

COUNTY OF WELLINGTON

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BY EMAIL

Sandra Bickford
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay St, Suite 2304
Toronto, ON
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July 29, 2020

Dear Ms. Bickford:

**Re: Addendum to Report PD2020-20
Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe**

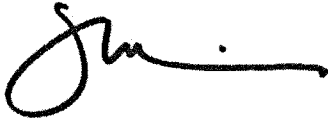
Please accept this letter as an addendum to the comments contained in County of Wellington report PD2020-20 (attached) for ERO posting 019-1680 (Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe). The comments contained in this letter were prepared after County Planning Committee considered our original comment report and therefore, represent a staff position.

Planning staff would like to comment on proposed changes to delete policy 4.2.8.2 a) ii. which currently prohibits the establishment of new mineral aggregate operations, wayside pits and quarries (and accessory and ancillary uses) within habitat of endangered species and threatened species outside of the Greenbelt area. Mineral aggregate resources are identified in Schedule "C" of the Wellington County Official Plan. We note that the majority of the resources in the County (approximately 85%) are located in the rural areas outside of the Greenbelt.

The supporting documents for the proposed amendment make general note of the proposed change to the Plan's aggregates policies, but provide no context. The absence of additional information, including a rationale for the change from the Ministry of Natural Resources and Forestry (MNRF), is a significant concern. We would recommend deferral of the policy change to allow us an opportunity to obtain/review information from the MNRF and submit further input, as necessary. In the absence of such information, we are not supportive of the proposed policy removal.

I trust that these comments are of assistance. Thank you for the opportunity to provide input into the proposed amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Wilhelm', with a long horizontal flourish extending to the right.

Sarah Wilhelm, MCIP, RPP
Manager of Policy Planning

Attachment: Proposed Amendment 1 to the Provincial Growth Plan (staff report PD2020-20)

- c. Aldo Salis, Director, Planning and Development Department
Donna Bryce, County Clerk



COUNTY OF WELLINGTON

COMMITTEE REPORT

To: Chair and Members of the Planning Committee
From: Sarah Wilhelm, Manager of Policy Planning
Date: Thursday, July 23, 2020
Subject: **Proposed Amendment 1 to the Provincial Growth Plan**

1.0 Background

The Province recently circulated a draft amendment to A Place to Grow: the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) and would like comments by July 31, 2020. The amendment would replace current population and employment forecasts contained in the 2019 Growth Plan, extend the planning horizon to 2051 and make other policy changes. The Province has also posted a proposed new methodology for land needs assessment with the same comment deadline. Once finalized, the County will be required to use the new land needs assessment methodology to assess the quantity of land required to accommodate forecast growth to 2051 through the municipal comprehensive review.

2.0 Key Changes to the Growth Plan

Amendment 1 to the Growth Plan proposes the following key changes:

- | | | |
|---|---|--|
| Growth Forecasts | → | Update the population and employment forecasts for the Greater Golden Horseshoe area and extend the planning horizon to 2051 |
| Mineral Aggregate Resource Extraction | → | Allow new mineral aggregate operations, wayside pits and quarries in habitats of endangered species and threatened species within the Natural Heritage System for the Growth Plan (outside of Greenbelt Plan area) |
| Provincially Significant Employment Zones | → | Permit municipalities to undertake employment area conversions outside the municipal comprehensive review for lands identified as provincially significant employment zones and within major transit station areas (there are no such zones/areas in Wellington) |
| Alignment with Provincial Policy Statement | → | Make technical changes to align with the 2020 Provincial Policy Statement |

No changes have been proposed to the 20% minimum intensification target in the delineated built-up areas or the minimum density in designated greenfield areas of 40 residents and jobs per hectare which apply to Wellington County.

The Province has asked for feedback on the following specific areas:

- updated growth forecasts and extension of Plan horizon from 2041 to 2051
- approach to implementation and timeframe for municipalities to bring official plans into conformity with the Growth Plan
- land needs assessment methodology

The growth forecasts and methodology are important because they directly affect the amount of land the County and member municipalities can designate for residential and employment purposes.

3.0 Updated Population and Employment Growth Forecasts to 2051

The current Growth Plan forecasts for the Greater Golden Horseshoe (GGH) run from 2031 to 2041 and would be replaced with forecasts starting in 2031 and ending in 2051. The Province intends to keep the 2041 population and employment from the current forecasts as a starting point for the new forecasts. This will ensure continuity of the work that municipalities – including Wellington County – have undertaken to bring their official plans into conformity with these forecasts. The County Official Plan was amended in 2017 to bring it into conformity with the 2041 population and employment forecasts.

The Province has released three growth outlooks for the GGH for consultation:

- **reference forecasts** which are considered the most likely future growth outlook
- **high and low scenarios** which provide a range of growth prospects under a set of deliberately aggressive and conservative assumptions about the future economic and immigration outlook¹

Only one of the three growth outlooks will be included in the final amendment. Municipalities will be required to use the selected growth outlook as the updated forecast. The Province is proposing a population of 160,000 for Wellington in 2051 as the reference forecast, with high and low scenarios of 168,000 and 156,000 (see Figure 1). The Province is proposing an increase in employment to 70,000 for Wellington in 2051 as the reference forecast, with high and low scenarios of 79,000 and 67,000 (see Figure 2).

