreach strategy associated with the consideration of the Proposed Development by the City.

Formal Pre-Submission Consultation was held with Elgin County, the Municipality of Central Elgin and the City of St. Thomas in July 2023.

## 2. Site Overview and Context

### 2.1 Site Location and Description

The Site is municipally known as 14000 Belmont Road (the “Site”) and legally described as PLAN 231 PT LOTS 28 TO 30, AND 32 RP 11R1214 PARTS 1 TO, 3 RP 11R5071 PARTS 1 TO 3, AND RP 11R10278 PART 1.

The Site is located in the south end of Belmont, a community in the Municipality of Central Elgin. The Subject Property is located directly north of an Ontario Southland Railway track that runs east-to-west along the south of Belmont.

The Site is generally bound by Belmont Road to the West, Caesar Road to the North, an Ontario Southland Railway track to the south, and woodlands to the east. The property is currently used for commercial industrial operations with an existing driveway access from Belmont Road.

The Site contains a variety of existing commercial industrial buildings, on-site outdoor storage, and surface parking areas.

The portion of the Site that is subject to the proposed applications for Official Plan and Zoning By-law Amendments was previously owned by the Municipality of Central Elgin and was conveyed to Belmont Farm Supply in 2018. The previous wooded area on this portion of the Site was removed in conjunction with the construction of the Belmont Soccer Fields to the north by the Municipal.

### 2.2 Surrounding Uses and Context

The Site is located on the eastern side of Belmont Street, which runs through the centre of Belmont. A Pizzeria, Fresh Mart, Diner, and a Dental Station are located on Belmont Road within approximately one kilometre of the Site. Belmont United Church is located approximately 1 kilometre from the Site.

<b>North</b>	North of the Site is the Belmont Arena. This property also contains baseball diamond fields, soccer fields, and public park space. Further north, a pizzeria, Fresh Mart, diner, dental station, and bicycle repair shop are located within 1 kilometre of the Site.
<b>East</b>	Directly east of the Site is an existing agricultural use, with agricultural farms exist further east from the Site.
<b>South</b>	Existing rail line and agricultural uses.

