



# COUNTY OF WELLINGTON

## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Sarah Wilhelm, Manager of Policy Planning  
**Date:** Thursday, February 09, 2023  
**Subject:** County Official Plan Review – OPA 120 Recommendation Report



PLANWELL

### 1.0 Executive Summary

- The purpose of this report is to review comments and recommend to County Council the adoption of County Official Plan Amendment No. 120 - "County Growth Forecast" ([Link to Final Draft OPA 120](#))
- OPA 120 is the second amendment to the County's Official Plan advanced as part of the County's Municipal Comprehensive Review (MCR) under section 26 of the Planning Act.
- The Amendment updates the population, household and employment forecasts, and revises text in accordance with the new forecasts.
- OPA 120 is informed by technical work presented in the Phase 1 Urban Structure and Growth Allocations Report and associated consultation from June to July 2021 which included a Public Information Centre and circulation for comments (see Planning Committee report PD2021-21 for further detail).
- The Phase 1 Report was approved in principle by County Council in March 2022.
- Consultation for Draft OPA 120 included circulation for comments, a statutory open house on December 15, 2022 and a statutory public meeting on January 12, 2023 in accordance with section 26 of the Planning Act.
- For the reasons outlined in this report, staff recommend that OPA 120 be adopted by County Council and forwarded to the Minister of Municipal Affairs and Housing for a decision.

### 2.0 Background

In September 2019, County Council authorized the Planning and Development Department to proceed with the County Official Plan Review, which includes a Municipal Comprehensive Review component under the Growth Plan for the Greater Golden Horseshoe (2019). The Minister of Municipal Affairs and Housing has advised that municipalities may choose to use a phased approach (which includes more than one Official Plan Amendment) to achieve conformity with the Growth Plan. This is the approach we are taking. The growth forecast in this amendment is based on the Phase 1 MCR Report: Urban Structure and Growth Allocations prepared by Watson & Associates Economists Ltd. (Watson). Revisions to local allocations were made as part of the Phase 1 MCR technical review and OPA 120 reflects those changes.

### 3.0 Summary of OPA 120

The main changes to the overall County growth forecasts, relative to the current Official Plan are:

- The forecast extends to 2051 (current time horizon is 2041);
- Time intervals before 2041 are no longer shown, except to include 2021 as a base (this is being done because the Growth Plan no longer shows time intervals before 2051, and to provide flexibility for short and medium term work); and
- A higher percentage of population growth in Wellington will take place in urban centres (89% in 2051 versus 82% in 2041).

The Amendment would also remove Special Policy 3.5.1 for Hillsburgh and Erin Urban Centres that is no longer necessary, as the Town has completed the Class Environmental Assessments for municipal servicing needed to determine the future growth for Hillsburgh and Erin to 2051.

### 4.0 Provincial Growth Plan

The Growth Plan requires that at a minimum, the population and employment forecasts in Schedule 3 will be used for planning and managing growth to 2051. OPA 120 implements the 2051 population and employment forecasts on a County-wide and municipal basis. As a priority, the Growth Plan requires a “vast majority” of growth to be directed to settlement areas that:

- i. have a delineated built boundary;
- ii. have existing or planned municipal water and wastewater systems; and
- iii. can support the achievement of complete communities.

With the proposed amendment, the County Official Plan will be in conformity with Amendment No. 1 to the Growth Plan for the Greater Golden Horseshoe (2019).

A discussion of the broader Provincial and County planning policy context is detailed in the County’s Phase 1 MCR Report, as prepared by Watson.

### 5.0 Consultation

The draft Official Plan Amendment (OPA 120) has been informed by consultation on the draft Phase 1 MCR Report: Urban Structure and Growth Allocations which included:

- Technical Resource Team (TRT) meetings with local and County staff through 2021
- Ongoing discussions with Ministry of Municipal Affairs and Housing staff
- Virtual Public Information Centre (PIC) to present Draft Phase 1 Report in June 2021
- Circulation of draft Phase 1 Report for comment from June to July 2021 to Member Municipalities, Indigenous communities, agencies, members of the public and stakeholders
- Documentation of PIC and circulation in Planning Committee report PD2021-21
- Documentation of Municipal feedback in Planning Committee report PD2021-30
- Documentation of final growth forecasts and allocations and feedback in Planning Committee Report PD2022-07

Key themes from the public consultation for the Phase 1 MCR technical report included the following:

- Preservation of agricultural land
- Municipal servicing availability
- Conservation of heritage resources
- Consideration of urban centre expansions
- Consideration of infilling and rounding out of rural settlements
- Housing affordability

The consultation for Draft OPA 120 included:

- September 2022 circulation to the Ministry of Municipal Affairs and Housing
- October 2022 circulation to Member Municipalities, Indigenous communities, agencies, members of the public and stakeholders
- December 15, 2022 statutory open house for Draft OPA 120
- January 12, 2023 statutory public meeting for Draft OPA 120

**Public Consultation  
at a Glance**

**42 Open House  
Participants**

**18 Public Meeting  
Participants**

**19 Written  
Submissions**

In order to obtain public feedback, notification of engagement opportunities was provided through the project email list and website updates. Notice of the statutory public open house and public meeting was provided in accordance with the Planning Act and advertised in the Wellington Advertiser. To provide options for the public, one meeting was virtual (open house) and the other was in person (public meeting). A recording of the presentation is also available on-line.

**6.0 Key OPA 120 Comments**

A summary of the key comments is provided below. For further details on these and other comments, see Appendix A (Open House Meeting Summary), Appendix B (Public Meeting Minutes) and Appendix C (Summary of Comments and Responses). Full written comments are available in the project file.

**6.1 Public Open House**

A number of key themes emerged from the open house:

- Centre Wellington growth
- Challenges related to Bill 23
- Housing affordability
- Ability of Erin to service its future growth
- Agricultural Mapping Review
- Impact of Greenbelt expansion in Erin
- Climate change impacts

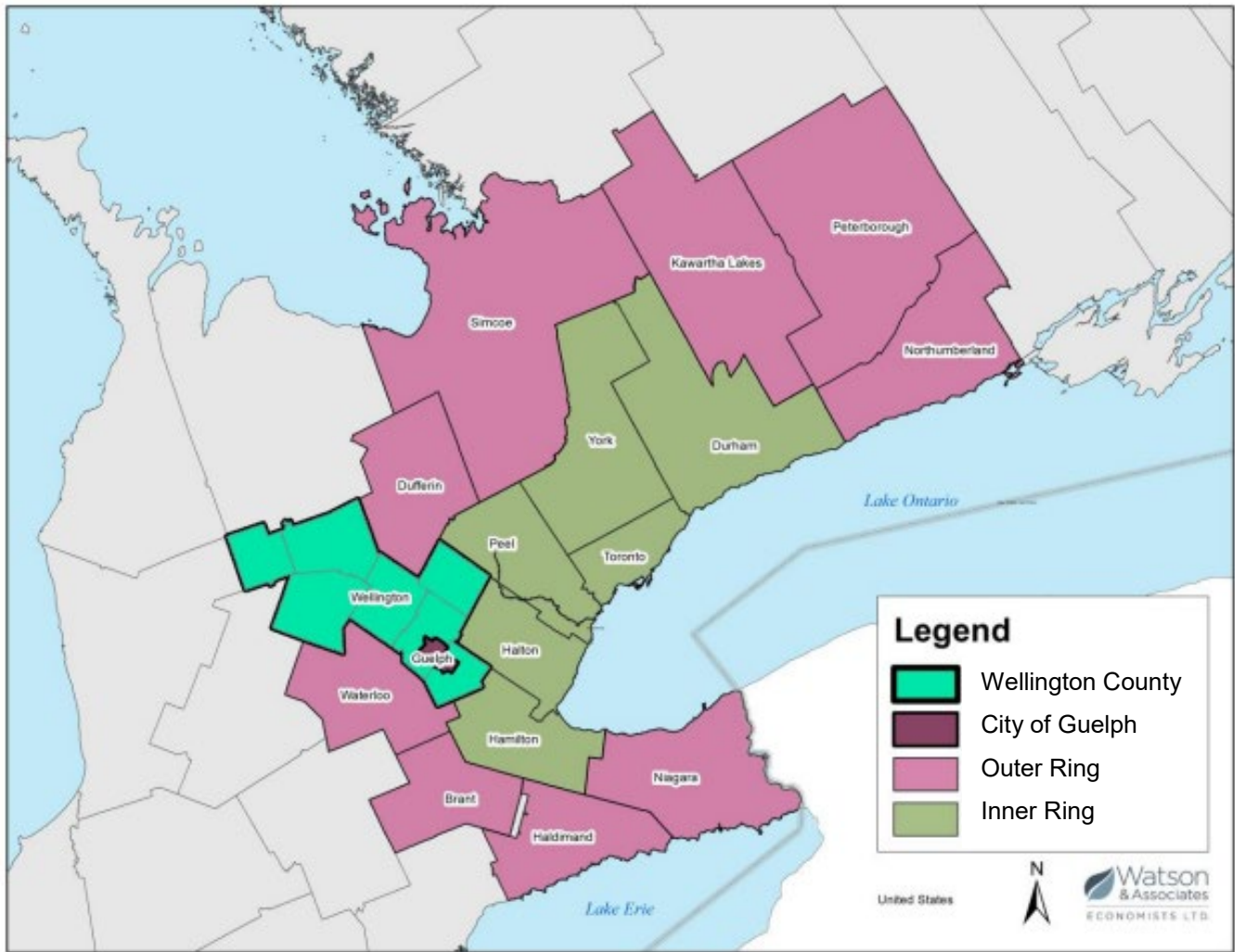
Additional comments below supplement the responses in the meeting summary for the first three topics.

