



Committee Report

To: Chair and Members of the Planning Committee
From: Sarah Wilhelm, Manager of Policy Planning
Date: Thursday, April 09, 2026
Subject: **County Official Plan Review – OPA 131 Recommendation Report**



PLANWELL

1.0 Purpose

The purpose of this report is to review comments and recommend to County Council the adoption of proposed Official Plan Amendment 131 (OPA 131) Rural Area Policies and Growth set out in Appendix A. The report provides results of the agency circulation, results of the community consultation process and highlights of the final draft amendment.

2.0 Overview

- This County-initiated amendment updates County-wide rural area policies, provides for a review of the rural residential growth shortfall in Erin and addresses rural residential and employment growth needs in Puslinch.
- OPA 131 is the fifth of a series of amendments to the County’s Official Plan as part of the Official Plan Review under Section 26 of the Planning Act. By addressing the need for rural residential and rural employment growth in Wellington, OPA 131 brings Phase 3B (Rural Area Growth Review) of the Official Plan Review to a conclusion.
- Consultation for OPA 131 included circulation for agency comments, a statutory open house on February 5, 2026, and a statutory public meeting on February 12, 2026 in accordance with the Planning Act.
- For the reasons outlined in this report, staff recommend that Final Draft OPA 131 be adopted by County Council and forwarded to the Minister of Municipal Affairs and Housing for a decision.

3.0 Background

The County’s ongoing Official Plan Review was launched in 2019 as a joint municipal comprehensive review (MCR) and 5-year review. The County has used a phased approach to the Official Plan Review to be better positioned to respond to frequent changes in Provincial policies, legislation and regulations which have occurred since that time.

OPA 131 is supported by numerous technical studies, reports and implementing OPAs, including but not limited to those listed under section 3.1 through 3.3 below. Each of these documents were made available for public review through the Official Plan Review project webpage (www.wellington.ca/planwell). Other available reports provide commentary on various provincial planning initiatives, including those which delayed the County’s ability to bring forward OPA 131.

3.1 Technical Studies

Urban Structure and Growth Allocations (June 16, 2021) and Amended (January 31, 2022)

Land Needs Assessment Report (August 29, 2022) prepared by Watson & Associates Economists Ltd.

Puslinch by Design: Employment Land Study (2024 – 2025)

Aberfoyle Expansion Planning Impact Assessment (September 2025)

Aberfoyle Expansion Agricultural Impact Assessment and Minimum Distance Separation (MDS) Study (September 2025)

Aberfoyle Expansion Aggregate Impact Assessment (September 2025)

3.2 County Planning Committee Reports

PD2021-17 Regionally Significant Economic Development Area

PD2021-21 Consultation and Engagement Overview

PD2021-30 Municipal Feedback

PD2022-07 Growth Forecasts and Allocations

PD2022-11 Draft Land Needs Assessment

PD2022-17 Consultation and Engagement Overview #2

PD2022-20 Land Needs Assessment

PD2023-05 Agricultural System Mapping and Policy Review

PD2024-29 2024 Rural Residential Growth Analysis

PD2025-13 2024 Residential Monitoring Report

PD2025-20 Phase 3B Rural Residential Growth

PD2025-24 OPA 131 Rural Area Policies and Growth

3.3 County-initiated Implementing OPAs

The following Official Plan Amendments implement the County's phased Official Plan Review and have been approved by the Province:

OPA 119 County Growth Structure

OPA 120 County Growth Forecast

OPA 123 Future Development Lands

OPA 126 Urban Boundary Expansions

4.0 Summary of OPA 131

The general purpose of the Final Draft of Official Plan Amendment 131 (OPA 131) is to:

- Add and change rural area policies to align with the 2024 Provincial Planning Statement;
- Provide flexibility for the Town of Erin to further study and determine priorities for directing its rural residential growth shortfall through a Town of Erin Official Plan Amendment, if necessary;
- Provide for future changes to the rural residential severance cut-off date in Erin through a Town of Erin Official Plan Amendment, if necessary;
- Expand Aberfoyle and redesignate lands to Residential, Highway Commercial, Residential Transition Area, Policy Area PA7-9 (County Aberfoyle Garage), Core Greenlands and Greenlands.

- Introduce Policy Area PA7-12 (Maltby Road Future Development Area) to phase future rural residential development (subject to any potential surplus rural growth), to address Highway Commercial lands, and introduce a 7.5 metre minimum buffer along Maltby Road;
- Modify the rural residential severance cut-off date in Puslinch to May 1, 2025 and keep it as March 1, 2005 in Erin and Minto;
- Designate new rural employment area lands in Puslinch, implement site-specific policies and modify the existing Puslinch Industrial Policy; and
- Complete other policy changes and map corrections.

Please refer to Appendix A for details of the amendment and Appendix B for key areas of change since the September 11, 2025 Draft OPA with rationale.

5.0 Policy Review

An overview of the applicable planning policy documents is provided below. For further detail, Appendix C highlights how Final Draft OPA 131 aligns with key applicable policies of the Provincial Planning Statement and Greenbelt Plan.

5.1 Provincial Planning Statement

The Provincial Planning Policy framework is established through the Planning Act and the Provincial Planning Statement (PPS). The PPS provides policy direction on matters of provincial interest related to land use planning and development. Under section 3 of the Planning Act, decisions affecting planning matters shall be consistent with policy statements issued under the Act. The PPS represents minimum standards and allows municipalities to be more restrictive provided it does not conflict with any other Provincial policy. Planning staff are satisfied that the recommended Final Draft of OPA 131 is consistent with the 2024 Provincial Planning Statement.

5.2 Greenbelt Plan

The Planning Act also requires that all decisions on planning applications shall conform with the policies of provincial plans, such as the Greenbelt Plan. The Greenbelt Plan identifies where urbanization should not occur to provide permanent agricultural and environmental protection. The Greenbelt Plan applies to parts of Erin and Puslinch. Planning staff are satisfied that the recommended Final Draft of OPA 131 conforms with the Greenbelt Plan.

5.3 County of Wellington Official Plan

The Wellington County Official Plan implements provincial policy and provides more detailed land use planning policy direction for the physical development of the County, local municipalities, and the long-term protection of resources.

The County of Wellington Official Plan policies were developed in sufficient detail to provide appropriate official plan coverage for the entire County, while still responding to local conditions. The County Official Plan also serves as the local official plan for five of the seven municipalities in Wellington. The Township of Centre Wellington and Town of Erin have local Official Plans which apply in addition to the County Plan.

Planning staff are satisfied that the Final Draft of OPA 131 conforms with the County Official Plan.

6.0 Consultation

Planning staff met and exceeded the minimum requirements of the Planning Act for notice related to OPA 131 which included the following:

- Circulation of Notice of Complete Application, Open House and Public Meeting to the Province, Member Municipalities, adjacent Municipalities, Indigenous communities, agencies, members of the public and stakeholders
- Notice of Statutory Open House on February 5, 2026 was posted in the Wellington Advertiser
- Notice of Statutory Public Meeting on February 12, 2026 was posted in the Wellington Advertiser
- Additional Notice of Draft Amendment, Open House, Public Meeting, and staff reports through the project email list and website updates. Properties directly impacted by map changes were provided direct mail notices in January 2026.

6.1 Public Open House

With a total of approximately seventy participants, there was a good turnout at the on-line statutory Open House (see Appendix D for meeting summary). The following key themes emerged from the open house:

- Land use designations and planning terms
- Severances in Erin and Puslinch
- Agriculture and rural impacts
- Housing allocation and growth targets
- Expansion of Aberfoyle
- Employment and industrial lands
- Presentation, public engagement and accessibility

6.2 Public Meeting

There was also good attendance at the in-person statutory Public Meeting. According to the sign-in sheet there were thirty-nine members of the public. A number of key themes emerged from the public meeting:

- Employment lands
- Expansion of Aberfoyle
- Severances in Erin and Puslinch
- Reallocation of rural growth from Erin to Puslinch
- Local and County process

See Appendix E for meeting minutes and attachments.