**West** An Esso Station, convenience store, and Tim Hortons are located directly west of the property.

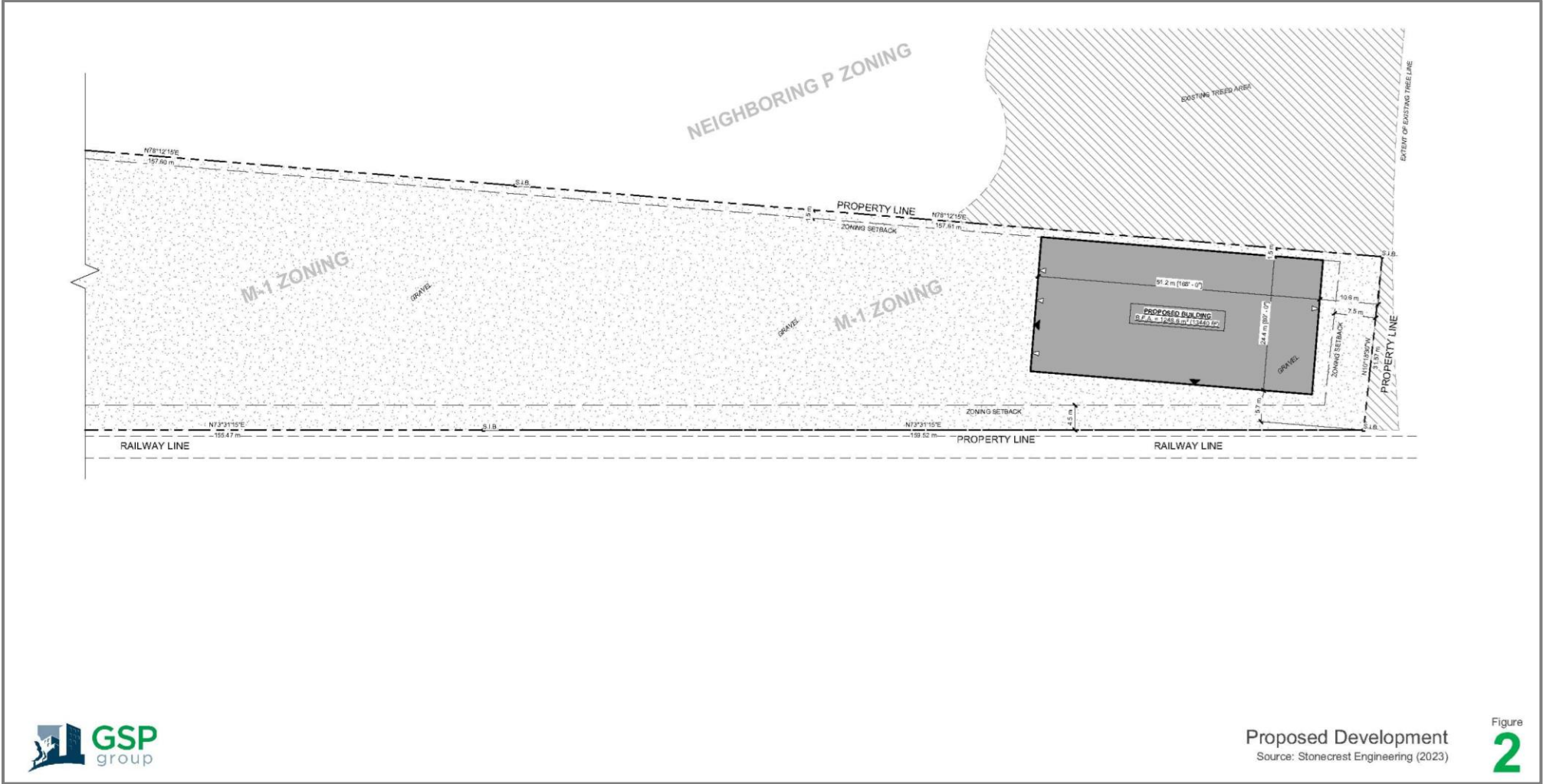


### 3. Proposed Development

The Site is currently occupied by the existing operations of Belmont Farm Supply, which includes a collection of storage, warehouse buildings and manufacturing equipment as well as outdoor storage and associated vehicular and equipment parking. Belmont Farm Supply is proposing the construction of a new seed and fertilizer warehouse at the rear of the Site, just beyond the existing operations and associated structures.

The new warehouse will provide for the expansion of existing on-site commercial industrial operations to the rear portion of the site and will be accessed via the existing driveway on Belmont Road. As identified in Figure 2, the new proposed warehouse is 51.2 metres long and 24.4 metres wide with a gross floor area (GFA) of 1248.6 square metres and maximum building height of 10.2 metres. The new warehouse will be surrounded by a gravel parking area.





Proposed Development  
Source: Stonecrest Engineering (2023)

Figure  
**2**

## 4. Policy Overview and Analysis

### 4.1 Ontario Planning Act

The *Planning Act R.S.O. 1990, c. P.13* (“Planning Act”) establishes the framework for land use planning in Ontario. The Planning Act provides for the integration of provincial matters in planning decisions, details a planning process that is fair, accessible, timely and efficient, encourages cooperation and coordination amongst various interest groups, and recognizes the decision-making authority and accountability of municipal councils in the planning procession.

The Planning Act requires that all planning decisions shall have regard to matters of Provincial interests as identified in Section 2. The following table provides an analysis of the Proposed Development in response to the prescribed Provincial interest of Section 2 of the Planning Act.

Section	Provincial Interest	Response
a)	The protection of ecological systems, including natural areas, features, and functions;	<p>Environmental Impact Study (“EIS”) was completed by Central Elgin to support the development of the adjacent municipal park and open space (2018); the portion of the Site where the new warehouse is proposed was included as part of the assessment completed in support of the Belmont Soccer Fields.</p> <p>It is our understanding that no further assessment required at this time.</p>
b)	The protection of agricultural resources in the Province;	<p>The Proposed Development does not include agricultural lands.</p> <p>However, the proposed new warehouse is associated with a commercial industrial use that supports surrounding agricultural operations. The expansion of the existing uses will increase the capacity for the Site to continue to support local agricultural operations.</p>
c)	The conservation and management of natural resources and mineral resource base;	<p>Please see commentary above related to EIS.</p> <p>While a portion of the Site was previously occupied by a woodlot, it is our understanding that the</p>

		wooded area was removed in conjunction with the construction of the Belmont Soccer Fields, prior to the sale of the land from the Municipality of Central Elgin to Belmont Farm Supply.
d)	The conservation of significant architectural, cultural, historical, archaeological, or scientific interests	Not applicable
e)	The supply, efficient use and conservation of energy and water;	The Site is not located within a Source Water Protection Area as identified by Elgin County.
f)	The adequate provision and efficient use of communications, transportation, sewage and water services and wastewater systems;	Not applicable
g)	The minimization of waste;	Not applicable
h)	The orderly development of safe and healthy communities;	The Proposed Development represents orderly and logical development as it provides for the expansion of an existing industrial agricultural uses on the property, rather than necessitating the construction of a new warehouse at a different location.
h.1)	The accessibility of persons with disabilities to all facilities, services and matters to which this Act applies;	Not applicable
i)	The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	Not applicable
j)	The adequate provision of a full range of housing, including affordable housing;	Not applicable
k)	The adequate provision of employment opportunities;	The Proposed Development will increase the storage and warehousing capacity of an existing agricultural industrial use. The new warehouse will contribute to the ongoing growth and expansion of a local employer, potentially creating more employment opportunities in the future.
l)	The protection of the financial and economic well-being of the Province and its municipalities;	The Proposed Development does not necessitate the new construction of municipal or provincial infrastructure.
m)	The coordination of planning activities of public bodies;	The applications for Official Plan and Zoning By-law Amendments will be circulated to all commenting agencies and public bodies by the County
n)	The resolution of planning conflicts involving public and private interests;	Resolution of planning conflicts, will be addressed as part of circulation

