



PLANNING OPINION REPORT

Official Plan Amendments
Elora Sands Development Inc.
7581 Nichol Road 15 & 6574 Gerrie Road
Township of Centre Wellington

Prepared For:
Elora Sands Development Inc.

March 2025

MGP

Official Plan Amendments

Planning Opinion Report

**Elora Sands Development Inc.
7581 Nichol Road 15 & 6574 Gerrie Road
Township of Centre Wellington**

Prepared by:

Malone Given Parsons Ltd.
140 Renfrew Drive, Suite 201
Markham ON L3R 6B3



Matthew Cory
MCIP, RPP, PLE, PMP

Prepared for:

Elora Sands Developments Inc.
2555 Meadowpine Blvd., Unit 3,
Mississauga, ON, L5N 6C3

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Contents

1.0	Site Context	1
1.1	Introduction	1
1.2	Site Location and Characteristics.....	1
1.3	Surrounding Land Uses	2
2.0	Concept Plan.....	4
2.1	Concept Plan	4
2.2	Overview	4
3.0	Supporting Technical Studies	7
3.1	Environmental Impact Study	7
3.2	Hydrogeological Assessment.....	8
3.3	Traffic Impact Study	9
3.4	Financial Impact Assessment.....	10
3.5	Agricultural Impact Assessment	11
3.6	Geomorphological Report	12
4.0	Land Needs Assessment.....	14
4.1	Township and County Municipal Comprehensive Review	14
4.2	MGP Land Needs Assessment	17
4.2.1	<i>Addressing Housing Need in the Regional Market Area.....</i>	<i>18</i>
4.2.2	<i>Conclusion</i>	<i>20</i>
5.0	Settlement Area Expansion Criteria	21
5.1	Settlement Expansion Policies.....	21
5.2	Response to Settlement Area Boundary Expansion Evaluation Criteria and Comment on the Draft Official Plan Amendment	21
6.0	Planning Policy Context.....	24
6.1	Planning Policy Considerations.....	24
6.1.1	<i>Growth Management</i>	<i>24</i>
6.1.2	<i>Complete Communities.....</i>	<i>27</i>

6.1.3	<i>Providing a Range and Mix of Housing</i>	28
6.1.4	<i>Natural Heritage Matters</i>	31
6.2	Policy Analysis	32
6.2.1	<i>Provincial Planning Statement (2024)</i>	32
6.2.2	<i>County of Wellington Official Plan</i>	33
6.2.3	<i>Township of Centre Wellington Official Plan (2013 Consolidation)</i>	40
7.0	Official Plan Amendment	46
7.1	Official Plan Amendments.....	46
7.2	Proposed Official Plan Amendments	46
7.2.1	<i>Rational for Official Plan Amendment(s)</i>	46
8.0	Planning Opinion	49
8.1	Statement of Conformity with Policy Documents	49
8.2	Conclusion	49

List of Figures

Figure 1: Location of the Subject Lands	2
Figure 2: Concept Plan.....	6
Figure 3: Schedule A1 of the County of Wellington Official Plan	34
Figure 4: Schedule B1 of the County of Wellington Official Plan	34
Figure 5: Schedule 'C1': Sourcewater Protection.....	38
Figure 6: Schedule 'D': Mineral Aggregate Resource Overlay	39
Figure 7: Schedule A1 Township of Centre Wellington Official Plan	41
Figure 8: Schedule B: Municipal Servicing Plan Fergus - Elora - Salem	43
Figure 9: Schedule 'C': Groundwater Management Plan Fergus - Elora - Salem	44

List of Tables

Table 1.1: Legal Description	2
Table 2: Comparison of Housing Forecasts	19
Table 3: Additional Land Required from Displaced Growth From Guelph	19
Table 4: Wellington County Growth Targets	26
Table 5: Pre- and Post-Development Housing Composition	31

Executive Summary

Malone Given Parsons Ltd. (“MGP”) represents Elora Sands Developments Inc. (“Elora Sands”), owner of the property municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (“Elora Sands Lands”). Elora Sands is working with the landowner located immediately south of the Elora Sands property (6574 Gerrie Road) to develop a comprehensive conceptual plan of these lands. Collectively, these three parcels are referred to herein as the “Subject Lands”.

The County of Wellington and Township of Centre Wellington are currently undertaking Municipal Comprehensive Review (MCR) processes with the intent of accommodating population and employment growth to the 2051 planning horizon. During these processes, the owners of the Subject Lands and their consultants (including MGP) provided input on growth scenarios, land needs assessments, and related policies.

Ultimately Council of the Township of Centre Wellington endorsed Scenario 3 (20% intensification rate and 53 people and jobs/ha in the DGA Community Area) which recommended a much-reduced settlement boundary expansion, equating to 132 hectares of community land for the Township; omitting the Subject Lands from the settlement boundary expansion. The County of Wellington has incorporated the Township’s recommendation and is seeking public input on a scenario that contemplates an expansion of 169 hectares in the Township of Centre Wellington

Following the decisions of Council, MGP has prepared a Land Needs Assessment (“LNA”), which identified that additional lands are required to meet future needs and growth. The MGP LNA concludes that between 517 hectares and 766 hectares of additional Community Area land for the County is required to meet growth demands through 2051, which utilizes the new Ministry of Finance population projections and contemplates accommodating displaced growth from Guelph that cannot be accommodated within its boundaries.

Since Guelph and the County are within the same Regional Market Area, it is appropriate for the County—and specifically the Township of Centre Wellington—to consider accommodating a share of this growth. If the County were to allocate land to the Township of Centre Wellington based on the population growth projections, approximately 351 hectares of additional land in the Township of Centre Wellington is required to ensure the Township and County can meet the 2051 growth forecast, which is more than what the County had concluded in its original analysis (204 hectares). Moreover, given the Township’s proximity to Guelph and ability to efficiently accommodate residential growth, Centre Wellington represents a logical and appropriate location to accommodate a significant portion of the displaced growth from Guelph, which amounts to an additional 249 hectares.

A conceptual development has been prepared for the Subject Lands. As further described in the policy analysis of this report, the Concept Plan demonstrates how the Subject Lands

can be developed in the future to meet the policy requirements of the PPS 2024 and the applicable Official Plans. At a high level, the Concept Plan shows how the natural heritage features can be protected on the Subject Lands and how a mix and range of housing and community uses can be realized on the Subject Lands in a manner that will help to achieve a complete community in the Community of Elora.

An Official Plan Amendment (OPA) is required based on the findings of MGP's Land Needs Assessment (MGP LNA) and the need for a settlement boundary expansion as outlined in this report. The MGP LNA confirms that additional Community Area land is required to accommodate future growth, and in our opinion, the Subject Lands are appropriately located to assist in meeting this need.

The inclusion of the Subject Lands within the urban boundary is necessary to ensure the County and the Township of Centre Wellington can accommodate forecasted growth to 2051 in a logical, orderly, and efficient manner. Given their proximity to the existing built-up area, the Subject Lands represent a natural and optimal expansion area that aligns with provincial policy objectives for growth management.

Both the settlement boundary expansion and the associated Official Plan Amendment achieve the following:

Promote Logical and Orderly Development:

- Facilitating a logical, orderly, and efficient pattern of development, the Subject Lands are directly adjacent to the existing built-up area and form a natural extension of the urban boundary. Their location represents an optimal area to accommodate future growth in a way that ensures compatibility with surrounding uses.
- The Concept Plan demonstrates a transition to adjacent areas, including the thoughtful placement of low-density housing forms along the southern boundary to provide a compatible interface with existing single-detached dwellings.

Support Compact, Multi-Modal Communities:

- The proposed development pattern avoids leapfrogging, promotes efficient land use, and supports active transportation by fostering a pedestrian-oriented, transit-supportive environment.

Create a Complete Community:

- The Concept Plan proposes a thoughtfully designed development pattern that introduces a diverse range and mix of housing options, tailored to meet local needs while enhancing housing diversity.
- The proposed housing typologies are respectful of the existing dominant housing forms, incorporating low-density housing along the edges to maintain compatibility with adjacent single-detached dwellings, while also integrating

higher-density and more attainable housing options in select locations to address broader community needs (townhomes and seniors home).

Protect Natural Heritage Systems (NHS):

- The Concept Plan protects and preserves identified NHS areas, with further evaluation to be conducted through future development applications.

Deliver Community Benefits:

- The proposed development increases available parkland for the benefit of current and future residents. The inclusion of a large-centralized community park is designed to meet the recreational needs of the larger Elora/Salem community.
- The community park has an opportunity to connect to the NHS system with a trail and provide additional passive and active recreational opportunities

Alignment with Settlement Expansion Criteria:

- The lands are adjacent to the existing settlement area, strategically located for efficient infrastructure extension and service delivery.
- The expansion avoids Greenbelt lands, specialty crop areas, and other protected zones.
- The development pattern ensures compact, logical and orderly, growth aligning with the County's and Township's objectives

In conclusion, the proposed settlement boundary expansion and associated official plan amendments represent good planning and is in the public interest, as they will help to achieve and facilitate necessary growth in the Township of Centre Wellington and the County of Wellington. The approval of this settlement boundary expansion and related OPAs will enable future development to occur on these lands in a manner that is logical and efficient, promoting a compact built form that is compatible with the surrounding established community. The proposed uses on these lands, as demonstrated by the Concept Plan, will contribute to the development of a complete community in this settlement area. The OPAs are consistent with or conform to relevant provincial, county and municipal policy, implementing the policies of the County of Wellington Official Plan and the Township of Centre Wellington Official Plan. For these reasons, this report concludes that this application represents good planning and is in the public interest.

1.0 Site Context

1.1 Introduction

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for Elora Sands Developments Inc. (“Elora Sands”), the owner of the property municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (“Elora Sands Lands”). Elora Sands is working with the landowner located immediately south of the Elora Sands Property (6574 Gerrie Road) to develop a comprehensive conceptual plan. Collectively, these two parcels are referred to herein as the “Subject Lands”, and are the subject of this settlement boundary expansion request.

1.2 Site Location and Characteristics

The Subject Lands are comprised of two (2) lots located on the southeastern side of Nichol Road 15, between Irvine Street and Gerrie Road. The lots are legally described in Table 1.1 below.

The Subject Lands are currently used for agricultural purposes. Several existing structures are located on the Subject Lands in connection to the existing agricultural operation.

Figure 1: Location of the Subject Lands



Source: Google Earth (2021), MGP (2024)

Table 1.1: Legal Description

Parcel No.	Party To	Legal Description	Area (ha)
1	ELORA SANDS DEVELOPMENT INC.	LT 16 CON 12 NICHOL EXCEPT PT 1 61R1012 & PT 1 61R4394; CENTRE WELLINGTON	40.02
2	1389461 ONTARIO LIMITED	PART LOT 17 CONCESSION 12 NICHOL, PARTS 1, 2, 3, 4, 5, 6, AND 7 61R22574 SUBJECT TO AN EASEMENT OVER PARTS 5 AND 6 61R22574 AS IN WC171333 TOWNSHIP OF CENTRE WELLINGTON	39.02

1.3 Surrounding Land Uses

The following summarizes the surrounding land uses. For the purposes of the description below, Nichol Road 15 is assumed to be an east-west road.

- **North:** Agricultural and related uses. A woodland is located north of Nichol Road 15.
- **East:** Established low-rise residential uses and a proposed subdivision (on lands owned by Cachet Developments Inc.)
- **South:** Established low-rise residential uses and an approved subdivision (known as the Ainley Subdivision). Future development lands fronting Gerrie Road.

- **West:** Agricultural lands and related uses.

2.0 Concept Plan

This section summarizes the proposed Concept Plan, which has been prepared to demonstrate the development feasibility of the Subject Lands and exemplify how the Subject Lands can be appropriately used to accommodate future required growth.

2.1 Concept Plan

A conceptual development (referred to herein as the “Concept Plan”) has been prepared for the Subject Lands. As further described in the policy analysis of this report, the Concept Plan demonstrates how the Subject Lands can be developed to meet the policy requirements of the PPS 2024 and the applicable Official Plans. At a high level, the Concept Plan shows how the natural heritage features can be protected on the Subject Lands and how a mix and range of housing and community uses can be realized on the Subject Lands in a manner that will help to achieve a complete community in Elora.

2.2 Overview

The Concept Plan is a high-level land use map that has been prepared for the purpose of demonstrating the feasibility of including the Subject Lands, with the inclusion of these lands within the urban boundary. As shown in Figure 2, the Concept Plan includes the protection of natural heritage features on the property and provides appropriate stormwater management controls. Opportunities for trail connections, parkland, and open spaces are also shown throughout the Concept Plan.

A centrally located 4.14-hectare park is proposed as part of the Plan, offering active and passive recreational opportunities. This park is strategically connected to the natural heritage system, enhancing accessibility and providing a seamless transition between green spaces. In addition to fulfilling recreational and community needs, the proposed park ensures compliance with the parkland dedication requirements of the Planning Act.

The Concept Plan also proposes a coordinated stormwater management solution that includes a facility serving both the Subject Lands and the adjacent Clayton lands, owned by Cachet. This approach provides an efficient stormwater management solution, ensuring optimal use of land and resources while supporting the long-term sustainability of the area.

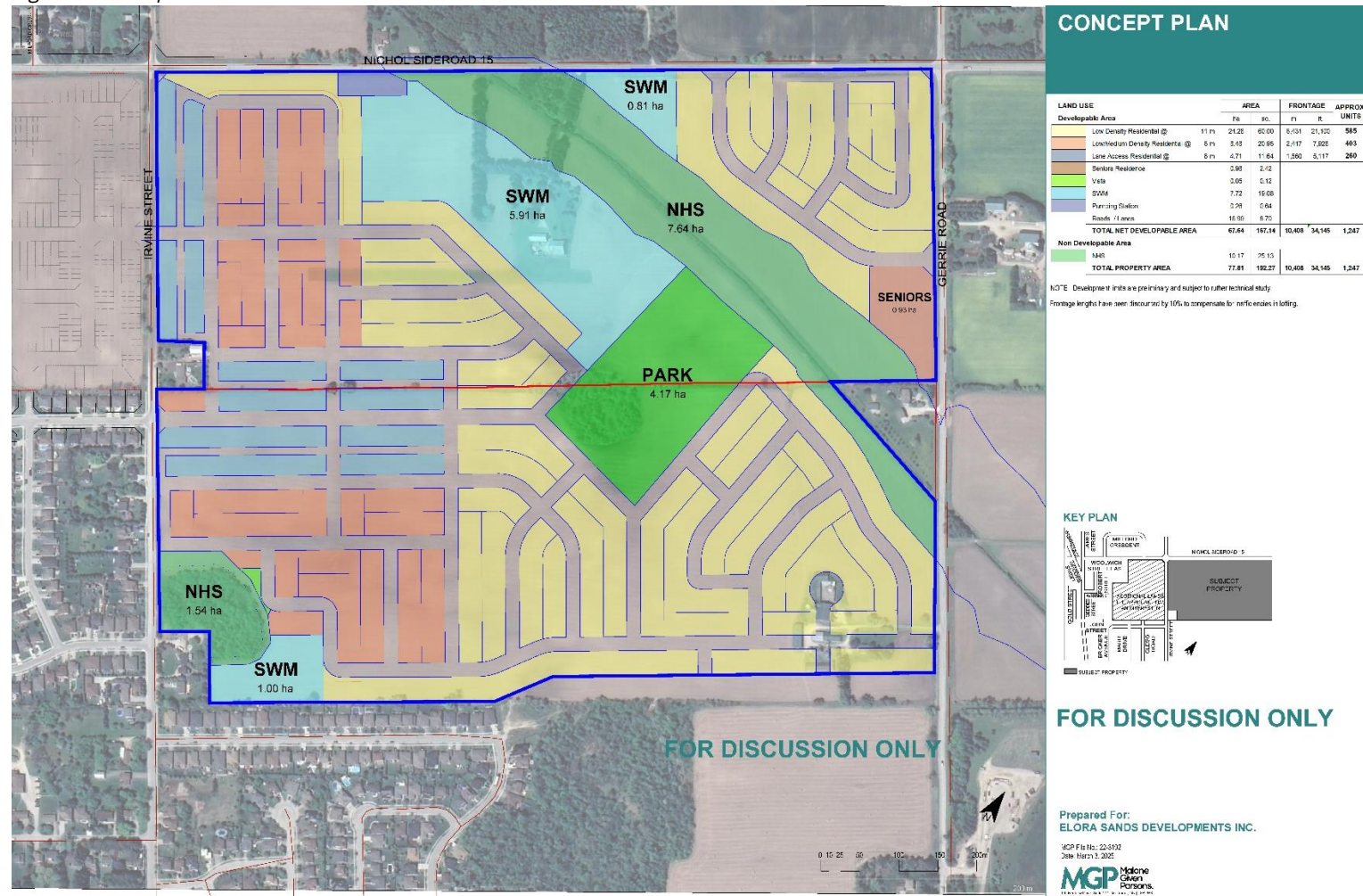
The proposed development supports a complete community by integrating a range of

uses, including residential, open space and recreational areas, and institutional facilities such as a seniors' residence. It offers a well-balanced mix of housing types, including single-family homes, townhouses, and seniors' residences, providing diverse options to meet various housing needs.

With respect to residential uses, the Concept Plan provides a diverse range of housing typologies. It includes a combination of low- to medium-density residential uses and a seniors' apartment. In total, the Plan contemplates 583 low-density units (43%), 663 medium-density units (49%), and 118 senior residence units (@120 units/ha) (8%). This equates to 1,364 total residential units. The Subject Lands can be developed at a minimum of 55 residents and jobs per hectare (excluding lands protected as part of the NHS), which exceeds the minimum County density target of 40 residents and jobs per hectare recommended for new developments in the County LNA.

The Concept Plan represents a well-coordinated and sustainable development approach that balances residential, recreational, and environmental considerations while optimizing land use and infrastructure

Figure 2: Concept Plan



3.0 Supporting Technical Studies

A number of technical studies have been prepared in support of the development of the Subject Lands. This section summarizes the studies/reports which have been submitted in support of the proposed Official Plan Amendments.

3.1 Environmental Impact Study

Beacon Environmental Limited prepared an Environmental Impact Study (EIS) dated February 2025, to assess the natural heritage features of the Subject Lands. The purpose of this EIS is to provide an overview of the existing natural heritage conditions and features both on and immediately adjacent to the subject properties; Identify applicable environmental policies and evaluate project conformance with relevant provincial and municipal planning documents, and GRCA policies and regulations; Identify a Natural Heritage System and discuss potential development impacts to natural heritage features and ecological functions; and, describe potential impacts and recommend appropriate mitigation measures to be implemented as the project moves forward.

As part of this work, Beacon undertook field investigations in the 2022, 2023, and 2024 field seasons as part of this study to characterize the natural heritage features and functions associated with the Subject Lands. The report acknowledges that additional seasonal surveys will be required as the project moves forward in the planning process, which will be conducted in 2025. This EIS relies on seasonal field studies including vegetation characterization, breeding bird surveys, amphibian surveys, bat habitat assessment, and aquatic habitat assessment that have been completed to date.

Beacon concluded that the proposed settlement area expansion will incorporate the NHS and associated buffers and the proposed concept for development will be largely confined to portions of the sites that are in agricultural use/existing dwellings/and anthropogenic areas that are landscaped. The appropriate natural heritage policy framework was reviewed in accordance with the PPS, County of Wellington Official Plan, Township of Centre Wellington Official Plan, Township of Centre Wellington Zoning By-law, as well as the GRCA regulations and ESA.

The EIS finds that the Nichol Drain and associated riparian corridor/the southwestern woodland and wetland communities on the Subject Lands and the woodland and wetland communities to the south will be protected by the proposed development. The presence of these features does not impede the lands from being brought into an Urban Area boundary; rather, this information can be used to develop a fulsome NHS as the project

moves forward.

The EIS further states that the potential impacts on the Subject Lands are limited to tree removal outside of woodland features, removal of Bobolink habitat, and potential impacts to the riparian corridor of the Nichol Drain with respect to the construction of a SWMF outfall. Mitigation measures have been recommended including the application of buffers and the development of restoration planting plans. General best practice mitigation measures including timing windows and erosion and sediment control will be undertaken. With the implementation of the recommended mitigation, no negative effects on the natural heritage system area are anticipated and enhancements to the subject property will be proposed as the project moves forward.

3.2 Hydrogeological Assessment

Soil-Mat Engineers & Consultants Ltd. prepared a Preliminary Hydrogeological Assessment, dated July 20, 2022, in support of the proposed applications. The purpose of the assessment was to provide detailed hydrogeological information to support site servicing options to support the assessment of site servicing options for the proposed development, from a geotechnical point of view. The study involved twenty-five boreholes, with ten on the Clayton Lands and fifteen on the Elora Sands, drilled between August 2021 and April 2022.

The soil conditions encountered on the Elora Sands generally consisted of a sandy silt/silty sand deposit in the upper levels with some areas and layers of clayey sandy silt till with depth. The soils encountered on the perimeter of the site were highly variable, often encountering layered deposits of clayey sandy silt till or sand. Occasional deposits of gravelly sand were encountered within some of the boreholes. The report notes that the presence of permeable granular deposits or ‘veins’ should be expected across the site.

The groundwater data gathered on the Elora Sands to date indicate a groundwater level on the order of 1.2 to 4.6 metres (elevations of between 408.5 to 410.7 metres) below the existing ground surface at Borehole Nos. 204, 205, and 206, predominantly located south of the landing strip within the farmer’s field. The groundwater drops to the east towards a tributary of the Irvine Creek [also identified as Nichol Drain] with a groundwater elevation of between 402.8 to 404.2 metres measured manually periodically within Borehole No. 004 from August 2021 to June 2022. The groundwater level drops to the north as well towards Nichol Road 15, where the stormwater management pond is proposed. The Investigation recommends that it would be prudent to advance a series of test pits or additional boreholes across the site, specifically in the areas of notably higher groundwater levels and areas of large excavations for deeper services or pumping stations, in order to assess how the groundwater will affect the excavations during site earthworks and servicing.

Relating to hydrogeological considerations, excavations for the proposed development services are expected to extend 2 to 5 metres below the surface, while excavations for

foundations would be expected to extend up to approximately 1.5 to 2 metres. Excavations for the proposed basement levels should be well above the groundwater level, pending review of the final site grading plans and foundation depths, along with more detailed assessments such as test pits in the area of observed shallow groundwater levels. The report recommends that final grading of the site should appropriately consider the groundwater levels in order to minimize or avoid conflict or impact to the groundwater during pre and post-construction. In this regard the grading and stormwater management plan should accommodate surface runoff that follows the existing overall drainage patterns as much as possible.

The report further states that it is not anticipated that the proposed construction will have an adverse impact on the groundwater condition in the area, provided the comments and recommendations are adhered to. There is not expected to be a significant or long-term impact on the development (such as ongoing dewatering, etc.) provided the discussion and recommendations of the report are considered in the site grading, servicing and stormwater design. The report also states that the hydrogeological setting of the site is such that potable wells in the area would be drawing from a deep confined bedrock aquifer, and would be largely unaffected by potential construction activities encountering the shallow near-surface groundwater regime.

The Investigation concludes that the subsurface descriptions and borehole information are intended to describe conditions at the borehole locations only. It is the contractors' responsibility to determine how these conditions will affect the scheduling and methods of construction for the project.

3.3 Traffic Impact Study

Paradigm Transportation Solutions Limited conducted a Transportation Impact Study (TIS), dated January 2025. The TIS includes an analysis of existing traffic conditions, a description of the proposed development, traffic forecasts for five-year horizon (2035) from the assumed build-out, ten-year horizon (2040) from the assumed build-out, and any recommendations required to manage future traffic conditions.

With existing traffic conditions, the study area intersections were found to be operating within acceptable levels of service with no specific problem movements during the AM and PM peak hours. The residential development of the Subject Lands is forecast to generate approximately 666 and 895 trips during the AM and PM peak hours upon full build-out. With background trip generation, study area intersections are forecast to operate within acceptable levels of service under 2035 and 2040 background horizons with Geddes Street (Wellington Road 18) and James Street (from the 2035 background horizon) noted to have critical movements.

With total traffic considerations, the study area intersections are forecast to operate within acceptable levels of service under 2035 and 2040 background horizons with the following intersections noted to have critical movements:

- Geddes Street (Wellington Road 18) and James Street (from the 2035 total horizon);
- Woolwich Street/Nichol Road 15 and Irvine Street (from the 2035 total horizon);
- Colborne Street and Irvine Street (from the 2035 total horizon);
- East Mill Street (Wellington Road 18) and Irvine Street (from the 2035 total horizon); and
- Colborne Street and Gerrie Road (from the 2035 total horizon).

The TIS notes that the proposed municipal street connections to Irvine Street, Nichol Road 15, and Gerrie Road are forecast to operate within acceptable levels of service during the AM and PM peak hours under 2035 and 2040 total traffic conditions.

The TIS concludes that traffic control signals are not warranted at the following intersections under 2035 and 2040 future traffic conditions:

- Geddes Street (Wellington Road 18) and James Street;
- Woolwich Street/Nichol Road 15 and Irvine Street;
- Colborne Street and Irvine Street;
- East Mill Street (Wellington Road 18) and Irvine Street; and
- Nichol Road 15 and Gerrie Road.

Left-turn lanes are warranted at the following intersections:

- Southbound on Geddes Street (Wellington Road 18) at James Street with 30 metres of storage upon the completion of the subject site;
- Westbound on Nichol Road 15 at Irvine Street with 25 metres of storage upon the completion of the subject site;
- Westbound on Nichol Road 15 at Gerrie Road with 15 metres of storage by the 2035 horizon year. Upon the completion of the subject site, the storage length should be extended to 25 metres;
- Eastbound on East Mill Street (Wellington Road 18) at Irvine Street with 25 metres of storage upon the completion of the subject site;
- Northbound on Irvine Street at Cachet Clayton/Street W-N under total traffic conditions;
- Southbound on Irvine Street at Cachet Clayton/Street W-N with 15 metres of storage on upon the completion of the subject site;
- Westbound on Nichol Road 15 at Street N-W with 15 metres of storage upon the completion of the subject site ; and
Westbound on Nichol Road 15 at Street N-E with 15 metres of storage upon the completion of the subject site.