7.0 Input from External Review Agencies

The County circulated Notice of the Draft OPA to the Province, Member Municipalities, adjacent municipalities, Indigenous communities, and agencies for comment by mid-November 2025. The circulation was repeated for the notice of Open House and Public Meeting. A summary of the comments received as a result of the above circulations and staff's responses to the comments are

provided in appendices to this report, including those of the Province (Appendix F1), Member Municipalities (Appendix F2), adjacent Municipalities (Appendix F3), Indigenous Communities (Appendix F4) and Agencies (F5).

The instances where staff made changes to Draft OPA 131 in response to external agency feedback are detailed in Appendix B of this report. Where appropriate, changes were made in response to comments from the Province, Member Municipalities and the City of Guelph. Staff are satisfied that the input from external review agencies has been adequately addressed.

8.0 Comments from the Public and Stakeholders

In addition to the Open House and Public meeting, written comments on Draft OPA 131 were also submitted to the Planning and Development Department. Staff reviewed all written submissions and have responded to specific comments from members of the public in Appendix F6 and stakeholders in Appendix F7. Full written comments are available in the project file. Staff have identified the following key themes from the public comments:

- | | |
|-----------------------|--|
| County-wide | <ul style="list-style-type: none">• Areas of Natural and Scientific Interest (ANSI)• Urban fringe policies• Bona fide farmer definition• Severances (residence surplus to a farming operation) |
| Erin | <ul style="list-style-type: none">• Severances (rural residential on non-prime farmland)• Reallocation of rural growth from Erin to Puslinch• Hamlet expansion• Estate residential• Erin Village expansion |
| Guelph-Eramosa | <ul style="list-style-type: none">• Rural employment area |
| Puslinch | <ul style="list-style-type: none">• Aberfoyle expansion• Arkell expansion• Severances (rural residential on non-prime farmland)• Rural employment area• Estate residential |

Changes were made in response to public comments regarding the previous proposal of the reallocation of growth from Erin to Puslinch and are detailed in Appendix A and B.

Prior to the circulation of Draft OPA 131 staff have received, tracked and reported on rural area comments in earlier phases of the Official Plan Review as part of the following reports:

- | | |
|-----------|---|
| PD2021-21 | Consultation and Engagement Overview |
| PD2022-07 | Growth Forecasts and Allocations |
| PD2022-11 | Draft Land Needs Assessment |
| PD2022-14 | OPA 119 Recommendation Report |
| PD2022-17 | Consultation and Engagement Overview #2 |

PD2022-20	Land Needs Assessment
PD2023-03	OPA 120 Recommendation Report
PD2023-09	Urban Expansion Requests
PD2024-08	Urban Boundary Expansion Review
PD2024-29	2024 Rural Residential Growth Analysis
PD2024-34	OPA 123 Recommendation Report
PD2025-14	OPA 126 Recommendation Report
PD2025-20	Phase 3B Rural Residential Growth

On the most part, comments focused on seeking opportunities for rural residential growth through more rural residential severances in areas of prime and non-prime farmland, expansion of Secondary Urban Centres (Aberfoyle, Morrision) and Hamlets (specifically Alma, Ariss, Arkell, Inverhaugh, Ospringe and Wallenstein) and more estate residential subdivisions.

Stakeholder comments from the Wellington Federation of Agriculture (WFA) addressed the following key areas:

- Protection of agricultural lands
- Revisions to definitions
- Maintain severance cut-off date of March 1, 2005 for Minto, Erin and Puslinch
- Impact of increased rural residential severances (fragmentation and future MDS II constraints)
- Severances (residence surplus to a farming operation)

Staff note that in response to WFA and other comments, the severance policies for a residence surplus to a farming operation have been modified in the Final Draft of OPA 131. See Appendix B and F7 for further details.

9.0 Final Draft Official Plan Amendment

The Final Draft of OPA 131 being recommended in this report may be found in Appendix A. A summary of the recommended changes between the September 11, 2025 Draft and April 9, 2026 Final Draft OPA 131 with rationale is provided in Appendix B.

Staff note that in Erin, Council and public feedback has resulted in changes to the amendment so that it no longer reallocates the Erin rural shortfall to the Township of Puslinch but allows for it to be considered in the future. Final Draft OPA 131 provides for a more detailed review by the Town outside of OPA 131 as part of an amendment to the Town's Official Plan, if necessary.

Other changes to OPA 131 are mainly related to the Aberfoyle expansion area, Puslinch rural employment policies, definitions, severances for a residence surplus to a farming operation and improving consistency with the Provincial Planning Statement.

10.0 Conclusion

Staff are satisfied that OPA 131 is consistent with the Provincial Planning Statement (2024), has regard for matters of Provincial interest, and is in conformity with the Greenbelt Plan (2017). Public concerns have been considered and addressed. In our opinion, OPA 131 represents good planning and is in the public interest.

11.0 Strategic Action Plan

This report relates to the following objectives and priorities in the County's Strategic Action Plan:
Making the best decisions for the betterment of the Community.

12.0 Recommendation

That pursuant to section 26 of the Planning Act, County Council declares that Official Plan Amendment 131 – Rural Area Policies and Growth (a) conforms with the Greenbelt Plan; (b) has regard for matters of provincial interest in section 2 of the Planning Act; and (c) is consistent with the Provincial Planning Statement.

That a by-law adopting County of Wellington Official Plan Amendment 131 be approved.

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

Respectfully submitted,



Sarah Wilhelm, RPP, MCIP
Manager of Policy Planning



Jameson Pickard, RPP, MCIP
Senior Policy Planner

In consultation with/approved by:

Aldo Salis, Director of Planning and Development
Scott Wilson, Chief Administrative Officer

- Appendix A Final Draft OPA 131
- Appendix B Changes to Draft OPA 131 with Rationale
- Appendix C Provincial Policy Review
- Appendix D Public Open House Meeting Summary
- Appendix E Public Meeting Minutes
- Appendix F1 Provincial Comments and Responses
- Appendix F2 Member Municipality Comments, Background and Responses
- Appendix F3 Adjacent Municipality Comments and Responses
- Appendix F4 Indigenous Community Circulation, Comments and Responses
- Appendix F5 Agency Comments and Responses
- Appendix F6 Public Comments and Responses (County-wide, Erin, Guelph-Eramosa and Puslinch)
- Appendix F7 Stakeholder Comments and Response (Wellington Federation of Agriculture)

Appendix A

Final Draft OPA 131 – Rural Area Policies and Growth

AMENDMENT NUMBER 131

TO THE OFFICIAL PLAN FOR THE

COUNTY OF WELLINGTON

April 9, 2026
Final Draft

COUNTY OF WELLINGTON

GENERAL AMENDMENT

(Rural Growth and Policy Updates)

Important Notice: This draft Amendment to the Official Plan for the County of Wellington may be revised after the statutory public meeting at any point prior to County Council's consideration as a result of public input, agency comments, and further review by the County of Wellington.

THE CORPORATION OF THE COUNTY OF WELLINGTON

BY-LAW NO. _____

A By-law to adopt Amendment No. 131 to the Official Plan for the County of Wellington.

The Council of the Corporation of the County of Wellington, pursuant to the provisions of the Planning Act, R.S.O. 1990, as amended, does hereby enacts as follows:

1. THAT Amendment Number 131 to the Official Plan for the County of Wellington, consisting of the attached text, maps and explanatory text, is hereby adopted.
2. THAT this By-law shall come into force and take effect on the day of the final passing thereof.

READ A FIRST AND SECOND TIME THIS _____ DAY OF _____, 20__

READ A THIRD TIME AND PASSED THIS _____ DAY OF _____, 20__

WARDEN

CLERK

**AMENDMENT NUMBER 131
TO THE
COUNTY OF WELLINGTON OFFICIAL PLAN**

INDEX

PART A - THE PREAMBLE

The Preamble provides an explanation of the proposed Amendment including the purpose, location, and background information, but does not form part of this Amendment.

PART B - THE AMENDMENT

The Amendment describes the changes and/or modifications to the Wellington County Official Plan which constitute Official Plan Amendment Number 131.

PART C - THE APPENDICES

The Appendices, if included herein, provide information related to the Amendment, but do not constitute part of the Amendment.

PART A - THE PREAMBLE

PURPOSE

The purpose of this amendment is to align the rural area policies with the 2024 Provincial Planning Statement (PPS) and complete Rural Phase 3B of the Official Plan Review. This amendment covers five key areas.