**Centre Wellington Growth**

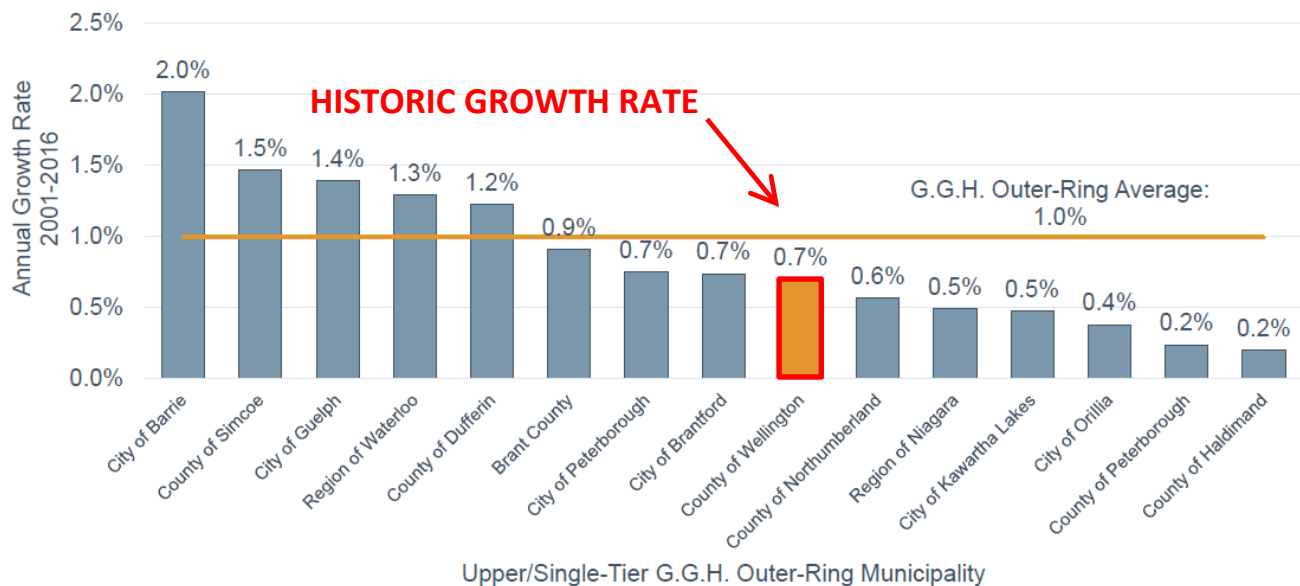
Centre Wellington is a highly desirable place to work and live. The share of growth allocated to Centre Wellington is consistent with population and housing trends observed over the past decade. Through Municipal input, Watson adjusted the allocations to shift a larger share of growth to the County’s northern municipalities and to Erin, however, the overall Provincial forecasts are also higher.

The Province has forecast more growth to “Outer Ring” municipalities in the Growth Plan, like Wellington County (see Figure 1). According to Watson, the Greater Golden Horseshoe (GGH) Outer Ring is projected to be the fastest growing region in Ontario over the next 30 years (faster than the Greater Toronto and Hamilton (GTHA) “Inner Ring”). In addition, the Province has increased Wellington County’s share of Outer Ring population growth (Figures 2 and 3). Overall population growth in Wellington is expected to be driven by net migration across all major age groups largely from intra-provincial migration, primarily from urban centres in the west GTHA.

**Figure 1      County of Wellington Context within the Greater Golden Horseshoe**

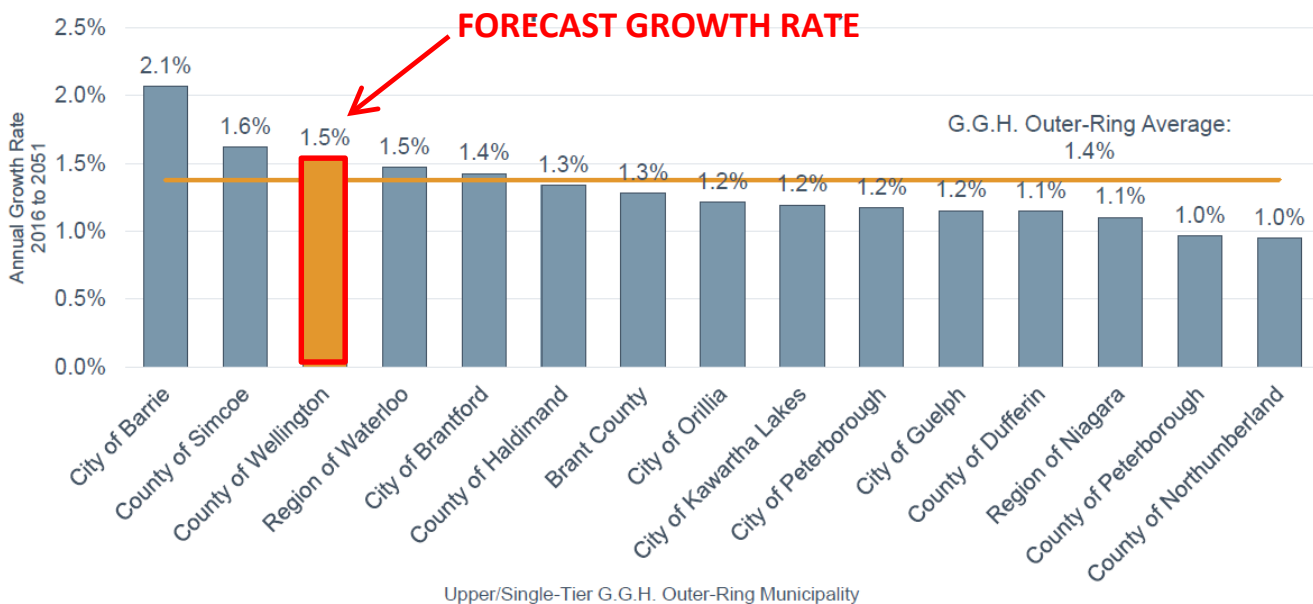


**Figure 2 GGH Outer Ring Annual Population Growth Rate by Municipality 2001 - 2016**



Source: Derived from Statistics Canada Demography Division data by Watson & Associates Economists Ltd., 2020.

**Figure 3 GGH Outer Ring Annual Population Growth Rate by Municipality 2016 - 2051**



Note: Population growth is based on the reference forecast scenario.

Source: Derived from Greater Golden Horseshoe Growth Forecasts to 2051 Technical Report, June 16, 2020, Hemson Consulting Ltd., by Watson & Associates Economists Ltd., 2020.

### **Impacts of Bill 23 on Growth Targets**

Bill 23, the More Homes Built Faster Act (2022), introduced exemptions and discounts to development charges which will reduce funding available to municipalities to finance growth-related infrastructure. In a November 20, 2022 letter to the Association of Municipalities of Ontario (AMO), the Minister of Municipal Affairs and housing stated that they “are committing to ensuring municipalities are kept whole for any impact to their ability to fund housing enabling infrastructure because of Bill 23”. There are still many unknowns related this and other aspects of Bill 23, but it is clear from the Provincial government that municipalities are expected to deliver more homes, faster. Staff will continue to monitor and respond as additional information becomes available.

