

May 9, 2024

Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON
M7A 2J3

Re: Bill 185 - ERO Number 019-8369

This letter constitutes formal comments for Bill 185, posted to the Environmental Registry of Ontario on April 10th, 2024.

Council and staff have considered the changes proposed by Bill 185. Some of the draft policies are welcome changes and would provide a more flexible policy environment. Others are extremely concerning and threaten the balanced land-use policy framework that Perth County and our Lower Tier Municipal partners have established to inform sustainable development in our communities.

The County of Perth has been diligently working towards a streamlined and supportive environment for responsible development of the needed residential and employment lands in our community. Careful consideration has been made to provide designated lands and policies in the new draft Perth County Official Plan to balance the need for housing, jobs and the preservation of the prime agricultural lands.

We respectfully provide the following comments for consideration:

1. Consultation Timeframe

Bill 185 was released on April 10th and the commenting period closes on May 10th, 2024. In light of the fact that the proposed changes are broad and far-reaching on various aspects relating to land use planning, staff and Council are of the opinion that the public consultation period does not provide an appropriate amount of time for staff and councils to consider the proposed changes and provide meaningful feedback. As such, staff recommend that the Province extend the timeline for public consultation.

2. Appeal Rights for Settlement Area Expansions

By allowing appeals on privately initiated proposals for settlement area expansions, there is concern that this will lead to increased speculation on agricultural land, inefficient use of land and uncoordinated and costly efforts to provide servicing and infrastructure. Municipalities could also face significant challenges in master servicing and infrastructure planning for settlement areas.

Council and Planning staff recommend that the right to appeal a municipal refusal of a privately initiated application for a settlement expansion be removed.

3. Removal of Mandatory Pre-Consultation Process

The pre-consultation process is a useful tool for both municipal staff and the applicants that guides and expedites the development approval process. It is an opportunity to have meaningful discussion around the merit of a development proposal and for staff to provide input on complete application submission requirements early on in the process. Applicants use these discussions to adjust their proposals and gain an understanding of the costs and timeline involved with their development proposal.

Perth County recommends that the pre-consultation process remain mandatory.

4. Exemptions for Post-Secondary Institutions & Community Services Facilities

Uses of this nature have the ability to have a broader impact on the community in which they are located with respect to matters relating to traffic, site designs, parking, sanitary and water servicing, stormwater management, emergency services and roads. As such, staff and Council have concerns with exempting these uses from the municipal planning approval process.

Perth County would support opportunities to improve coordination and streamlining of the municipal approval processes for such uses but has concerns with exempting these uses from the planning approval process.

The above-noted comments have been discussed by County Council and endorsed for submission to the Ministry for consideration regarding the important amendments proposed through Bill 185.

Sincerely,



Rhonda Ehgoetz, Warden



Lori Wolfe, Chief Administrative Officer