1. County-wide PPS Rural Area Policy Consistency (PPS)
2. Erin Rural Residential Growth Review (ERIN)
3. Puslinch Rural Residential Growth (PCH-R)
4. Puslinch Rural Employment Growth (PCH-E)
5. Other Changes (CW – Centre Wellington, ERIN, MINTO, PCH-R)

The details of the amendment are as follows:

1. County-wide PPS Rural Area Policy Consistency (PPS)

Aligns the rural area policies with the 2024 Provincial Planning Statement by:

- Updating permitted use policies in the prime agricultural area.
- Implementing an agricultural system approach to enhance protection of agricultural land base in the County and support the viability of agri-food network.
- Requiring new non-agricultural uses in the prime agricultural area to avoid or minimize impacts on the agricultural system as demonstrated through an agricultural impact assessments or equivalent analysis.
- Permitting lot creation in the prime agricultural area for infrastructure where the use or facility cannot be accommodated through an easement or existing right-of-way.
- Revising residence surplus to a farming operation severance policy to strengthen lot size requirements and strengthen and clarify requirements related to eligibility.
- Aligning the County Official Plan with the Rural Area concept of the PPS.
- Revising existing and adding new definitions in accordance with the PPS related to agriculture.
- Adding a new definition “Farm Operation” to the Plan to support the implementation of the Residence Surplus to a Farming Operation and On-farm Diversified use policy frameworks.
- Other changes to clarify and support the implementation of the rural area policy framework in the County.

- Removal of policy 6.8.4 which places restrictions on the type of employment areas uses outside of settlement areas as it is based on a Growth Plan policy which no longer applies.

2. Erin Rural Residential Growth Review

(ERIN, PCH-R)

Provides flexibility for the Town of Erin to further study and determine its priorities for directing rural residential growth:

- Adds a new policy 3.5.1 to support a local review of potential options for addressing the rural residential growth shortfall in the Town of Erin. If applicable, any surplus is to be reallocated to the Township of Puslinch.
- Provides for future consideration of changes to the rural residential cut-off date under policy 3.5.1 and the lot creation policies of section 10.4.4, if warranted.
- Policy 3.5.1 is to be implemented through any necessary amendments to the Town of Erin Official Plan to allow for local consultation and eliminate potential policy duplication.

3. Puslinch Rural Residential Growth (PCH-R)

Makes sufficient rural residential land available in Puslinch over the long-term by changing the severance cut-off date in Puslinch and expanding Aberfoyle:

- Change the rural residential severance date to May 1, 2025 as it applies to the Secondary Agricultural Areas of Puslinch.
- Expand the secondary urban centre boundary of Aberfoyle.
- Change land use designations within the expanded Aberfoyle boundary:
 - From Secondary Agricultural and Country Residential to Residential, Highway Commercial, Industrial, Residential Transition Area, Core Greenlands and Greenlands.
- Add a new policy area (PA7-12) Maltby Road Future Development Area related to policy 3.5.1 (above) to phase future residential development (subject to County reallocation of growth), to address Highway Commercial lands and introduce a 7.5 metre minimum buffer to provide an urban-rural interface along Maltby Road.
- Add a new policy area (PA7-9) Aberfoyle Garage to County lands within the current and expanded Aberfoyle boundary to provide flexibility for future needs.

- Make housekeeping changes to:
 - Align the mapped boundary of existing policy area PA7-2 (Mill Creek Residential Area) and PA7-6 (Mini Lakes) with property boundaries.
 - Change land use designation from Industrial to Residential for a residential property.

4. Puslinch Rural Employment Growth (PCH-E)

To make sufficient rural employment land available in Puslinch over the long-term:

- Change land use designation from Secondary Agricultural to Rural Employment Area.
- Add new policy area (PA7-10) to establish site-specific policies for newly identified prestige rural employment areas.
- Add new policy area (PA7-11) to establish additional site-specific policies for newly identified rural employment areas.
- Make changes to section 9.8.3 Puslinch Industrial Policy by adding policies to implement Puslinch by Design: Employment Land Study to address road infrastructure, transportation, concept plan, communal wells and land use compatibility and deleting subsection (a).

5. Other Changes

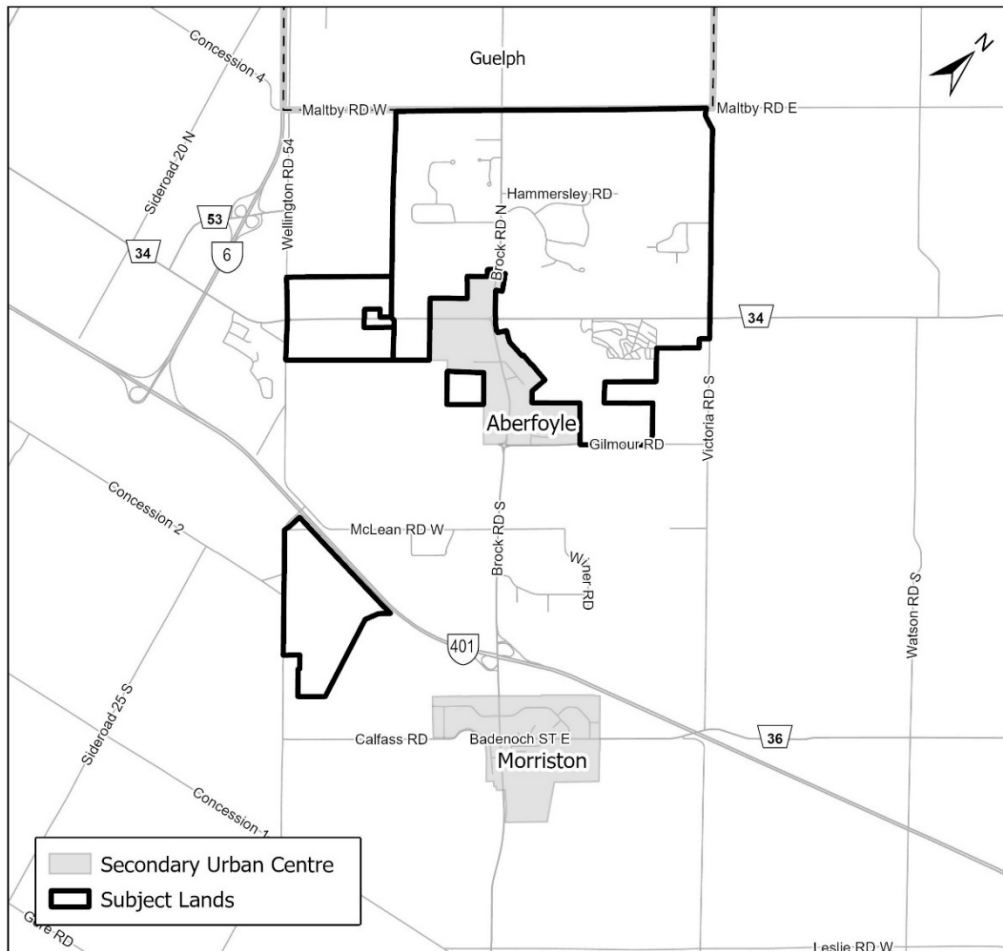
Other changes include:

- PPS updates to clarify: (1) when amendments to County Growth Structure (Schedule A) mapping is required (County-wide); and (2) when amendments are not required for employment conversions where a local Official Plan Amendment has been approved for such a conversion to take place. (CW, ERIN)
- Removal of rural cluster policy 6.5.4 applicable to Secondary Agricultural Areas as the necessary assessment has been completed. (ERIN, MINTO, PCH-R)
- Clarify that the rural residential severance date of March 1, 2005 continues to apply to the Secondary Agricultural Areas of Erin and Minto. (ERIN, MINTO)

LOCATION

Many of the policy changes apply broadly across the County of Wellington. Others apply to the Secondary Agricultural Areas of Erin, Minto and Puslinch. The lands subject to the proposed amendment located within the Township of Puslinch are identified in the Key Map below.