### **Housing Affordability**

The County, in consultation with Member Municipalities, will take action to explore and implement planning policy changes to promote and secure affordable and attainable housing in Wellington County. A housing policy review will be completed as part of Phase 3 of the MCR. As we noted in a recent progress report on the Official Plan Review (PD2023-01), the Province has proposed to introduce a new Provincial planning policy document supporting their initiative to build more homes faster. We have paused the policy review pending more information about these new Provincial policies.

The County has already taken steps to increase housing options through second unit policy updates in 2017 and additional residential unit policies in 2020. Through proposed OPA 121, the County is amending Official Plan policies to allow municipalities to establish a Community Planning Permit System and other measures aimed at streamlining the development approval process in Wellington.

## **6.2 Public Meeting**

Four people spoke at the public meeting. The comments emphasized the following:

- agricultural land conservation
- request for more rural growth in Puslinch
- information about vision
- a site-specific request to allocate more growth to Clifford

Additional information about public and stakeholder comments is in section 6.7.

## **6.3 Municipal**

Township of Puslinch comments are the only municipal comments that were received for OPA 120. Township Council has requested that the County revise the Official Plan to increase the supply of rural residential lots in the Secondary Agricultural Area designation of Puslinch. The proposed revision is to remove the severance cut-off date of March 1, 2005 or alternatively, to move the date to March 1, 2015. Township Council has noted that there are limited opportunities for rural residential growth given the pending designation of Prime Agricultural Areas, Natural Heritage System and Greenbelt Expansion.

Planning staff acknowledge Council's concerns. As part of Rural Phase 3B of the MCR, the County - together with the Township - will comprehensively review the rural residential supply in Puslinch. Implications of revised Prime Agricultural mapping, Natural Heritage System and potential Greenbelt expansion will be considered at that time. In addition, we are monitoring to see what progress the Province makes toward developing a new Provincial planning policy framework which may introduce increased flexibility for rural growth.

#### **6.4 Indigenous Communities**

Our office received comments of no concerns from the Métis Nation (MNO), Chippewas of the Thames and Chippewas of Rama First Nation. Chippewas of the Kettle and Stony Point First Nation (CKSPFN) emphasized the need to protect existing farmland and natural heritage features from development, disclose uses of water and/or waterways, and protect water quality. The County will consult further with CKSPFN and other Indigenous communities as part of the ongoing Official Plan Review.

#### **6.5 Agencies – Conservation Authorities**

Responses were received from Grand River Conservation Authority, Conservation Halton, Maitland Conservation and Saugeen Conservation. No concerns were raised by these Conservation Authorities.

#### **6.6 Agencies – Other**

No concerns were noted in responses from Bell and Grey County.

#### **6.7 Public and Stakeholder Comments**

The public and stakeholder comments received and the staff responses are included as Appendix C. Some of the comments deal with matters in future phases of the growth management technical work such as settlement area boundary expansions, rural residential severances, etc. The discussion below provides more details about key comments directly related to OPA 120 and those received from Wellington Federation of Agriculture.

#### **Request to Increase Allocation to Clifford**

GSP Group planning consultants provided detailed comments on behalf of Clifford (Park St) Developments Inc. (Landscout Investments and Cachet Developments). The comments have been reviewed by Watson and a change to the Town's growth forecast is not recommended.

The growth forecast and allocation within the Town of Minto was prepared during Phase 1 of the MCR through consultation with the Town. It should be noted that initially the growth forecast for the Town of Minto included a greater allocation to the Urban Centre of Clifford. The allocation was revised based on the Town's request for a greater allocation of population and housing to the Urban Centre of Palmerston, with a corresponding reduction in the allocation to the Urban Centre of Clifford. Staff note that the growth forecast is a minimum and the County will continue to monitor growth and consider changes to the forecast and allocation by the next Official Plan review.

### **Request to Increase Allocation to Puslinch**

Our office received comments from local builders/developers in Puslinch (Sloot Construction, George R. Good Construction, DRS Inc. and Timberworx) requesting an increase in the allocation to Puslinch. The Growth Plan requires that growth be limited in rural settlement areas that are not serviced by existing or planned municipal water and wastewater systems or are in the Greenbelt. A change to the Township's growth forecast is not recommended.

Staff note that the projections anticipate that Puslinch will add 710 housing units over the 2021 to 2051 period, whereas the July 2019 supply of residential units is 431. Pending Phase 3B of the MCR will focus on rural growth, including any necessary updates to the rural residential supply for Puslinch.

### **Request to Increase Allocation to Rural Centre Wellington**

Stovel and Associates Inc. provided comments on behalf of BelCal Inc. regarding lands in Belwood (Part Lot 12, Concession 7). The comments requested that more growth be allocated to the rural areas of Centre Wellington or a policy provision be added to provide more flexibility in the interpretation of the growth tables. Staff do not recommend a change to the Township's growth allocation.

### **Wellington Federation of Agriculture (WFA)**

WFA provided detailed comments in Table C4.1 of Appendix C addressing the following:

- Protection of Prime Agricultural Areas and the agri-food network
- Re-designation of Prime Agricultural land to Secondary Agricultural
- Prohibition of additional rural residential lots in the Secondary Agricultural designation
- Integration of climate change with growth management
- Increase minimum intensification target to 20% and strive to reach 25% intensification
- Application of a target of 80 people and jobs per hectare to future development properties that are currently farmed
- Transportation planning for agricultural uses as part of urban boundary expansions

We note that our office will continue to work with WFA and other agricultural stakeholders as part of the Agricultural Policy and Mapping Review and the ongoing MCR. Staff have provided responses to WFA's comments on OPA 120 in Table C4.1 of Appendix C.

With respect to the minimum intensification target and greenfield density targets, we note that the Township of Centre Wellington is considering retaining Watson & Associates Economists Ltd. to further review the urban centre land needs results for Centre Wellington, including the residential intensification and greenfield density assumptions. This may reduce the land need requirements for Centre Wellington.

## **7.0 Provincial Comments**

As legislatively required, our office circulated Draft OPA 120 to the Ministry of Municipal Affairs and Housing on September 1, 2022. While no written comments were received, in conversations with Provincial staff they encouraged us to proceed with OPA 120 and had no revisions.



## 8.0 Final Draft Official Plan Amendment

The final draft County Growth Forecast Official Plan Amendment being recommended in this report may be found at the following link: [Link to Final Draft OPA 120](#). Since the circulation of the first draft of OPA 120, no changes have been made to the projected growth in the tables. Staff made minor editorial changes to add the word “Primary” to Urban Centre references in Table 1 and 7 and put Puslinch and Wellington North tables in alphabetical order.

## 9.0 Conclusion

Staff are satisfied that OPA 120 is consistent with the Provincial Policy Statement (2020), has regard for matters of provincial interest, and is in conformity with the Growth Plan (2019, as amended) and Greenbelt Plan (2017). Public concerns have been considered and addressed. In our opinion, OPA 120 represents good planning and is in the public interest.

## 10.0 Recommendations

That pursuant to section 26 of the Planning Act, County Council declares that Official Plan Amendment 120 – County Growth Structure (a) conforms with the Growth Plan for the Greater Golden Horseshoe and Greenbelt Plan; (b) has regard for matters of provincial interest in section 2 of the Planning Act; and (c) is consistent with the Provincial Policy Statement.

That a by-law adopting County of Wellington Official Plan Amendment 120 be approved.

That the County Clerk forward the report to the Ministry of Municipal Affairs and Housing and to Member Municipalities.

Respectfully submitted,



Sarah Wilhelm, MCIP, RPP  
Manager of Policy Planning

- Appendix A Public Open House Meeting Summary
- Appendix B Public Meeting Minutes
- Appendix C Summary of Comments and Responses

# **Appendix A**

## **OPA 120 Public Open House Meeting Summary**

## Wellington County Official Plan Review OPA 120 Virtual Public Open House Meeting Summary December 15, 2022

Prepared by LURA Consulting

### Background

The County of Wellington is currently reviewing its Official Plan (OP) to complete a Municipal Comprehensive Review (MCR) and a 5-year review of its Official Plan as specified under Section 26 of the *Planning Act*. An MCR is part of the OP review process. It establishes a long-term vision and planning framework for a municipality that fosters a sustainable approach to future growth and economic development. The County is doing this to prepare for additional population and employment growth and ensure that the updated OP supports healthy, compact, and complete communities in Wellington as directed through *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*.

