

DATE: March 28, 2024

FROM: Landwise on Behalf of Tribute Communities

RE: Submission to ERO 019-8273 to Bill 162: Get It Done Act - Amending the Official Plan Adjustments Act, 2023

Introduction

Landwise has been retained by Tribute Communities as of October 4, 2023, to provide professional planning assistance for lands municipally known as 6704 Beatty Line N, 6684-6688 Beatty Line N, and 7692 Sideroad 15 in the Township of Centre Wellington (Fergus), County of Wellington (“subject lands”) as shown in Figure 1.

This submission in response to Bill 162 is made on behalf of Tribute (Fergus Oaks) Limited (“Tribute Communities”) regarding the Settlement Area Boundary Expansion (“SABE”) review occurring within the County of Wellington. This submission is to highlight concerns arising from the Land Needs Assessment (“LNA”) conducted by the County of Wellington to inform their SABE process and to seek means to revisit the process with population projections that reflect recent changes to federal immigration targets and migration trends within the province.

Although the subject lands were brought into the urban boundary through OPA 119 by Minister Decision on April 11, 2023, and subsequently removed through Bill 150, Landwise acknowledges that Bill 162 does not bring these lands back into the urban boundary. However, our position is that the subject lands should be considered as part of the longer-term growth management process for the County.

Formal Request

Landwise respectfully requests that the Minister of Municipal Affairs and Housing recommends the County of Wellington revisit their LNA in the next phase of their Municipal Comprehensive Review, and that the County work with Ministry staff to ensure that their growth projections accurately reflect the evolving population trends arising from federal immigration targets and migration trends within the province. In addition, the Ministry should ensure that the LNA is prepared in conformity with the growth targets assigned to the County by the Province through the Growth Plan for the Greater Golden Horseshoe.

County of Wellington Municipal Comprehensive Review Background

The County of Wellington began their most recent Municipal Comprehensive Review (“MCR”) in September 2019.

Phase 2 of the County’s MCR was based on an LNA completed in August 2022. The LNA identified the need for a SABE of 238 hectares (588 acres) within Centre Wellington, including 177 hectares (437 acres) within Fergus. Consistent with the Provincial Policy Statement, 2020 (“PPS”) and the Growth Plan for the Greater Golden Horseshoe, 2020 (“Growth Plan”), the Ministry of Municipal Affairs and Housing (“MMAH”) approved Official Plan Amendment No. 119

“OPA No. 119”) on April 11, 2023. OPA No. 119 had 33 modifications including three (3) SABEs within Fergus totaling approximately 326 hectares (805 acres).

The LNA was based on the growth forecasts contained in Schedule 3 of the Growth Plan, which were prepared in the summer of 2020. However, subsequent changes to Federal immigration targets prompted the Ontario Ministry of Finance (“OMF”) to update the population forecasts in the summer of 2023. The County of Wellington (which includes the City of Guelph) is now projected to have a population of 395,380 by 2046, which is 51,400 persons more than what the Growth Plan forecasts over this same period. The MMAH’s SABEs formerly approved on April 11, 2023, and implemented by OPA No. 119 aligned with these revised immigration targets, indicating an increased growth trajectory for the County of Wellington.

The subsequent Provincial decision to walk back these changes will, as a result, require the County of Wellington to continue its planning for growth at the local level based on an LNA that, in the opinion of Parcel Economics Inc. (“Parcel Economics”), is deficient in accurately accommodating the growing needs of the County.

Where to Grow

Landwise recognizes the pivotal role that the agricultural sector has within a community such as Centre Wellington and concurs with the intent to identify lands that would minimize impacts on agricultural uses and operations. However, Landwise considers that in order to successfully inform the process and ensure that the preservation of agricultural resources is balanced with the land needs of the County, population growth must be accurately addressed. Failure to do so runs the risk of a premature reconsideration of land needs and potentially creates greater pressure on agricultural resources in the future.

An accurate demographic assessment must therefore inform the process and determine the amount and location of lands to be brought into the Settlement Area Boundary. Landwise notes that the population projections contained in Schedule 3 of the Growth Plan, which were utilized in the original LNA prepared by Watson and Associates in August 2022, do not account for recent changes to Federal immigration targets. The changes to Federal immigration targets have resulted in unprecedented population growth in recent years, including in the County of Wellington. **As a result, the LNA underestimates the amount of land that is required to accommodate population growth in the County of Wellington.**

Subject Lands

The subject lands are located in northeast Fergus, specifically on the northwest corner of the intersection of Beatty Line North and Sideroad 15. The subject lands are irregularly shaped with an approximate area of ±190.43 hectares (±470.56 acres), and approximate frontages of ±1,134 metres (±3,720 feet) on Beatty Line North and ±970 metres (±3,182 feet) on Sideroad 15. The subject lands have limited natural heritage features, including Irvine Creek along the northeast perimeter of the subject lands (refer to **Figure 1: Site Map - Lands Owned by Tribute Communities**).