Figure 1 Key Map



BACKGROUND

In September 2019, County Council authorized the Planning and Development Department to proceed with the County Official Plan Review, which includes a Municipal Comprehensive Review (MCR) component under the Growth Plan for the Greater Golden Horseshoe (Growth Plan, 2019 as amended) and a 5-year review component. The Minister of Municipal Affairs and Housing advised that municipalities may choose to use a phased approach, which includes more than one official plan amendment, to achieve conformity with the Growth Plan.

The Province concluded a process to streamline and combine the 2020 Provincial Policy Statement (PPS) and 2019 Growth Plan for the Greater Golden Horseshoe (Growth Plan). The 2024 Provincial Planning Statement (2024 PPS) came into effect October 20, 2024 and all land use planning decisions are required to be consistent with its policies.

OPA 131 is the fifth amendment of the County's phased Official Plan Review.

BASIS

This County-initiated amendment is based on the following:

- A detailed review of the 2024 PPS policies;
- A detailed review of the County of Wellington’s population, household and employment growth forecasts and allocations to 2051 as approved by the Province through OPA 120 in July 2024;
- An in-depth Land Needs Assessment carried out primarily to assess the quantity of urban land required to accommodate the County’s forecasted growth to 2051. The Assessment also included a rural employment analysis ultimately identifying the need for a minimum of 30 ha of additional rural employment area land in Puslinch;
- Supplemental calculation of land need for the expansion of Aberfoyle;
- The detailed “Puslinch by Design: Employment Land Study”, further Township Council direction and 2024 PPS policies allowing municipalities to plan for employment growth beyond the 2051 planning horizon. Puslinch by Design: Employment Land Study is based on the following:

Background Report including Background Papers

- Employment Land Market Study
- Transportation
- Municipal and Private Servicing
- Land Use Planning and Land Use Compatibility
- Aggregates
- Agriculture
- Natural Heritage
- Design
- Cultural Heritage Resources

Phase 3 Detailed Planning Study

Phase 4 Land Options Report

Phase 5 Recommended Land Option and Land Use Report

Phase 5 Addendum Report

- Results of the evaluation and overall recommendations for where the Township of Puslinch can most feasibly expand the urban boundary of Aberfoyle based on the following:

Planning Impact Assessment

Agricultural Impact Assessment

Minimum Distance Separation (MDS) Study for Aberfoyle SABE Aggregate Impact Assessment

This County-initiated amendment is being processed under Section 26 of the Planning Act.

PUBLIC AND AGENCY INPUT

A Special Meeting of County Official was held in June 2021 for the Official Plan Review.

This Official Plan Amendment (OPA 131) has been informed by previous consultations on the Phase 1 MCR Report: Urban Structure and Growth Allocations and Phase 2 MCR Report: Land Needs Report which included:

- Technical Resource Team (TRT) meetings through 2021
- Ongoing discussions with Ministry of Municipal Affairs and Housing staff
- Virtual Public Information Centre (PIC) to present Draft Phase 1 Report in June 2021
- Virtual Public Information Centre (PIC) to present Draft Phase 2 Report in December 2021
- Circulation of draft Phase 1 Report for comment from June to July 2021 to Member Municipalities, Indigenous communities, agencies, members of the public and stakeholders
- Numerous County Planning Committee reports which have documented the results of public consultation and engagement

The “Puslinch by Design: Employment Land Study” included three public open houses and multiple Council meetings to obtain public feedback on the Study.

The County of Wellington has had pre-application consultations with various Provincial ministries to address specific technical questions of the County related to draft OPA 131.

The direct consultation for OPA 131 included:

- Circulation to the Ministry of Municipal Affairs and Housing
- Circulation to Member Municipalities, adjacent Municipalities, Indigenous communities, agencies, members of the public and stakeholders
- Statutory Open House
- Statutory Public Meeting

Notice of the statutory open house and public meeting was provided in accordance with the Planning Act and advertised in the Wellington Advertiser. To obtain further public feedback, notification of engagement opportunities was also provided through the project email list and website updates.

PART B - THE AMENDMENT

All of this part of the document entitled **Part B - The Amendment**, consisting of the following text and schedules constitutes Amendment No. 131 to the County of Wellington Official Plan.

DETAILS OF THE AMENDMENT

The Official Plan of the County of Wellington is hereby amended as follows:

PART 1 – INTRODUCTION

PPS	1. Section 1.1 Purpose is amended by: adding the phrase “local food” to the end of the first list following the phrase “cultural facilities”.
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PART 2 – WELLINGTON’S PLANNING VISION

PPS	2. Section 2.1.3 Land Stewardship is amended by: adding the phrase “, farmers” following the phrase “community groups” in the first paragraph.
PPS	3. Section 2.2 Our Commitment to the Future is amended by adding the following new section and renumbering the subsequent sections as follows: “2.2.11 Maintain and enhance a geographically continuous agricultural land base and support the long-term economic prosperity and productive capacity of the <i>agri-food network</i> .”

PART 3 – WELLINGTON GROWTH STRATEGY

<p>PPS CW ERIN</p>	<p>4. Section 3.1 General Strategy is amended by adding the following sentences to the end of the section:</p> <p>“County Growth Structure (Schedule A) shall be amended to reflect changes to Primary and Secondary Urban Centres, Hamlets, Employment Areas and Rural Employment Areas associated with Land Use (Schedule B) amendments.</p> <p>A duplicate County Official Plan Amendment is not required for changes to employment areas and/or rural employment areas identified on Schedule A where a local Official Plan is in effect and an amendment to change an <i>employment area</i> designation(s) has been approved. In such instances, the County will maintain and update Schedule A in accordance with the approved local official plan amendment.”</p>
<p>ERIN PCH-R</p>	<p>5. Section 3.5 Allocating Growth is amended by adding the following new policy before Table 1:</p> <p>“3.5.1 Erin Rural Residential Growth Review</p> <p>The purpose of this policy is to support a local review of potential options for addressing a rural residential growth shortfall in the Town of Erin and if necessary, to reallocate any surplus to the Township of Puslinch.</p> <p>Table 3 sets out the forecasted growth for the Town of Erin to 2051, including ranges for the rural population and rural households outside of Hillsburgh and Erin Village. The ranges represent the rural residential growth shortfall.</p> <p>If the Town of Erin determines that the appropriate amount of rural growth is to be less than the upper range set out in Table 3, this shall be implemented through an amendment to the Town of Erin official plan, without an amendment to this Plan.</p> <p>If the Town of Erin determines that a change(s) to the March 1, 2005 date restriction of Section 10.4.4 (Secondary Agricultural Areas – Residential Lots - Erin and Minto) is warranted, such changes shall be implemented by a local official plan amendment to include necessary lot creation policies in the Town’s Official Plan, as appropriate.</p> <p>This approach to implementation is meant to allow for local consultation and eliminate potential policy duplication.</p> <p>The County may reallocate any surplus forecasts within the ranges of Table 3 to the Township of Puslinch, as appropriate, without an amendment to this Plan.”</p>

ERIN	6. Section 3.5 Allocating Growth is amended by deleting Table 3 and replacing it with the following:
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“Table 3 TOWN OF ERIN
Projected Growth in Wellington County to 2051

	2021	2051*
Erin		
Total Population ¹	12,000	26,000 to 26,300
Households	4,230	9,080 to 9,200
Total Employment ²	3,100	6,200

	2021	2051*
Erin Village		
Total Population ¹	3,100	10,800
Households	1,140	3,840
Hillsburgh		
Total Population ¹	1,400	6,100
Households	550	2,190
Outside Primary Urban Centres		
Total Population ¹	7,500	9,100 to 9,400
Households	2,540	3,050 to 3,170

¹ Includes net undercount adjustment which is estimated at approximately 3%

² Includes ‘no fixed place of work’ employment

* See Policy 3.5.1”

PCH-R	7. Section 3.5 Allocating Growth is amended by changing the column heading of Table 7 from “2051” to “2051*” and adding the following text to the end of Table 7: “*See Policy 3.5.1.”
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PART 4 – GENERAL COUNTY POLICIES