In June 2021, the County released its MCR Phase 1 Report ([review the report](#)). It held a virtual public open house ([review the presentation](#) and [read the consultation summary](#)) to discuss the recommendations prepared by consultants Watson & Associates Economists Ltd. relating to Urban Structure and Growth Analysis. Official Plan Amendment (OPA) 120 implements part of the growth management technical work from Phase 1, including:

- Updating the population, household and employment forecast tables in the Official Plan
- Revising text in accordance with updates

### Meeting Promotion

A public notice regarding the Virtual Public Open House was published in the Wellington Advertiser two weeks before the meeting. The meeting was also promoted through the County's social media platforms.

Members of the public who wished to join the Virtual Public Open House were requested to register in advance. Individuals could also join the meeting by phone.

### Meeting Overview

The Virtual Public Open House was held on December 15, 2022, with the purpose to:

- Provide an update on the County of Wellington's Official Plan Amendment (OPA) 120
- Gather feedback and answer questions about Wellington County's OPA 120

The meeting presentation was posted in advance on [Plan Well](#), the County of Wellington's Official Plan Review website, to allow participants to review it beforehand or follow along if they joined the meeting by phone.

**In total, 42 participants joined the meeting.**

Susan Hall (Facilitator from LURA Consulting) began the meeting with an introduction and overview of the meeting agenda. Sarah Wilhelm (Manager of Policy Planning at the County of Wellington) provided introductory remarks and delivered a presentation ([review the presentation](#)) on the following areas of the County of Wellington's OPA 120:

- Policy Context and Provincial Planning Policy Structure
- County and Local Planning Policy
- Potential Impacts of Bill 23
- Municipal Comprehensive Review (MCR) and Work Plan
- Overview of Phase 1 Work
- County Growth Forecast Amendment
- Population, Housing, and Employment Highlights 2021-2051
- Consultation to Date
- Key Themes from Comments

Susan Hall facilitated a discussion to receive feedback and comments from participants. A summary of the facilitated discussion is provided below.

## What We Heard

### General OP Review and MCR Process

Participants were invited to ask questions and share their comments regarding the County of Wellington's Official Plan Amendment (OPA) 120.

The questions, answers, and comments are included as follows. Questions are marked by a "Q", comments are marked with a "C", and answers and responses are noted with an "A".

### General

**Q: Is there a timeline for completing the Official Plan review?**

A: There is currently no timeline for completion. Previous government legislation, Bill 23, changes to the 2020 Provincial Policy Statement, updates to the Growth Plan, and guidance documents have made things a bit of a moving target. The County is phasing in amendments gradually and pushing forward so that it can continue to support future growth.

**Q: How can residents and communities in the Town of Caledon be kept informed?**

A: For the OPA 120 process, individuals can subscribe through the project website for updates or be added to the email list to receive email updates on the project. In terms of

services from the Town of Erin, individuals can request information directly on the Town of Erin's website.

#### [Agricultural Designation](#)

**Q: What kind of employment is anticipated to accommodate the increase in population in Centre Wellington?**

A: More information is required to answer this question completely. Sarah Wilhelm, Policy Planning Manager, will address this and follow up with the participant who posed this question.

**Q: What is the difference between Prime Agricultural and Secondary Agricultural?**

A: Puslinch Minto and Erin are the only three municipalities with a Secondary Agricultural designation in Wellington County. The Prime Agricultural designation is primarily in areas with soils in Classes 1, 2, and 3, while the Secondary Agricultural designation is located in areas with lower capability for agriculture. The Province, under the Growth Plan, has issued for the agricultural system to be mapped in which they identified Prime Agricultural areas and candidate areas. Through the implementation and updating of the Official Plan and under the Growth Plan, the County is required to go through a process of rationalizing and reviewing the County's agricultural mapping. This work is ongoing, and there will be a detailed assessment of the difference between county and provincial mapping. The County will recommend how these lands should be designated based on a series of provincial and county criteria and put forward a final recommendation on what it would look like to implement the refined agricultural system under the Growth Plan.

**Q: How are lands designated as Prime Agricultural or Secondary Agricultural? Is there documentation showing how lands are designated as such?**

A: Soil composition is a significant part of how agricultural lands are designated. This designation process refers to the Canadian Land Inventory (CLI) mapping. The range of soils (e.g., Class 1, Class 2, Class 3, etc.) helps inform what can constitute Prime Agricultural land. The land use and its surrounding area are also factors that can contribute to the designation, and these factors are mainly used within the provincial agricultural system mapping.

When the Province did their desktop assessment, it developed several criteria and weighed them. There were assessment units that were created, and the consultants went across the GTA and weighed each of those criteria in those particular units and stitched them all together to create an agricultural system map that produced a Prime Agricultural area if it hit a certain threshold. The [Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe](#) is a document that provides a simplified explanation of the agricultural system and the assessment methodology. A



more detailed technical document exists on how the Province has done their assessment, which is available for request through the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA).

Through the agricultural system review, the County will take the Province's initial mapping and refine it further to ensure that it reflects what it believes should have a Primary Agricultural or Secondary Agricultural designation. A consultation process with the public will also support this review.

**Q: If the initial designation was a "desktop exercise," does this mean these lands were grouped via computer satellite photos? Will the consultants review these recommendations by visiting each site before Phase 3 is finalized and submitted to the Province?**

A: The Province only conducted a desktop exercise through Geographic Information Systems (GIS) mapping and other automated mapping processes - ground truthing was not part of the provincial process. The Province did their process, mapped it, and then gave the County the primary and candidate areas, which have a bit more flexibility in reviewing and refining those areas. The primary areas recommended are more rigid because only certain scenarios allow refinement. The County has integrated some ground-truthing into the process to ensure nothing is egregious or out of place.

WSP is the consulting firm assisting the County of Wellington with Phase 3 work. The County needs to look at agricultural impact as part of the Settlement Boundary Expansion work. Margaret Walton, PLANScape Inc., is the other specialized consultant helping the County review its agricultural system mapping. Margaret Walton is prominent in the agricultural space for her extensive field and planning work across the country. She has helped many municipalities implement their agricultural system mapping and provided recommendations. A ground-truthing element to this work has already been completed to help form the County's recommendations.

**Q: What is ground-truthing?**

A: The County cannot go on to private properties, so ground truthing involves driving to a site to look and observe what is on the land in terms of crops, buildings, etc. This is the extent of what the County can do given the geographic size of the County.

**Q: Do you speak directly to the landowners during the ground-truthing process?**

A: That is not part of the process at this point. The County is conducting this ground-truthing exercise to form an objective opinion on the lands and present a recommendation. There will be time for consultation and public engagement later in the process. At that time, landowners can share their ideas and concerns about their property and when there will be a discussion about what the County has proposed and what the policies require.

**Q: Are any specific dates being explored for further details regarding site-specific requests to re-designate lands from Prime to Secondary Agricultural?**

A: There are three municipalities involved in this process, and it is a significant undertaking to understand and review all these areas and put forward a recommendation. The public has not yet been involved in this process, but the County is open to hearing about the public's interests. There will be a point where the County will present its recommendations based on its assessment, and a more formal dialogue and process with the public will occur.

**Q: Do you have an estimated timeframe for when the agricultural mapping work will be done? Will there be an opportunity to provide ground-truthing comments about what the consultant has presented?**

A: It's hard to put an exact timeframe as there are close to 1,000 assessment units across Wellington County, with close to 300 assessment units in the Township of Puslinch alone. It takes some time to go through all the assessment units, but the County is working diligently with the consultants and member municipalities. Once the County and the member municipalities arrive at a minimum level of agreement on how to proceed, it can start a broader consultation with agricultural stakeholder groups and members of the public. At that point, there will be an opportunity to comment on and refine the agricultural mapping work.

**Q: Who can the public contact about the agricultural review, particularly when the agricultural land is next to and partially integrated into a rural residential development?**

A: Jameson Pickard, Senior Policy Planner, is the contact for any questions regarding the agricultural review or to discuss the agricultural work being done and how that applies to a specific residential property. His contact information is included in this summary's Wrap-Up and Next Steps section.

**Growth Forecast**

**Q: Why is the growth very high for Centre Wellington?**

A: Watson and Associates have done a detailed analysis of Centre Wellington's growth and found that it has traditionally taken about a 50% share of the County's growth - part of this is due to market demand and demographics. The County was able to shift some of this growth, with the Town of Erin now taking a higher share of growth. However, Centre Wellington continues to be a desirable place for people to live. When the County presents to the Centre Wellington Council, it will be able to speak more specifically about the growth in this area.