3.4 Financial Impact Assessment

Keleher Planning & Economic Consulting Inc. prepared a Fiscal Impact Study dated March 2025 in order to estimate the financial impacts of the proposed residential development on the Township of Centre Wellington and Wellington County.

Based on the proposed redevelopment, and the DC/EDC rates in effect as of the writing of the FIS, the development would generate \$38.9 million for the Township, \$10.6 million for Wellington County, and \$3.8 million for local school boards through the EDC.

The FIS concludes that the proposed development would generate \$2.9 million per year in property taxes for the Township, as well as \$5.5 million per year for the County and \$1.3 million for education. Water and sewer rates are imposed by the Township, and revenue estimates are based on the Township's 2024 water/sewer rates. Estimates of demand (litres/capita/day) were based on industry benchmarks of 372 litres/capita/day. In total, it is estimated that the subject development would generate \$2.9 million in water and sewer rate revenues annually.

Based on estimated incremental annual revenues and expenditures that are anticipated to accrue to the Township and County, it is estimated that the development of the subject development would generate an annual net surplus to the Township of \$734,800 or approximately \$220 per capita. In addition, the development would generate a modest annual surplus for the County of approximately \$3.2 million per year, or \$958 per capita.

3.5 Agricultural Impact Assessment

MacNaughton Hermsen Britton Clarkson Planning Ltd. (MHBC) prepared an Agricultural Impact Assessment (AIA) dated March 2025, to identify potential impacts on agriculture from the proposed settlement area boundary expansion and development and to identify mitigation measures to abate these impacts to the extent feasible. As part of the AIA, surrounding agricultural land uses, operations and structures on properties within 1.5-kilometre of the subject lands have been documented to assess the potential impact from the proposed development on the surrounding agricultural uses/operations and determine the extent of mitigation that may be required.

The Subject Lands are currently in agricultural use, containing a cultivated field (winter wheat (2024), a barn, a drive shed, and a dwelling (northern Sands parcel), and cultivated field (winter wheat, 2024), several livestock barns, a drive shed, a grain silo, and a dwelling (southern parcel). Surrounding land uses generally include agricultural uses and rural residential uses to the north and east with the Elora settlement area boundary located directly to the south and east. The Fergus settlement area boundary is located approximately 500 metres to the south-east of the Subject Lands.

The AIA assesses impacts to agriculture as a result of the proposed development. It is noted that the development of these lands will result in the removal of prime agricultural lands, agricultural structures, and existing agricultural drainage improvements (tile drainage). However, it is noted that the type and nature of the agricultural uses on the subject lands are typical of Wellington County.

The report addresses the fragmentation of agricultural lands, concluding that the level of fragmentation within the surrounding area decreases the agricultural priority of the lands for agriculture. Additionally, removal of these lands will not result in the creation of any

isolated agricultural parcels.

Pertaining to compatibility impacts, the AIA finds that the proposed settlement area boundary expansion and residential development does not pose significant compatibility concerns with surrounding normal farm practices. The MDS I review identified no compatibility issues related to odour from nearby livestock operations.

On matters related to economic and community impacts, the AIA finds that the Subject Lands do not contain supportive agricultural infrastructure or services. The subject lands also do not produce a commodity that the surrounding agricultural system or agri-tourism industry deeply depends on; rather, hay and winter wheat crops are common within the study areas and the broader County.

Relating to traffic impacts, the AIA recommends the Traffic Impact Study be prepared in support of this application with consideration of impacts to agricultural traffic, specifically during April through to November when farm equipment is more active on roadways. The AIA also articulates that Nichol Sideroad 15 is already a highly travelled municipal road servicing as an 'informal' east/west by-pass to the settlements of Fergus and Elora/Salem. As a result, agricultural traffic on this road has already had to adapt to the existing volumes and speeds of traffic along this road.

In summary, the AIA concludes that the surrounding agricultural area is already fragmented by nature of proximity to existing settlement areas, non-agricultural uses, and rural residential uses. The level of fragmentation within the surrounding area decreases the agricultural priority of the lands for agriculture. Removal of these lands will not result in the creation of any isolated agricultural parcels. The Subject Lands are not within a specialty crop area and the proposed expanded settlement area complies with the minimum distance separation formulae. The subject lands exhibit characteristics of lower priority agricultural lands given existing fragmentation in the area, proximity to existing non-agricultural uses, location adjacent to an existing settlement area, and limited agricultural improvements on the land. Impacts on surrounding agricultural operations can be mitigated based on the recommended mitigation measures included in this report.

3.6 Geomorphological Report

GEO Morphix was retained to complete a fluvial geomorphological assessment for the Subject Lands, which includes a summary of existing information and data collected for the subject lands from previously completed studies. That letter notes that Field-confirmation of existing conditions as well as detailed work to address erosion hazard delineation and erosion mitigation plans are ongoing. A standard geomorphology checklist has been included as part of the submission material.

That letter concludes that Nichol Drain was previously characterized under the 2008 Nichol Drain Subwatershed Study by Aquafor Beech Limited. The feature was generally characterized as a stable, vegetation-controlled drainage ditch; however, watercourse

reaches of the Nichol Drain downstream of the subject lands were identified as potentially sensitive to changes in upstream land use. Queen Street Creek is a small tributary to Irvine Creek but has not been adequately studied from a geomorphological perspective.

GEO Morphix is completing a more detailed geomorphological assessment to address data gaps associated with the Nichol Drain and Queen Street Creek. This includes, but is not limited to the following:

- Updates to existing conditions desktop characterization for the Nichol Drain and Queen Street Creek, including refined reach delineation and a review of more recent topographic and geological data for the subwatershed and subject lands
- Updated field data collection for the Nichol Drain and Queen Street Creek within the subject lands as well as downstream, receiving reaches (where access is permitted) to document present-day channel conditions, assess channel stability, and record evidence of active channel erosion
- Delineation of appropriate meander belt widths or erosion hazards for the Nichol Drain to support natural hazard constraint delineation in accordance with the Provincial Planning Statement (PPS, 2024)
- Completion of a detailed erosion threshold and erosion mitigation assessment to support appropriate SWM planning for the subject lands

Ongoing geomorphology work is intended to support further advancement of the subject lands and requirements for future planning and development submissions. The geomorphology scope of work will be consistent with other standard geomorphology submission guidelines, as summarized in the appendix attached to that letter.

4.0 Land Needs Assessment

The following section provides a summary of the Land Needs Assessments applicable to the Subject Lands. This Section concludes with the findings of the Land Needs Assessment prepared by Malone Given Parsons Ltd. in January 2025, in support of the inclusion of the Subject Lands within the urban boundary.

4.1 Township and County Municipal Comprehensive Review

The County of Wellington and Township of Centre Wellington Municipal Comprehensive Review (MCR) processes began in response to the Province's updated growth management framework; which at the time, was directed by the Growth Plan for the Greater Golden Horseshoe ("Growth Plan"), 2020. It should be noted the Growth Plan has now been rescinded and replaced by the Provincial Planning Statement, 2024.

The MCR processes that are being undertaken by the County and the Township aim to accommodate population and employment growth to 2051 by determining land needs, evaluating settlement area expansions, and planning for sustainable community development.

The County of Wellington LNA prepared growth allocations and housing assumptions to emphasize intensification and apartment-focused development in built-up areas. Key assumptions include:

- **Intensification Rate:** A County-wide target of 20%, reflecting the County's growth strategy but higher than recent historical rates of intensification. The intensification rate decreased from 39% over the 2006 to 2009 period to 20% over the most recent period of 2016 to 2019. The decline in the County's intensification rate is largely due to the diminishing supply opportunities of at-grade housing within the B.U.A.
- **Density Target:** An overall target of 40 people and jobs per hectare (pj/ha) countywide, with higher densities allocated to areas with servicing and infrastructure potential. The density is expected to range across the County from 32 people and jobs/ha to 47 pj/ha with Centre Wellington anticipated to be at 47 pj/ha.
- **Housing Mix:** A forecast growth mix of 67% single- and semi-detached units, 18% row housing, and 15% apartments. While this mix generally aligns with market preferences, it assumes a higher proportion of rows to support missing middle and intensification goals. By comparison, the Hemson Growth Plan

(2020) background work assumed that 78% of new growth would be in single- and semi-detached units and 8% row housing.

- **Land Needs:** Approximately 501 hectares of additional community area land required countywide, with allocations for municipalities based on servicing capacity and regional priorities. It was concluded that Centre Wellington's urban boundary expansion required approximately 238 hectares by 2051 designated for community area uses.

The County LNA, as originally prepared, recognized the rapid population growth occurring in the County, specifically in established urban centres and in lower-tier municipalities, such as Centre Wellington.

Elora Sands (formerly represented by Parcel Economics and now represented by MGP) has been actively involved in this process, providing input on growth scenarios, land needs assessments, and related policies. Elora Sands has been an active participant throughout these processes, signifying a commitment to ensure that growth aligns with local needs. Below is a summary of Elora Sand's contributions to these processes:

Submissions by Parcel Economics:

- April 29, 2022: Letter commenting on earlier iterations of the County Land Needs Assessment (LNA).
- May 2, 2022: Follow-up comments refining feedback on the County's LNA.

Submissions by Malone Given Parsons (MGP):

- November 17, 2022: Comments on the County's LNA Report as outlined in PD2022-20, dated September 8, 2022.
- January 3, 2023: Feedback on the draft Official Plan Amendment 119 (dated July 2022).
- January 3, 2024: Comments on updated Township growth scenarios.
- September 27, 2024: Feedback on the recommendation report (PLN2024-34).

These letters detailed our opinion and comments regarding the optimal growth scenario that should be applied as part of the Township's Urban Boundary Expansion Review. In our review of the County Land Needs Assessment ("County LNA") at that time, we were pleased with the direction that the County (and their consultant, Watson & Associates) took with the Land Needs Assessment, which recognized the rapid population growth occurring in the County; specifically, in established urban centres and in the lower-tier municipalities (such as Centre Wellington). Specific to Centre Wellington, we note that the County LNA concluded that 238 hectares of additional Community Area land would be required to accommodate the forecasted population growth to 2051 through the expansion of the settlement area. Of this, 70 hectares would be assigned to the community of Elora. Prior to MGP preparing its own land needs assessment, our previous submissions concurred that this allocation strategically addressed the community's evolving needs while ensuring that growth could be accommodated in a sustainable

manner.

Following the preparation of the County's LNA, the Township of Centre Wellington retained Watson & Associates to conduct a separate LNA through which additional scenarios for growth utilizing higher intensification rates and density targets, such as Scenario 3 which assumed a 20% intensification rate and 53 people and jobs/ha in the DGA Community Area. This scenario was endorsed by Council on September 30th, 2024 as the Preferred Scenario for land need associated with Settlement Area Boundary Expansion for the Fergus and Elora-Salem Urban Centres. Scenario 3 recommended a much-reduced expansion, equating to 132 hectares of community land for the Township. This scenario did not contemplate the inclusion of the Subject Lands within the urban boundary.

MGP made submissions that commented that this scenario appears to be unrealistic and therefore unachievable and recommended continuing with the County LNA conclusions. For the purposes of land needs assessment, setting targets that cannot be achieved will result in a shortage of housing in the Township/County. While individual areas may achieve this target (53 residents and jobs per hectare) demonstrated in South Fergus, historically the DGA has only achieved 41 residents and jobs per hectare, and it would be overly aggressive to assume the remaining DGAs will develop at a significantly higher level than what has been achieved before. Planning for a higher density will put the Township at risk of not having a sufficient land supply to provide a marked-based housing mix.

We note that both the Township and County LNA did not conduct the demand analysis on a unit-type basis, and instead blends the densities of multiple unit types. This does not accurately assess the land needs. Blending densities in a LNA can distort results by misrepresenting the relationship between housing demand and land supply for specific unit types. If the remaining supply of certain housing types (e.g., single-detached homes) is limited, blending assumes an average density that doesn't reflect actual market conditions or preferences. This risks underestimating land needs for low-density housing or overestimating for high-density types like apartments, leading to mismatched planning outcomes. By assessing housing demand by unit type, the assessment ensures a more accurate alignment between supply and the housing mix required to meet market-based needs, resulting in balanced growth and sustainable community development.

MGP was also concerned that this change in assumption has been done in isolation, without analyzing the broader context to ensure that the Watson-prepared Township LNA is consistent with and is still good planning with the earlier prepared County LNA also prepared by Watson.

Despite our concerns, Township staff prepared recommendations for settlement area expansions, which did not include the Subject Lands, and on October 28th, 2024 Council of the Township of Centre Wellington passed a motion that requested that the County of Wellington proceed with the development of an amendment to the County of Wellington Official Plan as necessary to implement the Township's Recommended Settlement Area Boundary Expansions supported by the preferred scenario.

On November 14th, 2024 County Council carried forward the recommendations of Township Staff with the introduction of County Official Plan Review – OPA 126 Urban Boundary Expansions, which included minor adjustments including reducing the County-wide intensification target to 15%. The County adjusted the expansion of the total Community Area to 169 ha, which represents an increase of 38 ha, compared to the Township's recommended scenario, however does not include the Subject Lands as a location for expansion.

County Council received OPA 126 and the associated staff report for information, that OPA 126 Urban Boundary Expansions be circulated for comments, that staff be directed to schedule and hold an open house(s) under the Planning Act to provide the public with opportunities to review and comment on the amendment, and that the Planning Committee be authorized to hold a public meeting under the Planning Act at the appropriate time. A public open house has not yet been scheduled as of the date of the writing of this report.

The proposed settlement expansion areas, particularly those south of Elora/Salem, do not represent the most appropriate locations for accommodating future growth when evaluated against the settlement expansion area criteria including those from the Provincial Planning Statement 2024. A key consideration in settlement boundary expansions is minimizing the impact on prime agricultural land. As demonstrated in the Township's Agricultural Impact Assessment, the lands south of Elora/Salem scored the highest (i.e. better agricultural land) from an agricultural perspective whereas the Subject Lands (only the western portion was reviewed), scored one of the lowest (least favourable agricultural land). More viable agricultural land should be preserved where possible and expanding into less viable agricultural land aligns better with provincial planning objectives.

Additionally, the Subject Lands provide a more logical and contiguous extension of the Elora settlement area, reinforcing efficient and orderly growth. In contrast, some of the proposed expansion areas in south Elora may have less efficiencies with servicing and require subwatershed studies for effective delivery of infrastructure. The Subject Lands can be efficiently serviced using existing infrastructure, minimizing additional costs for the municipality.

Given these factors, the Subject Lands represent a more appropriate location for settlement expansion compared to the currently proposed areas. Their inclusion within the settlement boundary would ensure that growth is accommodated in a sustainable, efficient, and policy-aligned manner, making them the logical choice for addressing the Township's long-term housing needs.

4.2 MGP Land Needs Assessment

In response to the Township and County LNA, MGP conducted a comprehensive Greenfield Supply Analysis and LNA for Wellington County (including the Township of Centre Wellington) as part of our input into this process. Attached as Appendix 1 to this

report is a summary of MGP's LNA undertaken for the County of Wellington on behalf of Elora Sands. Our analysis includes technical evaluations supported by GIS shapefiles and detailed tables, which identify the need for significantly more land in both the County and Township to meet growth forecasts through 2051. Our analysis also adjusts the 2051 population projects provided by the Ministry of Finance, as directed by the PPS, which states that planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance. Based on the population share that the County of Wellington has had since 2016 within the larger Wellington Census subdivision (~40%), the Ministry of Finance population projections estimate an additional 15,800 people within the County to 2051.

The County's proposed intensification target of 15%, which we support maintaining, reflects a realistic balance between accommodating growth and protecting agricultural lands. While we support the DGA density target proposed by the County, our analysis recommends an overall 41 residents and jobs per hectare for Centre Wellington based on past development patterns and the Township's unique context. Historically, Centre Wellington has achieved DGA densities of approximately 41 residents and jobs per hectare, and it would be overly ambitious to assume significantly higher densities in remaining DGAs without compromising the market-based housing mix necessary for sustainable growth.

This balanced growth scenario sets realistic density and intensification targets to achieve balanced, sustainable development while ensuring sufficient land supply. This scenario would align with market demand, enhance housing affordability, and deliver complete communities.

Our analysis concludes that approximately 517 hectares of additional Community Area land for the County is required to meet growth demands through 2051, which utilizes the new Ministry of Finance population projections. These figures are based on a detailed review of existing land supply, growth projections, and the feasibility of achieving planned densities and intensification rates.

If the County were to allocate land to the Township of Centre Wellington based on the population growth projections, approximately 351 hectares of additional land in the Township of Centre Wellington is required to ensure the Township and County can meet the 2051 growth forecast, which is higher to what the County had concluded in its original analysis (204 hectares). This is an increase of approximately 182 hectares over what the County ultimately has recommended for Centre Wellington through OPA 126.

4.2.1 Addressing Housing Need in the Regional Market Area

The Ministry of Finance (MOF) provides population projections based on larger census subdivision areas, which can be appropriately considered regional market areas under the Provincial Planning Statement (PPS) 2024. Regional market areas are defined as larger geographic regions that encompass multiple municipalities and reflect how housing markets, employment patterns, and population growth function at a broader

scale.

In this case, the Ministry of Finance groups the County of Wellington (including Centre Wellington) and the City of Guelph into a single area, which forms a regional market area as per the PPS 2024. These municipalities share economic, demographic, and employment characteristics, reinforcing the need for a coordinated approach to growth. This interconnectedness underscores the strategic advantage of coordinating growth across municipal boundaries. Located just under 30 minutes from downtown Guelph, the Subject Lands provide a natural extension of growth that aligns with regional infrastructure and servicing plans. Given this regional interconnection, the PPS requires planning authorities to provide an appropriate range and mix of housing to meet projected needs within the regional market area.

Through our review of the Guelph Land Needs Assessment (LNA), we have determined that the City is undersupplying ground-oriented housing by approximately 4,500 units, as shown in the table below.

Table 2: Comparison of Housing Forecasts

	Singles/Semis	Rows	Apartments	Total
Hemson (2020)	40,800	15,900	28,300	85,000
Guelph LNA (2022)	37,645	14,540	33,515	85,700
Difference	(3,155)	(1,360)	5,215	700

This conclusion is based on the Hemson Technical Backgrounder, which sets the minimum level of housing required to meet projected demand. The Backgrounder accounts for demographic trends, household formation rates, and migration patterns to ensure that municipalities plan for an adequate supply of single-detached, semi-detached, and row housing alongside higher-density options. Any undersupply of these housing types indicates that Guelph's current planning does not fully accommodate projected needs, impacting housing availability across the broader regional market area.

As shown in the table below, this displaced growth from Guelph translates to an additional land need of 249 hectares.

Table 3: Additional Land Required from Displaced Growth From Guelph

	Singles/Semis	Rows	Apartments	Total
New DGA Unit Requirement	3,155	1,360	0	4,515
Gross Density (units/ha)	15	35	100	
Land Requirement (ha)	210	39	-	249

Given Centre Wellington's proximity to Guelph—under 30 minutes from downtown—there is an opportunity to help address this shortfall within the County of Wellington through appropriately planned urban expansions. Ensuring a sufficient land supply for ground-oriented housing in Centre Wellington would align with regional infrastructure and

servicing plans while contributing to a balanced and sustainable housing market across the Wellington Subregion.

As Centre Wellington is forecasted to accommodate over 40% of the County's total growth, it is reasonable to assume that approximately 40% of the displaced growth—roughly 100 hectares—should be directed here. Expanding the urban boundary in Centre Wellington would help ensure that the regional market area can meet its long-term housing needs while maintaining a diverse housing mix that reflects market demand.

4.2.2 Conclusion

It is our opinion that there is a need to expand the settlement area to accommodate future residential development in Centre Wellington, and specifically Elora (a minimum of 351 hectares with an additional 100 hectares from displaced growth from Guelph), which can be provided by the proposed expansion areas in the eastern portion of the Elora, which totals approximately 67 gross developable hectares.

5.0 Settlement Area Expansion Criteria

5.1 Settlement Expansion Policies

With regard to the County’s consideration of growth options, it is our opinion that the inclusion of the Subject Lands represents an appropriate location for a settlement expansion as they can achieve the County’s criteria for settlement area boundary expansion and are consistent with the Provincial Planning Statement, 2024 (“PPS”).

The following Section addresses the key policy considerations as they relate to settlement boundary expansions.

5.2 Response to Settlement Area Boundary Expansion Evaluation Criteria and Comment on the Draft Official Plan Amendment

Our team has reviewed the settlement expansion criteria established in the PPS 2024 and the County of Wellington Official Plan. Through our review, it is our opinion that the Subject Lands in Elora represent an excellent opportunity for the County to accommodate growth through the creation of innovative and complete communities and to do so in a manner that can be serviced in a fiscally sustainable manner. In this regard, our team has reviewed the settlement expansion criteria established in the PPS 2024 and the County of Wellington Official Plan. With respect to the settlement area boundary expansion requests, please find attached the following supporting materials:

- A summary table of responses to each of the applicable policies derived from the PPS 2024 and the County of Wellington Official Plan regarding settlement area boundary expansions/expansions to primary urban centres (Appendix 2); and,
- A proposed mapping amendment to the County of Wellington Official Plan, which shows the revised land use designation for the requested expansion areas as “Urban Centre” (Schedule 1a) , which is provided in the Draft COPA.
- A proposed mapping amendment to the Township of Centre Wellington Official Plan, which shows the revised land use designation for the requested expansion areas as “Residential” and “Core Greenlands” , which is provided in the Draft OPA.

The assessment of the evaluation criteria shows that the requested expansions are appropriate and consistent with/conforms to (as the case may be) the applicable policies for the following reasons:

- Consistent with the conclusions of the original County LNA, and building upon the LNA prepared by MGP on behalf of Elora Sands, it is our opinion that there is a need to expand the settlement area to accommodate future residential development in Elora (a minimum of 351 hectares with an additional approximately 100 hectares), which can be partly provided by the proposed expansion areas in the eastern portion of the Elora, which totals approximately 67 gross developable hectares;
- The two areas for settlement expansion that include the Subject Lands, represent logical areas for urban expansion as they have the following characteristics:
 - These two parcels in Elora can be planned as a complete community to accommodate the forecasted growth. These areas will provide additional and diverse housing supply abutting the existing settlement area. Moreover, they can be comprehensively developed to provide for opportunities to address climate change goals, including promoting compact and energy-saving designs, developments with greater densities, and transit-supportive and walkable communities to lower GHG emissions stemming from buildings and transportation.
 - The Lands are located in the Community Planning Study Area, which is an area that the County will be considering for future urban expansion. These candidate areas were considered appropriate options for future residential, recreational, public service and institutional uses of the Fergus and Elora-Salem Urban Centres. The County noted that this area has the potential to play a significant role in community life in the future.
 - The lands are located immediately adjacent to the Elora Settlement Area and are strategically located to provide a portion of the required Community Area land needs. Servicing infrastructure either exists or can be extended to the lands in a timely and efficient manner as outlined in the Functional Servicing and Stormwater Management Report prepared by MTE dated March 2025
 - The development of the Subject Lands will continue the orderly development pattern of the Elora Settlement Area and as such, will help utilize existing public facilities including public elementary and secondary schools, Elora & District Community Centre, a fire station, public parks (including Elora Quarry) and libraries.
 - The proposed expansion lands, as well as any required infrastructure and services, will be planned in a financially and environmentally sustainable manner over their full life cycle through robust technical studies in accordance with Provincial and local planning policies. The two areas in Elora benefit from the location or expansion of existing infrastructure.

- There are no specialty crop areas in the proposed expansion areas.
- The proposed expansions are located outside of the Greenbelt.

The combined settlement areas represent an opportunity to create a complete community and provide for an appropriate mix of housing and jobs in the Community of Elora. We believe that this area is representative of a logical and optimal location to accommodate a portion of the required settlement area expansion needed to achieve the growth forecasted in the County to 2051.

Expanding the settlement area to include the Subject Lands is essential to realizing a contiguous settlement structure that is bounded by arterial roads and surrounded by existing or planned residential neighbourhoods to the south and west.

The technical studies, which are provided as part of this submission, have informed the responses to the evaluation criteria contained in Appendix 2 attached. Moreover, the inclusion of the Subject Lands are consistent with the policies of the PPS 2024.

6.0 Planning Policy Context

This section of the report addresses applicable Provincial, County, and Township planning policies. Pertinent policies addressed herein relate to growth management, compatibility with surrounding uses, range and mix of housing, urban design, and parkland dedication requirements.

6.1 Planning Policy Considerations

Relying on the MGP LNA and Settlement Area Boundary Analysis detailed in Sections 4.0 and 5.0 of this report, this section analyzes the policy context of the Subject Lands on the basis that they are included in the settlement area and designated with an urban land use designation to accommodate community uses. The following Section addresses matters such as growth management, appropriate compatibility with surrounding uses, the delivery of complete communities, housing, parkland dedication, and the preservation of natural heritage. Other applicable policies within Provincial, County, and Township planning documents have been reviewed and we have concluded that the proposed development is consistent with or conforms to these policies. Further discussion and overall opinions are provided in the following sections.

6.1.1 Growth Management

The Provincial Planning Statement (PPS) 2024 provides high-level policy direction on matters related to growth and growth management in the province of Ontario. We note that the PPS codifies Ontario's goal of achieving at least 1.5 million homes built by 2031. Under the PPS, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance, with the option to modify as appropriate (Policy 2.1.1). In accordance with Policy 2.1.1, the development of the Subject Lands will help to achieve the Ontario Population Projections published by the Ministry of Finance, as demonstrated through MGPs LNA.

Under the PPS, Settlement Areas are to be “the focus of growth and development” (Policy 2.3.1.1). Settlement areas are to be based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, and support active transportation, among other factors (Policy 2.3.1.2).

Under the PPS, planning authorities shall (Policy 2.1.4):

- a) *maintain at all times the ability to accommodate residential growth for a minimum*

- of 15 years through lands which are designated and available for residential development; and*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans”.*

The Subject Lands will be located in the settlement boundary to allow for and accommodate future growth, in accordance with the policies of the PPS 2024. The Concept Plan demonstrates that these lands will achieve an appropriate density in accordance with local planning policy and can deliver a locally appropriate mix of land uses and housing typologies that efficiently use land and resources. The designation and eventual development of these lands will contribute to the municipality’s ability to accommodate residential growth, as required by the PPS. For these reasons, it is our opinion that the Subject Lands are consistent with the growth management policies of the PPS 2024.