		and review process as well as part of Public Consultation Strategy as identified in Section 6 of this Report
o)	The protection of public health and safety;	Not applicable
p)	The appropriate location of growth and development; and	The Proposed Development would expand an existing use and operations to a small portion of split-designated area in the rear of the Site. Overall, the proposed seed warehouse is consistent with the municipal vision for activities on the Site.
q)	The promotion of development that is designed to be sustainable, to support public transit and be oriented to pedestrians;	Not applicable
r)	The promotion of built form that: <ul style="list-style-type: none"> <li>i) is well designed;</li> <li>ii) encourages a sense of place; and</li> <li>iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.</li> </ul>	<p>The Proposed Development has been designed to expand existing commercial industrial uses to the rear of the site. The storage being located to the rear of the Subject Property focuses industrial vehicle activity towards the existing operations towards the front of the site.</p> <p>The Proposed Development is located on a Site where the proposed warehouse would be in character with the existing character of the neighbourhood. The Proposed Development does not inhibit or degrade the sense of place of any adjacent properties.</p>
s)	The mitigation of greenhouse gas emissions, and adaption to a changing climate.	The Proposed Development includes the construction of a few warehouse for fertilizers and seed, allowing for the storage of agricultural resources in a safe location. Improperly-stored and maintained grain and related products can result to resource and revenue loss, requiring the shipping of replacements and further contributing to the CO2 contributions that such systems produce.

Based on the above-noted analysis, the Proposed Development conforms to the Planning Act.

## 4.2 Provincial Policy Statement

The Provincial Policy Statement (“PPS”) provides policy direction on matters of provincial interest, and guides growth and development in Ontario. The PPS supports land use planning that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS is issued under Section 3 of the Planning Act and came into effect on May 1, 2020, replacing the PPS issued on April 30, 2014. The following provides a summary of the key PPS policy consideration for the Subject Property as well as justification for the proposed development in terms of these policies.

The Subject Property is located within the Belmont Urban Settlement Area as shown in *Schedule 1 – Land Use Structure* of the Municipality of Central Elgin Official Plan.

Policy 1.1.1 of the PPS states that healthy, liveable and safe communities are sustained by promoting efficient development and land use patterns, accommodate an appropriate range and mix of housing, employment, institutional, recreation and open space uses, promoting the integration of land use planning with transit-supportive development and intensification, and ensuring necessary infrastructure and public service are or will be available.

Policy 1.1.3.1 of the PPS states that settlement areas shall be the focus of future growth and development. Policy 1.1.3.2 further states that land use patterns within ‘settlement areas’ shall be based on densities and a mix of land uses which:

- a) efficiently use land and resources;
- b) are appropriate for, and efficiently use, the ‘infrastructure’ and ‘public service facilities’ which are planned or available, and avoid the need for their unjustified an/or uneconomical expansion;
- c) minimize negative impacts to air quality and climate change, and promote energy efficiency;
- d) prepare for the ‘impacts of a changing climate’;
- e) support ‘active transportation’;
- f) are ‘transit-supportive’, where transit is planned, exists or may be developed; and
- g) are ‘freight-supportive’.”

*Response: The Proposed Development efficiently utilizes land and resources, providing for the expansion of an existing commercial industrial use on a site where municipal infrastructure exists. The proposed warehouse is located on the same site as existing*

*commercial industrial uses, reducing the need for unnecessary transport and additional land consumption. This reduction in demand for transportation contributes to a reduction in carbon emissions associated with vehicular transportation. Intensification of the existing uses is more energy efficient than the establishment of warehouse on a new site.*

Policy 1.1.3.6 of the PPS states that “New development taking place in ‘designated growth areas’ should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, ‘infrastructure’ and ‘public service facilities’”.

*Response: The Site is located within an existing built-up area. The Proposed Development is compact in form and size, and within a designated growth area, efficiently using the land within the Belmont urban area boundary.*

The PPS states that planning authorities will promote economic development and competitiveness by providing for a range and mix of employment, institutional, and boarder uses to meet long term needs. Policy 1.3.1 of the PPS continues by stating that planning authorities should promote economic development by maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses and take into account the needs of existing and future businesses. Furthermore, Policy 1.3.1 of the PPS instructs planning authorities to promote economic development.