**Q: Would Belwood not having municipal services be a limitation for residential growth?**

A: A certain amount of growth can occur within the boundaries of all the rural settlement areas designated in the Official Plan.

**Q: Can you confirm that the density targets are a minimum?**

A: Yes. The intensification target and density targets are a minimum.

**Q: Higher densification numbers would support compact communities and protect farmland. Why is this topic being pushed to Phase 3?**

A: This topic is being addressed through Phase 2. Through the technical work of Watson and Associates, the intensification target that has been established is a reduced target of 15% and the greenfield area density of 40 people and jobs per hectare remains the same. The County has a full technical document that details how Watson and Associates arrived at the actual targets, and County Council has approved this technical work. However, since the Wellington Federation of Agriculture is weighing in on this topic again, the County will include their additional comments.

**Q: Could Bill 23 bring in challenges for growth targets?**

A: The County is aware of concerns around the development charge changes in Bill 23 and the challenges it could create. This legislation is meant to speed up growth, though the County continues to monitor this legislation and its potential impacts. The County continues to consult with the Province and has been encouraged to move forward with OPA 120. At this point, the County will continue with the OPA 120 process, but as things change regarding Bill 23, it will adapt accordingly.

**Town of Erin**

**Q: How will the Greenbelt expansion in the Town of Erin impact rural land use?**

A: The Greenbelt expansion in the Town of Erin is taking place on rural land that was not considered for urban land use, which means that the expansion will not impact the allocation of growth to the urban areas. This expansion might have a moderate or minor impact on severance potential in other parts of the Greenbelt that are in Wellington County, but there should not be any changes related to OPA 120. There is also a report on the project website that the County prepared last year, which includes a table that compares the differences in requirements or policy provisions for lands within and outside the Greenbelt.

**Q: What is the significance of the Whitebelt designation? When and why was the land in the Town of Erin designated as Whitebelt? How large is this new proposed**



**Whitebelt in the Town of Erin? Was adding a Whitebelt designation in the Town of Erin part of the Bill 23 Greenbelt changes?**

A: There are currently no Whitebelt designations in the County of Wellington or the Town of Erin. However, when the Greenbelt designation was first put in place, large areas of land were reserved to accommodate future urban growth and became known as Whitebelts. These lands are located between the municipalities' urban boundaries and where the Greenbelt restriction fell.

The Greenbelt designation changes were once separate from Bill 23, but the government has now related them. The Greenbelt designation changes were to remove about 7,400 acres of land from the Greenbelt in several municipalities.

As part of the consultation on the Greenbelt designation changes, the County of Wellington and the Town of Erin have provided coordinated comments over the last 12 years expressing that there are many layers of protection in place for the Paris Galt Moraine and natural heritage features in its rural areas.

In the Land Needs Assessment for the Town of Erin, there was a need for Employment Lands. This need for Employment Lands would be difficult, if not impossible, to achieve under the current Greenbelt and Growth Plan policies because the boundaries are essentially set with such minor limitations.

A letter was written to the Province requesting approximately 400 acres of designated Whitebelt to address the land needs identified. This Whitebelt designation does not necessarily mean that all this area is intended for development, but it aims to provide flexibility to look at an appropriate area where some additional Employment Lands could go. The County is still awaiting a response from the Province regarding this request, but this was the County's effort to help deliver the Employment Land needs that are anticipated but cannot be met with the current urban boundaries.

**Q: Does the Town of Erin have the required water source for the forecasted residential and industrial growth and use until 2051 and beyond? Has there been a study on groundwater for this growth?**

A: The Town of Erin is responsible for water and wastewater servicing. The County has done a high-level servicing review as part of the technical work for Phase One, and the only urban centre within Wellington County that has more than enough services to 2051 is the village of Clifford. However, it is not unusual for municipalities not to have the servicing in place. They will start to plan out these services once the forecasts are in the plan because they are typically used for new growth. There is also information on the Town of Erin's website about environmental assessments related to a sufficient water supply.

**Q: The Town of Erin is disposing of its sewage effluent and urban drainage directly into Caledon. Has this been factored into the forecasts for growth? The West Credit River is too small to receive the forecasted sewage effluent daily. Is this why the Town of Erin can grow as much as it has been noted?**

A: The Town of Erin having a municipal wastewater system is part of why more growth is being directed there. The Town of Erin is responsible for the appropriateness of the technical design and any related impacts of its wastewater system. If there are specific concerns related to how the plant is being designed and their work, that can be brought up directly with the Town of Erin.

#### Environment and Climate Change

**Q: What steps will be taken to protect the West Credit River's vital watershed area?**

A: OPA 120 deals with increasing the forecasts in the forecast timeframe and does not affect the mapping of any environmentally significant areas. However, there are protections around significant features and environmentally significant areas. For example, the Official Plans of the Town of Erin and Wellington County have Core Greenlands and Greenlands designations that protect a range of environmental features.

**Q: Has Wellington County done any measurements on how its growth will contribute to climate change?**

A: Certain policy requirements require the County to integrate climate change considerations into settlement boundary expansion work. This is a top-down process where the Province issues the growth forecast for jobs and population. The County is then mandated to take that growth as a minimum and allocate it amongst its municipalities. The County would also need to develop a suite of climate change policies in its Official Plan. The County of Wellington recognizes that climate change is an important component of the Official Plan, and climate change will be considered when looking at the settlement boundary expansions. There is a Climate Change and Sustainability Manager that has been part of this process, but because of Bill 23 and the potential impacts of this new policy document, it is hard for the County to anticipate whether there might be changes to climate change policies.

#### Other

**Q: Is there thought being given to the impact on soft services, not just water, sewer, and roads, but other important services that help integrate newcomers into the community?**

A: Municipal services, including hard and soft services, is something the County will be looking at as part of Phase 3.

**Q: How would having three residential units per lot affect the tax base?**

A: If a lot has more than one residence on it, it will impact taxes. The tax base is based on the property's value; if the value of the property increases, it is likely that the impact will be assessed slightly higher. It also depends on the circumstance of the property, its conditions, and several other factors, but typically, one might expect to see taxes go up.

**Q: Will municipalities be encouraged to ensure that the housing types are added to allow those working in Wellington County to afford those residences?**

A: Although it is not within the scope of OPA 120, the County acknowledges that this is an important issue. The County has a task force that deals with attainable housing, and the work of this group will continue to emphasize to the community how important it is to provide places for everyone to live. The County will eventually look at policies around housing and housing mix once the dust settles a little bit more with the provincial policies.

**Q: Will the proposed 2051 population growth forecast for the Clifford village allow for land currently designated as Future Development for residential uses? Does this growth forecast reflect and utilize the available servicing capacity in the village of Clifford?**

A: The County recently received the several-page detailed letter submitted regarding interest in the land at 41 Park Street in the village of Clifford. The County would like to spend some time reviewing this and will report through the Planning Committee when it has reviewed all the questions that have been filed.

**Q: Will the Senate's work on soil across Canada be published in time for the County's study?**

A: The Federal government has not initiated anything, and it could take some time before they can complete the review and present the study results. The aim is to wrap up this work by the end of next year, but it will certainly be considered if it becomes available during that time.

**Written Feedback**

Following the meeting, the County of Wellington received 1 submission by email. The submission relates to previous technical work on a site-specific employment area conversion request.

**Wrap Up and Next Steps**

Susan Hall (LURA Consulting) invited the participants to attend the in-person statutory public meeting on Thursday, January 12, 2022, at 10:30 a.m. in the Council Chambers at the County of Wellington Administration Centre located at 74 Woolwich Street

Wellington County OPA 120 Meeting Summary  
December 15, 2022

Guelph, ON N1H 3T9. It will not be a hybrid meeting, but those who cannot attend are welcome to send in their comments before the meeting.