In addition to extending the planning horizon to 2051, the Province has made two fundamental changes in how municipalities are required to implement the forecasts:

- **lower** forecasts are not permitted
- **higher** forecasts are permitted

The proposed amendment includes changes to specify that the forecasts in the Growth Plan are a minimum, rather than a maximum. In addition, municipalities have the flexibility to use higher forecasts as established through the municipal comprehensive review (MCR). Therefore, in selecting the reference forecast, the County would still have an opportunity to evaluate if there is a need for additional growth through the MCR.

¹ Greater Golden Horseshoe: Growth Forecasts to 2051, Technical Report, June 16, 2020, Hemson Consulting Ltd.

Figure 1 Provincial Population Forecast Scenarios to 2051 for Wellington County

Population

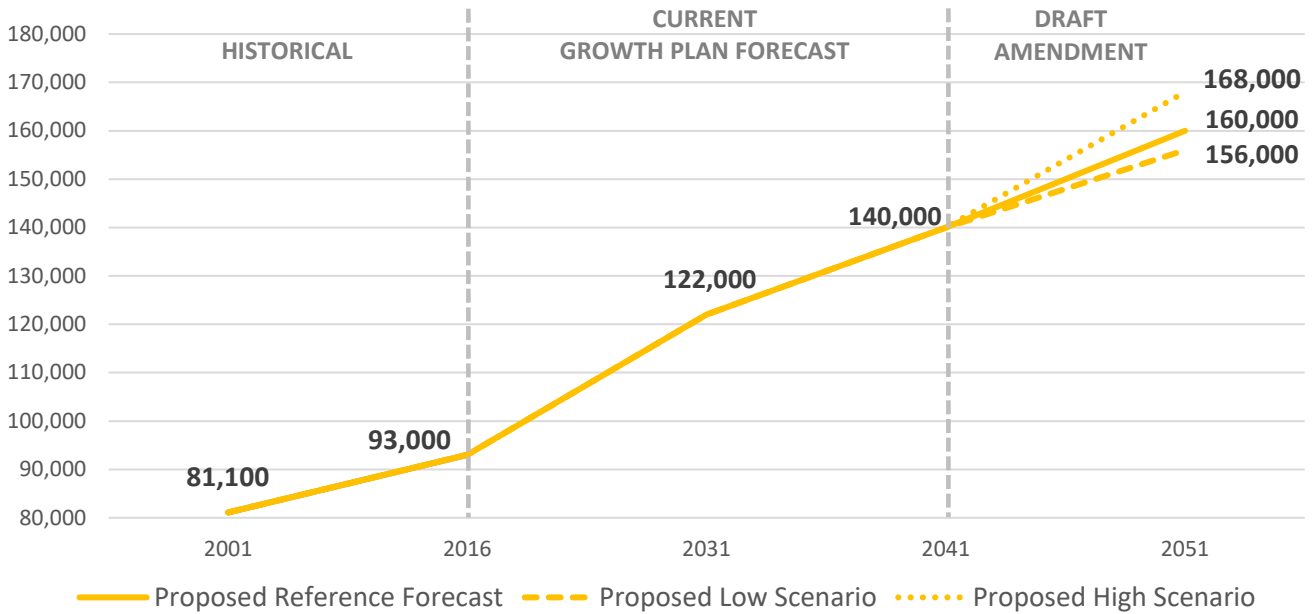
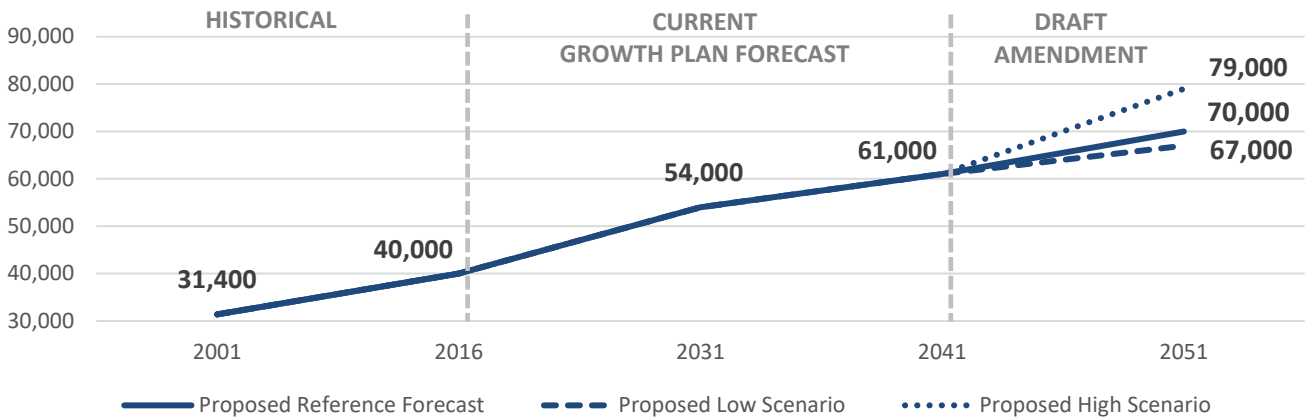


