



October 2, 2024

Honorable Minister Calandra
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

SENT VIA ERO Posting

RE: ERO 019-9065

Consideration of transition of land use planning matters to facilitate the introduction of a new policy statement issued under the Planning Act

Dear Minister Calandra,

Thank you for the opportunity to provide feedback regarding the need for transition regulations to facilitate implementation of in-process planning matters in the County of Wellington. Our submission is provided below.

1. Type of Planning Matter Requiring Transition
Urban Settlement Area Boundary Expansions

2. Status of Planning Matter

A County-initiated Official Plan Amendment to implement recommended urban settlement area boundary expansions will be put into circulation this fall (but after October 20, 2024). This work is part of the County's ongoing Official Plan Review.

Background

The amendment will be based on County forecasts and allocations to 2051 which are in effect following recent approval of OPA 120 by the Province on July 11, 2024. Reliance on these forecasts is in keeping with section 2.1.1.2 of the 2024 PPS.

In addition, the County has followed the Provincial Land Needs Assessment Methodology under the Growth Plan in determining land needs for community areas and employment areas and is prepared to implement those results. The County's

Urban Land Needs Assessment was prepared by Watson & Associates and has been approved by County Council.

Mapleton urban expansions have been completed through requested Provincial modifications to OPA 120. However, urban settlement area boundary expansions need to be identified to provide additional land in Centre Wellington (326 ha), Erin (23 ha) and Minto (18 ha). The Centre Wellington need is based on the preferred density and intensification scenario approved by a Township Council resolution of September 30, 2024.

County staff is currently awaiting local council recommendations concerning locations for growth and anticipate Centre Wellington's response soon. In the meantime, County staff continues to draft an implementing official plan amendment for circulation this fall.

The County of Wellington would have completed its settlement area boundary expansions prior to October 20, 2024 were it not for the following:

- 2-year Provincial delay on final approval of County of Wellington Official Plan Amendment 119 (County Growth Structure) from time of Council adoption in May 2022 to final Provincial decision on Bill 162 in May 2024.
- 1-year+ Provincial delay on final approval of County of Wellington Official Plan Amendment 120 (County Growth Forecast) from the time of Council adoption February 2023 to final Provincial decision in July 2024.
- 1-year of uncertainty concerning the finalization of the 2023 draft PPS.
- Reviewing, responding and pivoting to a multitude of legislative, policy, and regulation changes introduced by the Government since 2019.

3. Specific Matters to be Addressed through Transition Regulation

The County is requesting a transition regulation so that the policies of section 2.3 (Settlement Areas and Settlement Area Boundary Expansions) would not come into effect for 2 years (October 20, 2026) or until the Province makes a decision under section 26 of the Planning Act (whichever comes first) on amendments to the County of Wellington Official Plan to implement recommended urban settlement area boundary expansions.

4. Rationale for Transitioning Matter

- a) Will allow Wellington and its member municipalities to complete technical evaluations in support of urban boundary expansion locations and implementation through a County Official Plan Amendment.
- b) Will provide the opportunity for Wellington and its member municipalities to focus on the review and completion of this important urban growth analysis and policy implementation to provide sufficient land for an appropriate range and mix of land uses in accordance with section 2.1.3 of the 2024 PPS.
- c) Will defer the need for the Wellington and its member municipalities to process numerous privately initiated Official Plan Amendments and allow the municipalities to divert resources and significant tax dollars from defending municipal decisions and instead direct efforts towards the provision of adequate municipal infrastructure and the implementation of new housing applications.
- d) Will permit Wellington and its member municipalities to meet other Government objectives to build housing faster, streamline processes and eliminate red tape.

5. Context

County of Wellington
Township of Centre Wellington
Town of Erin
Town of Minto

6. Other Relevant Details

The concept of delaying or deferring requests for changes to municipal planning policy and decisions is currently provided for by provincial legislation and policy. This request is not a removal of rights, but a postponement in the interest of providing municipalities the time to complete and implement a provincially mandated official plan review process.

Further, the Ministry has advised that it will be bringing forward Provincial training, guidance material, and technical criteria issued to assist planning authorities and decision-makers with implementing the policies of the 2024 Provincial Planning Statement. This training and guidance should be delivered to municipalities with time to assess the impact of policy changes and allow the opportunity to implement policy revisions and procedures, broadly and especially on the complex matters related to urban boundary expansion requests.

The County of Wellington is doing its part to deliver a range and mix of housing without the benefit of funding tied to Provincial housing targets:

5,711 housing units

- Wellington is exceeding Provincial requirements for short-term housing supply (5,711 housing units represents an 8-year supply, which is more than double the 3-year requirement).

13,883 housing units

- Wellington is exceeding Provincial requirements for long-term housing supply (13,883 housing units represents a 19-year long-term supply, which exceeds the minimum 15-year supply).
- The housing supply will be even higher once the County has factored in approved urban expansions for residential growth in Mapleton and additional residential lands/higher density in the recently approved South Fergus Secondary Plan in Centre Wellington.

More housing options

- Broadening opportunities for housing in the Central Business District, Residential Transition Area and Highway Commercial designations;
- Policy clarification to provide support for stacked townhouses; and
- Updating Additional Residential Unit policies to reflect recent changes to the Planning Act and the approval of the Provincial Planning Statement, 2024 as part of OPA 123 (to be considered for adoption later in October).

By supporting our transition request, the Province will help us continue to build on these efforts. If you have any questions about this submission, please feel free to contact me by email at aldos@wellington.ca.

Sincerely,



Aldo L. Salis, MCIP, RPP
Director of Planning and Development

- c. Ted Arnott, MPP, Wellington-Halton Hills
Matthew Rae, MPP, Perth-Wellington
Warden Lennox and County Council
Scott Wilson, CAO