



May 7, 2026

Hon. Mike Harris
Minister of Natural Resources
438 University Avenue, Suite 1802
Toronto, ON M5G 2K8

Minister Harris

**Re. Township of Melancthon Response to the Ministry of Natural Resources
Proposed Amendment to the Designation of Area of Development Control
Regulation under the *Niagara Escarpment Planning and Development Act*.**

On behalf of the Township of Melancthon, staff is pleased to provide written comments pertaining to the proposed amendment to the designation of Area of Development Control Regulation under the *Niagara Escarpment Planning and Development Act* that was prepared by the Ministry of Natural Resources ('MNR'). It is our belief that the following comments will assist the MNR in not only determining whether to proceed forward with the amendment, but current areas that require greater clarification and refinement.

The Township of Melancthon wants to first make note of its strong support for the amendments being proposed by the MNR. Given the prominence of the of the Area of Development Control in the Township of Melancthon, but specifically surrounding the major growth area of Horning's Mills, the refining of planning responsibilities would be well received by planning staff. Drawing from experience, Township planning staff have been required to provide clarification on the development approval process for landowners in the Area of Development Control. This need for clarification has resulted in applications associated with new developments being delayed. With a significant portion of the lands currently in the Area of Development Control being located in a notable growth area, this change will ensure that future growth in Melancthon occurs using the planning framework that has been established by Councilors and residents alike. Landowners and prospective applicants will only be required to undertake one approval process, which not only creates a clearer process for the applicant, but also establishes a more streamlined development application process.

While staff are in strong support of the amendment, Township planning staff would appreciate greater clarification be provided with respect to the transition phase. For landowners located in the Area of Development Control that may currently have a development permit application in front of the Niagara Escarpment Commission ('NEC') would they still be required to proceed forward with this application process if this change were to be implemented? If not, would the landowner be then



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required to determine alignment with the Township zoning by-law and, if not in conformity, then undertake a zoning by-law amendment? Clarification on this process is critical for not only landowners but Township planning staff, as the zoning structure for the currently designated Area of Development Control has not been established in the Township of Melancthon zoning by-law. This would, therefore, require Township planning staff to undertake a housekeeping amendment to the zoning by-law to establish zoning for the area currently defined as Area of Development Control. Township planning staff would appreciate if the MNR provides a grace period between when a decision is made on the amendment and when it becomes in-force and effect. This grace period would provide Township planning staff the opportunity to have the zoning by-law updated once the Area of Development Control has been adjusted, as per the proposed amendment.

The Township of Melancthon appreciates the opportunity to provide comments on the proposed amendment to the designation of Area of Development Control regulation under the *Niagara Escarpment Planning and Development Act*. We also want to note our appreciation to the Province of Ontario, but specifically the MNR in their work to create clearer and more streamlined planning application processes. It is our hope that the comments provided above will assist the MNR in further refining the proposed amendments to the Area of Development Control in the County of Dufferin.

Respectfully submitted,

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