Figure 2 Provincial Employment Forecast Scenarios to 2051 for Wellington County

Employment



Figures 1 & 2 Note: Population includes the net Census undercount and is approximately 3% for the forecast period.
 Source: Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe
 A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019
 Greater Golden Horseshoe: Growth Forecasts to 2051 Technical Report, Hemson Consulting Ltd,
 June 16, 2020

3.1 Comments

County Planning staff supports:

- retention of the 2041 forecasts as a starting point for the new forecasts;
- extension of the planning horizon to 2051;
- flexibility to use higher forecasts if determined through the municipal comprehensive review; and
- selection of the reference forecast for population and employment growth for Wellington County.

4.0 Implementation and Conformity

As set out in the proposal, there are limited transitional rules for implementation of proposed Amendment 1. This means that once approved, Amendment 1 would apply to most municipal decision-making, including the current municipal comprehensive review. For official plan conformity, the proposed approach is to retain the current date for conformity of July 1, 2022, which corresponds with the municipal election cycle.

The July 1, 2022 official plan conformity date originates from the 2017 Growth Plan. This timeframe recognized that an MCR is a multifaceted and complex project. The date has not changed since then despite a Provincial pause and introduction of a new Growth Plan (2019), new Provincial Policy Statement (2020) and a host of new legislation. In addition, County planning staff has had to scope the MCR work plan with Watson & Associates while waiting for the new forecasts and land needs assessment methodology discussed in this report.

As a result, planning staff needs additional time to complete one area of the County MCR: Natural Heritage System (NHS) mapping and policy development. The Grand River Conservation Authority (GRCA) prepared a Natural Heritage System for Wellington County in 2018. While it was our intention to use the County NHS as a basis for refinements to the Provincial NHS and for future policy development in the Official Plan there were differences between how the two maps were created. We will need time to reassess our methodology with the Ministry of Natural Resources and Forestry, and consult with the six Conservation Authorities in Wellington, our member municipalities, agencies and the public. This can be accomplished through a separate official plan amendment with an extended timeframe beyond 2022.

4.1 Comments

County Planning staff supports implementing Amendment 1 through the current MCR.

Staff requests that the Province allow the Natural Heritage System component of the Wellington County MCR to be completed with an extended timeframe beyond the July 1, 2022 official plan conformity deadline.

5.0 Land Needs Assessment Methodology

The Growth Plan requires upper- and single-tier municipalities to use the land needs assessment (LNA) methodology issued by the Minister to assess the quantity of land required to accommodate forecasted growth to the horizon of the Plan. Municipalities must also use the methodology to determine whether there is a need for a settlement area boundary expansion.

The Province has developed the proposed LNA methodology to replace the 2018 LNA methodology, which is out of date with the 2019 Growth Plan. The proposed methodology retains the key steps outlined in the 2018 document but removes the detailed technical steps. There are various components that need to be considered when assessing local land needs for (1) community area land (land used for housing, population-related jobs and office jobs) and (2) employment area land (for all various types of employment):

Community Area Land Needs Assessment	Employment Area Land Needs Assessment
<ul style="list-style-type: none">• population forecasts• housing needs analysis• housing allocation and supply inventory• community area jobs analysis and reconciliation	<ul style="list-style-type: none">• employment forecasts• employment categorization and needs analysis• employment allocation and reconciliation

The proposed new LNA methodology will allow for greater flexibility regarding the way in which upper-tier and single-tier municipalities conduct long-term urban land needs assessment through their respective MCR processes.

5.1 Comments

County Planning staff supports the simplified and flexible approach offered by the new land needs assessment methodology.

6.0 Impact of COVID-19 Pandemic

The COVID-19 pandemic is an unprecedented event with unknown long-term economic impacts. The forecasts in the Technical Report² (which forms the basis for Amendment 1) were adjusted to account for a reduction in expected Greater Golden Horseshoe population growth in 2021 and a decline in total employment in the second quarter of 2020. The Report assumes that overall growth will return to pre-pandemic expectations within 3 years but emphasizes that the impacts of COVID-19 should be closely monitored. The Province is required to review the Growth Plan forecasts every five years. In addition, the County's consulting land economists (Watson & Associates) will review factors and trends impacting Wellington as part of the MCR process.

² Greater Golden Horseshoe: Growth Forecasts to 2051, Technical Report, June 16, 2020, Hemson Consulting Ltd.

Recommendations

That the report “Proposed Amendment 1 to the Provincial Growth Plan” be received for information and forwarded to the Ministry of Municipal Affairs and Housing in response to their request for input into the Draft Amendment and Methodology.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sarah Wilhelm', with a long horizontal flourish extending to the right.

Sarah Wilhelm, MCIP, RPP
Manager of Policy Planning