*Response: The Proposed Development represents an efficient use of land and resources, expanding an existing commercial industrial use on an urban Site. The Proposed Development maintains an existing commercial industrial use which supports a range of local agricultural economic activities and takes into account the current and future needs of an existing business.*

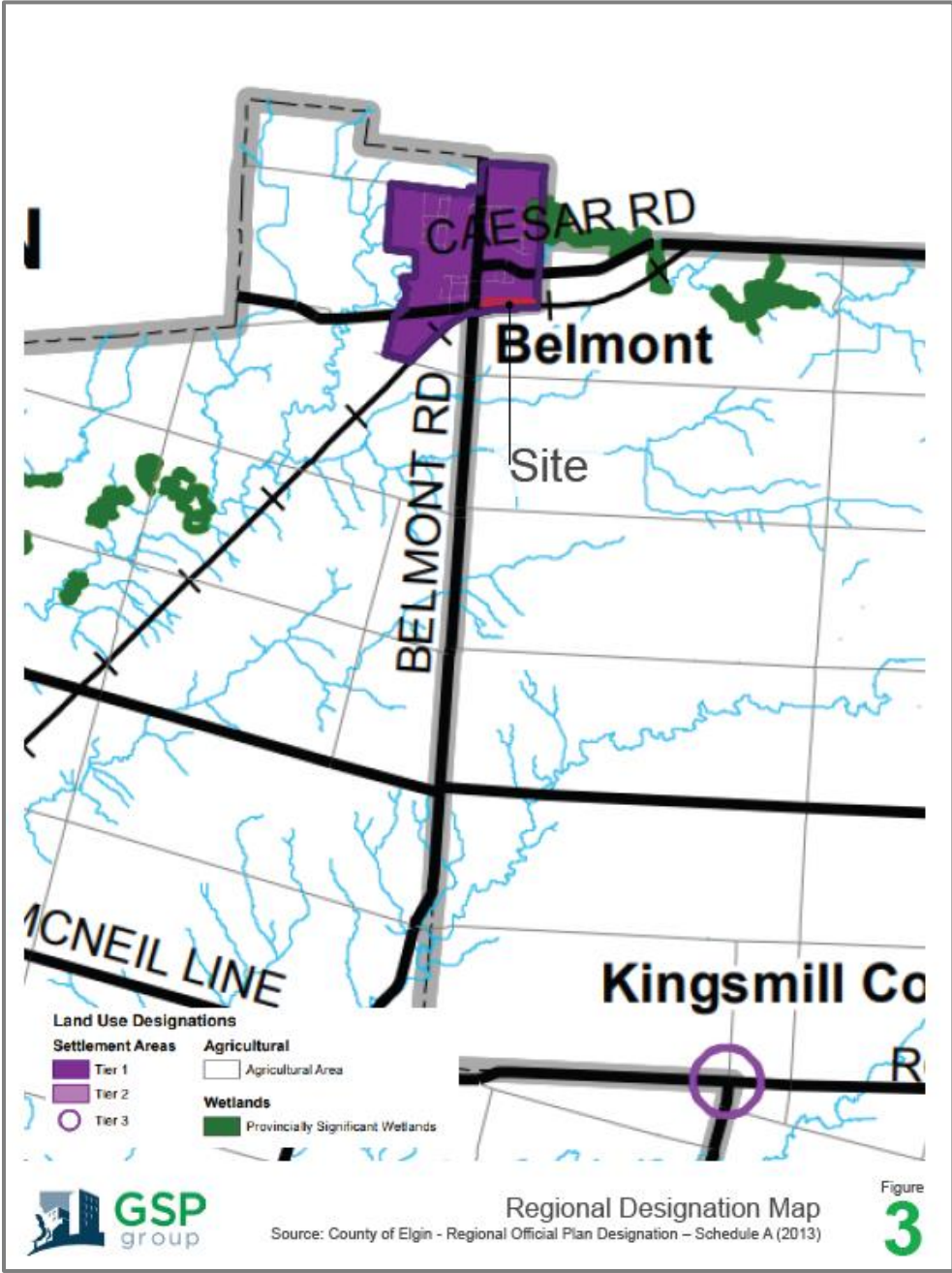
In summary, the Proposed Development has regard for the PPS as it efficiently utilizes land and resources and represents intensification on a Site within a designated growth areas that is compact in form. The Proposed Development is required to support the current and future needs of an existing, local employment/agricultural business.

#### **4.4 County of Elgin Official Plan**

The Official Plan of the County of Elgin (“County OP”) was approved by the County of Elgin on October 9th, 2013 by the Ministry of Municipal Affairs and housing. The Consolidated version of the Official Plan was adopted in February of 2015. The County OP provides policy direction on planning matters for the County.

The following provides a summary of the key County OP policy consideration for the Site as well as justification for the proposed development in terms of these policies.

The Site is designated as a Tier 1 Settlement Area in the County OP (Figure 3), which is intended to accommodate the largest populations throughout the County and are considered central communities where a range of growth and development uses and opportunities are provided.



Section A4.3 of the County OP provides goals for the economic prosperity of the region. Section A4.3 (h) of the County OP states that a goal of the Region is to ensure that the County has a 20 year supply of serviced residential, employment and commercial land, in intensification areas, designated growth areas, and in the right locations.

*Response: The Proposed Development represents site specific intensification within a designated growth area that is optimal located at the south end of the will contribute to the Belmont Settlement Area, separate from residential and other sensitive uses and proximate to surrounding rural and agricultural operations to whom Belmont Farm Supply serves.*

Section B1 of the County OP governs the growth management of Settlement Areas, stating that they shall be the focus of growth and their vitality and regeneration shall be promoted. There are a range of urban and rural settlement areas in Elgin County where a mix of land uses are permitted, including a variety of housing types, commercial and employment uses, institutional uses, community and recreational facilities, and open space.