Sarah Wilhelm (Manager of Policy Planning at the County of Wellington) provided participants with the project team's contact information for any additional feedback and wrapped up the meeting. Participants can provide their feedback and comments until January 4, 2023. Members of the public can contact the project team by email or by phone at:

**Primary Contact:** Sarah Wilhelm, Manager Policy Planning

Phone: 519-837-2600 ex 2130

Email: [planwell@wellington.ca](mailto:planwell@wellington.ca)

Mailing Address: ATTN Planning Department

74 Woolwich Street

Guelph, ON

N1H 3T9

**Secondary Contact:** Jameson Pickard, Senior Policy Planner

Phone: 519-837-2600 ex 2300

Email: [jamesonp@wellington.ca](mailto:jamesonp@wellington.ca)

## **Appendix B**

### **OPA 120 Public Meeting Minutes**



## Corporation of the County of Wellington Public Meeting Minutes

### OPA 120 – County Growth Forecast OPA 121 - Development Approval Process Updates

January 12, 2023  
Council Chambers

**Present:** Warden Andy Lennox  
Councillor James Seeley (Chair)  
Councillor Mary Lloyd  
Councillor Michael Dehn  
Councillor Shawn Watters

**Also Present:** Councillor Matthew Bulmer

**Staff:** Jennifer Adams, County Clerk  
Aldo Salis, Director, Planning and Development Department  
Matthieu Daoust, Senior Planner (Development)  
Meagan Ferris, Manager of Planning and Environment  
Curtis Marshall, Manager of Development Planning  
Jameson Pickard, Senior Planner (Policy)  
Zachary Prince, Senior Planner (Development)  
Troy Van Buskirk, Planning Technician  
Sarah Wilhelm, Manager of Policy Planning

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### OPA 120 – County Growth Forecast

**Members of the Public:** There were 18 members of the public who attended the meeting. Staff have recorded their names in the project file as part of the public record.

#### OPENING OF MEETING

Chair Seeley welcomed everyone and called the meeting to order at 10:41 am.

## **PURPOSE OF MEETING**

Chair Seeley read the following statement:

The purpose of this meeting is to present information and receive public input regarding proposed amendment 120 to the County of Wellington Official Plan for the County Growth Forecast as part of the County's Municipal Comprehensive Review.

## **STATEMENT READ BY CHAIR**

Chair Seeley read the following statement:

This meeting is to provide information, comments and input for Planning Committee and Council. County Council has not taken a position on the matter; County Council's decision will come after full consideration of input from the meeting, submissions from the public and comments from agencies.

If you wish to be notified of the decision of the Corporation of the County of Wellington in respect of the adoption of the proposed Official Plan Amendment, you must make a written request to the Director, Planning and Development Department, County of Wellington, 74 Woolwich Street, Guelph, Ontario, N1H 3T9.

Official Plan Amendment 120 requires approval from the Minister of Municipal Affairs and Housing. Pursuant to Section 17(36.4) of the Planning Act there is no appeal in respect of a decision of the approval authority if the approval authority is the Minister.

## **PRESENTATION OF PROPOSED OFFICIAL PLAN AMENDMENT**

Chair Seeley invited Sarah Wilhelm, Manager of Policy Planning to make a presentation about the proposed amendment. Ms. Wilhelm's presentation covered the following areas:

- Policy Context and Provincial Planning Policy Structure
- County and Local Planning Policy Context
- Potential Impacts of Bill 23
- Municipal Comprehensive Review (MCR) and Work Plan
- Overview of Phase 1 Work
- County Growth Forecast Amendment
- Population, Housing, and Employment Highlights 2021 – 2051
- Consultation to Date
- Key Themes from Comments

Presentation slides are available at the following link: [OPA 120 Public Meeting Presentation Jan 12 2023](#)



## PUBLIC INPUT

**Janet Harrop** spoke on behalf of the Wellington Federation of Agriculture (WFA). The WFA wants to preserve as much agricultural land as possible by requesting:

- increased intensification in urban areas;
- support for the agricultural system as a whole;
- Canada Land Inventory class 1 through 6 lands to be considered Prime Agricultural; and
- that growth be concentrated within current urban boundaries.

WFA is concerned that land use changes over time have converted farmland to non-agricultural uses which, when taken as a whole, have negative impacts on the agricultural system in Wellington. Related information is detailed in a report by Dr. Wayne Caldwell of the University of Guelph. The WFA is currently preparing a study of the economic impact of agriculture in Wellington County.

**John Slood**, a Puslinch resident and home builder, requested that rural residential lots be permitted to be under 1 acre in size, due to improvements in septic system design. He also asked that staff revisit the growth allocated to Puslinch to allow more rural growth, as Puslinch is so desirable.

**Evan Wittmann**, planning consultant representing Landscout Investments and Cachet Developments, spoke regarding a proposed residential development in Clifford (Minto) to develop Future Development designated lands and also expand the urban boundary for additional development. Mr. Wittmann distributed and presented a document which outlined his concerns with the findings of the County's Land Needs Assessment and servicing availability in Minto. He requested that more growth be allocated to Clifford to support his client's proposal.

**Warden Lennox** advised that he would want to hear from the Town of Minto before taking action on this request.

**John Scott** of Elora asked what vision is informing these discussions and decision-making.

**Aldo Salis** advised that the Province broadly sets the planning vision, but that it is also based on input from residents and communities.

**Chair Seeley** indicated that this is part of strategic planning and that elected officials also juggle this with financial responsibilities.

**Councillor Lloyd** noted that some municipalities have urban design guidelines. The role at the County is to decide where growth occurs and member municipalities decide how growth occurs through their planning guidelines.



**Councillor Watters** advised that the Province takes the lead by dictating the growth numbers and the County distributes the growth to member municipalities. Our communities will change and start looking different.

**Warden Lennox** noted that we are at the beginning stage today. There are many more pieces that go into this before things are built. Our communities are evolving and we need to have a vision of where we are going to take this in line with the needs of today. We need housing and we can't build what we have always been building. We need to be thoughtful about it.

#### **CLOSING**

There being no further comments or questions from the public, Chair Seeley thanked everyone for attending the OPA 120 – County Growth Forecast public meeting and declared the public meeting closed at 11:50 am.

# Appendix C

## Summary of Comments and Responses

Table C1	MUNICIPAL Comment and Response Table
Table C2	INDIGENOUS COMMUNITY Comment and Response Table
Table C3	AGENCY Comment and Response Table
Table C4	PUBLIC AND STAKEHOLDER Comment and Response Table (none received for Guelph/Eramosa)
Table C4.1	COUNTY-WIDE
Table C4.2	CENTRE WELLINGTON
Table C4.3	ERIN
Table C4.4	MAPLETON
Table C4.5	MINTO
Table C4.6	PUSLINCH
Table C4.7	WELLINGTON NORTH

## Appendix C

**Table C1**      **MUNICIPAL Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
PUSLINCH Council Recommendations: November 17, 2022 MUN	<p>Council comments of October 19, 2022 meeting through resolution No. 2022-350:</p> <p>Whereas the Township will have limited land opportunities available for rural residential growth with the pending designation of Prime Agricultural Areas, Natural Heritage System and Greenbelt Expansion (which will take up 93% of Puslinch lands)</p> <p>The Township of Puslinch requests that the County as part of its Official Plan Update include removal of the severance criteria date forward from March 1, 2005 or at the very least moving the date to March 1, 2015 to permit additional severances and that the Township requests that the County advise when this new date is likely to be known; and</p> <p>That Council direct staff to forward this resolution to Township of Guelph Eramosa and Township of Erin.</p>	<p>See Section 6.3 of report for response.</p>

**Table C2**      **INDIGENOUS COMMUNITY Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
<p>Métis Nation  October 18, 2022  OPA120-001I</p>	<p>Have conducted a high-level review and do not have any immediate concerns of impact on Métis rights or interests. Ask that staff email if there are any significant changes.</p> <p>Shared some of the core concerns of MNO Citizens</p> <ul style="list-style-type: none"> <li>• to promote and foster community development;</li> <li>• to provide care and support necessary to meet the fundamental needs of the citizens of the Métis Nation</li> <li>• to promote the improved health and wellness of the individual, the family and the whole Métis community</li> <li>• to ensure that Métis can exercise their Aboriginal and Treaty rights and freedoms and in so doing, act in a spirit of cooperation with other Aboriginal and non-Aboriginal people;</li> <li>• to re-establish land and resource bases to protect and preserve the land and waters within our homelands for future generations.</li> </ul> <p>Encourage the County to read the Statement of Prime Purpose in its entirety (<a href="#">Statement of Prime Purpose - Métis Nation of Ontario (metisnation.org)</a>), and consider the perspective of Métis citizens during future stages of the project.</p>	<p>There were no changes to OPA 120 since the original circulation of the draft version.</p> <p>Planning staff have reviewed the core concerns and Statement of Prime Purpose and will consider this perspective during future phases of the MCR.</p>