The Wellington County Official Plan anticipates that the County will grow from approximately 100,800 people in 2021 to approximately 160,000 in 2051. To accommodate this, the County will plan for new housing, commerce, employment, and services for approximately 59,000 new residents. It should be noted that based on the PPS 2024, this will need to be updated to reflect the Ministry of Finance forecasts which anticipate approximately an additional 15,800 people within the County.

Under the County Official Plan, in accordance with the direction of the PPS, the majority of growth will be directed to primary urban centres that offer municipal water services and municipal sewage services (Policy 3.1.1) and the County will encourage development patterns that:

- are cost-efficient;
- are environmentally sound;
- are compatible with existing uses;
- maintain small-town character;
- maintain resource land; and,
- provide access to community services and facilities.

Section 3.3.1 sets out targets for growth in greenfield areas, which state that the County will be planned to achieve an overall minimum density of not less than 40 residents and jobs per hectare. With respect to servicing, Section 3.4 sets out that Wellington will provide for the efficient and environmentally sound use of land by encouraging full municipal water and wastewater services for new development.

Section 3.4 ‘Guiding Growth’ under the Official Plan sets out general objectives for growth, including matters such as encouraging efficient cost-effective development patterns; taking advantage of capacities in existing and planned water, wastewater, utilities and transportation systems; supporting the achievement of complete

communities through a more compact built form; encourage more efficient use of land through increased densities in designated greenfield areas, among other matters.

Section 3.5 of the County Official Plan speaks to ‘Allocating Growth’, articulating that growth in Wellington will be influenced by a number of factors including:

- market forces
- available land and services
- planning policies

The allocation of growth in Wellington County is depicted in Table 1 of that Plan. Table 2 of the Official Plan demonstrates the projected growth of Centre Wellington. It should be noted this is anticipated to increase to 65,000 people in Centre Wellington with the Ministry of Finance population projections. A summary of Table 2 is included below:

Table 4: Wellington County Growth Targets

Wellington County Growth Targets	2021	2051
Centre Wellington		
Total Population ¹	34,100	58,200
Households	12,810	22,130
Total Employment	12,200	25,100
Elora-Salem		
Total Population ¹	7,800	14,100
Households	2,960	5,280

The County Official Plan sets a Greenfield Density Target under Section 3.3.1. Under that section, designated greenfield area of the County will be planned to achieve an overall minimum density of not less than 40 residents and jobs per hectare. Likewise, the Township’s Official Plan requires new developments to achieve densities that promote the overall greenfield density target of 40 persons and jobs per hectare; and specifically strive to attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions (Policy C.5.6.2.i). Under the Township Official Plan, it is specified that gross hectares or gross acres means residential land excluding environmentally protected features and non-residential uses (schools, convenience commercial) but includes roads, parks, stormwater management areas, or other utility blocks (Policy C.5.6.2 iii).

In accordance with the policies outlined in the Provincial Planning Statement (PPS) 2024 and the Wellington County Official Plan, it is our opinion that the Concept Plan for the Subject Lands demonstrates a cost-effective and sustainable development pattern that aligns with the region's growth objectives.

The Subject Lands represent a logical continuation of growth adjacent to the existing built boundary, thereby optimizing the use of existing infrastructure. As detailed in the Functional Servicing and Stormwater Management Report prepared by MTE, the necessary servicing infrastructure is already in place and can be extended to

accommodate future development with minimal investment. This approach not only supports the efficient use of land but also aligns with the PPS's directive to focus growth within settlement areas (Policy 2.3.1.1).

The Concept Plan effectively directs growth to a primary settlement area as designated in the County Official Plan. It demonstrates the feasibility of delivering a combination of housing typologies, including low to medium-density residential uses and a seniors apartment. Specifically, the Plan contemplates 583 low-density units (43%), 663 medium-density units (49%), and 118 senior residence units (8%), totaling 1,364 residential units. This development can achieve a minimum density of 55 residents and jobs per hectare (excluding lands for the natural heritage system), which exceeds the County's minimum density target of 40 residents and jobs per hectare for new developments as outlined in Section 3.3.1 of the Official Plan. The introduction of townhouses and a seniors residence will enhance the diversity of the housing stock, contributing to the creation of complete communities through a more compact built form.

Furthermore, the Concept Plan incorporates pedestrian-friendly elements, including trails and park spaces, which are essential for fostering community interaction and recreational opportunities. These community amenities align with the objectives of the County Official Plan to support complete communities and enhance the quality of life for residents.

In summary, it is our opinion that the proposed development is consistent with the PPS and conforms to the County of Wellington Official Plan and the Township of Centre Wellington Official Plan on matters of growth management. The scale and density of development, as shown on the Concept Plan, will contribute towards the minimum density target set out by the Province and reflected in the County and Township Official Plans. Therefore, we conclude that the Subject Lands are well-suited for appropriate development in accordance with the applicable land use policies.

6.1.2 Complete Communities

The PPS 2024 sets out policy direction for the achievement of complete communities. The definition of the Complete Communities under the PPS is as follows:

“means places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations”
[emphasis added].

Under Section 2.1.6 of the PPS 2024, Planning authorities should support the achievement of complete communities by:

- a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;
- b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and
- c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.

The Wellington County Official Plan describes complete communities as those which: provide a diverse mix of land uses; provide a diverse range and mix of housing options; expand convenient access to a range of transportation options, public service facilities, open spaces, recreational facilities, and healthy, local, and affordable food options; provide for more compact built form and a vibrant public realm; and, are age friendly (Policy 2.1.5).

The Concept Plan demonstrates that an appropriate range and mix of land uses can be accommodated on the Subject Lands to meet the long-term needs of the community. Although conceptual, the Plan envisions a diverse array of housing types with varying densities, designed to serve people of all ages, abilities, and incomes. This commitment to inclusivity is further reinforced by the inclusion of a conceptual senior apartment block, which specifically addresses the housing needs of older adults and individuals with varying abilities.

Additionally, the distribution of parks and open spaces, integrated with the proposed natural heritage system, provides essential on-site public spaces that enable residents to live, work, and play within the community. These amenities not only enhance the quality of life, but also promote social interaction and recreational opportunities for all residents.

The Subject Lands are immediately adjacent to the existing community of Elora/Salem, ensuring convenient access to a broad range of community, commercial, and institutional uses. This alignment with the principles of complete communities, as outlined in the PPS 2024 and the Wellington County Official Plan, supports the creation of vibrant, inclusive neighborhoods that cater to diverse needs.

6.1.3 Providing a Range and Mix of Housing

The introduction of the PPS articulates that *“Ontario will increase the supply and mix of housing options, addressing the full range of housing affordability needs”*. It is further stated that *“[e]very community will build homes that respond to changing market needs and local demand”* and *“[p]roviding a sufficient supply with the necessary mix of housing options will support a diverse and growing population and workforce, now and for many years to come”*.

Section 2.2 of the PPS specifically addresses housing matters, stating that planning

authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;
- b) permitting and facilitating:
 - 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
 - 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;
- c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and
- d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Section 3.3.1 of the County of Wellington Official Plan emphasizes the importance of providing affordable housing options to meet the needs of residents. The Plan states that the County is committed to ensuring that a range of affordable housing options is available to low- and moderate-income households.

The proposed Concept Plan aligns with these policies by offering a development that accommodates a diverse range of housing types and densities. Single-detached dwellings will account for 43% of the housing stock, maintaining their role as the dominant form of housing, consistent with local policy direction. However, the Concept Plan also introduces medium-density housing, such as townhouses, to diversify the housing stock and provide more affordable options for current and future residents. Additionally, the concept plan proposes an efficient development pattern comprising a range and mix of land uses, including residential uses that encourage a range of densities, dwelling types, and attainable housing opportunities to serve the needs of current and future residents. This mix ensures an efficient use of land and infrastructure while addressing the need for a compact, sustainable development pattern. Furthermore, the inclusion of a seniors' residence responds to demographic trends and provides housing options for individuals of all ages and abilities.

The Concept Plan also supports the PPS's emphasis on transit-supportive development

and active transportation. By integrating a range of densities and compact urban design, the plan facilitates walkability and efficient connectivity to existing and planned transit networks. This approach not only aligns with the Township's Official Plan but also ensures that the development contributes to broader sustainability objectives.

Section 8.1 of the County Official Plan describes Urban Centres as the primary focus for housing, commerce, services, job creation, recreation, and community facilities. The Plan recognizes that urban centres are the primary focus for growth, but emphasizes a need to retain a small-town lifestyle (Policy 8.1.2). The vision statement outlined under Policy 8.1.3 articulates that *“that traditional community values will be maintained and the small-town character will be enhanced”* and *“that the single-detached home will continue to be the dominant form of housing, but a greater variety of housing types will also be available”*.

Policy 8.1.3 a) states that single-detached dwellings are currently the dominant housing type in the Urban Centres designation and that this trend is expected to continue. However, new housing types are needed to provide a greater variety of residential accommodations as well as a more affordable housing supply (Section 8.3.1). The Official Plan further contemplates that this variety in dwelling types, consisting of semi-detached, townhouse, and apartment dwellings will be implemented in response to this need and that these units may eventually account for at least one-quarter of all housing units in most Urban Centres (Section 8.3.1).

Similarly, the Township Official Plan articulates a desire to encourage the production of a wide range of housing types to meet future housing needs. The Plan provides that Council *shall* provide for the opportunity, through subdivision approval and zoning bylaw approvals, for a variety of housing types to be provided (Policy C.5.1). Moreover, Policy C.5.6.3 articulates that within Greenfield areas, the Township will encourage increased densities, a broader mix of housing, and will encourage the introduction of medium density housing types in new subdivisions and other Greenfield areas.

As demonstrated in the Table below, single-detached dwellings make up the dominant housing type in the Elora/Salem Population Centre (Population Centre 0278), making up 66% of all housing types according to 2021 Census data. With the introduction of the Concept Plan, a greater diversity of housing types can be introduced into this population centre; namely in the form of medium-density dwellings (townhouses) that provide an alternative to the current dominant housing types in the surrounding area. Based on this Table, it is our opinion that the direction of the Township's Official Plan is met in maintaining a single-detached dwellings as the dominant housing type while adding to the range of housing options and a compact form of future development.

Table 5: Pre- and Post-Development Housing Composition

Dwelling Type	Population Centre 0278			
	Pre-development*		Post-development	
	Count	Percentage	Count	Percentage
Single-detached house	6175	66%	6931	65%
Semi-detached house	530	6%	641	6%
Row house	871	9%	1194	11%
Apartment or flat in a duplex	160	2%	160	2%
Apartment (fewer than five storeys)	1530	16%	1597	15%
Apartment (five or more storeys)	110	1%	110	1%
Other single-attached house	10	0%	10	0%
Movable dwelling	10	0%	10	0%
Total	9396	100%	10653	100%

*Pre-development numbers were retrieved from Statistics Canada (2021). These numbers have been adjusted to include the Clayton Subdivision located west of the Subject Lands

It is our opinion that the proposed development is consistent with the housing policies of the PPS and conforms to the policies of the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan on matters of housing.

6.1.4 Natural Heritage Matters

The PPS 2024 also provides policy direction on matters of natural heritage features and systems. Section 4.1.1 states that “[n]atural features and areas shall be protected for the long term,” while Section 4.1.2 emphasizes that “the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved.” These policies establish the framework for preserving and enhancing natural systems within the development context.

Section 4.1.8 of the PPS states that “*development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions*”.

A portion of the Subject Lands are designated as part of the County’s Greenland System, as shown on Schedule ‘B1’. The Greenlands System is intended to include those features and areas which are part of Wellington’s natural heritage or areas in which natural or human-made conditions may pose a threat to public safety. In accordance with Section 4.1.8 of the PPS, the Concept Plan has been designed to ensure that development does not negatively impact the ecological functions of these adjacent lands. As such, the Concept Plan demonstrates conformity with this policy.

Under Section 5.2, the Greenland System contains landscapes, resources, and ecological systems that are essential to environmental and public health. The plan emphasizes the need for careful conservation of land, water, air, and biological resources to support

healthy, prosperous communities.

Section 5.3 reinforces that the Greenlands System will be maintained or enhanced. Activities that diminish or degrade the essential functions of the Greenlands System will be prohibited. Activities which maintain, restore or, where possible, enhance the health of the Greenlands System will be encouraged where reasonable

As shown in the Township Official Plan, Core Greenlands form a part of the Natural Heritage Designation, which are encouraged to be protected and enhanced (as described in Section C.3.1). When planning for the future of Centre Wellington, the Township will give consideration to the protection, preservation, and enhancement of significant natural features, including those that are designated ‘Core Greenlands’.

Section 8.8 defines Core Greenland Areas as “a composite of provincially significant wetlands, the habitat of endangered or threatened species, and floodways and hazardous lands.” Furthermore, Section 8.2 prohibits development or site alteration within Provincially Significant Wetlands, the habitat of threatened or endangered species, and floodways.

The Concept Plan has been designed to protect and maintain the natural heritage system on the Subject Lands, consistent with the policies of the PPS 2024, the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan. An Environmental Impact Study (EIS) prepared by Beacon Environmental confirms that the identified natural heritage features will be preserved, with appropriate mitigation measures in place to ensure no negative impacts on their ecological functions or adjacent lands.

In alignment with the applicable Official Plan policies and schedules, the Concept Plan designates a natural heritage system block that reflects the importance of conservation, as emphasized in Sections 5.2 and 5.3. The final determination of natural heritage system boundaries will be refined through future development applications, incorporating the findings and recommendations of the EIS. This approach ensures that the protection, maintenance, and potential enhancement of these natural features remain a priority, consistent with Section 8.8 and other relevant policies.

In summary, it is our opinion that the Concept Plan is consistent with or conforms to the applicable natural heritage policies by protecting these areas for the long term.

6.2 Policy Analysis

6.2.1 Provincial Planning Statement (2024)

The Provincial Planning Statement (the “PPS”) was introduced on October 20th, 2024, and with it, a simplified and more locally responsive planning document for municipalities. The PPS 2024 replaces both the *Provincial Policy Statement, 2020*, and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019*.

The PPS 2024 is a streamlined province-wide land use planning policy framework that provides municipalities with the tools and flexibility they need to build more homes. The PPS enables municipalities to, plan for and support development, and increase the housing supply across the province; align development with infrastructure to build a strong and competitive economy that is investment-ready; foster the long-term viability of rural areas; and, protect agricultural lands, the environment, public health and safety. Under the Planning Act, planning decisions must be consistent with the policies of the PPS.

As described above, Settlement Areas are to be *“the focus of growth and development”* (Policy 2.3.1.1). Settlement areas are to be based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, and support active transportation, among other factors (Policy 2.3.1.2).

The Subject Lands are proposed to be located in the settlement boundary to allow for and accommodate future growth, in accordance with the policies of the PPS 2024. As demonstrated by the Concept Plan, future development can be accommodated in a manner that efficiently uses land and resources, optimizes existing and planned infrastructure and public service facilities, supports active transportation, and protects natural features.

On this basis, and as demonstrated in earlier sections of this report, it is our opinion that the future development of the Subject Lands represents an efficient and appropriate opportunity to accommodate required growth, is representative of good planning, is consistent with the PPS 2024 policies, and should be accepted on this basis.

6.2.2 County of Wellington Official Plan

The County of Wellington Official Plan (“WCOP”) was adopted by Wellington County Council on September 24, 1998, approved by the Ministry of Municipal Affairs on April 13, 1999, and came into effect on May 6, 1999. The latest consolidation of the Wellington Official Plan is dated July 2024 and has since been amended through OPA 126.

The WCOP is intended to give direction over 20 years, to the physical development of the County, its local municipalities, and to the long-term protection of County resources. The Wellington County Official Plan enshrines the concepts of sustainable development, land stewardship, and healthy communities as part of the fundamental beliefs that underpin the directions of the plan. Per the WCOP, all land use and servicing decisions must conform to the policies of this plan.

Based on the proposed Official Plan Amendment application, the Subject Lands are intended to be brought into the Urban Boundary and redesignated as part of the Primary Urban System. For the purposes of this analysis, the Subject Lands are reviewed against the policies applicable to the Primary Urban System, though it is noted that the lands are currently designated Agricultural (as shown below).

Figure 3: Schedule A1 of the County of Wellington Official Plan

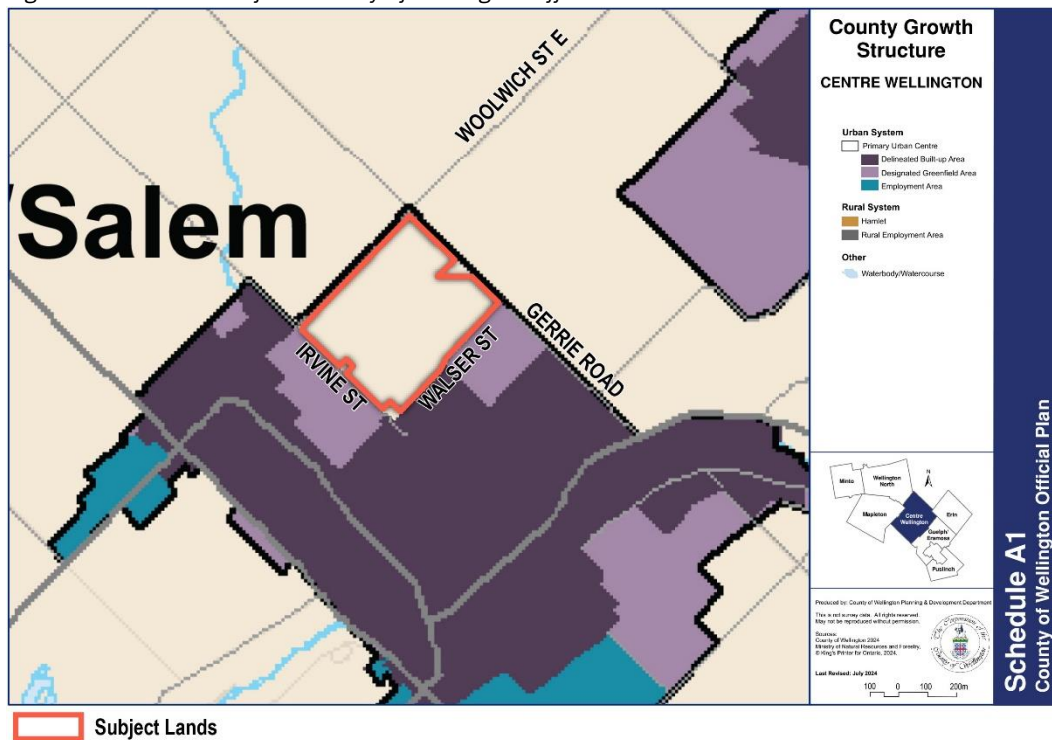
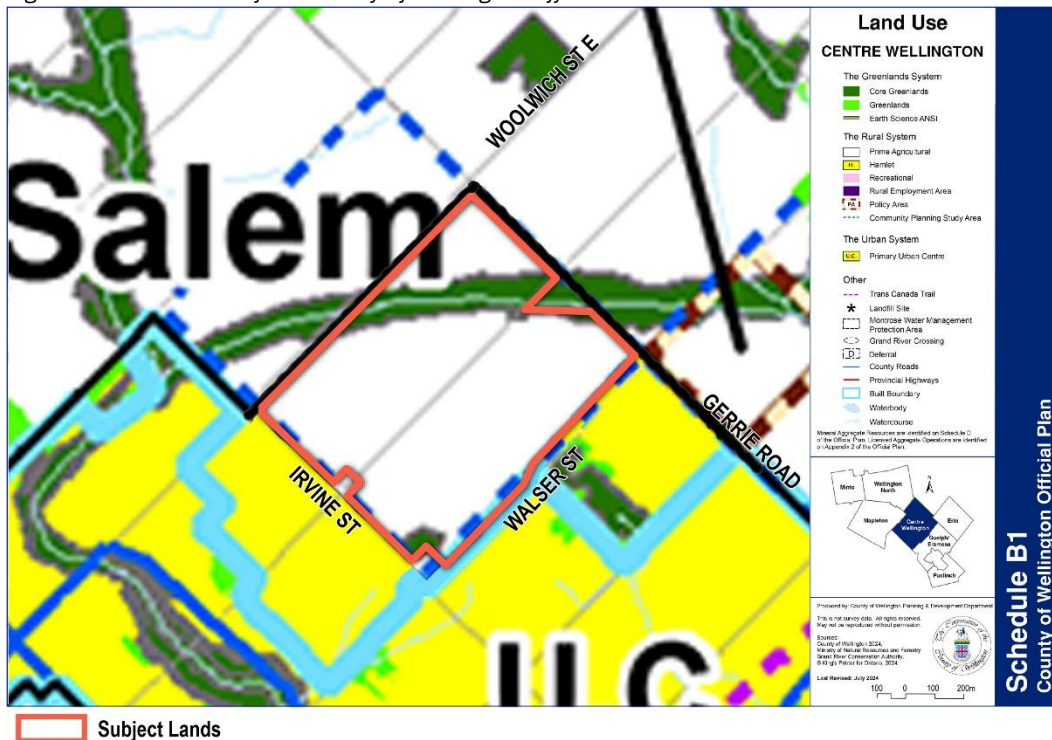


Figure 4: Schedule B1 of the County of Wellington Official Plan



Urban System

The Urban System designation, shown on Schedule A1 of the WCOP, encompasses the County's larger urban areas and are expected to accommodate the majority of growth during the planning period (Policy 7.1). New development and population increases are to be directed to Urban System areas with full municipal services (Policy 7.2).

The WCOP specifies that land use patterns in the Urban System shall promote:

- **Efficient Use of Land and Resources:** Development patterns should use land and resources effectively.
- **Efficient Use of Infrastructure:** Development must utilize planned or existing public services and avoid unjustified infrastructure expansions.
- **Environmental Stewardship:** Patterns must minimize negative impacts on air quality and climate change and promote energy efficiency.

The proposed Concept Plan aligns with these policies by facilitating a compact, higher-density form of development that efficiently uses land and resources. It leverages existing infrastructure, as confirmed by the MTE servicing memo, and incorporates active transportation options while protecting natural heritage features.

Primary Urban System

The Subject Lands are proposed to be part of the Primary Urban System, which is intended to support a full range of land uses, including residential, commercial, industrial, institutional, and open space uses (Policy 7.4.1). Specific land use details are determined by local official plans, zoning bylaws, and development policies.

Residential Policies

Primary Urban Centres shall provide a broad range of residential uses to deliver a diverse supply of housing, including affordable housing. The WCOP mandates that the County will plan for a diverse range and mix of housing options, densities, and unit sizes on full municipal services (Policy 7.4.5).

The objectives for residential development, as outlined in Section 8.3.2, are as follows:

- a) to ensure that an adequate supply of land is available to accommodate anticipated population growth over the planning period;
- b) to provide a variety of dwelling types to satisfy a broad range of residential requirements and ensure that affordable housing is available;
- c) to manage the rate of growth and the amount of residential development within the urban centre in order to maintain and enhance the small town character;
- d) to support the development, at appropriate locations and densities, of residential facilities that meet the housing needs of persons requiring specialized care;
- e) to ensure that adequate infrastructure will be available to all residential areas;
- f) to minimize potential compatibility issues between residential and other land

uses;

- g) to encourage intensification, development proposals provided they maintain the stability and character of existing neighbourhoods;
- h) to support the establishment of certain non-residential uses in appropriate locations of the municipality;
- i) to encourage residential developments which incorporate innovative and appropriate design principles which contribute to public safety, affordability, energy conservation and that protect, enhance and properly manage the natural environment;
- j) to monitor the housing supply by reviewing new development, demolitions, intensification, and the number of affordable housing units brought on stream.

The Concept Plan aligns with these objectives by providing sufficient land for future residential growth and demonstrating a mix of housing types, including medium-density blocks, to meet housing demand, will minimize compatibility issues/maintain and enhance the small town character by generating a like-on-like development interface, and will be serviced by existing infrastructure.

The residential designation permits a wide variety of housing types, including detached and semi-detached dwellings, townhouses, and apartments, as well as other housing forms subject to zoning by-law and plan policies (Section 8.3.3). Among these, medium-density residential uses are supported by specific policies that guide their development.

The provision of medium-density housing plays an essential role in the Concept Plan, aligning with County objectives for providing more attainable housing options. This housing typology is an important component of the Concept Plan, offering a balanced approach to accommodating future growth and meeting the community's housing needs.

The WCOP provides specific criteria for medium-density residential developments, as outlined in Section 8.3.5. These include:

- Density thresholds of up to 35 units per hectare (14 units per acre) for townhouses or row houses, and up to 75 units per hectare (30 units per acre) for apartments.
- Requirement for developments to be located on full municipal services.

The Concept Plan proposes medium-density development at approximately 34 units per hectare. This density aligns with the recommended threshold for townhouses and row houses and can deliver contemporary housing forms and attainable housing options. . The details of the proposed medium-density blocks will be evaluated against the criteria of Section 8.3.5 as part of future development applications.

Based on the above, it is our opinion that future development of the Subject Lands conforms to the Primary Urban Systems policies of the Wellington County Official Plan. We note that consistency with these policies will be further addressed through future development applications.

Greenlands System

Section 7.4.13 provides additional direction for lands within the Greenlands System. These policies provide direction for areas where urban development is adjacent to or near Greenland System features, as identified on Schedule B of the Plan. Section 8.9 of the County Official Plan states that the Greenland areas designated within Urban Centres consist mainly of Core Greenlands. The primary purpose is to identify hazardous areas which pose a threat to property or human life or have inherent limitations to development.

It is the objective of the Greenlands System to:

- a) to provide protection to those aspects of the natural environment which can be harmed by urban development;
- b) to protect the community from those aspects of the natural environment which can pose a threat to public health and safety;
- c) to ensure that natural areas are protected and their natural beauty retained for future generations;
- d) to improve public access to natural areas where appropriate; and
- e) to encourage stewardship and enhancement of the local natural environment.