*Response: The Proposed Development is located within a settlement area, contribute to the range of commercial and employment uses existing in the built-up area.*

Section C1 of the County OP contains policies governing Settlement Areas within the County. Specifically, Section C1.1.3 states that it is the objective of the ROP to:

- a) monitor and ensure that there is a 20-year supply of land for all types of employment uses in a number of different settings and locations at all times;
- b) recognize that there are many types of employment in the County and that each has different locational requirements that are necessary to support their continued viability;
- c) encourage local municipalities to protect employment areas from land uses which may affect the continued viability of existing and future employment uses and their expansion in the future;
- d) encourage and promote development in appropriate locations that combines a mix of employment uses and supporting uses to facilitate the more efficient use of urban land;
- e) promote the efficient use of existing and planned infrastructure by creating the opportunity for various forms of intensification, where appropriate; and,
- f) require a high standard of urban design for development and redevelopment”.

*Response: The Proposed Development will expand an existing local commercial industrial use and will continue to make efficient use of existing municipal infrastructure. The new*



*warehouse has been situated at the rear of the Site, away from the Belmont Road frontage, and has been designed and located to function cohesively with the existing operations on the balance of the property.*

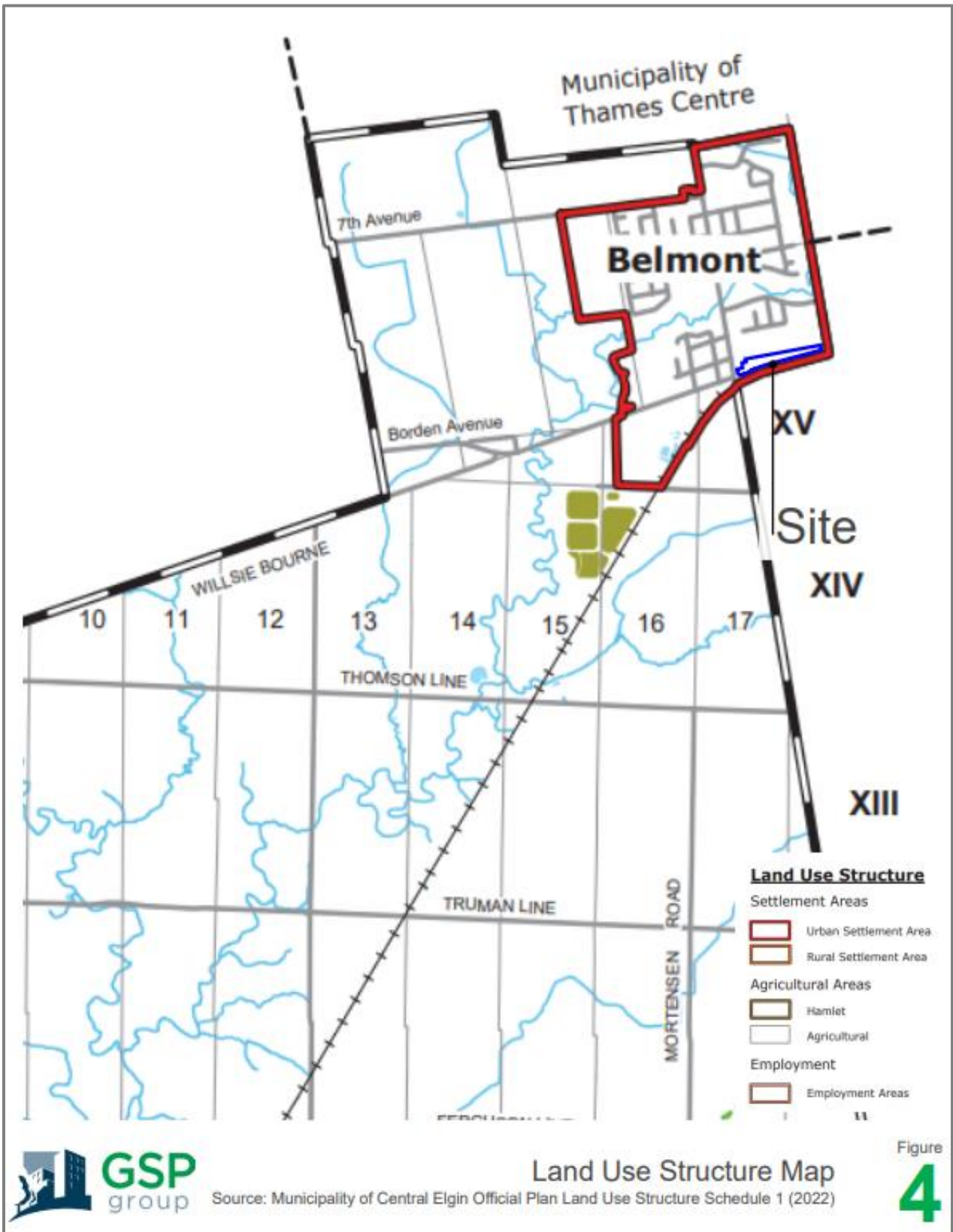
In summary, the Proposed Development conforms to County OP as it is growth and development within a settlement area, will make efficient use of existing municipal infrastructure already available to the Site and will provide for investment in and expansion of a successful, local commercial industrial use.