<p>PPS</p>	<p>8. Section 4.2.5 Rural Opportunities is amended by:</p> <ul style="list-style-type: none"> a. adding “that are compatible with agriculture and other resource-related uses” following the word “employment” in the first paragraph of this section. b. adding “directly” following the phrase “Businesses required to” in the third paragraph of this section. c. adding “, local food” following the phrase “development of tourism” and adding “that leverage rural amenities and assets” following the phrase recreation opportunities in the fifth paragraph of this section. d. deleting the sixth paragraph of this section entirely and replacing it with the following: “<i>The applicable policies of this plan will be used in locating employment opportunities to ensure normal farm practices are able to continue unhindered and avoid and minimize impacts on the agricultural system, Greenlands System and mineral aggregate resources.</i>”
<p>PPS</p>	<p>9. Section 4.2.6 Home Business is amended by:</p> <ul style="list-style-type: none"> a. adding “<i>on-farm diversified uses</i> will be permitted, in accordance with provincial guidelines and the policies of this plan.” following the word “Additionally,” in the third paragraph of this section. b. deleting the following text in the third paragraph, which states: “the following uses may be considered: <ul style="list-style-type: none"> • sales outlets for agricultural products produced on the farm; • home industries which are small in scale with limited employees, and minimal off site impact; • bed and breakfast establishments; • farm vacation enterprises.”
<p>PPS</p>	<p>10. Section 4.3 Farmland Protection is amended by adding the following new section and renumbering the subsequent sections as follows:</p> <p>“4.3.1 Agricultural System The County has adopted an <i>agricultural system</i> approach to agricultural land use planning to support the protection of the agricultural land base in the County and provide support for the viability of the agri-food industry. The <i>agricultural system</i> includes two components:</p>

	<p>1) The agricultural land base consisting of <i>Prime Agricultural Areas</i> and <i>Secondary Agricultural Areas</i>; and</p> <p>2) the <i>agri-food network</i>.</p> <p>The <i>agri-food network</i> complements and supports the agricultural land base and includes <i>infrastructure</i>, services and other agri-food assets that are needed to sustain and enhance agriculture and the broader agri-food sector in the County.</p> <p>It is the policy of this Plan to protect the continuity of the agricultural land base, to minimize land use conflicts, to provide opportunities to support local food production and urban agriculture and foster a robust <i>agri-food network</i>.”</p>
PPS	<p>11. Section 4.3.1 Prime Agricultural Areas is amended by deleting the sentence in this section in its entirety and replacing it with the following:</p> <p>“<i>Prime agricultural areas</i> will be designated and protected so that normal farming operations are not hindered by conflicting development. Within <i>prime agricultural areas</i> Class 1, 2, and 3 lands will be given the highest level of protection followed by class 4 through 7 lands, in this order of priority.”</p>
PPS	<p>12. Section 4.3.3 Policy Direction is amended by deleting bullets a), b) and c) in their entirety and replacing them with the following:</p> <p>“a) Class 1, 2, and 3 agricultural lands, associated Class 4 through 7 lands, and additional areas with a local concentration of farms which exhibit the characteristics of ongoing agriculture, and <i>specialty crop areas</i> will be designated as <i>prime agricultural areas</i>.</p> <p>b) Urban Centre or Hamlet expansions are subject to the policies of Section 4.8 Expansion of Primary and Secondary Urban Centres and Hamlets.</p> <p>c) Limited non-residential uses, other than aggregate extraction in accordance with Section 6.6, may only take place in <i>prime agricultural areas</i> if:</p> <p>i) it can be demonstrated there is an identified need with the planning horizon of this Plan for additional lands to accommodate the proposed use;</p> <p>ii) there are no reasonable alternative locations which avoid <i>prime agricultural areas</i>;</p> <p>iii) if <i>prime agricultural areas</i> are unavoidable, there are no reasonable alternative locations within <i>prime agricultural areas</i> with lower priority agricultural lands;</p>

	<p>iv) the proposed use complies with the <i>minimum distance separation formulae</i>; and</p> <p>v) impacts from any new or expanding non-agricultural uses on the <i>agricultural system</i> are avoided, or where avoidance is not possible, minimized and mitigated as determined through an <i>Agricultural Impact Assessment</i> or equivalent analysis based on provincial guidance.</p> <p>In considering need and alternative locations, decision makers will be guided by the following:</p> <p>Need</p> <ul style="list-style-type: none"> • projected population for the local municipality and county or growth allocated by broader studies • public health or safety considerations • existing vacant land already designated for the proposed use • potential for infilling existing areas • previous rates of land consumption • availability and efficiency of servicing • need for a variety of opportunities to encourage economic development and satisfy housing and business demand <p>Alternative Locations</p> <ul style="list-style-type: none"> • impacts on agricultural land and operations • location requirements of the proposed use • degree of land fragmentation in the area • Canada Land Inventory classification”
PPS	<p>13. Section 4.4.6.1 Additional Residential Units within a Main Residence is amended by adding the following bullet to the end of the bullet list in this section:</p> <p>“ h) <i>Minimum Distance Separation Distance Formulae</i> is complied with, where applicable.”</p>
PPS	<p>14. Section 4.4.6.2 Additional Residential Units within an Ancillary Building or Structure is amended by adding the following text to the end of bullet a) following the phrase “agricultural production”:</p> <p>“ and is compatible with, and would not hinder, surrounding agricultural operations”.</p>
PPS	<p>15. Section 4.6.5 Agricultural Impact Assessment is amended by deleting the text of this section in its entirety and replacing it with the following:</p>

	<p>“In accordance with the policies of this Plan, where a new or expanding non-agricultural use is proposed in the <i>prime agricultural area</i> or secondary agricultural area, an <i>agricultural impact assessment</i> or equivalent analysis may be required to assess the potential impacts on the <i>agricultural system</i> and existing <i>agricultural uses</i>. Impacts from non-agricultural uses are to be avoided or if avoidance is not possible, minimized and mitigated as determined through the <i>agricultural impact assessment</i> or equivalent analysis, based on provincial guidance.</p> <p>A scoped <i>agricultural impact assessment</i> or equivalent analysis may be required for certain permitted uses in the <i>prime agricultural areas</i> and secondary agricultural areas depending on the size, scale or anticipated impact of the proposed <i>development</i>. Scoped assessments may be used to help achieve policy objectives and recommend measures to minimize and mitigate impacts to surrounding agricultural uses.”</p>
PPS	<p>16. Section 4.6.5.1 Rural Development in Prime or Secondary Agricultural areas is deleted in its entirety, which states:</p> <p>“4.6.5.1 Rural Development in Prime or Secondary Agricultural areas</p> <p>Where development is proposed in prime or secondary agricultural areas, a Council may require an assessment of the impacts the development may have on agricultural activities in the area. An assessment may include any or all of the following:</p> <ul style="list-style-type: none"> a) the opportunity to use lands of lower agricultural potential; b) compliance with the minimum distance separation formulae for livestock operations; c) the degree to which agricultural expansion may be constrained; d) potential interference with normal agricultural activities and practices; e) potential interference with the movement of agricultural machinery on roads; f) such other concerns as a Council may consider relevant.” <p>Subsequent sections are to be renumbered.</p>
PPS	<p>17. Section 4.7.1 Distinct Urban-Rural Boundary is amended by deleting bullet a) and bullet b) in its entirety and replacing it with the following:</p> <p>“ a) prohibits new <i>development</i> adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion. Adjacent will normally mean within 1 kilometre of an urban area boundary. In certain circumstances, the existence of natural or human made boundaries can be considered as rationale to support the increase or decrease in the 1 kilometre limit.</p>

	<p>b) New or expanding livestock facilities, and other <i>agricultural uses</i>, that are proposed adjacent to an existing urban boundary are permitted, provided they comply with the <i>minimum distance separation formulae</i>, and any other applicable policy in this Plan.”</p>
PPS	<p>18. Section 4.8.2 Primary Urban Centre Expansion Criteria is amended by:</p> <p>a. deleting the text in bullet g) in its entirety and replacing it with the following:</p> <p>“whether impacts on the <i>agricultural system</i>, including agricultural operations, are considered from expanding settlement areas and would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an <i>agricultural impact assessment</i> or equivalent analysis, based on provincial guidance;”</p> <p>b. deleting the text in bullet j) in its entirety and replacing it with the following:</p> <p>“whether the expanded settlement area complies with the <i>minimum distance separation formulae</i> has been considered.”</p>

