



October 3, 2024

Honorable Paul Calandra
Minister of Municipal Affairs and Housing

Submitted to Environmental Registry of Ontario

Re: ERO posting No. 019-9065 – Provincial Planning Statement Transition

We respectfully submit this request in response to ERO posting no. 019-9065. We understand that, in accordance with [section 3\(6.1\)](#) of the [Planning Act](#), the Minister may make regulations providing for transitional matters which, in the opinion of the Minister, are necessary or desirable to facilitate the implementation of a policy statement issued under subsection 3(1).

The Municipality of Middlesex Centre Official Plan Amendment #59 (“OPA #59”), represents the result of a comprehensive review process undertaken by the Middlesex Centre and adopted by Municipal Council on May 18, 2022 and by the County of Middlesex on September 12, 2023. OPA #59 is currently subject to numerous appeals at the Ontario Land Tribunal (case number OLT-23-001073) with developers trying to include lands within Middlesex Centre’s settlement area boundary. A twenty-five day hearing is scheduled with the first phase scheduled to start on June 16, 2025, for a period of twenty days and a further five days scheduled to start on October 6, 2025.

The comprehensive review process resulting in OPA #59 was the culmination of significant public engagement and analysis, based on the policy framework set out in the 2020 Provincial Policy Statement, and in accordance with the framework in the County of Middlesex Official Plan, recently updated and adopted by the Minister of Municipal Affairs and Housing in 2023.

OPA #59 represents a significant step forward for the Municipality and incorporates a number of important policy updates including but not limited to additional residential units (ARUs) and numerous other policy updates important to the continued development and growth occurring in Middlesex Centre. OPA #59 was accompanied by updates to Middlesex Centre’s Zoning Bylaw, which will not come into force until the appeals are resolved and OPA #59 is in force.

Certain policies of the new Provincial Planning Statement 2024 that come into force on October 20, 2024, directly impact the appeals to OPA #59. Specifically, Middlesex Centre’s growth forecasts and the allocation of growth throughout the Municipality.



The Municipality is concerned that the introduction of the 2024 PPS policies represents a significant challenge to proceeding with the standard appeal track through the Ontario Land Tribunal (the “OLT”), whereby the OLT will be expected to assess OPA #59 against a new provincial planning policy framework under which they were never assessed nor intended to be assessed against. Middlesex Centre has significant concerns that this will result in unnecessary delays in approving its current planning policy framework (Official Plan and updated Comprehensive Zoning By-law). The traditional process as set out above is likely to result in significant delays and inefficient use of resources.

In light of these circumstances and taking into account the Minister’s jurisdiction to issue a regulation addressing such transitional matters, Middlesex Centre requests that the Minister exercise its jurisdiction as follows:

The Minister approve OPA #59 in its current form and dismiss the appeals in their entirety. All the Appellants would have the ability to submit site-specific Official Plan Amendments in accordance with the PPS 2024 policy framework and *Planning Act* requirements.

We believe that this approach represents the most efficient way for Middlesex Centre to move forward and contribute to both the Province’s and Municipality’s objectives of housing first and increasing the province’s housing supply. It also represents a more efficient use of resources for both the municipality and the Ontario Land Tribunal, resources that would be much better used getting more shovels in the ground to house the people of Ontario.

As you can appreciate any delay in development results in significant impacts to Middlesex Centre in terms of continuing to move development forward in a timely manner. Middlesex Centre is one of the fastest growing municipalities in Southwestern Ontario for a population of its size and consists of four rapidly growing settlement areas: Arva, Delaware, Komoka-Kilworth and Ildertonⁱ.

Middlesex Centre prides itself on engaging and implementing good planning principles that are in the public interest. It is notable that Middlesex Centre has been recognized as one of Canada’s most liveable cities being ranked in the top 30 cities across the country for community, economy, and educationⁱⁱ.

Middlesex Centre also received funding from the Housing-Enabling Water Systems Fund (HEWST) that is being used to support Middlesex Centre in twinning the Glendon Drive Watermain, increasing supply capacity and creating a redundant back up feed to the community of Kilworth. This will improve the availability and reliability of municipal



water services for existing and future residents of the growing Kilworth community. The purpose of this funding is to meet the current and future housing demandsⁱⁱⁱ.

Middlesex Centre's Official Plan guides the short-term and long-term development of the Municipality. The policies of the Official Plan are necessary to promote orderly growth and compatibility among the various land uses. The purpose of the Official Plan is to ensure that development occurs in a timely manner, represents good planning, and is in the public interest. Ensuring that OPA #59 is approved in a timely manner is imperative to the continued orderly and appropriate growth of the Municipality.

It is also notable that there is no procedural fairness or prejudice to the Appellants should the Minister decide to dismiss the appeals as each of the Appellants can submit site specific amendments that will be appropriately assessed for consistency under the new provincial policy planning statement.

We would be happy to discuss this further and provide additional information to help inform the Minister's assessment.

Sincerely,

Michael Dilullo,
Chief Administrative Officer
Municipality of Middlesex Centre

Stephanie Bergman,
Manager of Planning and Development
Municipality of Middlesex Centre

ⁱ [Middlesex Centre, Ontario | Business View Magazine](#), September 24, 2024.

ⁱⁱ [Middlesex Centre named one of Canada's Top 100 Most Livable Cities | Middlesex Centre](#)

ⁱⁱⁱ [Middlesex Centre Secures \\$493,000 in Provincial Funding for Water System Infrastructure | Middlesex Centre](#)