#### **4.5 Municipality of Central Elgin Official Plan**

The Municipality of Central Elgin Official Plan (“Official Plan”) is a long-range, comprehensive land use strategy for the Municipality and provides a policy framework for land use decisions. The in-force Official Plan replaced the previous Official Plan originally approved by the Ministry of Municipal Affairs and Housing in 2013. The Official Plan is based on a 25-year planning horizon to the year 2046.

The following provides a summary of the key Official Plan policy considerations for the Site as well as justification for the Proposed Development.

The Site is located in the Urban Settlement Area for Belmont, which is intended to be one of the areas of focus for growth and development in Central Elgin (Figure 4).

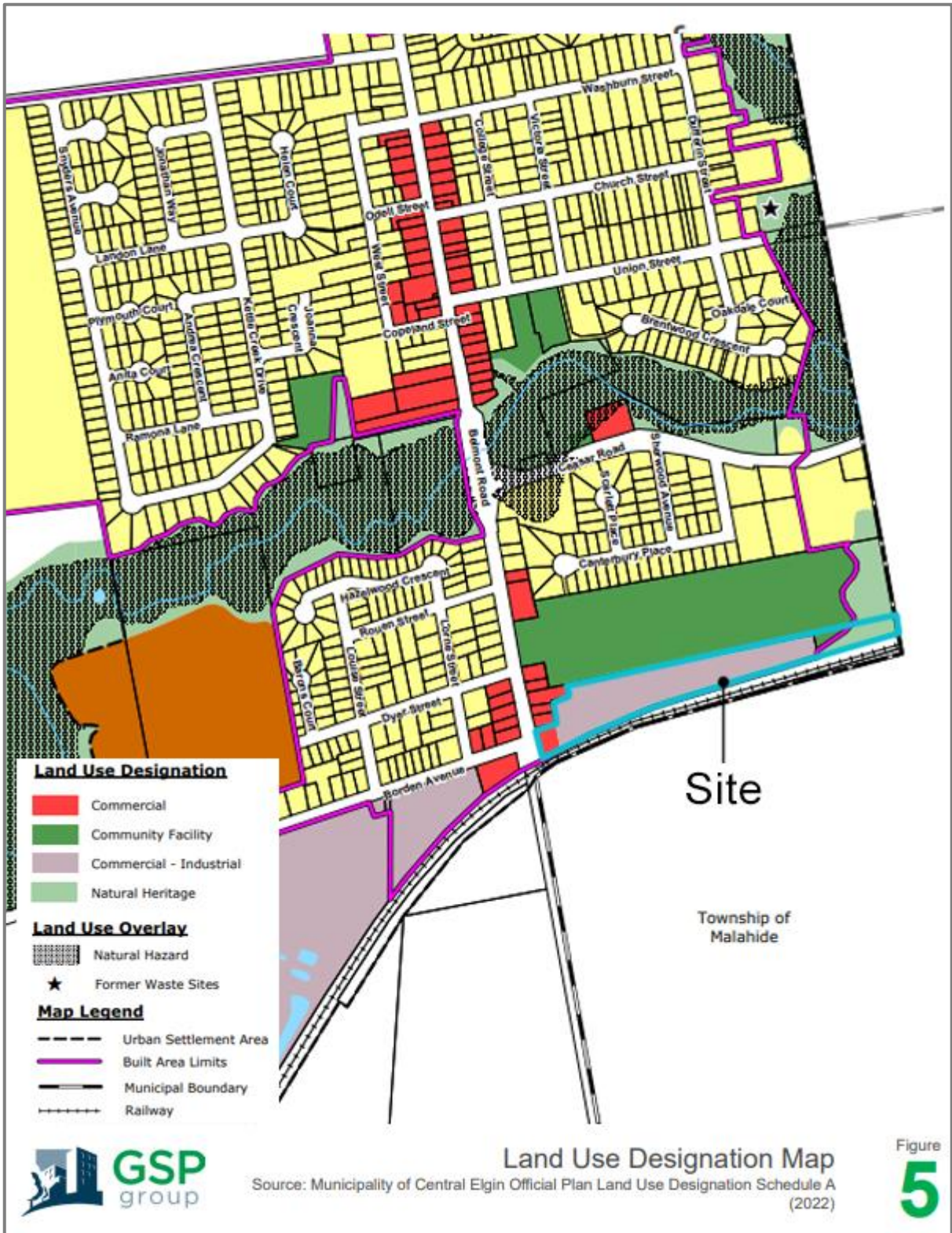


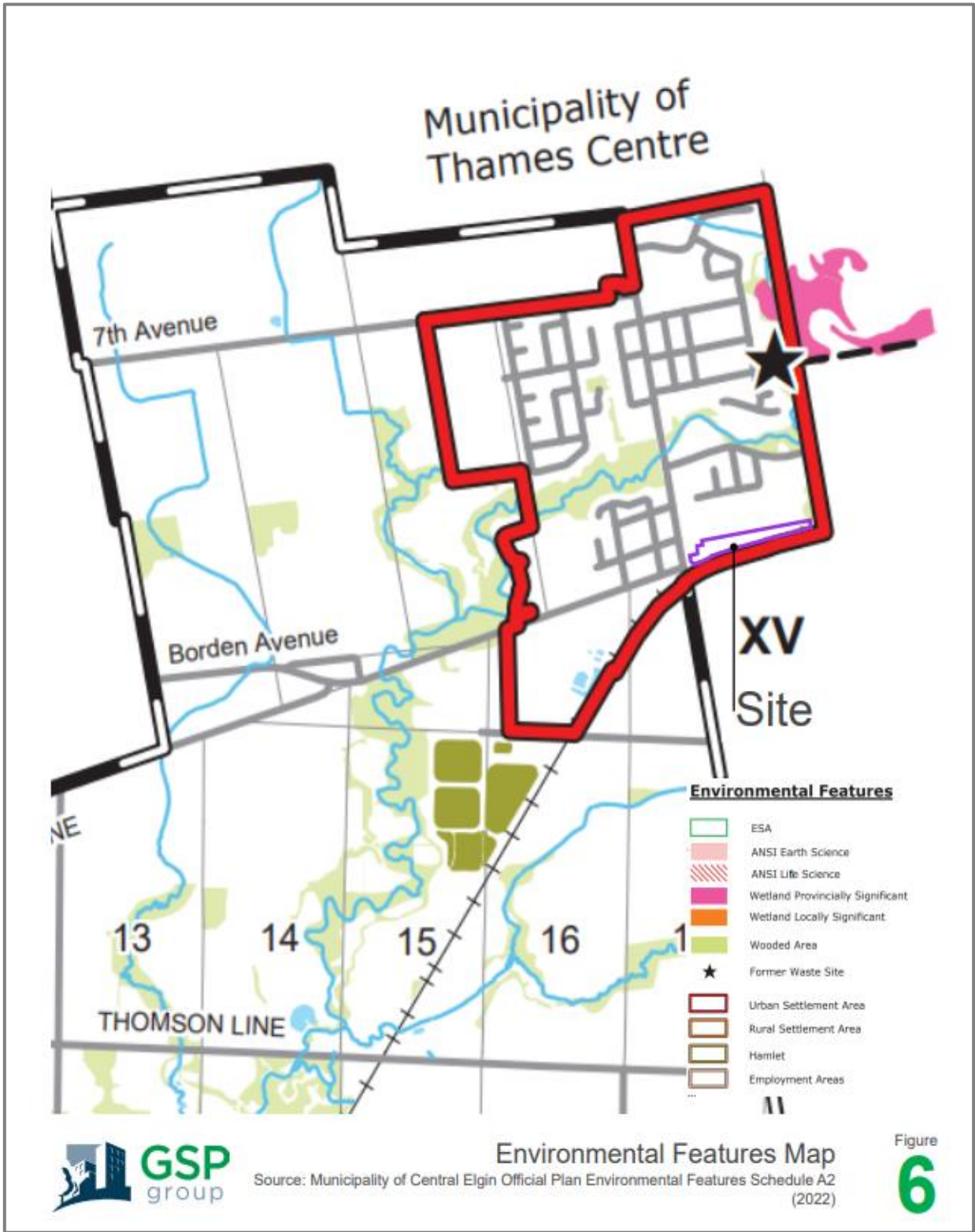
The majority of the Site is designated “Commercial - Industrial”, which permits a mix of space-extensive commercial activities along with light industrial activities. In accordance with Policy 4.4.1 (e), light industrial uses are limited to those activities such as manufacturing, processing and repair services, bulk fuel sales, storage of goods and raw materials wholesaling, and similar such uses. Light industrial uses are permitted to be small scale in size, self-contained within a building and processing no emissions.

A small portion of the Site is designated as “Commercial” along the Belmont Road frontage. Permitted uses in the Commercial designation include retail stores, personal and business services, offices, restaurants, hotels, motels, places of entertainment, and general assembly.

*Response: The proposed warehouse represents investment in and an expansion of the existing commercial industrial operations on the Site, which includes manufacturing, processing, and the storage of goods and materials. The proposed warehouse is intended to provide for additional indoor storage associated with Belmont Farm Supply within a self-contained, small building; it is located at the rear of the property, beyond the portion of the Site designated for commercial purposes.*

The rear portion of the site, where the proposed new seed warehouse is to be located, is designated as “Community Facility” and “Natural Heritage”. Permitted uses in the “Community Facility” designation include indoor and outdoor recreation, leisure, conservation and public works as well as regional parks and accessory buildings including a community centre, recreational areas, public works facilities and other municipally owned lands. While the current “Community Facility” designation permits the construction of new facilities and buildings for recreational and public purposes, it does not currently permit the Proposed Development, which includes a new warehouse.