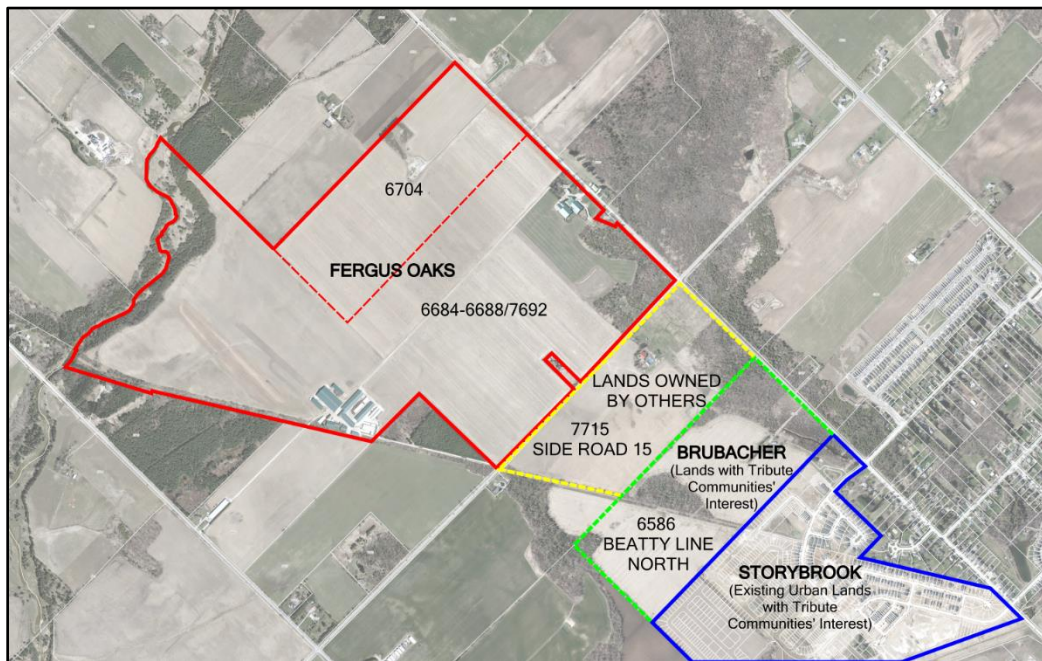
Figure 1: Site Map - Lands Owned by Tribute Communities



Recommended Expansion Lands

The lands recommended to be considered for a SABE are comprised of several properties including the subject lands as well as lands referred to as 6586 Beatty Line North and 7715 Side Road 15 and part of 6611 Gerrie Road. The recommended expansion lands have a collective area of ± 275 hectares (refer to **Figure 2: Lands Requested for Settlement Area Boundary Expansion**). The lands under consideration about the Storybrook subdivision which is currently under construction. Expanding the boundary north would provide a logical extension of servicing and connectivity amongst the newer communities.

Figure 2: Lands Requested for Settlement Area Boundary Expansion



In support of the subject lands, Tribute Communities retained Parcel Economics to commission an updated LNA. Parcel Economics prepared an updated LNA report dated December 15, 2023 (See Appendix “A” for report summary) which was based on population projections prepared by the OMF in Summer 2023. **Based on these population projections by the OMF, Parcel Economics conclude that Centre Wellington requires 377 hectares of Community Area land to accommodate population growth to 2051, which exceeds the 238-hectare expansion identified in the Phase 2 Municipal Comprehensive Review Report dated August 29, 2022.**

In support of determining where best to grow, Tribute Communities has also initiated preliminary investigation into the servicing and planning considerations of the proposed expansion lands. With regard to stormwater quantity and quality, it has been determined that stormwater can be managed on-site through the establishment of stormwater ponds that are aligned with sub watershed planning to ensure that there are no adverse impacts on natural heritage systems and in compliance with the GRCA. A Servicing Feasibility Report, prepared by C.F. Crozier & Associates Inc. demonstrates that there is ample supply to draw water from identified well areas while managing capacity. The expansion of the trunk sewer and future expansion of treatment facilities will address the need for wastewater services.

The Servicing Feasibility Report also demonstrates that the majority of Fergus is covered by Wellhead Protection. The proposed well at Area 7 is located within the proposed expansion lands and is designated as existing Wellhead Protection Level C. The Wellhead Protection impacts resulting from area 7 cannot be determined until construction is completed, but the impacts would not restrict residential use.

To this end, the subject lands provide a logical extension to the existing settlement boundary and offer a unique solution as they can be serviced, planned, and phased in a comprehensive manner as they include large contiguous parcels with limited landowners. Tribute Communities is a motivated community developer and builder who has proven their ability to build homes at a large scale. Tribute Communities can support the Province and County of Wellington to accommodate necessary growth while protecting significant natural heritage resources. The size of the subject lands allows for efficient and comprehensive land use planning and phasing that will accommodate sustainable growth and a range of densities without fragmenting agricultural lands or the need for significant amendment to the LNA.

Conclusion

In conclusion, the County of Wellington, including Centre Wellington, is experiencing a pattern of population growth that is aligned with recent growth trends, including federal immigration targets and increased migration to the County from elsewhere in Ontario. To be prepared for the targeted population increase, Centre Wellington requires 377 hectares of Community Area lands. This figure is in excess of the 238-hectare expansion identified in the Phase 2 Municipal Comprehensive Review Report dated August 29, 2022. The inclusion of the proposed ±275 hectares (refer to **Figure 2: Lands Requested for Settlement Area Boundary Expansion**) highlighted in this submission, represents both an opportunity to locate growth in a logical and appropriate location while also providing an amount of developable area necessary to accommodate future growth.

The County of Wellington has recognized that growth is necessary and has initiated the assessment for infrastructure expansions and upgrades that will be required to accommodate said growth. To achieve the above, Landwise on behalf of Tribute Communities respectfully requests that the Minister recommends that the County of Wellington revisit their Land Needs Assessment to ensure that it accurately reflects the evolving growth projections expected in the County to 2051 and beyond, and ensures that the County is planning for growth in accordance with Provincial policies and direction.

Should you have any questions or require additional information, please do not hesitate to contact Edward John at (905) 574-1993 ext. 202 or edward.john@landwise.ca.

Appendix "A" - Parcel Economics Report Summary

Respectfully Submitted,
Landwise



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