PART 6 – THE RURAL SYSTEM

<p>PPS</p>	<p>19. Section 6.1 Defined is amended by:</p> <p>a. deleting the first sentence of this section in its entirety and replacing it with the following:</p> <p>“The Rural System is a relatively stable part of the County landscape devoted to economic activities based on natural resources. The Rural System primarily consists of natural resource land, <i>natural heritage features and areas</i> and other uses typically found in nonurban areas.”</p> <p>b. updating the bullet list as follows:</p> <p>deleting the phrase “<i>mineral aggregate areas</i>” and replacing it with the phrase “<i>mineral aggregate resources</i>” and by adding the phrase “Greenlands System” to the end of the bullet list.</p>
<p>PPS</p>	<p>20. Section 6.2 Purpose is amended by deleting the three paragraphs in this section in their entirety and replacing them with the following:</p> <p>“The Rural System plays a vital role in the structure and economic success of the County. It shapes the unique landscape and character of the area while enhancing residents' quality of life. By utilizing rural assets and amenities and prioritizing wise resource management and protection, the Rural System serves as the foundation for a sustainable economy.</p> <p>The purpose of the Rural System is to:</p> <ul style="list-style-type: none"> • Support the economic activities which depend on Wellington’s natural resources to deliver a sustainable and diversified agricultural industry and rural economy. • Support the wise use and sustainable management of natural resources. • Support a connected <i>agricultural system</i> that protects and enhances the agricultural land base, supports local food production and a robust <i>agri-food network</i>. • Maintain and build upon the rural character of the County by leveraging rural amenities and assets, such as agricultural operations, recreational and tourism opportunities, natural resources, and the protection and enhancement of the natural environment. • Promote the efficient use of rural <i>infrastructure</i> and <i>public service facilities</i>.

	<ul style="list-style-type: none"> • Support the vitality and regeneration of secondary urban centers and hamlets to ensure they continue to serve the needs of rural residents and businesses in the County. • Conserve the biodiversity and connectivity of natural heritage features and the ecological benefits provided by the natural environment. <p>The Rural System is a large and diverse area. Opportunities exist for a variety of resource, employment and community uses which need to be accommodated to support a healthy, integrated and viable Rural System.”</p>
PPS	<p>21. Section 6.3 Planning Approach is amended by:</p> <ul style="list-style-type: none"> a. deleting the first paragraph in this section in its entirety and replacing it as follows: <p>“<i>Prime agricultural areas</i> will be protected for the long-term use of agriculture. While agriculture will be the main land use activity in these areas, <i>agricultural-related uses</i> and <i>on-farm diversified uses</i> will be allowed in accordance with the policies of this Plan and provincial guidelines.”</p> b. deleting the second paragraph in this section in its entirety and replacing it as follows: <p>“Secondary agricultural areas of non-prime farmland have been identified. While agriculture will be the main land use activity in these areas, a broader range of residential, employment and community uses will be allowed than in <i>prime agricultural areas</i>. This development will be directed to areas that minimize constraints to agricultural and other resource-related uses, can be sustained by rural service levels, and is appropriate to the <i>infrastructure</i>, which is planned or available, and avoids the need for uneconomical expansion.”</p> c. in the third paragraph, deleting the phrase “<i>Significant mineral aggregate deposits</i>” and replacing it with the phrase “<i>Deposits of mineral aggregate resources</i>”. d. in the fifth paragraph, adding the phrase “outside of <i>the prime agricultural area</i>” immediately following the phrase “Non-farm related housing may be considered”. e. in the sixth paragraph, deleting the word “lands” and replacing it with “areas” immediately following the phrase “Rural employment”. f. deleting the eighth paragraph in this section in its entirety and replacing it as follows:

	<p>“Waste Management Facilities may be allowed in the Rural System subject to the Environmental Assessment Act or the Environmental Protection Act, the Environmental Services policies of this Plan, and the <i>prime agricultural area</i> in accordance with section 4.3.4 c).”</p> <p>g. adding the following new paragraph to the end of this section:</p> <p>“<i>Natural heritage features and areas</i> and other Greenland System components are located in the Rural System and form integral part of the rural landscape. Development in and adjacent to these areas will be in accordance with Section 5 Greenland System of this Plan.”</p>
PPS	<p>22. Section 6.4.1 Defined is amended by deleting the first paragraph of this section in its entirety and replacing it with the following:</p> <p>“Canada Land Inventory Class 1, 2, and 3 lands and associated Class 4 through 7 lands, and additional areas with a local concentration of farms which exhibit characteristics of ongoing agriculture will be designated as <i>prime agricultural areas</i> and be protected for the long-term use for agriculture. <i>Prime agricultural areas</i> will be identified by a planning authority based on provincial guidance or informed by provincial mapping.</p> <p>Currently there are no known <i>specialty crop areas</i> in the County. Should any areas be identified, the County will develop policies to govern their protection and development.”</p>
PPS	<p>23. Section 6.4.3 Permitted Uses is amended by:</p> <p>a. in bullet b) deleting the phrase “secondary uses including home businesses and farm businesses” and replacing it with the phrase “<i>on-farm diversified use</i>”.</p> <p>b. in bullet e) deleting the phrase “single detached homes” and replacing it with the phrase “a single detached dwelling associated with an <i>agricultural use</i>”.</p> <p>c. adding new bullet f) to the list and renumbering the subsequent sections as follows:</p> <p>“f) a single detached dwelling on an existing vacant lot in accordance with the local zoning by-law”</p> <p>d. in bullet h) deleting the word “accessory” and replacing it with the phrase “farm help”.</p>

	<p>e. in bullet k) deleting the existing phrase “licensed aggregate operations” and replacing it with “licensed <i>mineral aggregate operations</i> as an interim use”.</p> <p>f. deleting bullet “n) kennels on existing lots of record” in its entirety.</p>
PPS	<p>24. Section 6.4.4 Home Businesses and Farm Businesses is deleted in its entirety and replaced with the following:</p> <p>“6.4.4 On-farm Diversified Uses <i>On-farm diversified uses</i> are permitted in appropriate locations in the <i>prime agricultural area</i> to enable farm operators to diversify and supplement farm incomes, as well as accommodate value-added and <i>agri-tourism uses</i>. A wide range of uses may qualify as an <i>on-farm diversified use</i> and could include:</p> <ul style="list-style-type: none"> • Home Occupations • Home Industries • <i>Agri-tourism</i> and recreational uses • Distillery or small-scale micro-brewery • Value-added processing and packaging • Retail uses <p>To ensure a use qualifies as an <i>on-farm diversified use</i> all the following criteria must be met:</p> <ol style="list-style-type: none"> i) The use is located on a <i>farm operation</i>; ii) The use is secondary to a primary agricultural use of the property; iii) The use will be limited in area, up to 2% of the lot area to a maximum 1 ha; iv) The use is compatible with, shall not hinder surrounding <i>agricultural uses</i>, or generate adverse impacts off-site; v) appropriate sewage and water services can be provided; vi) The use complies with the <i>minimum distance separation formulae</i> in accordance with section 6.4.9; vii) Any other matter deemed appropriate by the municipality. <p>Further to item iii) above, when determining the size of the <i>on-farm diversified use</i> it shall generally include all areas proposed to be used by the <i>on-farm diversified use</i>, including buildings, laneways, parking, outdoor storage, servicing and amenity areas. Local municipalities may discount shared facilities that are also used by the farm operation from the calculation of total size of the <i>on-farm diversified use</i>.</p> <p>Uses that attract large numbers of customers, employees or other people to the farm, create compatibility issues or have high water or wastewater needs may not be considered <i>on-farm diversified uses</i> and will be directed to Primary Urban Centres or other appropriate land use designations.</p>