Per Section 8.9.3 of the Plan, within the Core Greenlands and Greenlands designations on Schedule B, permitted uses and policies outlined in the Greenland System of this Plan shall apply. An analysis of the Greenlands System is provided under Section 6.2 of this report.

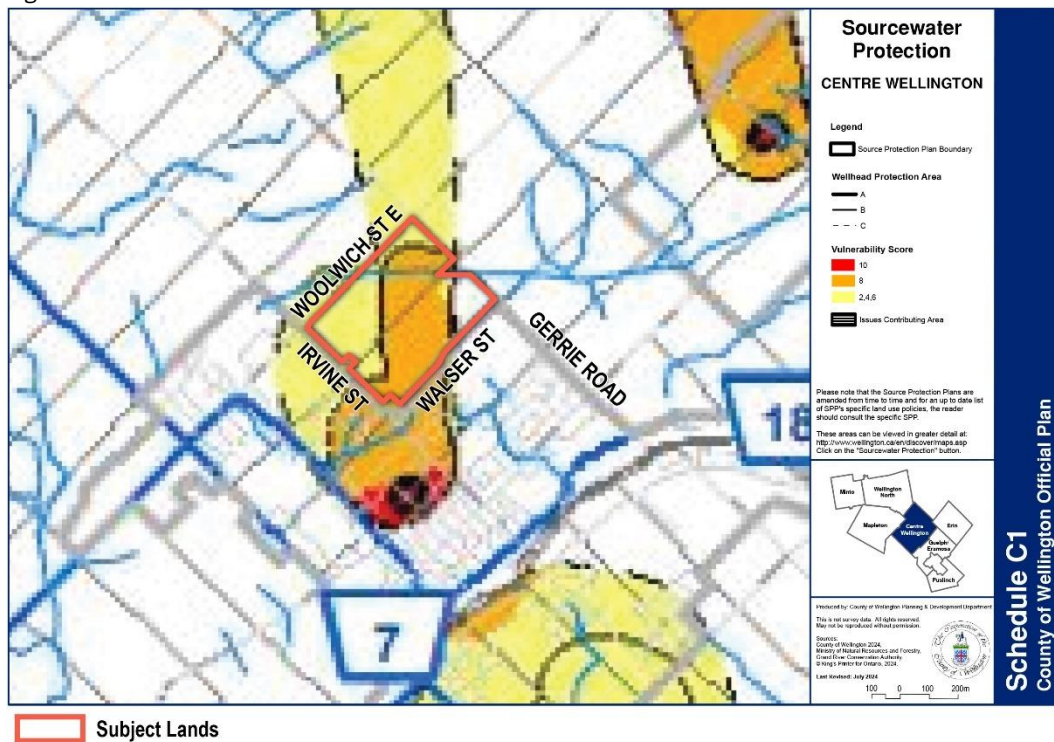
An Environmental Impact Study (EIS) prepared by Beacon Environmental confirms that the Concept Plan complies with these objectives by protecting natural heritage features and identifying an NHS block within the Subject Lands. The EIS demonstrates that development will safeguard sensitive natural areas while supporting environmental stewardship.

Based on the findings of the EIS and the design of the Concept Plan, it is our opinion that the proposed development conforms to the Greenlands System policies of the County Official Plan.

Wellhead Protection

Schedule C1 of the County Official Plan identifies that the Subject Lands are within Wellhead Protection Areas 'B' and 'C' and are subject to the applicable policies of the County Official Plan. These areas are also subject to the vulnerability score identified on this Schedule and are located within areas identified as '2,4,6' and '8', as shown in Figure 3.

Figure 5: Schedule 'C1': Sourcewater Protection



The Official Plan describes the Wellhead Protection Area as “an area that is related to a wellhead and within which it is desirable to regulate or monitor drinking water threats because land use activities in these areas have the potential to affect the quality or quantity of water that flows into the well” (Policy 4.9.5.1). It is noted that the ‘vulnerability score’ identifies the degree to which a WHPA or IPZ within the County is vulnerable to contamination. The vulnerability score of an area can range from 1 to 10, with 10 being the most vulnerable.

Section 4.9.5.2 states that land use activities that may pose a drinking water threat to municipal water supplies are defined by the Clean Water Act, 2006. These uses generally include disposal sites, storage sites for materials, chemicals, fuel, and any hat reduces the recharge of an aquifer, among similar uses, as listed in Section 4.9.5.2 of the Official Plan. The proposed development does not include any sensitive land uses that would pose a threat to drinking water

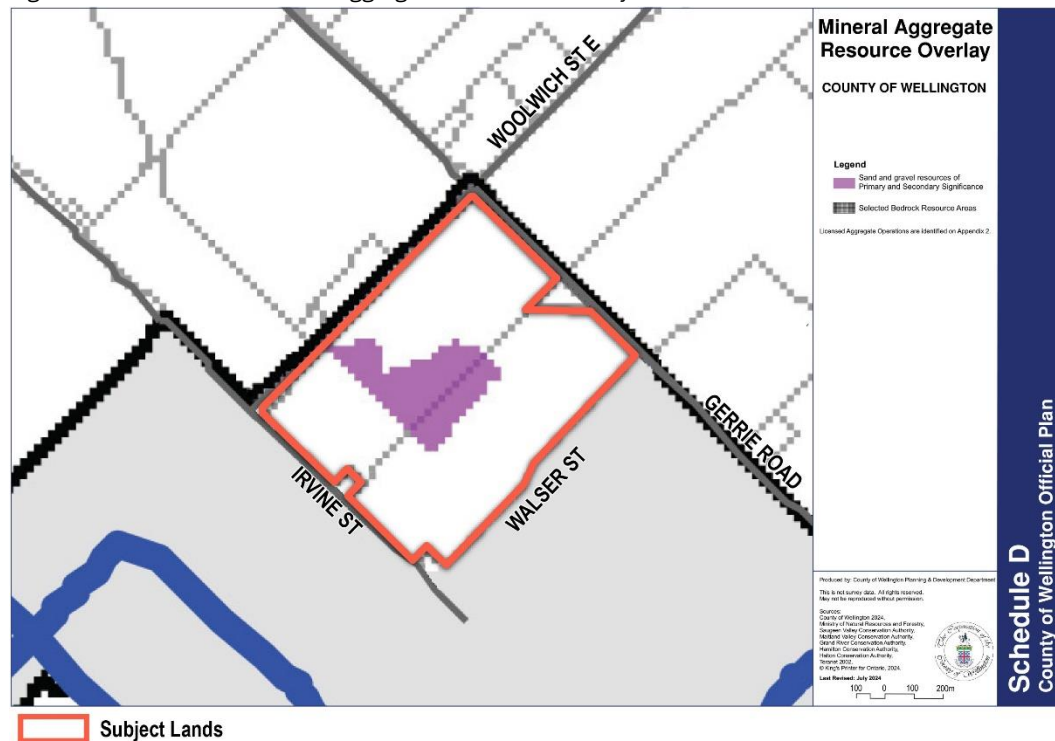
Section 4.9.5.3 of the Plan states that, notwithstanding the land uses permitted by the underlying land use designation in this Official Plan an application for development, redevelopment, or site alteration within a Wellhead Protection Area, Intake Protection Zone, or Issue Contributing Area where a drinking water threat could be significant requires a Section 59 Notice issued by the Risk Management Official.

In compliance with this policy, a Section 59 Notice will be prepared and submitted as part of future detailed development applications.

Mineral Aggregate Resource Overlay

The Subject Lands are partially subject to a Mineral Aggregate Resource Overlay as shown on Schedule D of the County Official Plan. A portion of the lands is identified as containing "sand and gravel resources of Primary and Secondary Significance," based on geological data from the Ministry of Northern Development and Mines (ARIP No. 162).

Figure 6: Schedule 'D': Mineral Aggregate Resource Overlay



Section 6.6 and 6.6.1 of the County Official Plan states that the overlay identifies areas with high potential for aggregate extraction but does not presume that extraction is appropriate in all cases. Development on or adjacent to the overlay is permitted if aggregate extraction is deemed infeasible, the proposed development serves a greater long-term public interest, and issues of public health, safety, and environmental impact are addressed.

The County Official Plan excludes certain areas from the overlay, such as primary and secondary urban centres (plus a 300-metre buffer), provincially significant wetlands, and significant woodlands, to account for environmental and land use constraints.

Soil-Mat has prepared an analysis in a memo titled Geotechnical Considerations – Aggregate Resource Potential, dated February 12, 2025, which concludes that the Subject Lands are predominantly composed of silty sand and sand soils with minor gravel content, and do not represent a significant mineral aggregate resource. The investigation found that while there are some isolated gravelly layers, they are highly variable across the site and do not constitute a viable aggregate resource. The sandy soils lack the

necessary gravel fraction to produce high-quality construction aggregates such as OPSS Granular A or B. While some sand may be suitable for use as concrete or septic sand, it would require extensive sorting and processing, making extraction neither technically nor economically viable. Given these findings, the analysis confirms that the Subject Lands do not contain a significant mineral aggregate resource.

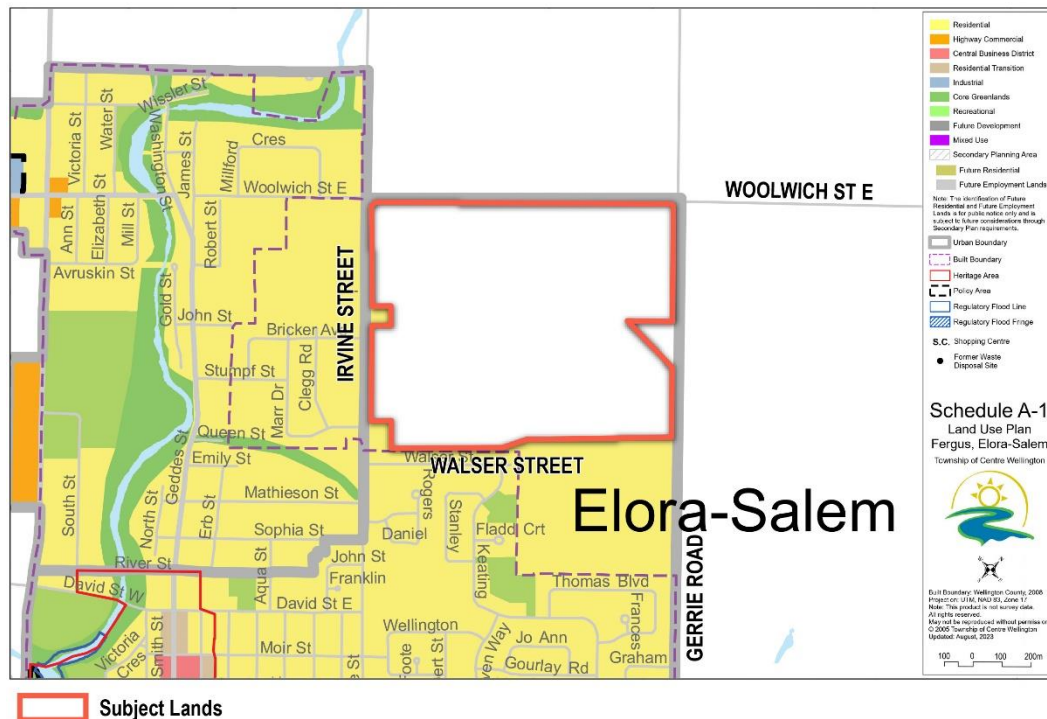
As such, the proposed development is consistent with the policies of the County Official Plan, as it does not impact aggregate resources. Furthermore, given that this application will bring the Subject Lands into the primary urban centre, the Mineral Aggregate Resource Overlay policies, it is anticipated that this overlay will no longer apply, similar to what OPA 126 has proposed for other expansion areas.

6.2.3 Township of Centre Wellington Official Plan (2013 Consolidation)

The Centre Wellington Official Plan (“CWOP”) was adopted in November 2003 and subsequently approved in May 2005. It is a policy document outlining the Township’s vision for land use, emphasizing the preservation of community character while enabling managed growth. The Official Plan outlines goals, objectives, and policies to guide future physical, social, and economic development, and change within the Township.

Based on the proposed Official Plan Amendment application, the Subject Lands are intended to be brought into the Urban Boundary and intended to be redesignated as Residential and Core Greenlands. For the purposes of this analysis, the Subject Lands are reviewed against the policies applicable to these proposed designations, though it is noted that the lands are currently located outside of the Urban Boundary and are not a part of the Township of Centre Wellington Official Plan, as shown below. We note that the Township of Centre Wellington relies on the policies of the County Official Plan Rural and Greenlands areas, per Section A.2.

Figure 7: Schedule A1 Township of Centre Wellington Official Plan



Residential Designation Policies

The Residential designation policies under Section D.2 of the CWOP acknowledge the predominance of single-detached homes in urban centres, but highlight the need for diverse and affordable housing types, including townhouses, apartments and group/nursing homes, to address evolving housing demands. It is expected that these higher-density dwelling types may eventually account for at least one quarter of all housing units in Fergus and Elora-Salem where full municipal services are available.

The Plan outlines several objectives to ensure that the character and integrity of existing residential areas are preserved while enabling controlled growth and development within the community. Generally, these objectives guide the permitted uses detailed under Section D.2.3.

The Plan permits a variety of housing types, but low-rise and low-density housing forms such as single-detached and semi-detached dwelling units shall continue to predominate. Townhouses, apartments and nursing/group homes are permitted subject to the requirements of the Zoning By-law and the applicable policies of the Official Plan. It is emphasized that the character of existing low-density residential neighbourhoods should generally be protected and land uses that would cause significant loss of privacy, loss of view, or loss of sunlight due to shadowing or which would be incompatible due to their nature will be discouraged. Medium-density housing typologies, permitted under Section D.2.5, are subject to criteria outlined in the Plan and are to be further evaluated during the draft plan of subdivision application process.

The Concept Plan demonstrates that the Subject Lands can accommodate a variety of housing options that simultaneously reflect the context of the surrounding community and will be on full municipal services. Medium-density townhouses are primarily situated along Irvine Street, aligning with the Township's intention to focus growth along this corridor in accordance with policy D.2.5.5, which encourages medium density development to locate on major roadways and arterial roads. This design delivers a seamless transition into lower-density housing forms as the development moves away from Irvine Street, ensuring compatibility with the surrounding low-density neighbourhood to the south.

Future development will meet applicable criteria under Section D.2.5 and Section E.9.1 of the Plan during the detailed development application stage.

It is our opinion that the proposed development conforms to the policies of the CWOP and will contribute to achieving its objectives by introducing diverse and attainable housing types, utilizing existing infrastructure, and maintaining compatibility with the community.

Greenlands System

The Core Greenlands policies are detailed under Section D.8 of the Township Official Plan. This designation is a composite of provincially significant wetlands, the habitat of endangered or threatened species, and floodways and hazardous lands.

As described by Section D.8.2:

“Upon lands designated Core Greenlands, no development or site alteration is permitted within Provincially Significant Wetlands, in provincially significant portions of the habitat of threatened or endangered species, or in the floodway. Uses shall be limited to conservation and resource management, open space and passive recreation”.

The Official Plan states that “[t]he Core Greenlands designations on the schedules to this Plan are based on mapping provided by the County in consultation with the Grand River Conservation Authority. The limits of the Core Greenlands designation may need to be refined by more detailed mapping on individual sites, such as when an Environmental Impact Study is prepared regarding a proposed development within or abutting such lands” (Section D.8.4). Moreover, it is stated that “Where more detailed mapping is available, minor adjustments may be made without an amendment to this Plan and the land use policies of the adjacent designation will apply as determined by Council”.

In accordance with the above, an NHS block is proposed to maintain the natural heritage areas on the Subject Lands and an Environmental Impact Study or an equivalent study will be provided as part of future development applications of these lands.

Roads

Schedule “B” of the Official Plan identifies Irvine St as a ‘Collector Road’, Nichol Rd 15

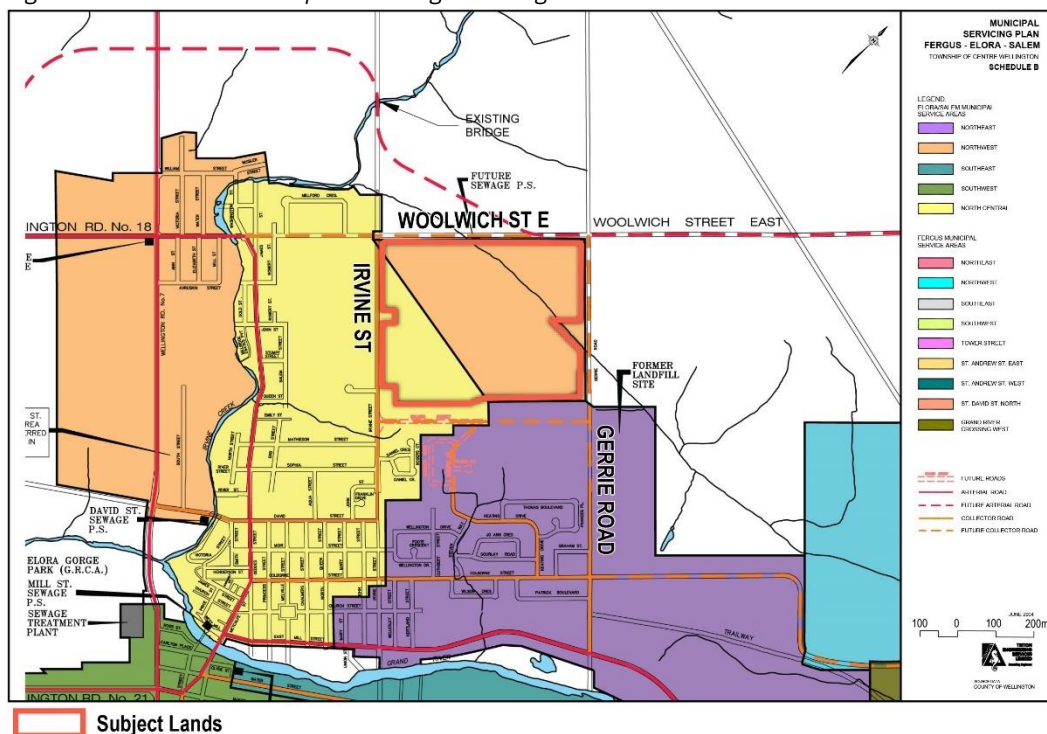
partially as a ‘Future Collector Road’/‘Future Arterial Road’, and Gerrie Road as ‘Future Arterial Roads’. The Township Official Plan states that Schedule “B” incorporates a roads plan identifying existing and proposed future arterial and collector roads and their potential alignment as required to promote the safe and efficient movement of people and goods within the Township. Road widenings and urbanization of the future arterials/future collectors will be addressed through detailed development applications.

This current and future road pattern will be addressed when development applications are filed on the Subject Lands. Impacts will be assessed through the preparation and submission of a Traffic Impact Study or an equivalent study.

Servicing

The Subject Lands are identified on Schedule ‘B’: Municipal Servicing Plan, of the Township Official Plan. Section C.6.2: Provision of Sewer and Water Services, states that *“The Fergus and Elora-Salem Urban Centres have municipal sewer and water services. New development will be required to connect to these services where they are available. It is the long-term intention of the Township to eventually provide municipal sewage and water services to all of the areas that are designated as part of the Fergus and Elora-Salem Urban Centres”* [emphasis added].

Figure 8: Schedule B: Municipal Servicing Plan Fergus - Elora - Salem



We note that the plan further states that the “inclusion of lands on Schedule “B” that are outside of the Urban Centre boundary does not imply that services will be extended beyond the Urban Centre boundary or that such lands can be developed without first being

designated Urban Centre in accordance with all other applicable policies of this Plan”.

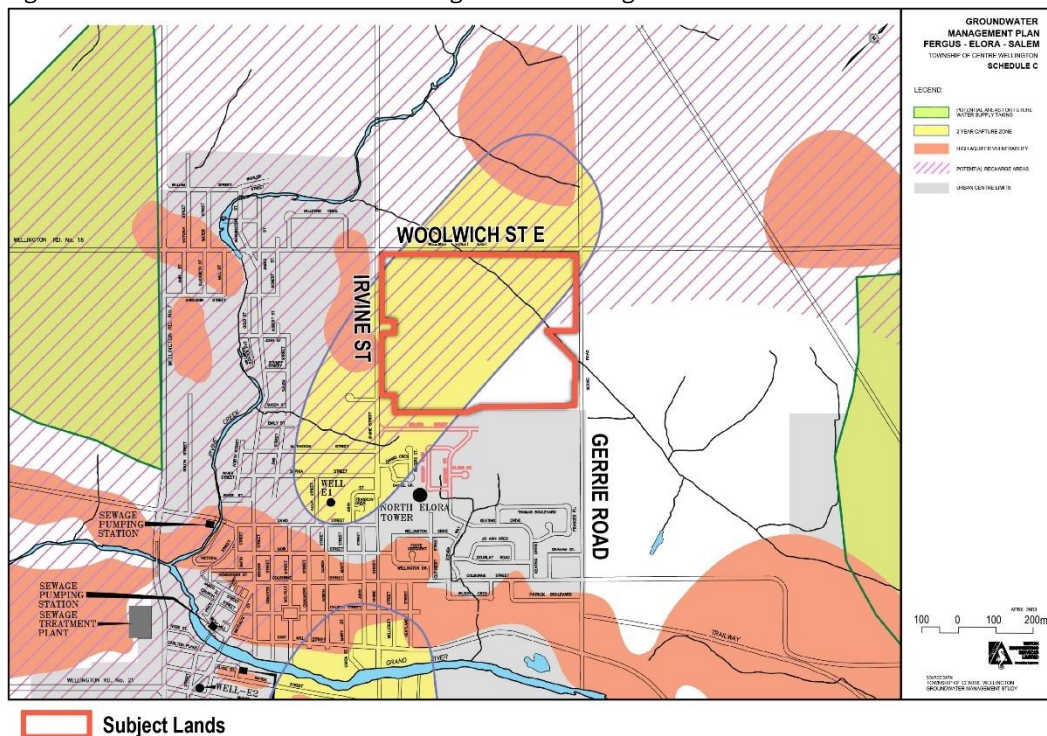
The Township’s long-term vision is to extend municipal services to all lands designated as part of the Fergus and Elora-Salem Urban Centres, as well as adjacent lands including the Subject Lands. While the Subject Lands are currently outside the Urban Centre boundary, they are proposed for inclusion as part of the settlement area through this application. This aligns with the broader intent of the Township to manage growth efficiently and extend services to areas identified for urban development.

To address servicing requirements, a Functional Servicing and Stormwater Management Study has been prepared by MTE for the Subject Lands. The study demonstrates that municipal infrastructure exists and can be extended to the Subject Lands with minimal investment. It outlines the feasibility of connecting to existing municipal sewer and water services, aligning with the Township’s infrastructure capacity and growth objectives.

Wellhead Protection

Section C.4 of the Township Official Plan sets out policy direction for ground and surface water resources. It is the policy of the Plan that land use planning policies and decisions shall be coordinated with and support related water initiatives such as subwatershed plans, fisheries management plans and remedial action plans.

Figure 9: Schedule 'C': Groundwater Management Plan Fergus - Elora - Salem



Under the Official Plan, the Subject Lands are located within a ‘2-year capture zone’ and a ‘potential recharge area’, as depicted on Schedule C.

Policy direction for Wellhead and Capture Zone Protection is detailed under Section C.4.5.2 b). This Section articulates that *“well field capture zones have been delineated for the municipal wells in Fergus and Elora using the groundwater flow model developed as part of Groundwater Study. Schedule “C” shows the simulated area for the 2-year time of travel for the Fergus and Elora municipal wells. A 2-year time of travel zone is proposed to delineate an appropriate area for wellhead protection. This area warrants special consideration due to the increased potential for surface contamination to rapidly reach the well. There will be limited opportunity for mitigation of groundwater contamination in within this zone”*.

Recharge Areas are defined under Section C.4.5.2 d) as *“major recharge areas within and adjacent to the Urban Centres are shown on Schedule “C”. These areas represent areas of higher permeability surficial deposits. Recharge areas are recognized for their contribution to the groundwater system. Education and awareness as well as potential methods of increasing recharge through specific management practices should be linked to drought management programs through the GRCA. The ability to potentially increase recharge over long periods of time, especially during periods of high precipitation and/or runoff, will aid in maintaining higher water table conditions on a more regional scale during dry periods. This will in turn, sustain baseflow for longer periods of time during drought conditions”*.

As detailed in the preliminary hydrogeological investigation prepared by Soil-Mat Engineers, it is acknowledged that the Subject Lands are within Wellhead Protection Area (WHPA). However, that report concludes that there would be no anticipated negative impact from the proposed development on nearby potable wells, including municipal supply wells. Further, the preliminary hydrogeological assessment articulates that given the proposed development would be provided with municipal water supply, there would be no impact to potential supply aquifers or associated water wells in the area, if any.

7.0 Official Plan Amendment

7.1 Official Plan Amendments

The purpose of this application is to amend the County of Wellington Official Plan to allow for the residential uses on the Subject Lands corresponding to the LNA in this report. An Official Plan Amendment is required to both the County of Wellington and the Centre Wellington Official Plans to facilitate the land uses depicted in the Concept Plan

7.2 Proposed Official Plan Amendments

The purpose of this application is to amend the County of Wellington Official Plan and the Township of Centre Wellington Official Plan to allow for the future delivery of community area uses on the Subject Lands given that there is a land need to 2051 to meet the population forecasts.

Under the County Official Plan, the Subject Lands are currently designated 'Prime Agricultural' and are located beyond the extent of the Primary Built-Up Area, as shown on Schedules 'A' and 'B1'. An OPA is required to redesignate the Subject Lands and include them within the settlement area for urban uses. A Draft Official Plan Amendment is submitted as part of this application.

A local OPA is also submitted to redesignate the Subject Lands under Township of Centre Wellington Official Plan. The amendment proposes to apply a Residential and Core Greenlands designation to these lands. A Draft Official Plan Amendment is submitted as part of this application.