Section 3.1.1 of the Official Plan states that new permitted uses, expansions/enlargements to existing uses, buildings or structures within or adjacent to a Natural Heritage designation that require a Planning Act approval may be permitted only if it can be demonstrated through an Environmental Impact Study (EIS) that there will be no negative impacts to the natural heritage features and/or their ecological functions.

Policy 3.1.1.2 of the Official Plan further states that development within or adjacent to woodlands are subject to the Natural Heritage policies of the Official Plan.

*Response: It is our understanding that an Environmental Impact Study was conducted by the Municipality of Central Huron in support of the development of the adjacent municipal park and Belmont Soccer Fields, which included the portion of the Site where the new warehouse is proposed. The new warehouse has been proposed within a small portion of the existing Natural Heritage to provide for appropriate access and maneuverability of the Site, as well as provide for sufficient separation from other warehouse, manufacturing, indoor and outdoor storage spaces on the property. It is our understanding that the previous natural area (wooded area) was removed at the time of the construction of the Belmont Soccer Fields, with the rear portion of the Site where the new warehouse is proposed remaining vacant for the last few years.*

In summary, the Proposed Development conforms with the Official Plan as it will provide for the enlargement of an existing, local commercial industrial business on a Site within the urban settlement area.

#### **4.6 Township of Central Elgin - Village of Belmont Zoning By-law 91-21**

The majority of the Site is zoned “Industrial Commercial (MC) and “General Industrial (M) in the Township of Centra Elgin – Village of Belmont Zoning By-law. Permitted uses in these zones include a limited range of commercial and industrial uses, including manufacturing, warehousing and/or the storage of goods and materials contained wholly within an enclosed building.

The rear portion of the Site, where the proposed warehouse is to be located, is zoned “Park (P)”, which does not currently permit the Proposed Development.



## 5. Proposed Applications

The following provides a summary of the proposed Official Plan and Zoning By-law Amendments. Assessment and justification for the proposed applications per the applicable Provincial, Regional and City planning framework are provided in Section 4.0 of this Report.

### 5.1 Official Plan Amendment

The proposed Official Plan Amendment seeks to redesignate the rear portion of the Site from “Community Facility” and “Natural Heritage” to “Industrial Commercial”. The redesignation will permit the construction of the new, proposed warehouse associated with Belmont Farm Supply.

The details of the proposed Official Plan Amendment will be revised and refined through further discussions with and review of the application by the County and Municipality of Central Elgin.

### 5.2 Zoning by-law Amendment

The proposed Zoning By-law Amendment seeks to rezone the rear portion of the Site from “Park(P)” to the “General Industrial (M)”.

The details of the proposed Zoning By-law Amendment will be revised and refined through further discussions with and review of the application by the County and Municipality of Central Elgin.



## 6. Public Consultation Considerations

Upon acceptance and circulation of the application package in support of the Proposed Development, the Municipality will required the posting of Notice of Application sign(s) to inform surrounding property owners of the Proposed Development. GSP Group and Belmont Farm Supply Inc. commit to post the required signage promptly with a clear, unobstructed view from the street, and agree to maintain the sign throughout the duration of consideration of the applications by the Municipality.

The proposed Zoning By-law Amendment requires a Statutory Public Meeting in accordance the *Planning Act* R.S.O. 1990. GSP Group and Belmont Farm Supply Inc. will attend the public meeting as scheduled by the Municipality and give a formal presentation regarding the Proposed Development and associated application as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation process to County and Municipality of Central Elgin staff for their review and consideration prior to the preparation of a final staff report and recommendation.

## 7. Conclusion

GSP Group has been retained by Belmont Farm Supply Inc. to provide planning justification in support of the Proposed Development of the Site at 14000 Belmont Road, which includes the construction of a new warehouse for the existing commercial industrial operation.

The majority of the Site is designated “Commercial – Industrial” in the Municipality of Central Elgin Official Plan and the rear portion of the Site, where the new warehouse is proposed, is designated “Community Facility” and “Natural Heritage”.

An application for Official Plan Amendment is required to redesignate the rear portion of the Site from “Community Facility” and “Natural Heritage” to “Commercial – Industrial” in order to permit the Proposed Development.

An application for Zoning By-law Amendment is also required to rezone the rear portion of the Site from “Park (P)” to “General Industrial (M)” to permit the proposed development.

The Proposed Development has regard for the PPS as it is consistent with the location of employment opportunities within the build-area area. No additional municipal or County services are required as part of the proposed development.

The Proposed Development conforms with the County OP as it represents intensification within a settlement area that will make efficient use of existing municipal infrastructure and result in further investment in a successful, local commercial industrial use.

The Proposed Development conforms with the Official Plan as it will provide for the enlargement of an existing, local commercial industrial business on a Site within the urban settlement area.

In summary, the Proposed Development is a suitable form of urban intensification on the Site, which is currently occupied by an existing commercial industrial use, and represents the expansion of an existing, long-standing employment use.

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