	<p>Local municipalities are encouraged to establish permissive zoning provisions for the establishment of <i>on-farm diversified uses</i> that are consistent with the criteria of this Plan. Site plan control may be applied to an <i>on-farm diversified use</i> at the discretion of the local municipality.</p> <p>An <i>on-farm diversified use</i> is prohibited from being severed from the property.”</p>
PPS	<p>25. Section 6.4.5 Agriculture-related Uses is amended by deleting the text in this section in its entirety and replaced with the following:</p> <p>“<i>Agriculture-related uses</i> are farm-related commercial and industrial uses that directly support agriculture and contribute to the vitality and economic viability of <i>prime agricultural areas</i>. <i>Agriculture-related uses</i> are permitted in appropriate locations in the <i>prime agricultural area</i> subject to the following:</p> <ul style="list-style-type: none"> a) Appropriate <i>sewage and water services</i> can be provided; b) The use is directly related to farm operations in the area; c) The use supports agriculture and the agricultural economy of the County of Wellington; d) The use benefits from being in close proximity to farm operations and provide direct products and/or services to farm operations as a primary activity; e) The use is compatible with, and does not hinder, surrounding land uses and meets all applicable provincial and municipal emission, noise, odour, compatibility, water and wastewater standards and receives all relevant environmental approvals; f) The use avoids cultivated lands and keeps the amount of land for new or expanding <i>agriculture-related uses</i> to the minimum necessary to support the use and its servicing needs; g) The use can obtain access to an all-season maintained public road and that access to a local road be preferred over County and provincial roads where practical. <p>Local municipalities are encouraged to establish permissive zoning provisions for the establishment of <i>agriculture-related uses</i> that are consistent with the criteria of this Plan. Site plan control may be applied to <i>agriculture-related uses</i> at the discretion of the local municipality.</p> <p>The severance of an <i>agriculture-related use</i> is discouraged and will be considered in accordance with policy 10.4.3.”</p>
PPS	<p>26. Section 6.4.6 Accessory Residence is deleted in its entirety and replaced with the following:</p> <p>“6.4.6 Farm Help Residence When the size and nature of a farming operation requires additional employment, a residence needed for the accommodation of farm help may be allowed provided that it is established within the main building</p>

	<p>cluster on the property, avoids cultivated lands and appropriate <i>sewage and water services</i> are provided.</p> <p>A farm help residence is encouraged to be temporary in nature but may include more permanent forms of housing.</p> <p>A farm help residence is permitted in addition to additional residential units permitted in section 4.4.6 of this plan.</p> <p>A farm help residence is prohibited from being severed from the property.”</p>
PPS	<p>27. Section 6.4.8 Community Service Facilities is amended by:</p> <p>in the third paragraph deleting the reference to “Section 4.3.3” and replacing it with “Section 4.3.4”.</p>
PPS	<p>28. Section 6.4.9 Minimum Distance Separation Formula (MDS) is deleted in its entirety and replaced with the following:</p> <p>“6.4.9 Minimum Distance Formulae (MDS) The appropriate provincial <i>minimum distance separation formulae</i> will be applied to new land uses, lot creation and new or expanding livestock facilities. MDS I will generally not be required for <i>on-farm diversified uses</i>, except where a municipality has required MDS to apply in their zoning by-law. For the purposes of MDS, <i>on-farm diversified uses</i> should be considered a Type A land use.”</p>
PPS	<p>29. Section 6.4.10 Group Homes is amended by:</p> <p>deleting the word “be” that immediately follows the phrase “zoning by-laws may”.</p>
PPS	<p>30. Section 6.4.11 Kennels is deleted in its entirety, which states:</p> <p>“Kennels may be allowed on existing lots of record and local zoning by-laws may establish criteria for these uses.”</p>
PPS	<p>31. Section 6.5.1 Defined is amended by:</p> <p>adding the phrase “located outside of Urban Centres and Hamlets and” immediately following the phrase “Rural System which are”.</p>
PPS	<p>32. Section 6.5.2 Identification is amended by deleting bullet a) and bullet b) of this section and replacing it as follows:</p> <p>“Secondary Agricultural Areas will be determined by the existence of large blocks of land which are not <i>prime agricultural areas</i> as identified by a planning authority through an evaluation based on provincial guidance or informed by provincial mapping.”</p>

PPS	<p>33. Section 6.5.3 Permitted uses is amended by adding new bullet d) to the end of the bullet list in this section as follows:</p> <p>“d) Limited residential development in accordance with the policies of this Plan.”</p>
ERIN MINTO PCH-R	<p>34. Section 6.5.4 Rural Clusters is deleted in its entirety, which states:</p> <p>“Rural clusters are long-established small groups of housing with occasional commercial, industrial or institutional uses located in the Secondary Agricultural Area designation. These areas are not designated on Schedule “A” or “B” and are not expected to grow but they may be recognized in the zoning by-law. New lots may be allowed in rural clusters in accordance with section 10.4.</p> <p>As part of a <i>municipal comprehensive review</i>, the County will assess the impact of constraints such as the <i>Provincial Agricultural System</i>, <i>Natural Heritage System</i> and Greenbelt Plan on the potential future supply of rural residential lots in the Secondary Agricultural Area, including rural clusters. This assessment will consider, among other things, whether changes to the rural residential lot creation policies are needed.”</p> <p>Subsequent sections are to be renumbered.</p>
PPS	<p>35. Section 6.5.5 Commercial, Industrial & Institutional is amended by deleting bullet d) and e) in their entirety and replacing as follows:</p> <p>“d) the use will avoid and minimize constraints on agriculture;</p> <p>e) the use will not preclude or hinder new or existing <i>mineral aggregate operations</i> or access to mineral aggregate resources identified on schedule D of this Plan;”</p>
PPS	<p>36. Section 6.5.7 Minimum Distance Separation Formula (MDS) is deleted in its entirety and replaced with the following:</p> <p>“6.5.7 Minimum Distance Formulae (MDS) The appropriate provincial <i>minimum distance separation formulae</i> will be applied to new land uses, lot creation and new or expanding livestock facilities. MDS I will generally not be required for <i>on-farm diversified uses</i>, except where a municipality has required MDS to apply in their zoning by-law. For the purposes of MDS, <i>on-farm diversified uses</i> should be considered a Type A land use.”</p>

PPS	<p>37. Section 6.7.1 Defined is amended by deleting the first paragraph in its entirety and replacing it with the following:</p> <p>“Recreational areas are normally land associated with lakes, reservoirs, ponds, rivers or other scenic resources which have potential for the development of recreational or seasonal residential uses relying on recreational activities.</p> <p>New or expanding Recreational Areas will be established by amendments to this Plan. Where new Recreational Areas are proposed in <i>prime agricultural areas</i>, the policies of Section 4.3.4 c) shall be met. Where justified, new and expanding uses will be established through a Policy Area under Part 9 Local Planning Policy of the Plan and will not result in the removal of the <i>prime agricultural area</i> designation.”</p>
PPS	<p>38. Section 6.8.1 Defined is amended by adding the following to the end of the last paragraph in this section:</p> <p>“New or expanding Rural Employment Areas will be established by amendments to this Plan. Where new or expanding Rural Employment Areas are proposed in <i>prime agricultural areas</i>, the policies of Section 4.3.4.c) shall be met. Where justified, new and expanding uses will be established through a Policy Area under Part 9 Local Planning Policy of the Plan and will not result in the removal of the <i>prime agricultural area</i> designation.”</p>
PPS	<p>39. Section 6.8.4 Existing Employment Areas outside Settlement Areas is deleted in its entirety, which states:</p> <p>“Existing <i>employment areas</i> outside of <i>settlement areas</i> on <i>rural lands</i> that were designated for employment uses in the County of Wellington Official Plan that was approved and in effect as of June 16, 2006 may continue to be permitted. Expansions to these existing <i>employment areas</i> may be permitted only if necessary to support the immediate needs of existing businesses and if compatible with the surrounding uses.”</p> <p>Subsequent sections are to be renumbered.</p>