7.2.1 Rational for Official Plan Amendment(s)

Based on the detailed LNA provided as part of this submission, it is our opinion that the proposed amendments to the Official Plan are required, represent good planning, and are in the public interest. The inclusion of the Subject Lands within the urban boundary is essential to addressing identified growth needs to 2051, as demonstrated by MGP's comprehensive LNA. Specifically, our analysis concludes that approximately 314 hectares of additional Community Area land is required County-wide, including approximately 241 hectares within the Township of Centre Wellington, to meet the County's growth demands under the new Ministry of Finance population projections. The proposed inclusion of the Subject Lands, totaling approximately 67 gross developable hectares, represents a critical step toward achieving these requirements in a balanced, sustainable, and fiscally responsible manner.

The Concept Plan demonstrates how these lands, and the proposed uses, align with the 2024 PPS and conform to the goals, objectives, and policies of the Wellington County Official Plan and the Centre Wellington Official Plan by:

- **Addressing Demonstrated Land Needs:**
 - The proposed settlement area expansion provides sufficient land to meet the County's housing and growth requirements to 2051, ensuring the Township achieves its allocated share of population growth.
- **Promoting Logical and Orderly Development:**
 - Facilitating a logical, orderly, and efficient pattern of development, the Subject Lands are directly adjacent to the existing built-up area and form a natural extension of the urban boundary. Their location represents an optimal area to accommodate future growth in a way that ensures compatibility with surrounding uses.
 - The Concept Plan demonstrates a seamless transition to adjacent areas, including the thoughtful placement of low-density housing forms along the southern boundaries to provide a harmonious interface with existing single-detached dwellings.
- **Supporting Compact, Multi-Modal Communities:**
 - The proposed development pattern avoids leapfrogging, promotes efficient land use, and supports active transportation by fostering a pedestrian-oriented, transit-supportive environment.
- **Creating a Complete Community:**
 - The Concept Plan proposes a thoughtfully designed development pattern that introduces a diverse range and mix of housing options, tailored to meet local needs while enhancing housing diversity.
 - The proposed housing typologies are respectful of the existing dominant housing forms, incorporating low-density housing along the edges to maintain compatibility with adjacent single-detached dwellings, while also integrating higher-density and more attainable housing options in select locations to address broader community needs.
- **Protecting Natural Heritage Systems (NHS):**
 - The Concept Plan protects and preserves identified NHS areas, with further evaluation to be conducted through future development applications.
- **Delivering Community Benefits:**
 - The proposed development increases available parkland for the benefit of current and future residents. The inclusion of a community park is designed to meet the recreational needs of the larger Elora/Salem community.

- The community park has an opportunity to connect to the NHS system with a trail and provide additional passive and active recreational opportunities
- **Aligning with Settlement Expansion Criteria:**
 - Strategic Location: The lands are adjacent to the existing settlement area, strategically located for efficient infrastructure extension and service delivery.
 - Environmental and Agricultural Considerations: The expansion avoids Greenbelt lands, specialty crop areas, and other protected zones.
 - Sustainable Development: The development pattern ensures compact, climate-conscious growth, aligning with the County's sustainability objectives

For the reasons stated above, it is our opinion that the requested OPAs represent good planning, and should be approved on this basis.

8.0 Planning Opinion

8.1 Statement of Conformity with Policy Documents

As discussed in this report, the Provincial Planning Statement (2024), the County of Wellington Official Plan (2024 consolidation), and the Township of Centre Wellington Official Plan (2013 consolidation) have been reviewed to assess the appropriateness of the proposed development. It is my opinion that the proposed development is consistent with or conforms to the policies of these documents, as proposed to be amended, and implements good planning that is in the public interest.

8.2 Conclusion

The proposed settlement boundary expansion and associated official plan amendments represent good planning and is in the public interest, as they will help to achieve and facilitate necessary growth in the Township of Centre Wellington and the County of Wellington. The approval of this settlement boundary expansion and related OPAs will enable future development to occur on these lands in a manner that is logical and efficient, promoting a compact built form that is compatible with the surrounding established community. The proposed uses on these lands, as demonstrated by the Concept Plan, will contribute to the development of a complete community in this settlement area. The OPAs are consistent with or conform to relevant provincial and municipal policy, implementing the policies of the County of Wellington Official Plan and the Township of Centre Wellington Official Plan. For these reasons, it is our opinion that this application represents good planning and is in the public interest.

APPENDIX 1



Date:	March 4, 2025
Project:	County of Wellington Land Needs Assessment
MGP File:	24-3414
Subject:	County of Wellington and Centre Wellington Community Area Land Needs Assessment Methodology and County of Wellington Designated Greenfield Area Density Analysis Methodology

This memo outlines the Land Needs Assessment Methodology (“LNA”) used to determine the amount of Community Area land required within the County of Wellington, as well as the Township of Centre Wellington, to accommodate the forecasted growth to 2051. This analysis was performed by Malone Given Parsons Ltd. (“MGP”).

In addition, this memo outlines the methodology involved in the analysis performed by Malone Given Parsons Ltd. to calculate the supply of the Community Area within the County of Wellington’s Designated Greenfield Area (“DGA”), which was used as input into the land needs assessment.

1.0 County of Wellington and Centre Wellington Community Area Land Needs Assessment Methodology

There are four (4) main components involved in the process.

- 1) **Population Forecast:** Establish the total population growth based on the 2021 Census and 2051 population forecast in the Ministry of Finance population projections at the County-level. For lower-tier municipalities, utilize the upper-tier municipality population distribution as part of their background work, to inform the population distribution.
- 2) **Housing Need:** Forecast total housing need by dwelling type to achieve the population forecast at the County-level, and then use that to inform the housing need by dwelling type at the lower-tier level.
- 3) **Housing Supply Potential by Policy Area:** Allocate residential units by dwelling type to the three policy areas: Built-Up Area, Designated Greenfield Area (“DGA”) and Rural Area, in each of the lower tier municipalities.
- 4) **Need for Additional Land:**
 - Calculate existing DGA unit supply.
 - Determine the amount of growth needed to be accommodated in the new DGA and calculate the Community Area land need requirement based on the unit mix.

The land needs assessment (LNA) methodology is applied initially at the County level to establish the total forecast housing need, and then with a more detailed assessment for each lower-tier municipality to determine the amount of land required to accommodate forecasted growth to 2051 and to ensure

consistency across all forecasts.

For the purposes of demonstrating the process of this land needs assessment, the summary tables will be at the County level and for the Township of Centre Wellington. Summary tables for the entire County are provided as part of Attachment 1.

1.1 Population Forecasts (Component 1)

In accordance with the Provincial Planning Statement (PPS) 2024, municipalities are directed to base their population projections on those provided by the Ministry of Finance. The Ministry of Finance (MOF) provides population projections based on larger census subdivision areas, which can be appropriately considered regional market areas under the PPS 2024. Regional market areas are defined as larger geographic regions that encompass multiple municipalities and reflect how housing markets, employment patterns, and population growth function at a broader scale.

In this case, the Ministry of Finance groups the County of Wellington and the City of Guelph into a single area. It is our opinion that this census subdivision is an appropriate scale to consider growth, particularly given the inevitable interrelation of housing and employment between the County of Wellington and the City of Guelph with residents who would choose to settle in this area. As such, we consider this one regional market area as per the PPS 2024. Moreover, the Ministry of Finance does not disaggregate its population forecast within CSDs; it is required that a split of population and employment growth between Wellington County and the City of Guelph be determined from the Ministry of Finance Population projections to 2051.

To disaggregate the MoF population projections in this regional market structure, we reviewed the population growth in each area from the 2021 Statistics Canada Census to the 2051 forecasted growth prepared for the former Growth Plan. Our review concluded that the distribution of growth assumed in the Growth Plan forecasts is a reasonable basis for assessing future trends, which assumed an increasing share of growth being directed to the County of Wellington over the next 25 years. This is appropriate given that the municipalities within the County, specifically Centre Wellington, has servicing potential, has land adjacent to existing settlement areas (whereas Guelph has grown to its boundaries) and that growth directed to these areas can accommodate growth in a complete community.

We have continued to allocate growth to the County of Wellington based on the anticipated distribution observed in the Growth Plan forecasts. This results in the County of Wellington accommodating approximately 49% of the population growth from 2021 to 2051 as shown in the table below.

Table 1: Estimate of Population Distribution

Year	Guelph		Wellington		TOTAL
	Number	%	Number	%	
2021 Census	143,740	60%	97,286	40%	241,026
2051 Growth Plan	208,000	57%	160,000	43%	368,000
Growth	64,620	51%	62,714	49%	126,974

The Ministry of Finance projects that the Wellington census subdivision area will have a population projection of 400,166 in 2051, which is 32,166 higher than the combined Growth Plan forecasts for the County of Wellington and the City of Guelph. Assuming a growth split of the Growth Plan forecast

between the two municipalities, the County of Wellington is estimated to account for 49% of that additional population growth. As a result, the County of Wellington is anticipated to have a population projection of 175,887 by 2051 (increase of 15,887 from the Growth Plan) to align with the Ministry of Finance projections.

In this analysis, the 2021 net undercount rate is applied, along with the 2021 non-household population rate based on Census data, to ensure accurate forecasting. The total population growth in the County of Wellington from 2021 to 2051 is projected to be 79,297; this growth assumption is used to estimate the unit forecast in Component 2.

Table 2: County of Wellington Population Forecasts

	2021 Census ¹	2051 Forecast	Growth 2021-2051
Population	97,286	177,154	79,868
Household Population	96,095	174,985	78,890
Non-Household Population ²	1,191	2,169	978
Net Undercount Rate ³	-0.72%	-0.72%	
Total Population⁴	96,591	175,887	79,297

Sources:

¹Statistics Canada, 2021 Census Profile.

²Statistics Canada, 2021 Census Profile. Assumed a rate of 1.22% for non-household population.

³Statistics Canada, 2021 Census net undercount rate for the Guelph CMA. Carried forward to 2051.

⁴Ministry of Finance Population Projections to 2051, dated 2024

The same methodology that we applied to distribute the County-wide population forecast, is used for each lower-tier municipality. To ensure consistency, we review the growth share for each municipality by comparing the 2051 growth forecasts from the County of Wellington's land needs assessment to the 2021 Census population. This determines how much growth each municipality is expected to accommodate based on previous forecasts. We then distribute the additional population in the County of Wellington based on the Ministry of Finance projections (as described earlier), across the lower-tier municipalities. This additional population is allocated proportionally based on each municipality's existing share of growth. The adjusted population totals are then added to the previous 2051 forecasts to generate the revised population forecasts. The results of this allocation are demonstrated in the following table.

Table 3: Revised Population Forecasts to 2051 by Lower Tier Municipality

Municipality	Population		Growth	Share of Growth	Revised Population Forecast
	2021	2051			
Centre Wellington	30,871	58,200	27,329	43%	65,058
Erin	11,895	26,200	14,305	23%	29,790
Wellington North	12,342	20,400	8,058	13%	22,422
Minto	9,029	15,300	6,271	10%	16,874
Mapleton	10,762	15,100	4,338	7%	16,189
Guelph-Eramosa	13,805	14,700	895	1%	14,925
Puslinch	7,887	10,000	2,113	3%	10,530
TOTAL COUNTY	96,591	159,900	63,309	100%	175,787

It is estimated that the Centre of Wellington's forecasted population to 2051 is 65,058, with a growth of 34,187.

Table 4: Population Forecast to 2051 for Centre Wellington

	2021 Census ¹	2051 Forecast	Growth 2021-2051
Population	31,093	62,456	31,363
Household Population	30,645	61,556	30,911
Non-Household Population ²	448	900	452
Net Undercount Rate ³	-0.72%	-0.72%	
Total Population	30,871	65,058	34,187

Sources:

¹Statistics Canada, 2021 Census Profile.

²Statistics Canada, 2021 Census Profile. Assumed a rate of 1.22% for non-household population.

³Statistics Canada, 2021 Census net undercount rate for the Guelph CMA. Carried forward to 2051.

⁴Revised Ministry of Finance Population Projections to 2051, dated 2024

1.2 Housing Need (Component 2)

The population forecast is converted into a unit forecast by dwelling type as part of Component 2. Based on the Hemson technical background work to the Growth Plan, dated August 2020, the 2051 unit forecast is 60,000 units with a growth of 24,670 units from 2021 to 2051. This forecast reflects housing trends and preferences as of 2021 and assumes no policy constraints on development. It represents a modified market-based demand forecast that serves as the basis for estimating unit need before adjustments are made to align with Provincial policy objectives. Table 5 summarizes the housing need by dwelling type. Dwelling types include the following categories: single/semi-detached houses, row houses and apartments.

Table 5: Hemson Forecasted Housing Need for County of Wellington

	Singles/Semis	Rows	Apartments	Total
2021 Census ¹	29,815	1,435	4,080	35,330
2051 Forecast ²	49,000	3,500	7,500	60,000
Unit Growth	19,185	2,065	3,420	24,670
Growth Mix (%)	78%	8%	14%	100%

Sources:

¹Statistics Canada, 2021 Census Profile.

²County of Wellington Future Dwelling Requirements, Hemson, Technical Backgrounder, 2020

The policies of the PPS 2024 require that sufficient land be provided to accommodate projected needs. Further, the policies require municipalities to provide an appropriate range and mix of housing options to meet the projected needs of current and future residents within the regional market area. The policies require municipalities to establish targets for intensification within built-up areas based on local conditions and plan new housing, to use land efficiently. Although the PPS 2024 does not impose strict intensification targets, it encourages a balanced housing approach that aligns with market demand and supports an appropriate range and mix of housing options.

To be consistent with the policies of the PPS 2024, we believe that a greater diversity of housing is necessary to accommodate the projected housing needs through a range of housing types while still achieving the principles of intensification and compact development. This revised housing mix should consider the anticipated demand for a range of housing options by prioritizing higher-density housing forms within the built-up area while maintaining a sufficient supply for grade-related, family-oriented housing in both the Built-Up Area and other growth areas. Most notably, in Wellington County, there is a lack of diversity in the supply of row housing compared to the historic demand for single/semi-detached units and apartments. Additional row housing (in all forms of rows) can provide additional housing options for new residents while still providing grade-related housing suitable for families.

To maximize the provision of grade-related and more attainable family-oriented housing, the component of household growth related to row housing was increased. By including a higher assumption for row housing, particularly street townhomes, the forecasted housing mix can accommodate similar housing preferences as single-detached homes (grade-related housing) that can still accommodate families. Additionally, townhomes can offer the potential for gentle intensification in the Built-Up Area and higher densities in the DGA while being relatively more affordable per square foot than single/semi-detached dwellings and apartments.

The proposed revised MGP housing mix achieves all of these objectives and provides a balanced mix of housing that:

- Maintains the projected demand for apartments with appropriate assumptions for intensification within the built-up area while allowing for higher-density forms of housing in other growth areas; and,
- Ensures an appropriate range and mix of housing of grade-related housing (singles, semis, and townhomes) to meet projected needs.

Table 6 translates the forecasted housing unit growth into a total projected population, using the persons per unit (PPU) assumptions derived from the County of Wellington Development Charges (DC) background study. These PPUs were applied to new units in the County of Wellington, and we have assumed that the PPU in existing units remains constant throughout the planning period, which represents a conservative assumption given that PPUs may decline over time as the population ages and household sizes shrink. Similar to Table 2, the net undercount and non-household population rates are incorporated to calculate the total population.

By applying these assumptions, the revised unit growth mix successfully accommodates the projected population growth, resulting in a total forecasted increase of 79,325 people. This approach ensures that the housing supply aligns with demographic trends while maintaining consistency with PPS 2024 objectives to provide a sufficient and achievable land supply to meet housing needs.

Table 6: Housing Need Adjusted to Achieve Population Target in County of Wellington

	Singles/Semis	Rows	Apartments	Total
Revised 2051 Unit Forecast	48,754	8,107	7,610	64,471
Revised 2051 Unit Mix (%)	76%	13%	12%	100%
Revised Unit Growth	18,939	6,672	3,530	29,141
Revised Unit Growth Mix (%)	65%	23%	12%	100%
PPU ¹	3.07	2.31	1.54	

Household Population Growth	58,048	15,439	5,443	78,930
Non-Household Population Rate ²	1.22%	1.22%	1.22%	1.22%
Non-Household Population	711	189	67	966
2021 Census Population	58,759	15,628	5,510	79,897
Net Undercount Rate ³	-0.72%	-0.72%	-0.72%	-0.72%
Forecasted Population Growth	58,339	15,516	5,471	79,325

Sources:

¹ County of Wellington DC Background Study, March 2022

² Statistics Canada, 2021 Census Profile.

³ Statistics Canada, 2021 Census net undercount rate for the Guelph CMA. Carried forward to 2051.

The same methodology used at the County level is applied to each lower-tier municipality to determine the housing unit forecast by dwelling type that accommodates the projected population growth. The projected housing mix achieves the same objectives as outlined above at the County level.

Municipality	Singles/Semis	Towns	Apartments	Total
Centre Wellington	7,610	3,563	1,540	12,713
Guelph/Eramosa	285	85	30	400
Mapleton	1,340	445	210	1,995
Minto	1,909	580	355	2,844
Wellington North	2,437	644	605	3,686
Erin	4,558	1,245	730	6,533
Puslinch	805	79	0	884
Total Wellington County	18,944	6,641	3,470	29,055

As an example, see the below table for reference to the Township of Centre Wellington, which demonstrates the revised housing unit forecast by dwelling type achieves the population growth forecast (34,187) with a total of 12,713 units.

Table 7: Housing Need Adjusted to Achieve Population Target in Township of Centre Wellington

	Singles/Semis	Rows	Apartments	Total
2021 Census ¹	9,270	740	1,960	11,970
2051 Revised Unit Forecast	16,880	4,303	3,500	24,683
2051 Revised Unit Mix (%)	68%	17%	14%	100%
Revised Unit Growth	7,610	3,563	1,540	12,713
Revised Unit Growth Mix (%)	60%	28%	12%	100%
PPU ¹	3.07	2.31	1.54	
Household Population Growth	23,325	8,245	2,375	33,944
Non-Household Population Rate ²	1.44%	1.44%	1.44%	1.44%
Non-Household Population	336	119	34	489
2021 Census Population	23,661	8,364	2,409	34,433
Net Undercount Rate ³	-0.72%	-0.72%	-0.72%	-0.72%
Forecasted Population Growth	23,492	8,304	2,392	34,187

Sources:

¹ County of Wellington DC Background Study, March 2022

² Statistics Canada, 2021 Census Profile.

³Statistics Canada, 2021 Census net undercount rate for the Guelph CMA. Carried forward to 2051.

1.3 Housing Supply Potential by Policy Areas (Component 3)

Component 3 determines the potential housing supply by policy areas. The policy areas include the Built-Up Area, Designated Greenfield Area, and Rural Area.

Tables 5 forecasts household growth by dwelling type by policy area. For reference, the planning period used in this analysis is from 2022 to 2051, covering the period from the last Census in 2021 to the forecast period of the Municipal Comprehensive Review (MCR) in 2051.

We have maintained the intensification rate that has been proposed by the County of Wellington in its latest version of the land needs assessment which assumes a 15% county-wide intensification rate (reduced from 20% in their original analysis) and a minimum of 20% in the Township of Centre Wellington. This target generally reflects a realistic expectation of growth, acknowledging the challenges the County of Wellington will face towards the end of the planning horizon when less intensification opportunities are available. While the 15% target is a minimum that can be exceeded if feasible, it should not be relied upon as a guaranteed outcome.

It is also assumed that a small portion (0.5%) of the growth will be accommodated in the Rural Area to reflect the limited growth potential in these areas. With the established intensification targets and the estimated number of units by dwelling type likely to be created within the Built-Up Area, the DGA units and Rural Area units are calculated. Table 8 distributes the revised unit growth, established as part of Component 2, among the policy areas, generating a unit demand for the Built-Up Area, DGA, and Rural Area. The DGA unit demand is then used in Component 4 to help calculate the new DGA Community Area land requirement.

This is applied to each of the local municipalities. The distribution of units by policy area is shown for the Township of Centre Wellington as an example.

Table 8: Distribution of Units by Policy Area for Township of Centre Wellington

2022-2051	Singles/Semis	Rows	Apartments	Total
Built-Up Area Units (20%)	127	890	1,526	2,543
% Units	5%	35%	60%	100%
DGA Units (79.5%)	7,419	2,673	14	10,107
% Units	73%	26%	0%	100%
Rural Area Units (0.5%)	64	0	0	64
% Units	100%	0%	0%	100%
Total Distribution	7,610	3,563	1,540	12,713
Built-Up Area Unit Demand	127	890	1,526	2,543
DGA Unit Demand	7,419	2,673	14	10,107
DGA Unit Mix (%)	73%	26%	0%	100%

1.4 Need for Additional Community Area Land (Component 4)

Component 4 converts the housing need requirements, from Component 3, into the amount of

additional Community Area land required to accommodate the 2051 population targets. This component includes the following steps:

- Calculate existing supply; and,
- Determine Community Area land requirement.

1.4.1 Calculate Existing Supply

It is first necessary to calculate the existing supply of units within the existing DGA Community Area. This analysis was undertaken as part of MGP's County of Wellington Designated Greenfield Area Supply Analysis, which generates a breakdown of planned and vacant units. Full details of this analysis can be found later in this memo (Section 2.0).

Planned units include all units estimated to be built beyond Spring 2021, those under construction, or included within development applications submitted to the municipalities that are either registered, draft approved or in progress. Vacant units are the potential units for all vacant residential land, as designated in the lower-tier Official Plan/Secondary Plans. The units are calculated based on the vacant land area available and the corresponding Official Plan policy permissions related to density and permitted residential dwelling types.

The planned and vacant units are combined for a total existing DGA supply. This is applied to each of the local municipalities. The below table show the planned and vacant designated greenfield area unit supply for the Township of Centre Wellington.

Table 9: Township of Centre Wellington Planned and Vacant Designated Greenfield Area Unit Supply

	Singles/Semis	Rows	Apartments	Total
Planned Units	1,676	818	744	3,237
Vacant Units	984	675	1,493	3,152
Total Existing DGA Supply	2,660	1,492	2,236	6,389

1.4.2 Determine Community Area Land Requirement

This existing supply is deducted from the forecasted housing need to generate the new DGA unit requirement. This is applied for all lower tier municipalities, with an example for Township of Centre Wellington shown below.

Table 10: Township of Centre Wellington New Designated Greenfield Area Unit Requirement

	Singles/Semis	Rows	Apartments	Total
Total Existing DGA Supply	2,660	1,492	2,236	6,389
DGA Unit Demand	7,419	2,673	14	10,107
New DGA Unit Requirement	4,759	1,181	0	5,940
New DGA Unit Mix	80%	20%	0%	100%

Having established the new DGA unit requirement, the new Community Area land requirement is generated by applying a standard gross density (units/ha) to each dwelling type as shown in Table 11.

Table 11: Additional Land Requirement to 2051

	Singles/Semis	Rows	Apartments	Total
New DGA Unit Requirement	4,759	1,181	-	5,940
Gross Density (units/ha)	15	35	100	
Land Requirement (ha)	317	34	-	351

As a result, a minimum of **351 hectares** of additional land in the Township of Centre Wellington is necessary to be designated as new Community Area through expansion of the settlement area boundary to meet the population forecast set forth in the Ministry of Finance.

When this is applied to all the municipalities, the entire County requires **517 hectares**, as shown in the table below.

Table 12: Additional Land Requirement to 2051 within the County of Wellington

Municipality	Land Need
Centre Wellington	351
Guelph/Eramosa	0
Mapleton	29
Minto	16
Wellington North	15
Erin	106
Puslinch	0
Total Wellington County	517

1.5 Addressing Housing Need in the Regional Market Area

The Ministry of Finance provides population projections based on larger census subdivision areas, which can be appropriately considered regional market areas under the PPS 2024. Regional market areas are defined as larger geographic regions that encompass multiple municipalities and reflect how housing markets, employment patterns, and population growth function at a broader scale.

In this case, the Ministry of Finance groups the County of Wellington (including Centre Wellington) and the City of Guelph into a single area, which forms a regional market area as per the PPS 2024. These municipalities share economic, demographic, and employment characteristics, reinforcing the need for a coordinated approach to growth. This interconnectedness underscores the strategic advantage of coordinating growth across municipal boundaries. Located just under 30 minutes from downtown Guelph, the Subject Lands provide a natural extension of growth that aligns with regional infrastructure and servicing plans. Given this regional interconnection, the PPS requires planning authorities to provide an appropriate range and mix of housing to meet projected needs within the regional market area.

Through our review of the Guelph Land Needs Assessment (LNA), we have determined that the City is undersupplying ground-oriented housing by approximately 4,500 units, as shown in the table below.

Table 13: Comparison of Housing Forecasts

	Singles/Semis	Rows	Apartments	Total
Hemson (2020)	40,800	15,900	28,300	85,000

Guelph LNA (2022)	37,645	14,540	33,515	85,700
Difference	(3,155)	(1,360)	5,215	700

This conclusion is based on the Hemson Technical Backgrounder, which sets the minimum level of housing required to meet projected demand. The Backgrounder accounts for demographic trends, household formation rates, and migration patterns to ensure that municipalities plan for an adequate supply of single-detached, semi-detached, and row housing alongside higher-density options. Any undersupply of these housing types indicates that Guelph's current planning does not fully accommodate projected needs, impacting housing availability across the broader regional market area.

As shown in the table below, this displaced growth from Guelph translates to an additional land need of 249 hectares.

Table 14: Additional Land Required from Displaced Growth From Guelph

	Singles/Semis	Rows	Apartments	Total
New DGA Unit Requirement	3,155	1,360	0	4,515
Gross Density (units/ha)	15	35	100	
Land Requirement (ha)	210	39	-	249

Given Centre Wellington's proximity to Guelph—under 30 minutes from downtown—there is an opportunity to help address this shortfall within the County of Wellington through appropriately planned urban expansions. Ensuring a sufficient land supply for ground-oriented housing in Centre Wellington would align with regional infrastructure and servicing plans while contributing to a balanced and sustainable housing market across the Wellington Subregion.

As Centre Wellington is forecasted to accommodate over 40% of the County's total growth, it is reasonable to assume that approximately 40% of the displaced growth—roughly 100 hectares—should be directed to Centre Wellington. Expanding the urban boundary in Centre Wellington would help ensure that the regional market area can meet its long-term housing needs while maintaining a diverse housing mix that reflects market demand.