**Table C2**      **INDIGENOUS COMMUNITY Comment and Response Table (continued)**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Chippewas of the Thames October 12, 2022 OPA120-002I	No concerns	No changes to OPA 120 requested.
Chippewas of Rama First Nation November 21, 2022 December 13, 2022 OPA120-003I	No comment	No changes to OPA 120 requested.
Chippewas of the Kettle and Stony Point First Nation (CKSPFN) January 11, 2023 OPA120-004I	<p>Caution against expanding into rural areas of the County to avoid converting farmland and environmentally protected land into a housing development.</p> <p>Forecasts should include wording that specifies where the growth is planned to be allocated in the County. In addition, wording can encourage municipalities to reduce and/or eliminate single-family zoning to boost housing capacity in built-up neighbourhoods.</p> <p>Strongly caution against expanding the urban settlement boundary. Maintaining agricultural farmlands and natural heritage features is integral to enhancing the health and safety of communities within the County.</p>	<p>No changes to OPA 120 recommended.</p> <p>The County Official Plan contains policies which encourage residential intensification. We note that these and other housing-related policies will be reviewed as part of the MCR to ensure that the County will provide an appropriate supply and variety of housing.</p> <p>Phase 3A of the MCR will consider urban settlement boundary expansions. Centre Wellington includes the County's two largest urban centres and is forecast a significant share of the County's growth. Therefore, any increase in its intensification and/or greenfield density target has more of an impact on decreasing agricultural land consumption.</p> <p>The Township is considering retaining Watson to further review the urban centre land needs results for Centre Wellington. This review will build upon the County's Phase 2 MCR Report and identify potential opportunities to optimize the use of land within current urban boundaries.</p>

**Table C2**      **INDIGENOUS COMMUNITY Comment and Response Table (continued)**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Chippewas of the Kettle and Stony Point First Nation (CKSPFN) (continued)	<p>CKPSFN affirms that all waterways within its traditional territory were never surrendered. With respect to the Duty to Consult, the County of Wellington should practice disclosing future uses of water and/or waterways to CKSPFN and aim to seek expressed permission for their use. Additionally, Wellington County should plan to monitor, maintain, and enhance water quality while advancing its future growth plans.</p> <p>Recommend that the County of Wellington focus on:</p> <ol style="list-style-type: none"> <li>1. Densifying existing urban settlement areas to accommodate for future growth;</li> <li>2. Provide CKSPFN with timely updates on the status of OPA 120; and,</li> <li>3. In a timely manner, consult with CKSPFN regarding future growth development plans in the County of Wellington.</li> </ol>	See above

**Table C3      AGENCY Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Maitland Conservation October 7, 2022 OPA120-001C	No comments or concerns.	No changes to OPA 120 requested.
Grand River Conservation Authority October 11, 2022 OPA120-002C	No comments or concerns	No changes to OPA 120 requested.
Conservation Halton October 18, 2022 OPA120-003C	No comments or concerns	No changes to OPA 120 requested.
Saugeen Conservation November 17, 2022 OPA120-004C	No comments	No changes to OPA 120 requested.
Bell October 12, 2022 OPA120-001A	No comments or concerns. Request for notice of decision.	No changes to OPA 120 requested.
Grey County January 12, 2023 OPA120-002A	No comments. Request for notice of decision.	No changes to OPA 120 requested.

**Table C4.1**     **COUNTY-WIDE PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Structure**

**Wellington Federation of Agriculture (WFA)**

November 17, 2022

OPA120-003P

Key Comments	Staff Response
1. Asks County to support and enhance the long-term viability and productivity of agriculture by protecting Prime Agricultural Areas and the agri-food network.	Our office will continue to work with WFA and other agricultural stakeholders as part of the Agricultural Policy and Mapping Review and the ongoing MCR.
<p>2. Wayne Caldwell's (Professor in Rural Planning &amp; Development at the University of Guelph) regional profile on Wellington, identifies that between 2000-2014 some 32,000 acres of prime agricultural land was redesignated as Secondary Agricultural Land. Secondary Agricultural designation is a popular designation, particularly in the Southern part of Wellington County, with a primary goal of creating additional residential building lots for economic gain and minimal agricultural activity. The resulting fragmentation of the Agricultural System results in:</p> <ul style="list-style-type: none"> <li>a. Residential lots in the rural landscape present a recipe for conflict, as times of the year residents will be negatively impacted by the normal farming practices that we, as farmers, have every right to perform. At busy times of the year the activities occur at all hours of the day/night. The local municipalities should prepare for an increase in complaints from residents and manage the conflict resolution.</li> <li>b. Driving Agricultural related businesses and investment out of the County as primary agriculture activity decreases.</li> <li>c. Loss of marginal agricultural land that is ideal for equine facilities and other livestock pasturing.</li> <li>d. Reducing Prime Agricultural lands (CLI 1-6) ability to maximize significant Climate Change and Environmental benefits.</li> </ul>	<p>The majority of the lands re-designated from Prime Agricultural to Secondary Agricultural referenced were located in Erin. This occurred in 2004 when the Town introduced a new Official Plan.</p> <p>As part of the Agricultural Mapping Review we anticipate some of the Secondary Agricultural lands in Erin, Minto and Puslinch will be re-designated Prime Agricultural.</p>



**Table C4.1**     **COUNTY-WIDE PUBLIC Comment and Response Table (continued)**  
**County Official Plan Amendment 120 – County Growth Structure**

Key Comments	Staff Response
WFA ask that during the land needs assessment process that no additional Secondary Agricultural residential lots be permitted. This would be accomplished by <i>removing the Secondary Agricultural designation from the Official Plan</i> and the lands be re-designated to Prime Agriculture (CLI 1-6).	
3. Integrate climate change considerations into planning and managing growth that values agricultural land and farm practices for their role in carbon sequestration, improved soil health, improved air quality, and water recharge. Farmland is a pivotal asset to mitigate climate change.	Climate change considerations will be reviewed as part of the MCR.
4. The recommended intensification target of 15% by the County will result in a large increase to urban boundary expansions. We see neighbouring rural townships - such as Woolwich – that are targeting a 25% intensification rate. The WFA feel that Wellington should also increase their intensification target within the urban boundary to the Provincial recommendation of 20% intensification and strive to reach a 25% minimum target.	<p>The recommended intensification target of 15% is a minimum measured across all of the urban centres in Wellington County. Centre Wellington and Wellington North are expected to achieve a 20% intensification rate, while others will be less due to constraints noted in the Phase 2 MCR Report intensification analysis.</p> <p>As Centre Wellington is forecast a significant share of the County's growth, any increase in its intensification rate has more of an impact increasing the County-wide intensification rate. The Township is considering retaining Watson &amp; Associates to further review the urban centre land needs results for Centre Wellington, including the residential intensification assumptions in the County's Phase 2 MCR Report.</p>

**Table C4.1**     **COUNTY-WIDE PUBLIC Comment and Response Table (continued)**  
**County Official Plan Amendment 120 – County Growth Structure**

Key Comments	Staff Response
<p>5. Review the future development properties that currently appear to be farmed and apply the province’s recommendations of 80 residents and jobs per hectare when accepting development plans.</p>	<p>Staff note that the current minimum Provincial Greenfield density requirement for Wellington County is 40 residents and jobs per hectare. The County is not requesting a reduction in that target.</p> <p>We note that Centre Wellington is forecast to achieve a minimum greenfield area density target of 47 people and jobs per hectare. The Phase 2 Report indicates that the South Fergus Secondary Plan may cause an increase in the Greenfield density, which may reduce the land need requirements for Centre Wellington. The Township’s potential review of the urban area land needs for Centre Wellington also includes the Greenfield density assumptions in the County’s Phase 2 MCR Report.</p>
<p>6. Urban boundary expansions need to include planning for vehicular, agricultural and truck traffic to move efficiently and safely through and around the urban centres. Farming equipment is required to move about the County as part of our normal farming practices.</p>	<p>The Growth Plan requires that urban boundary expansions avoid, or if not possible, minimize and mitigate impacts on the agri-food network, including agricultural operations.</p>

**Table C4.2 CENTRE WELLINGTON PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Structure**

Name/Date/ID	Key Comments	Staff Response
Stovel and Associates Inc. November 18, 2022 OPA120-008P	Comments on behalf of BelCal Inc. regarding lands in Belwood (Part Lot 12, Concession 7, Centre Wellington). Ask staff to revisit the projected growth for the rural areas outside of Fergus and Elora-Salem as 240 units is too low. Alternatively, ask for a policy provision to provide more flexibility and interpretation of the projections in the growth tables.	It is important to recognize that the Provincial growth forecast is a minimum. No changes to OPA 120 recommended.
GSP Group January 11, 2023 OPA120-014P	Comments on behalf of Brubacher Acres Limited Partnership, 6586 Beatty Line North, Fergus seeking inclusion of property within an expanded Fergus settlement area boundary.	Settlement area expansions are not part of OPA 120. This request will be considered as part of Urban Phase 3A of the municipal comprehensive review.
GSP Group January 11, 2023 OPA120-015P	Comments on behalf of RBS & EJS Fergus Limited Partnership, 6490 First Line seeking inclusion of property within an expanded Fergus settlement area boundary.	Settlement area expansions are not part of OPA 120. This request will be considered as part of Urban Phase 3A of the municipal comprehensive review.