2.0 County of Wellington Designated Greenfield Area Supply Methodology

There are three (3) main steps in the LNA process:

1. Calculate Community Area Developable Area.
2. Determine the Status of Community Area Land.
3. Determine the Unit Supply.

Each step is outlined below.

2.1 Calculate Community Area Developable Area

The County of Wellington's Official Plan and lower-tier municipality land use schedules are digitized into ArcGIS to establish a base for the developable area calculations for the DGA. All areas within the Settlement Area Boundary and outside of the Built-Up Area are classified as DGA. Each designation is classified as either Community Area, Employment Area, or Non-Developable Area.

The developable Community Area includes all lands available for development for both public and private uses, including, residential, commercial, and institutional uses, parks, and infrastructure (i.e., local, and regional roads and stormwater management ponds). Non-developable area land includes all environmental features and natural heritage systems, major infrastructure, and infrastructure rights-of-way (i.e., existing 400-series highways, utility lines, and rail lines), and various existing uses (i.e., cemeteries and estate subdivisions). Employment Area land includes all land available for employment uses which are traditionally designated in Official Plans for business and economic activities.

This analysis focuses on the Community Area as it is this area that has potential to yield residents and population-related jobs. The developable Community Area excludes all Employment Area and all Non-Developable Area within the DGA as delineated on the relevant lower-tier Official Plan/Secondary Plan schedules.

2.2 Determine the Status of Community Area Land

To estimate the residential unit yield and potential population, it is first necessary to classify the Community Area land into the following categories:

1. **Built:** This includes all land that appears built as of Spring 2021 to align these units with the 2021 Census. The land is classified through an analysis of Google Earth and/or Municipal interactive satellite/aerial imagery and Google Street View images dated Spring of 2021, if available, and a review of Geowarehouse's property sales history, where appropriate.
2. **Planned:** This includes all land that was either built beyond the Spring of 2021 or has a development application submitted, draft approved, registered or under construction.
3. **Vacant:** This refers to all land remaining within the Community Area Land that is unbuilt and without any current development application submissions.

2.3 Determine the Unit Supply

Once the developable Community Area is calculated, the total unit supply by dwelling type for each lower-tier municipality is determined. A unit count is generated for the same three categories related to the land area; Built, Planned, and Vacant. Dwelling types include single-detached, semi-detached, townhouses, and apartments.

2.3.1 Built Units

To achieve an accurate picture of unit growth potential from 2022 to 2051, it is necessary to account for all existing units within the DGA built as of the 2021 Census. Built units as of Spring 2021 are estimated using a variety of sources. Available sources include, but are not limited to, satellite and aerial imagery from Google Earth and/or Regional/Municipal interactive mapping, parcel data, development subdivision status mapping (current and historical, if available), Staff reports, draft plans, and data available in Geowarehouse. All built units are inventoried with their source referenced. A unique map identifier by municipality matches the records in Attachment 2 to the lower-tier municipality maps in Attachment 4.

2.3.2 Planned Units

Planned units include all units built beyond Spring 2021, those under construction, and those included within development application submissions to the lower-tier municipalities that are either registered, draft approved, or submitted. The Planned unit supply is calculated using the same sources used to

calculate the Built unit supply. Though in this case, the most current development application status mapping available from the lower-tier municipalities is used, if available, or the current development applications listed on the municipality’s website are reviewed to determine if any of the applications are within the DGA. All development applications are compiled into a summary table in Attachment 2. As with the built units, a unique map identifier is given to each application to correlate it with the maps found in Attachment 4.

The following assumptions have been used in determining the unit supply for the Planned units within the County of Wellington.

1. Where draft plans provide a range of total units by type, rather than an exact number, the average is calculated and added to the unit supply.
2. Where draft plans refer to “Multiple Residential” units, they are assumed to be townhouses.
3. Where draft plans refer to “Multiple Residential/Mixed Used” units, they are assumed to be apartments.

2.3.3 Vacant Units

It is necessary to generate a unit potential for all vacant residential lands, as designated in the lower-tier Official Plans/Secondary Plans. The land area of each residential designation is compiled along with the corresponding Official Plan policy permissions relating to density and permitted residential uses. Assumptions are made using our discretion and knowledge of the policies to split the residential land area between the policies permitted dwelling types. This land area is multiplied by the gross units per hectare for that specific dwelling type to generate an overall unit count.

The conversion from net density to gross density for residentially designated land assumes that non-residential uses would amount to 50% of the gross area. The non-residential uses include roads, SWMs, parks, institutional areas, and commercial areas. For Secondary Plans that have some of these uses already delineated, the calculation between net to gross density may vary. Table 1 demonstrates the percentage of land generally associated with each of the non-residential uses.

Table 1: Non-Residential Uses Assumptions

Non-Residential Uses	% of Non-Residential Land
Roads	28%
SWMs	7%
Commercial	3%
Schools	5%
Other Institutional	2%
Parks	5%
Total	50%

Table 2 converts the assumed net density into the gross density to be applied when calculating the vacant units.

Table 2: Net and Gross Residential Densities by Dwelling Type

Dwelling Type	Assumed Net Density	Calculated Gross Density
Single-Detached Dwellings	25	12.5
Semi-Detached Dwellings	30	15
Street Townhouses (Including On-Street and Laneway Townhouses)	40	20
Stacked / Back-to-Back Townhouses	90	45
Stacked Back-to-Back Townhouses	120	60
Low-Rise Apartments	100	50
Mid-Rise Apartments	200	100
High-Rise Apartments	300	150

Once the Vacant units are estimated by dwelling type, the net density is calculated to ensure it is within the Official Plan permissions range. Details are found in Attachment 3.

The final unit supply by dwelling type is tallied by the upper- and lower-tier municipality for each of the three categories; Built, Planned and Vacant. A summary of the results is found in Attachment 1. It is the Planned and Vacant unit supply that is used as an input to the LNA.

Attachments:

- Attachment 1: County of Wellington Summary LNA Tables
- Attachment 2: County of Wellington's Designated Greenfield Area Supply Analysis Summary Tables
- Attachment 3: County of Wellington's Built and Planned Supply Table
- Attachment 4: County of Wellington's Designated Greenfield Area Mapping

ATTACHMENT 1 - County of Wellington Summary LNA Tables

Forecasted Total Dwelling Unit Mix to 2051 by Municipality

Municipality	Singles/Semis	Towns	Apartments	Total
Centre Wellington	16,880	4,303	3,500	24,683
Guelph/Eramosa	4,545	400	295	5,240
Mapleton	4,400	480	370	5,250
Minto	4,719	690	850	6,259
Wellington North	6,207	869	1,400	8,476
Erin	8,503	1,250	1,000	10,753
Puslinch	3,500	89	140	3,729
Total Wellington County	48,754	8,081	7,555	64,390

Forecasted Built-Up Area Growth by Municipality (2021 – 2051)

Municipality	Singles/Semis	Towns	Apartments	Total
Centre Wellington	127	890	1,526	2,543
Guelph/Eramosa	2	17	29	48
Mapleton	12	84	144	239
Minto	21	149	256	427
Wellington North	37	258	442	737
Erin	23	160	274	457
Puslinch	796	88	0	884
Total Wellington County	1,018	1,646	2,671	5,335

Forecasted Total Growth by Municipality (2021 – 2051)

Municipality	Singles/Semis	Towns	Apartments	Total
Centre Wellington	7,610	3,563	1,540	12,713
Guelph/Eramosa	285	85	30	400
Mapleton	1,340	445	210	1,995
Minto	1,909	580	355	2,844
Wellington North	2,437	644	605	3,686
Erin	4,558	1,245	730	6,533
Puslinch	805	79	0	884
Total Wellington County	18,944	6,641	3,470	29,055

Wellington County Designated Greenfield Area Density Analysis

Municipality	Status	Total Area	Community Area										Population with Undercount	Population-Related Employment ¹	Total People & Jobs	Total People & Jobs Per Hectare
			Unit Counts				Total Units	Population by Unit Type				Total Population				
			Singles	Semis	Towns	Apartments		Singles	Semis	Towns	Apartments					
Centre Wellington	Built - as of Census (May 2021)	146.1	1,068	22	343	229	1,662	2,993	52	765	378	4,188	4,158	506	4,664	31.9
	Built - 2021 to 2024	3.7	32	8	15	-	55	98	25	35	-	157	156	19	175	48.0
	Planned	164.2	1,632	4	803	744	3,182	5,002	12	1,857	1,146	8,018	7,960	969	8,929	54.4
	Vacant	156.4	984	-	675	1,493	3,152	3,016	-	1,562	2,302	6,880	6,830	831	7,661	49.0
		470.4	3,716	34	1,835	2,465	8,051	11,109	89	4,218	3,826	19,243	19,104	2,324	21,429	45.6
Guelph/ Eramosa	Built - as of Census (May 2021)	54.5	416	-	214	-	630	1,229	-	493	-	1,721	1,709	232	1,941	35.6
	Built - 2021 to 2024	0.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Planned	1.4	-	-	50	-	50	-	-	116	-	116	115	16	130	93.9
	Vacant	7.0	55	-	10	-	65	168	-	23	-	191	189	26	215	30.9
		62.9	471	-	274	-	745	1,397	-	631	-	2,028	2,013	273	2,286	36.4
Mapleton	Built - as of Census (May 2021)	26.9	132	37	-	-	169	454	113	-	-	567	563	88	651	24.2
	Built - 2021 to 2024	7.9	69	10	-	-	79	211	31	-	-	242	240	38	278	35.2
	Planned	5.8	14	-	57	-	71	43	-	132	-	175	174	27	201	34.7
	Vacant	103.4	1,051	-	184	-	1,235	3,222	-	425	-	3,648	3,621	566	4,187	40.5
		144.0	1,266	47	241	-	1,554	3,931	144	557	-	4,632	4,599	719	5,317	36.9
Minto	Built - as of Census (May 2021)	36.8	101	30	31	-	162	286	79	49	-	414	411	49	459	12.5
	Built - 2021 to 2024	9.1	64	18	33	-	115	196	55	76	-	328	325	38	364	39.9
	Planned	15.4	122	46	57	-	225	374	141	132	-	647	642	76	718	46.5
	Vacant	131.0	1,272	-	158	169	1,599	3,898	-	366	261	4,525	4,493	531	5,024	38.4
		192.4	1,559	94	279	169	2,101	4,754	275	623	261	5,914	5,871	694	6,565	34.1
Wellington North	Built - as of Census (May 2021)	53.0	173	16	14	88	291	478	39	28	144	690	685	99	784	14.8
	Built - 2021 to 2024	8.4	53	28	38	-	119	162	86	88	-	336	334	48	382	45.4
	Planned	26.1	134	76	165	24	399	411	233	382	37	1,062	1,055	152	1,207	46.2
	Vacant	305.8	2,904	-	364	380	3,648	8,901	-	843	586	10,330	10,256	1,481	11,736	38.4
		393.3	3,264	120	581	492	4,457	9,952	358	1,341	768	12,418	12,329	1,780	14,109	35.9
Erin	Built - as of Census (May 2021)	33.9	32	-	-	36	68	93	-	-	62	156	154	19	174	5.1
	Built - 2021 to 2024	1.3	3	-	-	-	3	9	-	-	-	9	9	1	10	7.7
	Planned	214.6	1,752	312	1,223	271	3,558	5,370	956	2,830	418	9,574	9,505	1,184	10,689	49.8
	Vacant	98.1	865	-	125	66	1,056	2,650	-	290	102	3,043	3,021	376	3,397	34.6
		347.9	2,652	312	1,348	373	4,685	8,122	956	3,120	583	12,781	12,689	1,581	14,270	41.0
Total Wellington County	Built - as of Census (May 2021)	351.3	1,922	105	602	353	2,982	5,532	283	1,335	585	7,736	7,680	993	8,672	24.7
	Built - 2021 to 2024	30.4	221	64	86	-	371	677	196	199	-	1,073	1,065	144	1,209	39.8
	Planned	427.5	3,654	438	2,355	1,039	7,485	11,200	1,342	5,448	1,601	19,592	19,451	2,423	21,874	51.2
	Vacant	801.6	7,131	-	1,516	2,109	10,756	21,856	-	3,509	3,252	28,616	28,410	3,811	32,221	40.2
	TOTAL	1610.9	12,928	607	4,559	3,500	21,594	39,265	1,822	10,491	5,438	57,016	56,605	7,371	63,976	39.7

Notes

1. Population-related jobs (including worked at home) were calculated based on 2016 Census Data for each municipality. 2021 Census Data is higher and that is mainly driven by Work From Home. For the purposes of this analysis we have assumed a more normalized rate refelctive of the :

2. 2021 Census Undercount based on Guelph Census Metropolitan Area

Wellington County Designated Greenfield Area Analysis

Built and Planned Unit Supply

Municipality	Settlement Area	Map ID	Name	Application #	Address	Status	Status	Singles	Semis	Towns	Apts	Total Units	Notes	Source
Centre Wellington	Elora-Salem	1	Salem Springs			Built	Built 2021	5				5		Google Earth - Counted
	Elora-Salem	2			350 Wellington Rd 7	Planned	Planned			271		271		Revised Submission - Concept Plan - August 2023
	Elora-Salem	3	Clayton Subdivision	23T-22005	75 Woolwich St	Under Review	Planned	155		131		286		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/cachet-0
	Elora-Salem	4				Built	Built 2021	115	10	20		145		Google Earth - Counted/Parcel Data
						Planned	Planned	6				6		Google Earth/Geowarehouse
	Elora-Salem	5	Ainley Subdivision	23T-18002	6542 and 6560 Gerrie Rd	Draft Approved	Planned	101		83	59	243		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/ainley
	Elora-Salem	6				Built	Built 2021	1				1		Google Earth - Counted
	Elora-Salem	7				Built	Built 2021	1				1		Google Earth - Counted
	Elora-Salem	8				Built	Built 2021	13		6		19		Google Earth - Counted
						Built	Built 2024	16	8			24		
						Planned	Planned		4			4	estimated unbuilt units as Semis, based on lot size in Geowarehouse	
	Elora-Salem	9	Haylock			Planned	Planned	253		31	150	434	Total max permitted unit count is 469	Preentation to Council - Haylock Farm Project - June 2020
	Elora-Salem	10	Youngblood			Planned	Planned	86			165	250	average of unit ranges. 20 to 30 residential Condominium units located outside DGA	LPAT Case #PL160992/PL160993
	Elora-Salem	11				Built	Built 2021	8				8		Google Earth - Counted
	Elora-Salem	12				Built	Built 2021	1				1		Google Earth - Counted
	Elora-Salem	13				Built	Built 2021	173	12	43		228		Google Earth - Counted
	Fergus	15	Storybook West Phase 2			Planned	Planned	503		99		602	average of unit ranges.	Draft Plan of Subdivision - in LPAT Decision, December 2018
	Fergus	16	Storybook West Phase 3			Planned	Planned	491		142	40	673	average of unit ranges.	Draft Plan of Subdivision - in LPAT Decision, December 2018
	Fergus	17				Built	Built 2021	162		32		194		Google Earth - Counted
						Built	Built 2024	13		15		28		Google Earth - Counted
	Fergus	18	Beatty Hollow	Apt Units: 23CD-21001		Planned	Planned	14		46	86	146		Proposed Change to Beatty Hollow Subdivision Presentation
	Fergus	19				Built	Built 2021	43				43		Google Earth - Counted
						Built	Built 2024	3				3		Google Earth - Counted
	Fergus	20				Built	Built 2021	173		50		223		Google Earth - Counted
	Fergus	21				Built	Built 2021	131				131		Google Earth - Counted
	Fergus	23	Habitat for Humanity	23CD-23004	465 Garafraxa St W	Planned	Planned				32	32	Stacked Towns	Planning Justification Report, Feb 2023
	Fergus	24			950+-960 St Dawvid St N	Planned	Planned				112	112	Stacked Towns	Planning Justification Report, May 2022
	Fergus	25			165, 169 Gordon St	Built	Built 2021				110	110		https://www.wellington.ca/en/social-services/HS165GordonStreet.aspx
	Fergus	26				Built	Built 2021	167		62		229		Google Earth - Counted
	Fergus	27				Built	Built 2021	2				2		Google Earth - Counted
	Fergus	28				Built	Built 2021	3				3		Google Earth - Counted
	Fergus	30				Built	Built 2021	4				4		Google Earth - Counted
		32				Built	Built 2021	3				3		Google Earth - Counted
	Fergus	33	Mazta/Homelands	23T-06001		Planned	Planned	24				24	Assumed 24 Units as Singles. Completion Date 2026	Centre Wellington GMS Strategy Land Use, May 2017
	Fergus	34				Built	Built 2021	63		130	119	312		Google Earth - Counted/Geowarehouse
	Fergus	35				Planned	Planned				100	100	Retirement Building	March 2023 Letter
	Fergus	36					Planned					-	Proposed Retail	
							Built - as of Census 2021	1,068	22	343	229	1,662		
							Built - 2021 to 2024	32	8	15	0	55		
							Planned	1,632	4	803	744	3,182		
						Total Centre Wellington		2,732	34	1,161	973	4,899		

Guelph/Eramosa	Rockwood	1				Built 2021	Built 2021	158		53		211		Google Earth/Geowarehouse
		2	North Rockwood Developments Inc		5150 Wellington Rd 27	Under Construction	Planned			50		50		Townhouse development in Rockwood gets final approval from council
		3				Built 2021	Built 2021	96		76		172	21 Condo units - 18 Guthrie Lane	Google Earth/Geowarehouse
		4				Built 2021	Built 2021	162		85		247	63 Hickory Dr - 85 Condo Towns	Google Earth/Geowarehouse
						Built - as of Census 2021		416	0	214	0	630		
						Built - 2021 to 2024		0	0	0	0	-		
						Planned		0	0	50	0	50		
						Total Guelph/Eramosa		416	0	264	0	680		
Mapleton	Drayton	1	Glenaviland Development Corp	37T-10005		Red Line Draft Approved	Planned	12		57		69		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/glenaviland
		2				Built 2021	Built 2021	36	11			47		Google Earth/Registered Plan for Neighbouring Block
						Built 2024	Built 2024	37				37		
						Planned	Planned	2				2		Google Earth/Geowarehouse
		3				Built 2021	Built 2021	17				17		Google Earth
		4				Built 2021	Built 2021	46				46		Google Earth
		5				Built 2024	Built 2024	13				13		Google Earth/Geowarehouse
		6				Built 2021	Built 2021	31	18			49		Google Earth/Geowarehouse
	7				Built 2024	Built 2024	19	10			29	Most recent imagery to 2022. Assumed Built by 2024	Google Earth/Geowarehouse	
8				Built 2021	Built 2021	2				2		Google Earth		
	Moorefield	1				Built 2021	Built 2021		8			8		Google Earth
						Built - as of Census 2021		132	37	0	0	169		
						Built - 2021 to 2024		69	10	0	0	79		
						Planned		14	0	57	0	71		
						Total Mapleton		215	47	57	0	319		
Minto	Palmerston	1	Clark-Heinmiller Subdivision	23T-15004		Red Line Revision	Planned	18	8	16		42		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/clark
		2				Built 2021	Built 2021	3				3		Google Earth
		3				Built 2021	Built 2021	2				2		Geowarehouse
						Built 2024	Built 2024	9		6		15	Assumed 6 towns based on size of lots in Geowarehouse	Geowarehouse
		4				Built 2021	Built 2021	7				7		Google Earth
		5	Wrighthaven Homes	23CD-23002		Draft Approved	Planned			10		10		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/wrighthaven
		6	Wrighthaven Homes - Phase 1 and 2			Built 2024	Built 2024	25	18	14		57	Site Plan	https://wrighthavenhomes.com/communities/creek-bank-meadows/
			Wrighthaven Homes - Phase 3			Under Construction	Planned	10				10	Site Plan	https://wrighthavenhomes.com/communities/creek-bank-meadows/
		7				Built 2021	Built 2021	3				3		Google Earth
		8				Built 2021	Built 2021	8	26	4		38		Google Earth
		9	Clair Ridge Estates	23T-90021		Draft Approved	Planned	23	16			39		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/clair-ridge
		10				Built 2021	Built 2021	7				7		Google Earth
		11				Built 2021	Built 2021	2				2		Google Earth
	Clifford	1				Built 2021	Built 2021	1				1		Google Earth
		2				Built 2021	Built 2021	1				1		Google Earth
		3				Built 2021	Built 2021	1				1		Google Earth
		4				Built 2024	Built 2024	6				6		Google Earth/Geowarehouse
						Planned	Planned	5				5		Google Earth/Geowarehouse
		5				Built 2021	Built 2021	32				32		Google Earth/Geowarehouse
		6				Built 2021	Built 2021	4				4		Google Earth
	7				Built 2021	Built 2021	1				1		Google Earth	
		1				Built 2021	Built 2021			4		4		Google Earth

	Harriston	2				Built 2024	Built 2024	4				4		Google Earth/Geowarehouse
		3				Built 2021	Built 2021	1				1		Google Earth
		4				Built 2021	Built 2021	3				3		Google Earth
		5	948193 Ontario Ltd		120 Arthur St W	Built 2021	Built 2021			11		11	Site Plan Control, 948193 Ontario Ltd. - Sept 2020	https://mintopublishing.escribemeetings.com/filestream.ashx?DocumentId=13936
						Built 2024	Built 2024			13		13		
		6				Built 2021	Built 2021			12		12	Condo Units	Geowarehouse
		7				Built 2021	Built 2021	4				4		Google Earth
		8	Framark Development Co.		99 Arthur St W	Built 2024	Built 2024	18				18	Assumed completed by 2024	Report to Committee of Adjustment - March 2022
		9				Built 2021	Built 2021	1				1		Google Earth
		10				Built 2021	Built 2021		4			4		Google Earth
		11				Built 2021	Built 2021	9				9		Google Earth
		12				Built 2021	Built 2021	10				10		Google Earth
		13	2626514 Ontario Ltd (Metzger)	23T-20201		Under Construction	Planned	66	22	31		119	9 Towns and Future Development Block within Built-Up Area.	https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/mex
		14				Built 2021	Built 2021	1				1		Google Earth
						Built 2024	Built 2024	2				2		Google Earth
							Built - as of Census 2021	101	30	31	0	162		
							Built - 2021 to 2024	64	18	33	0	115		
							Planned	122	46	57	0	225		
							Total Minto	287	94	121	0	502		
Wellington North	Arthur	1	940749 Ontario Ltd	23T-18007		Draft Approved	Planned	10	8	8	24	50		940749 Ontario Limited Wellington County
		2				Built 2021	Built 2021	1				1		Google Earth
		3				Built 2021	Built 2021	54	4			58		Google Earth
		4	Pinestone Construction Inc. - Phase 3		East Ridge Landing	Built 2024	Built 2024	19	20	8		47		Site Plan
			Pinestone Construction Inc. - Phase 4		East Ridge Landing	Under Construction	Planned	18	18	20		56		Site Plan
		5	2073022 Ontario Ltd - East Ridge Landing - Phase 5	23T-24002	East Ridge Landing	Under Review	Planned	18	12	25		55		2073022 Ontario Ltd - East Ridge Landing - Phase 5 Wellington County
		6				Built 2021	Built 2021	2				2		Google Earth
		7				Built 2021	Built 2021	1				1		Google Earth
	Mount Forest	8				Built 2021	Built 2021	2				2		Google Earth
		1				Built 2021	Built 2021	1				1		Google Earth
		2				Built 2024	Built 2024		2			2		Google Earth
		3				Built 2021	Built 2021	2				2		Google Earth
		4				Built 2021	Built 2021	5			88	93		Google Earth/Geowarehouse
		5				Built 2021	Built 2021			10		10		Google Earth
		6	2574574 Ontario In	23T-18004		Registered	Planned	11	8	10		29		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/2574574
		7				Built 2021	Built 2021			4		4		Google Earth/Geowarehouse
						Built 2024	Built 2024			12		12		Google Earth/Geowarehouse
		8	H. Bye Construction Ltd.			Planned	Planned			20		20	Estimated units based on Geowarehouse blocks	Geowarehouse
		9	5053745 Ontario Inc	Party to: 2574574 Ontario Inc									Appears under construction. Application info N/A. Assumed as vacant.	
		10				Built 2024	Built 2024	5		18		23		Google Earth/Geowarehouse
		11				Built 2021	Built 2021	10				10		Google Earth/Geowarehouse
		12	Marlanna Homes				Planned	14				14		Geowarehouse
		13				Built 2021	Built 2021	5				5		Google Earth/Geowarehouse
						Built 2024	Built 2024	28	6			34		Google Earth/Geowarehouse
		14				Built 2021	Built 2021	80				80		Google Earth
		15				Built 2021	Built 2021	3				3		Google Earth
		16				Built 2021	Built 2021	1				1		Google Earth
						Built 2024	Built 2024	1				1		Google Earth/Geowarehouse

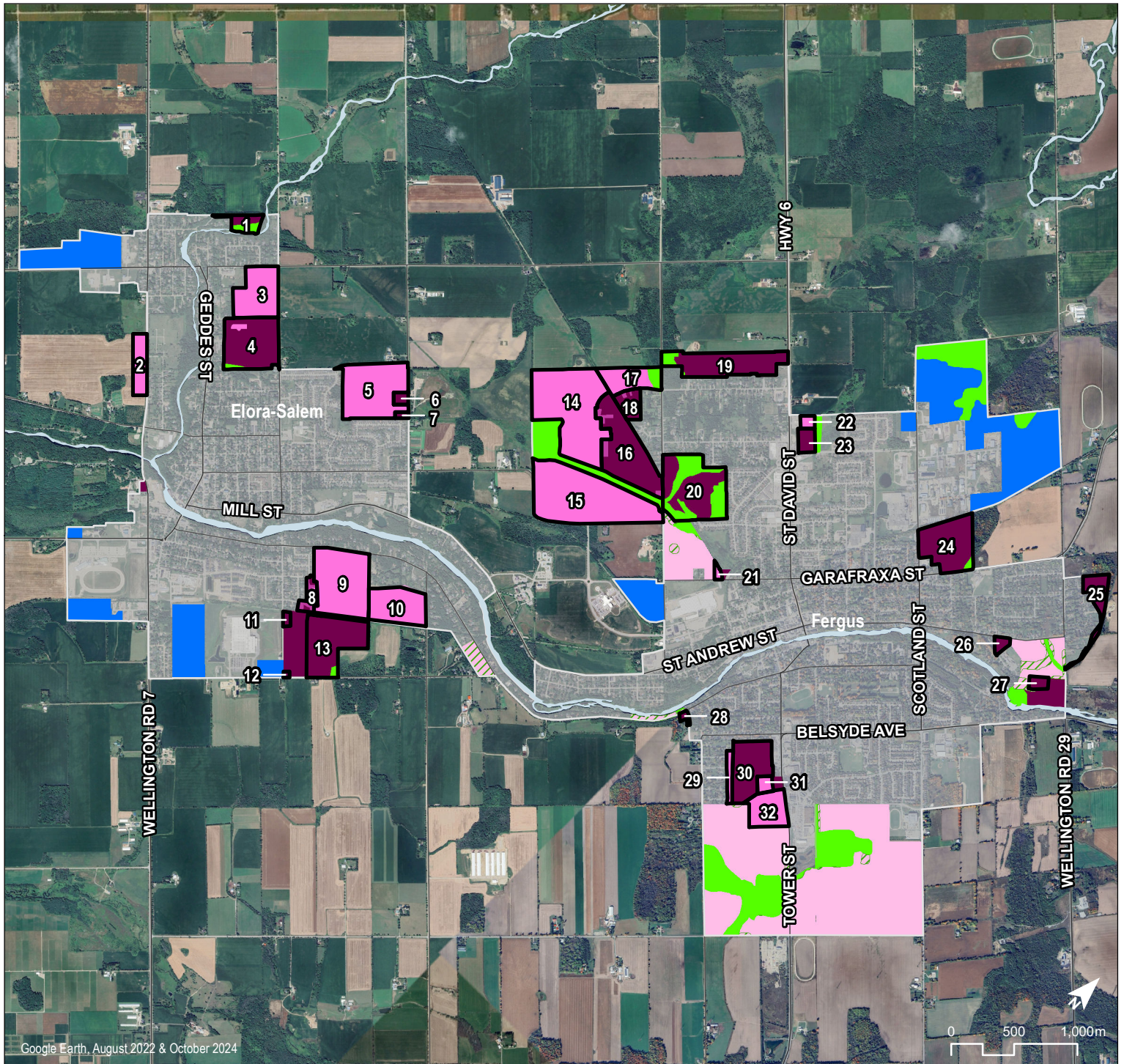
		17				Built 2021	Built 2021	3				3		Google Earth
		18				Built 2021	Built 2021		12			12		Google Earth/Geowarehouse
		19	John Welton Custom Home Building	23T-20303		Draft Approved	Planned	63	30	48		141	Block 130 Multi-Family Block of 12 units. Assumed as Towns	https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/john-welton
		20	Betty Dee Ltd	23T-23001		Under Review	Planned			34		34		https://www.wellington.ca/business-development/development-applications/active-applications/betty-dee-ltd
		21				Built 2021	Built 2021	3				3		Google Earth
							Built - as of Census 2021	173	16	14	88	291		
							Built - 2021 to 2024	53	28	38	0	119		
							Planned	134	76	165	24	399		
							Total Wellington North	360	120	217	112	809		
Erin	Hillsburgh	1				Built 2021	Built 2021	1				1		Google Earth
		2	Hillsburgh Heights Inc	23T-21002		Under Review	Planned	195		174		369		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/hillsburgh
		3				Built 2021	Built 2021	3				3		Google Earth
		4	Beachcroft Investments Inc	23T-23003	63 and 63A Trafalgar Rd	Under Review	Planned	378		286	271	935	Apts Includes 188 Mixed Use Seniors and 83 low-rise seniors	https://www.wellington.ca/business-development/development-applications/active-applications/beachcroft-investments-inc
		5				Built 2021	Built 2021	3				3		Google Earth
	Erin	1				Built 2021	Built 2021	6				6		Google Earth
		2	2779181 Ontario Corp. - Coscorp Inc.	23T-22004		Under Review	Planned	403		225		628	Based on Composite Lotted plan. Additional Towns for MD Block 14 and 15 based on 23T-22004 Draft Plan.	https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/2779181
		3	2779176 Ontario Inc. - Mattamy (Erin) Ltd.	23T-22003		Under Review	Planned							https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/2779176
		4				Built 2021	Built 2021	7				7		Google Earth
		5	Homes in the Hills	23T-18006		Under Review	Planned	33				33		https://www.wellington.ca/business-development/planning-development/development-applications/active-applications/homes-hills
		6			11 and 15 Highway 24	Built 2021	Built 2021				36	36	2 buildings - 3 floors each. Estimated # of units	
		7				Built 2021	Built 2021	2				2		Google Earth
		8				Built 2021	Built 2021	2				2		Google Earth
		9				Under Construction	Planned					-	Highway Commercial	
		10		23T-12001		Under Construction	Planned	740	312	538		1,590	Includes Future Development blocks	LPAT Case # PL171265
		11				Built 2021	Built 2021	3				3		Google Earth
		12				Built 2021	Built 2021	1				1		Google Earth
						Built 2024	Built 2024	3				3		Google Earth
						Built 2021	Built 2021	4				4		Google Earth/Geowarehouse
						Planned	Planned	1				1		Google Earth/Geowarehouse
		13				Planned	Planned	2				2		Google Earth/Geowarehouse
							Built - as of Census 2021	32	0	0	36	68		
							Built - 2021 to 2024	3	0	0	0	3		
							Planned	1,752	312	1,223	271	3,558		
							Total Erin	1,787	312	1,223	307	3,629		

Wellington County	Built - as of Census 2021	1,922	105	602	353	2,982
	Built - 2021 to 2024	221	64	86	0	371
	Planned	3,654	438	2,355	1,039	7,485
	Total Wellington County	5,797	607	3,043	1,392	10,838

Guelph		1			201 Elmira Rd S		Built 2025				377	377	West Peak Condos	https://www.gta-homes.com/guelph-condos/west-peak-condos/
		2	Edgewood Developments			Under Construction	Planned						small portion in DGA. Assumed all units with Built-Up Area	Google Earth
		3	Mar-Cot Developments	OZS19-011	1871 and 1879 Gordon St		Planned				43	43		https://guelph.ca/2019/11/1871-1879-gordon-street/
		4	Tricar Propertles		1880 Gordon St		Built 2025				173	173	Building 2	https://www.tricar.com/locations/gordon-square-2/
					1882 Gordon St		Planned				180	180	Building 3	https://urbantoronto.ca/database/projects/gordon-square-3.52203
		5			410 Clair Rd E		Built 2025						Place or Worship - no units	Google Earth
		6		23T-18001	190-216 Arkell Rd		Planned			11	80	91	May 2024 submission	https://guelph.ca/2018/12/190-216-arkell-road/
		7		23T-19002	220 Arkell Rd		Planned	33			64	97	64 Stacked Towns. Feb 2024 submission	https://guelph.ca/2020/02/220-arkell-road/
		8			388 Arkell Rd		Planned						no units, Secondary School	Guelph Open Data - Active Development Planning, Sept 2024
		9	Victoria Park Village Inc		1159 Victoria Rd S		Built 2025	32	36	19		87		Google Earth/Geowarehouse
						Under Construction	Planned	34		5		39		Google Earth/Geowarehouse
						Planned	Planned	15		32	199	245	Estimated Multiple Residential 2.3 ha @ 86.5 units/ha and Cluster towns 0.9 ha @ 35 units/ha	Victoria Park Village Updated Impact Assessment, Nov 2009
		10					Built 2025	41	16			57		Google Earth/Geowarehouse
		11		SP23-018	855 Victoria Rd S	Fully Approved June 2024	Planned			99		99		Guelph Open Data - Active Development Planning, Sept 2024
		12		OZS24-015	115 Watson Parkway N		Planned		201		928	1,129		https://guelph.ca/wp-content/uploads/OZS24-015-115-Watson-Pkwy-N-Notice-Complete-Application-and-Public-Meeting-Resident.pdf
		13					Built 2025				405	405	The Grand Trios.	https://urbantoronto.ca/database/projects/grand-trios.52215
		14		SP24-011	118 Starwood Dr		Planned			6		6		Guelph Open Data - Active Development Planning, Sept 2024
		15	Debrob Investments				Built 2025	47				47	Phase 1	Google Earth/Geowarehouse
		16	Debrob Investments	23T-12501			Planned	59		34	141	234	Phase 2. Estimated 20 Street towns on block 128 and 129. Block 130 - 14 cluster towns and 18 stacked towns (apts). Block 131 and 132 -123 stacked towns (apts)	https://pub-guelph.escribemeetings.com/Meeting.aspx?Id=0cc8fb08-0209-45c2-b066-bf437d59f184&Agenda=Merged&lang=English&Item=17&Tab=attachments
		17	Wesley Woods Ltd		425 Watson Pkwy N		Built 2025				139	139	The Watson Residences	https://www.apartments.com/the-watson-residences-425-watson-guelph-guelph-on/rh5fxp1/
		18		SP22-125	78 and 82 Eastview Rd		Planned			30	40	70		Guelph Open Data - Active Development Planning, Sept 2024
		19		23T-16501	46, 47, 87 Hyland Rd		Planned	9				9		https://guelph.ca/2016/03/46-47-87-hyland-road-3/
		20	Terra View Custom Homes - Nima Trails				Planned			5	55	60	60 units total as per Guelph Open Data. 5 towns on Site Plan. Assumed remainder as	https://www.terra-view.com/nima/?gad_source=1&gclid=EAlaIqobChMIjOavwPLAiW3aEgBR0zXBvtEAAyASAAEgLK6_D_BwE
							Built 2025	15				15	apts in commercial/residential buildings	
		21					Planned	104			181	285	Total for Nima Trails is approximately 360 Units. Assumed townhouse and condo blocks at north end - make up remainder of	
		22			85 Mullin Dr		Built 2025				32	32	110 Total Stacked towns. 24 built prior to census	Site Plan, Nov 2016 - Committee of Adjustment Notice of Public Hearing
		23	Ethanview Ltd		85 Mullin Dr	Under Construction	Planned				54	54		
		24	North Ridge Upscale Towns		675 Victoria St N		Built 2025			32		32	Neighbourhood commercial plan - unbuilt	https://northridgeguelph.com/
		25					Built 2025			14		14		Goolge Earth/Geowarehouse
		26	Daniel J Clayton Holdings Ltd	PRE24-0155	46 Goldenview Dr		Planned			47		47		Guelph Open Data - Active Development Planning, Sept 2024
		27			20 and 37 Cityview Dr N		Planned	67	20	104		191	34 semis and 9 singles within BUA	https://guelph.ca/2013/01/20-37-cityview-road-north/
		28			132 Clair Rd W		Planned			60		60	Cannot determine exact location. Assumed within the Commercial Mixed Use Designation	Guelph Open Data - Active Development Planning, Sept 2024
								Built - 2021 to 2025	135	52	65	1,126	1,378	
								Planned/Under Construction	321	221	433	1,965	2,939	
								Total Guelph	456	273	498	3,091	4,317	

DESIGNATED GREENFIELD AREA

Centre Wellington, Wellington County



- Settlement Area Boundary
- Built-Up Area
- Map ID Boundary

Designated Greenfield Areas

Status of Community Area

- Built 2021
- Built 2021 to 2024
- Planned
- Vacant

- Employment Area

Non-Developable Area

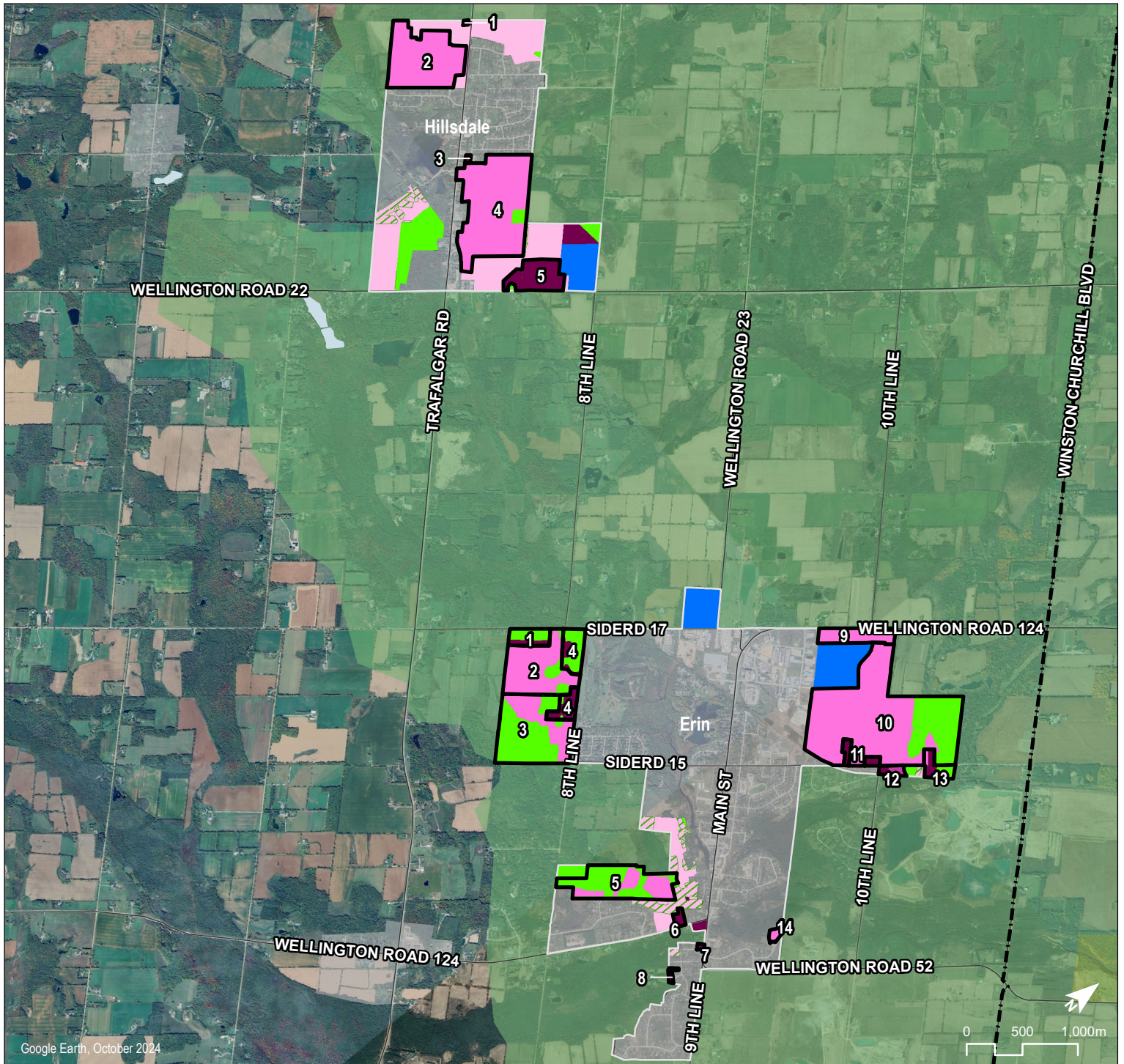
- Natural Heritage System
- MNR Feature

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MGP File: 22-3192
Date: February 20, 2025

DESIGNATED GREENFIELD AREA

Erin, Wellington County



--- Municipal Boundary

○ Settlement Area Boundary

■ Built-Up Area

■ Niagara Escarpment Conservation Plan

■ Greenbelt Plan

○ Property Boundary with ID

Designated Greenfield Areas

Status of Community Area

■ Built 2021

■ Built 2021 to 2024

■ Planned

■ Vacant

■ Employment Area

Non-Developable Area

■ Natural Heritage System

■ MNRF Feature

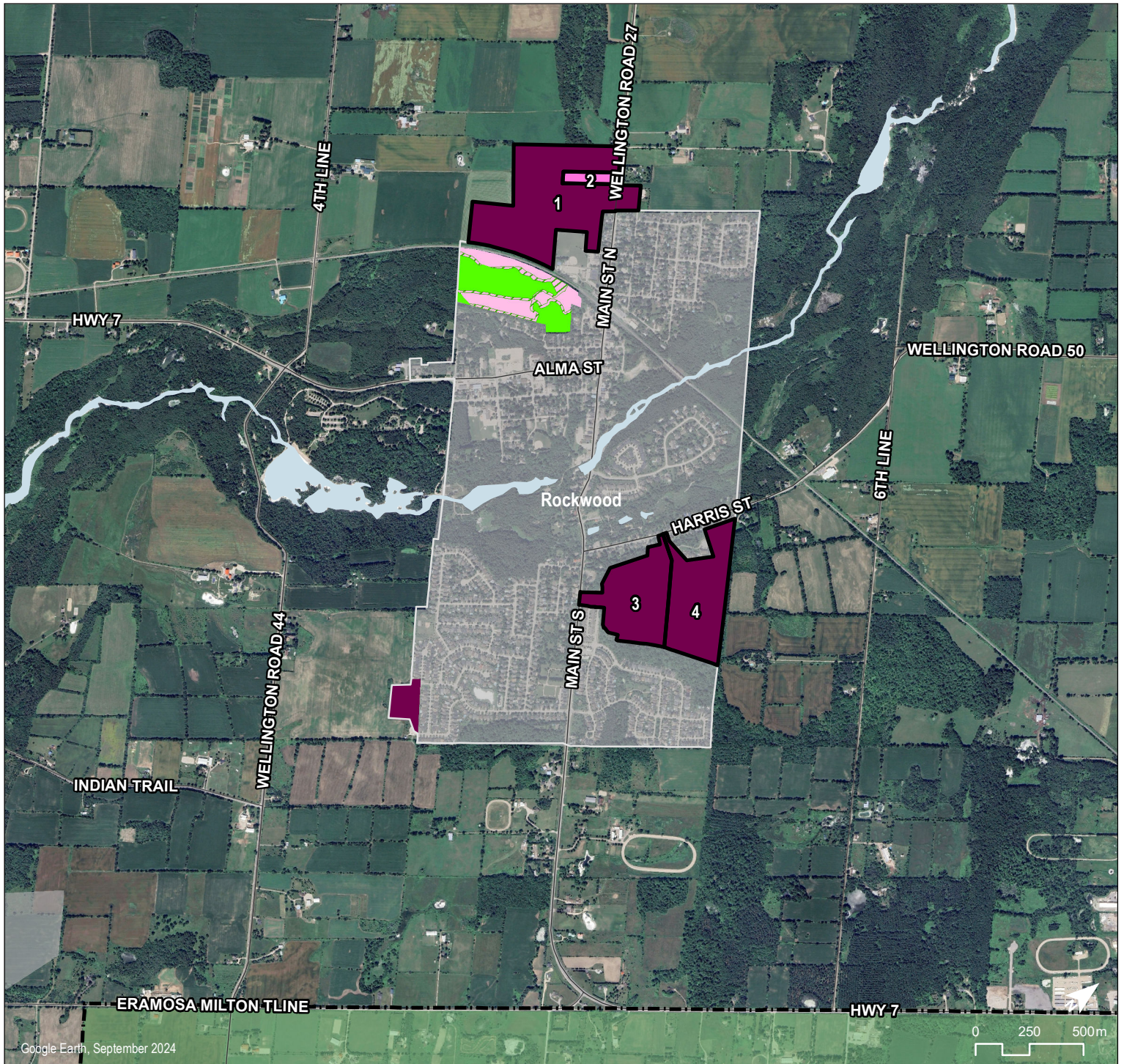
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Date: February 20, 2025

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Parsons.

DESIGNATED GREENFIELD AREA

Guelph-Eramosa, Wellington County



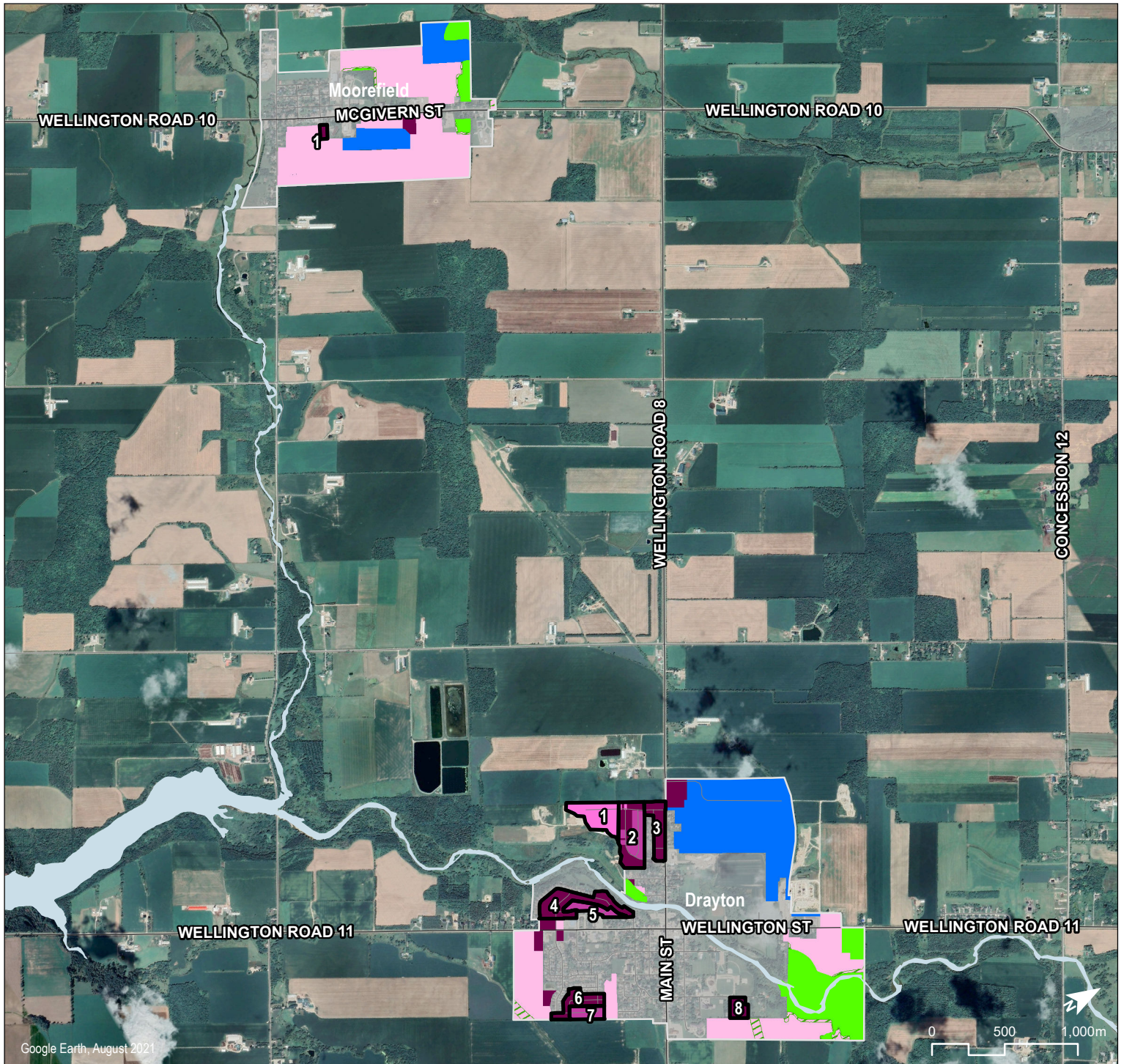
- | | | |
|---|--|---|
| --- Municipal Boundary | Designated Greenfield Areas | Employment Area |
| Settlement Area Boundary | Status of Community Area | Non-Developable Area |
| Built-Up Area | Built 2021 | Natural Heritage System |
| Greenbelt Plan | Built 2021 to 2024 | MNRF Feature |
| Property Boundary with ID | Planned | |
| | Vacant | |

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Date: February 20, 2025

DESIGNATED GREENFIELD AREA

Mapleton, Wellington County



- Municipal Boundary
- Settlement Area Boundary
- Built-Up Area
- Property Boundary with ID

Designated Greenfield Areas

Status of Community Area

- Built 2021
- Built 2021 to 2024
- Planned
- Vacant

- Employment Area

Non-Developable Area

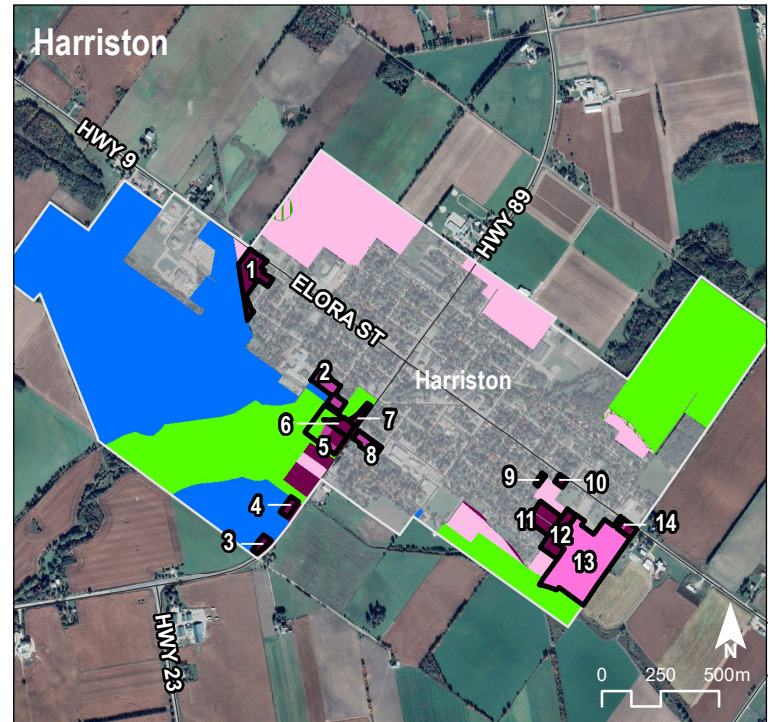
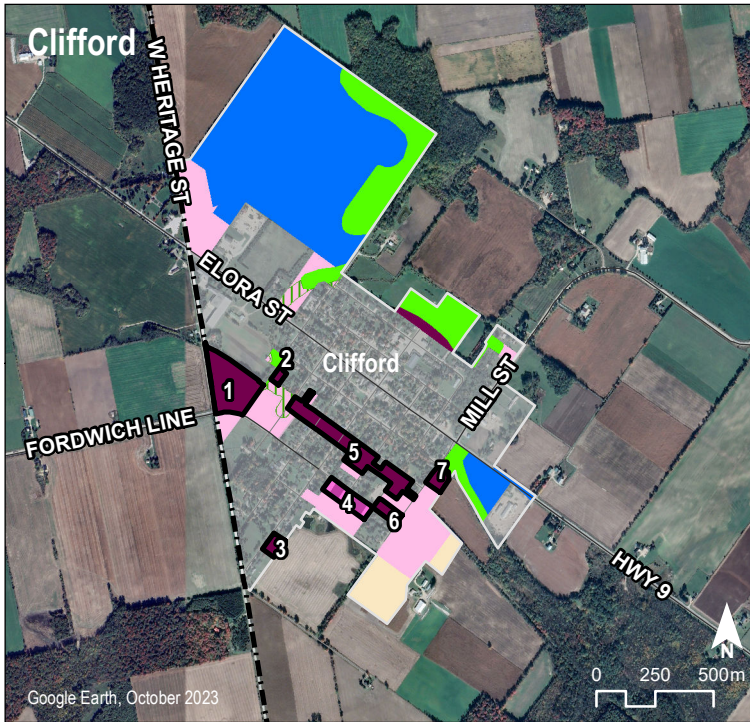
- Natural Heritage System
- MNRF Feature