**Table C4.3**     **ERIN PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Structure**

Name/Date/ID	Key Comments	Staff Response
Member of Public October 19, 2022 OPA120-001P	Request to redesignate property at 9538 Sideroad 17 from Prime Agricultural to Secondary Agricultural	Changes to land use designations are not part of OPA 120. This request will be considered as part of the Agricultural System Mapping and Policy review.
Member of Public January 9, 2023 OPA120-010P	Lot 28, Concession 7. Request that County consider allowing multiple severances per lot and removal of March 2005 restriction for severances in the Secondary Agricultural Area.	Changes to lot creation policies are not part of OPA 120. This property is identified as a candidate area as part of the Provincial Agricultural System and is being considered as part of the County's Agricultural System Mapping review to remain as Secondary Agricultural or change to Prime Agricultural. Policy staff have reached out to the land owners to recommend that they participate in the review.
Member of the Public January 12, 2023 OPA120-018P	Request to expand Hamlet of Ospringe to include property at 5475 Second Line.	Changes to land use designations are not part of OPA 120. This request will be considered as part of Rural Phase 3B of the municipal comprehensive review.

**Table C4.4**     **MAPLETON PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Structure**

Name/Date/ID	Key Comments	Staff Response
MHBC Planning November 17, 2022 OPA120-002P	Supportive of the projected growth County-wide and for the Township of Mapleton.	No changes to OPA 120 requested.

**Table C4.5**     **MINTO Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
GSP Group December 14, 2022 OPA120-009P	<p>Comments on behalf of Clifford (Park St) Developments Inc. (Landscout Investments and Cachet Developments) raise a discrepancy between the population growth allocation to Clifford proposed in OPA 120 and the findings and recommendations of the County's Land Needs Assessment (LNA).</p> <p>Views population growth allocation to Clifford in OPA 120 to reflect an inflexible and restrictive approach to accommodate future growth in Clifford and is premature considering that the forecasts in OPA 120 will be used as a basis for evaluating Future Development land re-designations and urban boundary expansion proposals through the Phase 3 technical work of the MCR which has not been completed.</p> <p>Clifford is the only urban area within Minto that is forecasted to have excess reserve servicing capacity by 2051.</p> <p>More of Minto's growth should be allocated to Clifford.</p>	<p><b>Growth Forecast and Distribution of Growth within Minto</b></p> <p>A change to the Town of Minto's growth forecast, including the redistribution of growth to the Urban Centres within Minto, is not recommended. The growth forecast and allocation within the Town of Minto was prepared during Phase 1 of the County of Wellington Municipal Comprehensive Review (MCR) through consultation with the Town. It should be noted that initially the growth forecast for the Town of Minto included a greater allocation to the Urban Centre of Clifford. The allocation was revised based on the Town's request for a greater allocation of population and housing to the Urban Centre of Palmerston, with a corresponding reduction in the allocation to the Urban Centre of Clifford. It is important to recognize that the growth forecast is a minimum and the County will continue to monitor growth and consider changes to the forecast and allocation by the next Official Plan review.</p> <p><b>Town of Minto Urban Land Needs</b></p> <p>Overall, the Town of Minto has a land requirement of 18 ha for Community Area lands. Appendix D (Figure D-3) in the County of Wellington Phase 2 MCR Report provides further details on the land needs. It is recognized that, in Figure D-3, the Clifford and Harriston Urban Centres show a surplus of 10 ha and 5 ha, respectively. Nonetheless, as noted in the Phase 2 MCR Report, the County is only identifying excess lands in the Urban Centres of Arthur and Mount Forest in Wellington North, due to the magnitude of the Township of Wellington's surplus (Community Area excess of 89 ha) (p. 6-4, Figure 6-1).</p> <p><b>Future Development Lands</b></p> <p>As noted in the Phase 2 MCR Report, Future Development lands are to be re-designated in the area municipality, prior to adding additional urban lands to the area municipality (p. 2-9). As such, Future Development lands in Clifford and Harriston are to be re-designated prior to adding the additional 18 ha of Community Area lands within the Town of Minto. As noted in the Phase 2 MCR Report, the County will identify the appropriate designation of Future Development lands and develop the criteria for the location of urban expansion lands. This will be done in consultation with Member Municipalities.</p>

**Table C4.6**     **PUSLINCH PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Stovel and Associates Inc. November 18, 2022 OPA120-006P	Comments on behalf of DRS Developments Ltd (Rear Part Lot 31, Concession 7, Puslinch). Additional housing and growth needs to be attributed to Puslinch, particularly Morriston. With recent Provincial expansions into the Greenbelt, Morriston should also be permitted to expand. Recommend that the County reconsider the growth allocations for the Township of Puslinch and Morriston.	No changes to OPA 120 recommended.  The County awaits a Provincial decision on OPA 119, which includes the subject lands and others adjacent to Morriston within a Regionally Significant Economic Development Study Area (RSEDA) which included the subject lands and others adjacent to Morriston. The RSEDA in the Morriston area is meant to address growth in these areas.
Stovel and Associates Inc. November 18, 2022 OPA120-007P	Comments on behalf of Timberworx Custom Homes. Growth assigned to Puslinch through consents is not an effective method for long-term planning. There needs to be a supply of existing approved lots that are registered in a draft plan of subdivision or condominium. More growth needs to be attributed to the Township of Puslinch.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.
Sloot Construction Ltd. January 10, 2023 OPA120-012P	Sloot Construction Ltd. does not think OPA 120 provides sufficient housing growth options in Puslinch. Is supportive of Township of Puslinch Council resolution 2022-350 (see table C1) and consideration of appropriate development in rural settlements, including the Hamlet of Arkell, Aberfoyle and Morriston. Emphasis should be placed on existing development proposals and plans of subdivision/condominium.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.

**Table C4.6 PUSLINCH PUBLIC Comment and Response Table (continued)**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Timberworx Custom Homes January 10, 2023 OPA120-013P	Timberworx Custom Homes does not think OPA 120 provides sufficient housing growth options in Puslinch. Is supportive of Township of Puslinch Council resolution 2022-350 (see table C1) and consideration of appropriate development in rural settlements, including the Hamlet of Arkell, Aberfoyle and Morriston. Emphasis should be placed on existing development proposals and plans of subdivision/condominium.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.
DRS Inc. January 10, 2023 OPA120-016P	DRS Inc. does not think OPA 120 provides sufficient housing growth options in Puslinch. Is supportive of Township of Puslinch Council resolution 2022-350 (see table C1) and consideration of appropriate development in rural settlements, including the Hamlet of Arkell, Aberfoyle and Morriston.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.
George R. Good Construction January 10, 2023 OPA120-017P	GRG Construction does not think OPA 120 provides sufficient housing growth options in Puslinch and will unduly limit growth opportunities in the Township. Is supportive of Township of Puslinch Council resolution 2022-350 (see table C1) and 2022-344 for the Audrey Meadows application.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.
Thomson Rogers January 20, 2023 OPA120-019P	Comments on behalf of Audrey Meadows Ltd., owners of Part of Lots 17, 18 and 19, Concession 8 pertain to a proposed site-specific Official Plan Amendment. Considers residential supply data used for the land needs assessment out of date and requests that their proposal be included in the land supply.	No changes to OPA 120 recommended. Comments will be considered as part of Rural Phase 3B of the municipal comprehensive review.

**Table C4.7**     **WELLINGTON NORTH PUBLIC Comment and Response Table**  
**County Official Plan Amendment 120 – County Growth Forecast**

Name/Date/ID	Key Comments	Staff Response
Biglieri Group January 10, 2023 OPA120-011P	Comments on behalf of TBG owners of 665 Eliza Street in Arthur. Support OPA 120 in principle. Supportive of policies that continue to put excess lands into “future development” category but are not removed from the urban boundary.	No changes to OPA 120 requested.