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Date: February 20, 2025

DESIGNATED GREENFIELD AREA

Minto, Wellington County



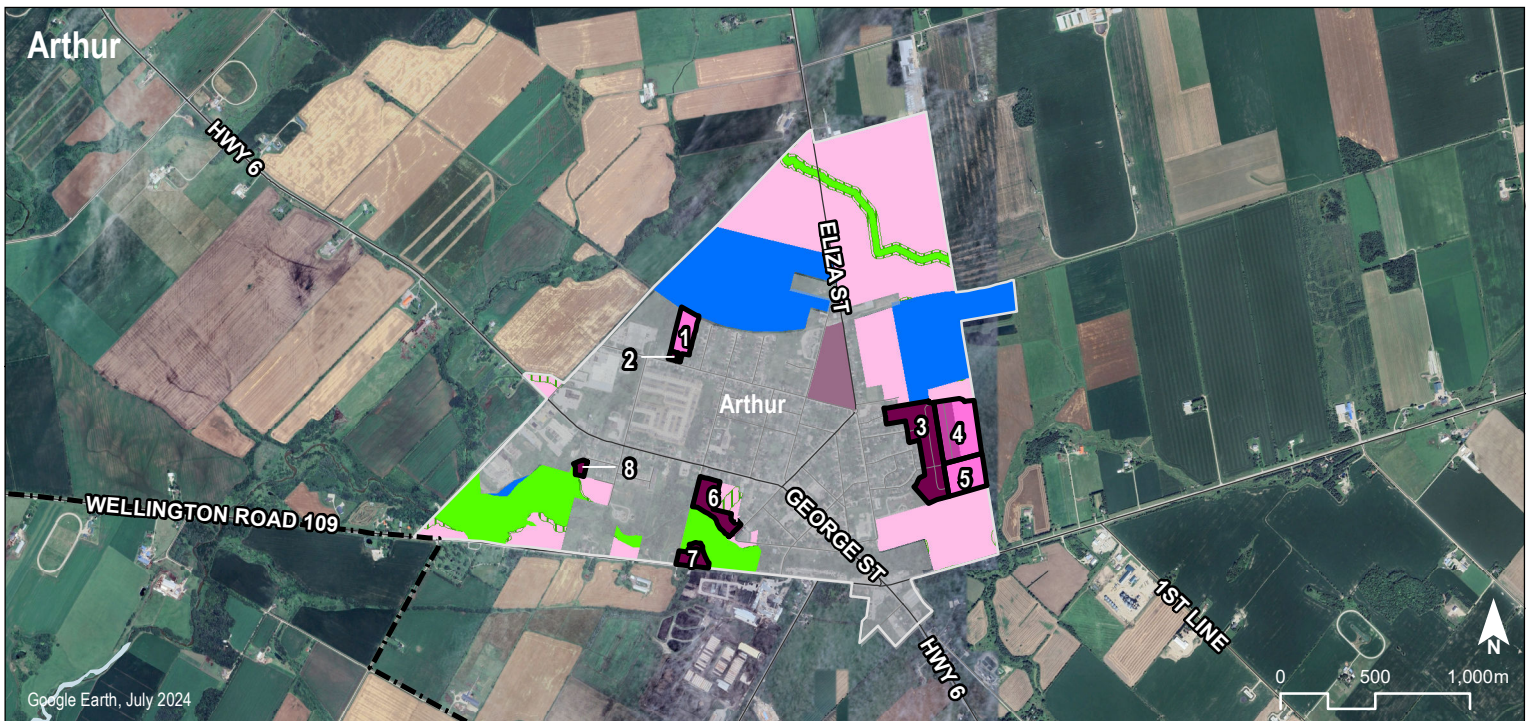
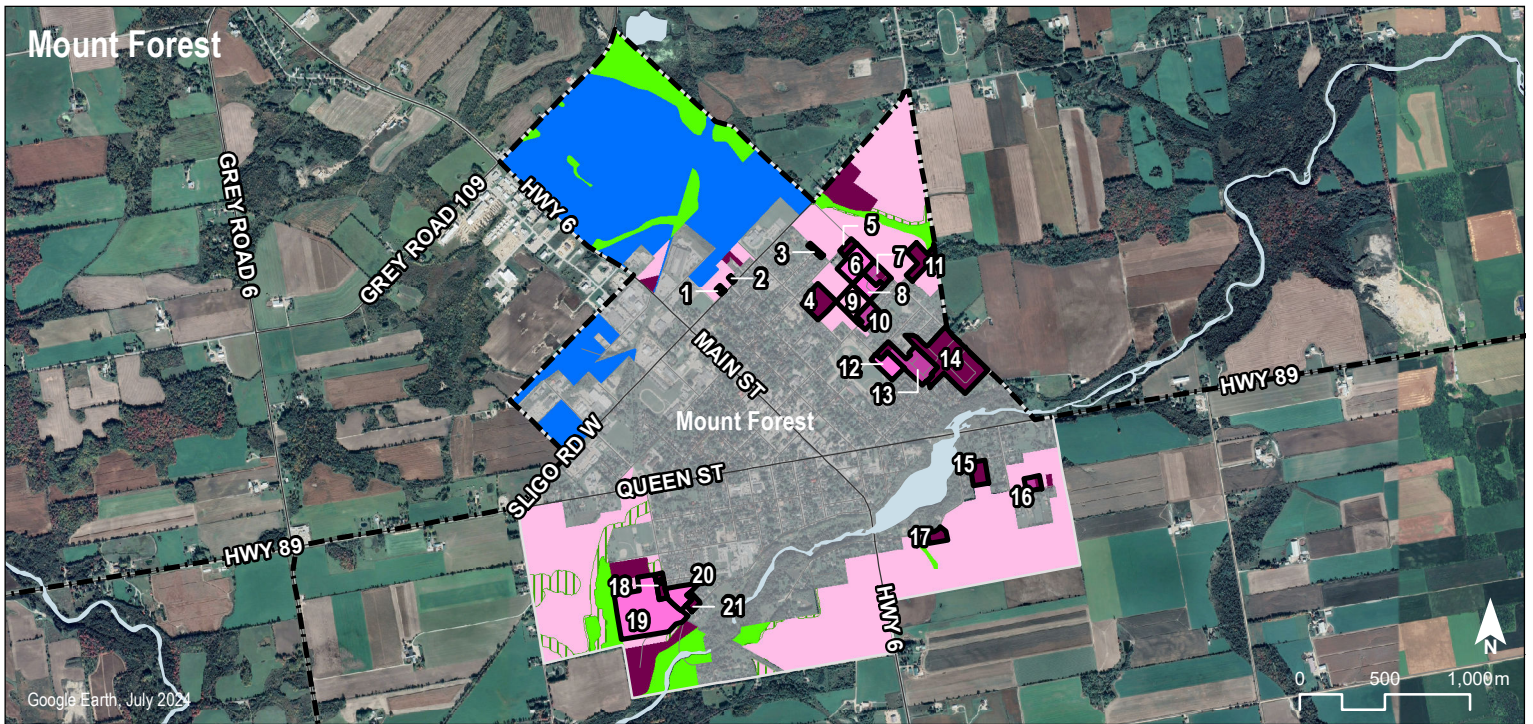
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|--|---|---|
| <ul style="list-style-type: none"> --- Municipal Boundary ○ Settlement Area Boundary ■ Built-Up Area ○ Property Boundary with ID | Designated Greenfield Areas
Status of Community Area <ul style="list-style-type: none"> ■ Built 2021 ■ Built 2021 to 2024 ■ Planned ■ Vacant | <ul style="list-style-type: none"> ■ Employment Area ■ Non-Developable Area ■ Natural Heritage System ■ Agricultural and Rural Area ■ MNRF Feature |
|--|---|---|

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Date: February 20, 2025

DESIGNATED GREENFIELD AREA

Wellington North, Wellington County



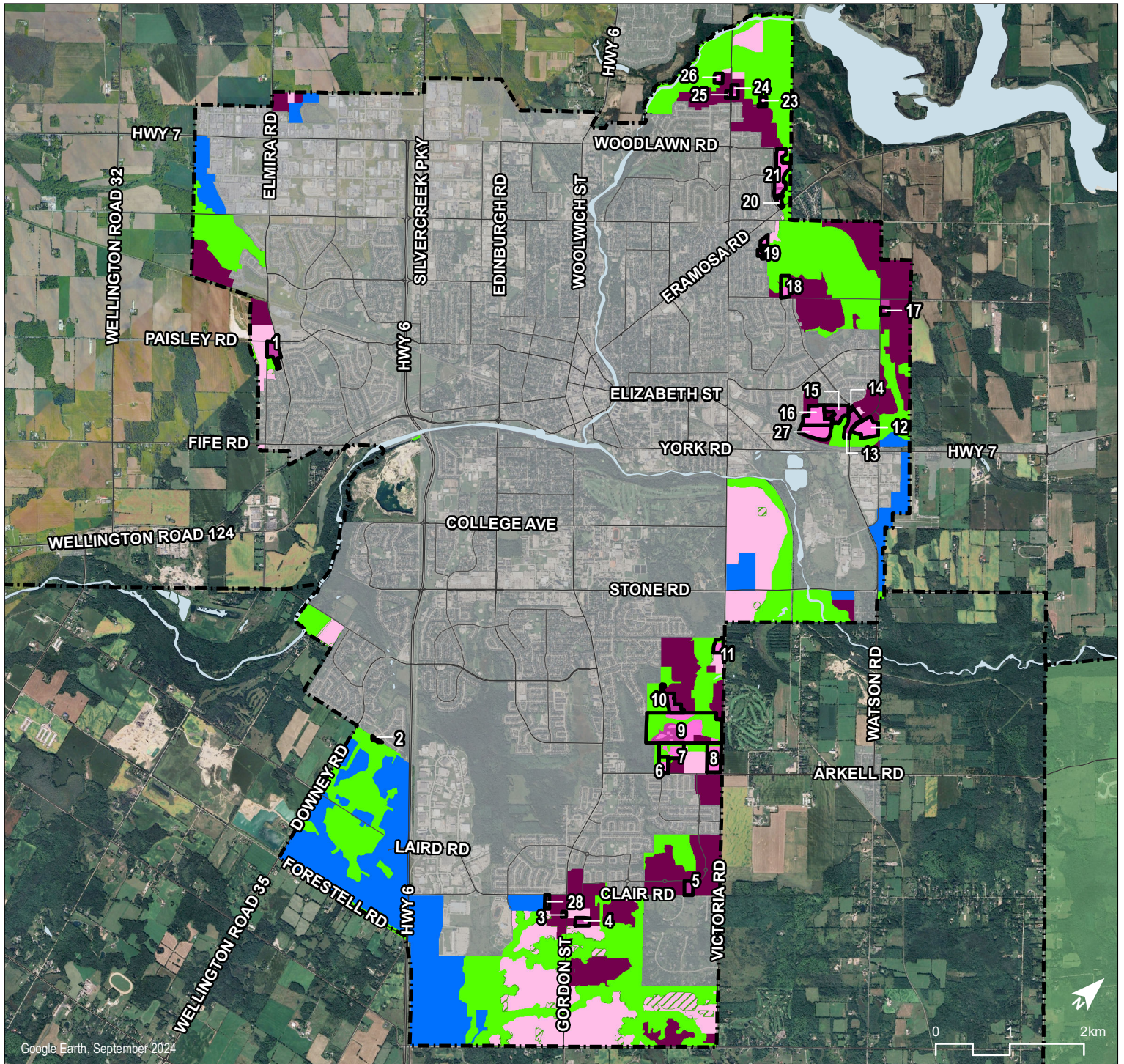
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|--|---|--|
| <ul style="list-style-type: none"> --- Municipal Boundary — Settlement Area Boundary ■ Built-Up Area ○ Property Boundary with ID | Designated Greenfield Areas
Status of Community Area <ul style="list-style-type: none"> ■ Built 2021 ■ Built 2021 to 2024 ■ Planned ■ Vacant | <ul style="list-style-type: none"> ■ Employment Area ■ Non-Developable Area ■ Natural Heritage System ■ MNRF Feature |
|--|---|--|

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Date: February 20, 2025

DESIGNATED GREENFIELD AREA

Guelph, Wellington County



- | | | |
|--|---|--|
| <ul style="list-style-type: none"> --- Municipal Boundary ○ Settlement Area Boundary ■ Built-Up Area ■ Greenbelt Plan ○ Map ID Boundary | Designated Greenfield Areas
Status of Community Area <ul style="list-style-type: none"> ■ Built 2021 ■ Built 2021 to 2024 ■ Planned ■ Vacant | <ul style="list-style-type: none"> ■ Employment Area ■ Non-Developable Area ■ Natural Heritage System ■ MNRF Feature |
|--|---|--|

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Date: February 20, 2025

APPENDIX 2

Wellington County Official Plan, 2024 Consolidation	PPS 2024	MGP Responses
4.8.2 A primary urban centre expansion may only occur where it has been demonstrated that:	2.3.2.1 In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:	This settlement area expansion request is being submitted in accordance with the criterion of the PPS 2024 and the Centre of Wellington Official Plan, as amended by OPA 126.
<div>a) sufficient opportunities to accommodate the population and employment forecasts for the County of Wellington, through intensification and in designated greenfield areas, using the intensification target and greenfield density targets, are not available;<div><div>i. within the County of Wellington; and</div><div>ii. within the applicable lower-tier municipality to accommodate the growth allocated to the municipality;</div></div></div>	<div>a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;</div>	<p>MGP conducted a comprehensive Greenfield Supply Analysis and LNA for Wellington County (including the Township of Centre Wellington) as part of our input into this process. Our analysis also adjusts the 2051 population projects provided by the Ministry of Finance, as directed by the PPS, which states that planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance. Based on the population share that the County of Wellington has had since 2016 within the larger Wellington Census subdivision (~40%), the Ministry of Finance population projections estimate an additional 15,800 people within the County to 2051.</p> <p>The County’s proposed intensification target of 15%, which we support maintaining, reflects a realistic balance between accommodating growth and protecting agricultural lands. While we support the DGA density target proposed by the County, our analysis recommends an overall 41 residents and jobs per hectare for Centre Wellington based on past development patterns and the Township's unique context. Historically, Centre Wellington has achieved DGA densities of approximately 41 residents and jobs per hectare, and it would be overly ambitious to assume significantly higher densities in remaining DGAs without compromising the market-based housing mix necessary for sustainable growth.</p> <p>This balanced growth scenario sets realistic density and intensification targets to achieve balanced, sustainable development while ensuring sufficient land supply. This scenario would align with market demand, enhance housing affordability, and deliver complete communities. Our analysis concludes that approximately 517 hectares of additional Community Area land for the County is required to meet growth demands through 2051, which utilizes the new Ministry of Finance population projections. These figures are based on a detailed review of existing land supply, growth projections, and the feasibility of achieving planned densities and intensification rates.</p> <p>If the County were to allocate land to the Township of Centre Wellington based on the population growth projections, approximately 351 hectares of additional land in the Township of Centre Wellington is required to ensure the Township and County can meet the 2051 growth forecast.</p>
<div>b) the expansion makes available sufficient lands for a time horizon not exceeding the year 2051 , based on the analysis provided for in a);</div>		The MGP LNA provides the required analysis to determine an appropriate and sufficient amount of land to be made available to 2051, taking into consideration housing demand and need by housing type, housing supply, employment and job forecasts, density targets, and balancing intensification with a market-based supply of housing, which will minimize land consumption.
<div>c) the timing of the expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the intensification target and density targets set out in Section 3.3., the phasing policies of Section 3.6, and the other policies of this Plan;</div>		The requested inclusion of the Subject Lands within an expanded urban area will provide a portion of the required land to accommodate growth to 2051 (per the MGP LNA); delivering an opportunity to plan a complete community with a diverse range and mix of housing types based on market demand. These lands will be planned to achieve higher residential densities than has historically been the case for designated greenfield areas (conceptually planned to be a minimum of 55 residents and jobs per hectare) and will therefore assist in achieving the County’s density target for the designated greenfields, which is planned for higher than the minimum Growth Plan density target of 40 people and jobs per hectare. The requested expansion does not adversely affect the intensification and density targets of the Count Official Plan as an appropriate amount of high-density growth is still allocated to the existing settlement areas/primary urban centres.

		<p>The Subject Lands represent a contiguous, orderly, and logical expansion to the existing Elora Settlement Area Boundary. These areas are adjacent to existing and planned community lands and are considered an appropriate size and location for a Settlement Area Boundary Expansion given their proximity to the existing road network, the existing settlement boundary, and the ability for the lands to be comprehensively planned. Expansion of these lands avoids ‘leapfrogging’ or fragmentation of development and promotes compact, multi-modal complete communities that will reduce GHG emissions.</p>
d) where applicable, the proposed expansion will meet the requirements of the Greenbelt Plan;		<p>The Subject Lands are located outside of the Greenbelt Plan Area not subject to the policies of the Greenbelt Plan.</p>
e) the infrastructure and public service facilities needed for expansion will be environmentally sustainable and financially viable over the full life cycle of these assets;	b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;	<p>The Subject Lands are located in an area well served by existing infrastructure. As demonstrated in the memos prepared by MTE entitled, Sanitary Servicing Overview for the Gibson Farm and Keating Farm (dated February 9, 2022) and Serviceability Assessment (dated December 16, 2022), sanitary and water servicing is readily available, and the Subject Lands have been accounted for in the planning of existing and future municipal infrastructure surrounding the site. A comprehensive stormwater management strategy for the Subject Lands and the adjacent subdivision is the preferred approach for the ultimate development of the area, which is detailed in the Comprehensive Stormwater Management Strategy Assessment prepared by MTE dated July 20, 2022. In addition, it is anticipated that the Subject Lands can be adequately serviced through the extension of existing utilities including hydro, gas, cable TV, and telephone (per MTE’s December 16th, 2022 memo).</p> <p>Development of the proposed expansion areas makes efficient use of vacant land within an area where roads, sanitary, and municipal services can be provided with minimal extensions to existing infrastructure. Development on these lands is planned to achieve a cost-effective development pattern by proposing development at a density that efficiently uses the available land in a compact built form. An FIS, prepared in support of this application concluded that the proposed development is estimated to generate \$1,250,100 in annual operating costs for the Township and \$276,200 in annual lifecycle costs for the Township. It is also estimated that the proposed development would generate \$2.9 million per year in property taxes for the Township, as well as \$5.5 million per year for the County and \$1.3 million for education.</p> <p>There are several public facilities near the Subject Lands, given the close proximity to the existing settlement area. Public facilities include the public elementary and secondary schools, Elora & District Community Centre, a fire station, public parks (including Elora Quarry), and libraries. As such, it is anticipated that the Subject Lands can be serviced in a cost-effective manner and will assist the County in maintaining a healthy supply of housing. Further technical studies will be provided as part of a future planning process.</p> <p>The creation of new neighbourhoods on the proposed expansion areas adjacent to the Elora settlement area will ensure a return on the investment of infrastructure related to growth in this area over their full life cycle.</p>
f) prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the County will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following;	<p>c) whether the applicable lands comprise specialty crop areas;</p> <p>d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;</p> <p>f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact</p>	<p>There are no other reasonable alternative areas within the County that could accommodate settlement expansion that would avoid prime agricultural lands. Through a future development review process with the County, any opportunities to avoid or mitigate impacts on existing agricultural uses will be assessed. There are no specialty crop areas in the Subject Lands.</p> <p>Any lands within the County required for expansion into the urban boundary to meet growth needs would have to consider potential impacts on nearby agricultural operations. This issue is not unique to the Subject Lands.</p>

<ul style="list-style-type: none"> i. reasonable alternatives that avoid prime agricultural areas are evaluated; and; ii. where prime agricultural areas cannot be avoided, lower priority agricultural lands are used; 	assessment or equivalent analysis, based on provincial guidance; and	As demonstrated in the Township's Agricultural Impact Assessment, the lands south of Elora/Salem scored the highest (i.e. better agricultural land) from an agricultural perspective whereas the Subject Lands (only the western portion was reviewed), scored one of the lowest (least favourable agricultural land). More viable agricultural land should be preserved where possible and expanding into less viable agricultural land aligns better with provincial planning objectives. Similar conclusions are also contained in the AIA prepared in support of this application.
g) any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;		The proposed expansion area in Elora can be expanded in compliance with this policy and through more detailed study at subsequent planning stages will ensure impacts on the agri-food network are either minimized or mitigated to the extent feasible. Preliminary mitigation measures are detailed in the submitted AIA.
h) in determining the most appropriate direction and location for expansion, the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the Provincial Policy Statement are applied, as well as the following are addressed: <ul style="list-style-type: none"> i. the existing development pattern in the community; ii. the potential impacts on people; iii. the need to avoid mineral aggregate areas or where it is unavoidable to use lands of lower quality aggregate resources; iv. the impacts on natural heritage systems and features; v. the impacts on groundwater and surface water; vi. the impacts on the safety and efficiency of existing or planned infrastructure; vii. the impacts on archaeology, cultural heritage landscapes, and built heritage resources; viii. logical boundaries based on existing property lines or recognized physical features where possible; and ix. other planning criteria considered appropriate in the circumstances. 		<p>This location is an appropriate location to accommodate growth in accordance with the Policies of the PPS 2024, as stated in the Planning Opinion Report prepared by Malone Given Parsons Ltd, dated March 2025.</p> <p>The proposed expansion has regard for the development pattern of the existing community by aligning proposed local roads facilitating a like-on-like development pattern to ensure appropriate transitions between the existing and proposed communities. The proposed development, and supporting background studies also have regard for impacts on people, avoidance of high-quality aggregate areas, impacts on groundwater, impacts on the safety and efficiency of existing/planned infrastructure, among other matters.</p> <p>As detailed, in the Planning Opinion Report, it is our opinion that the extension of the settlement boundary follows logical boundaries. In all, it is our opinion that the proposed settlement boundary expansion is an appropriate location to accommodate this growth.</p>
i) the County and local municipalities will plan to maintain or move significantly towards a minimum of one full-time job per three residents within or in the immediate vicinity of the urban centre or hamlet;		The proposed settlement area expansion is more appropriate for community area rather than employment area, as it lacks the locational characteristics needed for major employment uses, such as direct access to highways, goods movement corridors, or proximity to other industrial or business park uses. Instead, the area is surrounded by existing community uses, making it better suited for residential and institutional development. The proposed development contemplates a seniors' centre that will generate jobs in healthcare, administration, and facility management. Additionally, ensuring an adequate supply of residential land will support workforce availability for employment areas (that are more appropriately designated) elsewhere in the County, aligning with the objective of moving toward a minimum of one full-time job per three residents.
j) the settlement area to be expanded is in compliance with the minimum distance separation formulae.	e) whether the new or expanded settlement area complies with the minimum distance separation formulae;	The Subject Lands are not within a specialty crop area and the proposed expanded settlement area complies with the minimum distance separation formulae, as concluded in the AIA.

<p>3.6 PHASING GROWTH</p> <p>Local municipalities, in coordination with the County, shall identify the logical and timely extension and sequencing of growth in designated greenfield areas as indicated on Schedule A (County Growth Structure). The process for phasing growth in Primary Urban Centres shall include:</p> <ul style="list-style-type: none">a) a Secondary Plan implemented through a County or local Official Plan Amendment;b) a County Official Plan Amendment and/or local Official Plan Amendment;c) a Growth Management and Phasing Plan approved by a local Council; ord) a combination of any of the above. <p>Growth will be phased to address availability, feasibility and plans for staging extensions or improvement of municipal sewage services, municipal water services, roads, active transportation, other infrastructure and public service facilities to support fully serviced and complete communities and employment areas. Other County or local planning criteria considered appropriate in the circumstances may also apply.</p> <p>Phasing will sequence development to ensure the substantial completion of new community area and employment areas before additional community areas and employment areas are opened up for development.</p> <p>Land identified for urban development or future urban development within primary urban centres may include active agricultural uses. Phasing options should be considered to keep lands in agricultural production and leave agricultural infrastructure in place until the land is to be developed.</p> <p>This policy does not apply to prevent the completion of previously approved development, logical infilling or development of a minor nature if the overall intent of this section is met.</p>	<p>f) the new or expanded settlement area provides for the phased progression of urban development.</p>	<p>The Subject Lands represent a contiguous, orderly, and logical expansion to the existing Elora Settlement Area Boundary. As above, these areas are adjacent to existing and planned community lands and are considered an appropriate size and location for a Settlement Area Boundary Expansion given their proximity to the existing road network, the existing settlement boundary, and the ability for the lands to be comprehensively planned. Expansion of these lands avoids ‘leapfrogging’ or fragmentation of development and promotes compact, multi-modal complete communities that will reduce GHG emissions.</p>
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Malone Given Parsons Ltd.
201- 140 Renfrew Drive
Markham Ontario
L3R 6B3 Canada

1-905-513-0170 mgp.ca