PART 9 – LOCAL PLANNING POLICY

PCH-E	<p>40. Section 9.8.3 Puslinch Industrial Policy is amended by:</p> <p>a. deleting subsection a) which states:</p> <p>a) Areas designated Rural Employment in Puslinch are permitted to have the following additional uses:</p> <ul style="list-style-type: none">• complementary commercial uses such as automotive uses, restaurants, motels and limited retail• offices, including a head office and/or research centre” <p>b. renumbering subsection b) to a) and replacing it with the following:</p> <p>“a) Two large parcels of land to both the east and west of Highway 6 N (Hanlon Expressway) have been designated Rural Employment. These lands have lower priority for development than the industrial lands in the “Puslinch Economic Development Area”. Existing properties will not be further fragmented by severance or subdivision until a detailed concept plan is developed, in cooperation with the City of Guelph, which provides an appropriate connection between the City’s industrial lands to the north and the interchange at Highway 6 N. This restriction will be reviewed periodically to determine if these lands should be available for development or whether the designation should be expanded to include additional lands. The sequence of development shall be further controlled so that the eastern side of Highway 6 N (Hanlon Expressway) develops first. Development immediately adjacent to the Hanlon Expressway/Highway 6 N shall be restricted in the degree and location of open storage and type of uses. The area west of Highway 6 N (Hanlon Expressway) will only be considered should no other suitable site be available.”</p> <p>c. by adding the following:</p> <p>“b) Urban Design Guidelines All lands designated Rural Employment whether existing or by future Official Plan Amendment, should comply with Puslinch by Design and should implement the Urban Design Guidelines adopted as part of Puslinch by Design.</p> <p>c) Road Infrastructure In all cases the cost for road infrastructure owned by the County and/or Township for development in the Rural Employment Area will be borne by the developer.</p>
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d) Transportation Plan

For lands west of the Highway 6 N (Hanlon Expressway) designated as Rural Employment on Schedule B7, a Transportation Plan establishing an internal road network and external road connections shall be required as part of any future development application. These connections shall be designed to direct all traffic to the midblock interchange at Highway 6 N (Hanlon Expressway) via Wellington Road 53. For clarity, the Transportation Plan must establish, to the satisfaction of the Township, that no truck or motor vehicle traffic generated by any use(s) will utilize Sideroad 20 N. Further, no driveway access or accesses for any employment or other non-agricultural uses shall be permitted onto Sideroad 20 N.

e) Concept Plan

A concept plan is required for lands designated Rural Employment on Schedule B7 as part of any future development application for lands west of the Highway 6 N (Hanlon Expressway).

f) Communal Wells

In order to protect groundwater function and quality, future communal wells should not be Multiple Aquifer Penetrating.

g) Land Use Compatibility

To ensure land use compatibility between industrial and sensitive land uses, a buffer area shall be established according to the following policies:

- i. Where a proposed industrial use is located within 300 metres of a sensitive land use, or where a sensitive land use is proposed within 300 metres of an existing or planned industrial use, the Township shall apply the Ministry of the Environment, Conservation and Parks (MECP) D-6 Guidelines: Compatibility Between Industrial Facilities and Sensitive Land Uses.
- ii. For Class I or Class II industrial facilities (as defined by MECP D-6 Guidelines), a Land Use Compatibility Study or equivalent technical assessments may be required to evaluate potential impacts such as noise, odour, dust, vibration, or emissions. Based on the findings of these studies, additional separation distances, buffering, or mitigation measures may be prescribed.

All land use decisions shall implement the D-6 Guidelines and any successor documents, as well as the cumulative

	impacts of surrounding land uses. No Class III industrial facilities are permitted.”
	41. Section 9.8.6 Puslinch Local Policies is amended by adding the following Policy Areas:
PCH-R	<p>“PA7-9 County Aberfoyle Garage</p> <p>The land identified as PA7-9 on Schedule B7-1 (Aberfoyle) is municipally known as 7396 Wellington Road 34. An Industrial designation applies to the front of the property which is used for the County Aberfoyle Garage and a Residential Transition Area designation applies to the rear of the property.</p> <p>Notwithstanding any provisions in the Plan to the contrary, the permitted uses on the land identified as PA7-9 may also include government offices, <i>public services</i>, childcare facilities and recreational uses. Accessory uses, buildings and structures are also permitted.”</p>
PCH-E	<p>“PA7-10 Highway 401 and Concession 7, and Wellington Road 34 Prestige Rural Employment Area</p> <p>The lands identified as PA7-10 on Schedule B7 of this Plan generally located on the south side of Highway 401 and east side of Concession 7, and on the north and south side of Wellington Road 34 east of Concession 7/Wellington Road 54 are designated Rural Employment Area. Notwithstanding Section 6.8 or any other provisions in the Plan to the contrary, the following policies apply:</p> <p>a) Defined</p> <p>The Prestige Rural Employment Area lands are intended for high-quality industrial, business and employment uses that require a well-designed setting while taking advantage of the proximity to major transportation infrastructure. The intent of this designation is to maximize the potential of lands with exposure to Highway 401 and Wellington Road 34 to promote businesses that are visible from these roads. As such, Prestige Rural Employment Areas are generally located along major roads and generally face Highway 401 and Wellington Road 34 with enhanced architectural and landscaping design standards to maintain a visually attractive environment. Outdoor storage and parking are limited to maintain the area’s aesthetic appeal and will not be permitted along the frontage of Highway 401 and Wellington Road 34. Loading areas are not permitted to face the Highway 401 and Wellington Road 34 frontage.</p> <p>In all cases, Prestige Rural Employment Area lands will be used by “dry” uses which do not use significant amounts of water in their operation and which do not produce significant amounts of</p>

effluent, consistent with rural servicing levels which rely on private water and sewage systems.

b) Permitted Uses

Notwithstanding Section 6.8.2 the uses permitted in the **PA7-10** area are limited to enclosed warehousing and distribution centres, corporate offices and headquarters accessory to a principle use, research and development facilities associated with manufacturing uses, light, medium, or high-tech manufacturing and processing operations deemed not to be noxious by reason of dust, odour, fumes, particulate matter, noise and excessive vibrations.

c) Zoning

Appropriate regulations for the Prestige Rural Employment Area shall be included in the Zoning By-law. Zoning provisions should address the following criteria:

i. Land Use Compatibility: To ensure land use compatibility between industrial and sensitive land uses, a buffer area shall be established according to the following policies:

- Where a proposed industrial use is located within 300 metres of a sensitive land use, or where a sensitive land use is proposed within 300 metres of an existing or planned industrial use, the Township shall apply Ministry of the Environment, Conservation and Parks (MECP) D-6 Guidelines: Compatibility Between Industrial Facilities and Sensitive Land Uses.
- For Class I or Class II industrial facilities (as defined by MECP D-6 Guidelines), a Land Use Compatibility Study or equivalent technical assessments may be required to evaluate potential impacts such as noise, odour, dust, vibration, or emissions. Based on these findings of these studies, additional separation distances, buffering, or mitigation measures may be prescribed.

All land use decisions shall be consistent with the D-6 Guidelines and any successor documents, as well as the cumulative impacts of surrounding land uses. No Class III industrial facilities are permitted.

ii. Parcel sizes: The need for a range of parcel sizes to accommodate diverse business needs, with an emphasis placed on the provision of larger parcels to support industries requiring significant land area. Lot fabric and subdivision design shall address long-term flexibility and market trends in industrial land demand.

	<ul style="list-style-type: none"> iii. Design guidelines: Where appropriate, design guidelines adopted by Township Council should be integrated as zoning requirements. iv. Buffer areas: Incorporate enhanced landscaping setbacks, buffering and screening where employment area lands interface with rural residential land uses, rural residential clusters and/or sensitive land uses. A minimum 70 m setback shall be required from rural residential uses, rural residential clusters and/or sensitive land uses. The setback may be greater than 70 m based on the recommendations within a land use compatibility assessment. The required setback shall be landscaped and/or contain natural self-sustaining vegetation in a manner that respects and sustains the rural character. This 70 m setback shall only be reduced through an Official Plan Amendment. v. Holding provisions: The Policy Area may be placed in an appropriate prestige industrial zoning category and shall be subject to a Holding (H) provision. Prior to the removal of the Holding provision, Township Council shall require the submission and approval of associated technical reports, studies and any additional information as deemed necessary by Township Council. vi. Lot coverage: Maximum lot coverage should generally be in the range of 40%, to ensure adequate space for landscaping, stormwater management, and buffering. <ul style="list-style-type: none"> d) Design Guidelines New development is encouraged to adhere to the design guidelines approved by Township Council for the area. e) Communal Wells In order to protect groundwater function and quality, future communal wells should not be Multiple Aquifer Penetrating. f) Road Infrastructure In all cases the cost for road infrastructure owned by the County and/or Township for development in the Rural Employment Area will be borne by the developer.”
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“PA7-11 Highway 401 and Concession 7 Rural Employment Area

The lands identified as **PA7-11** on Schedule B7 of this Plan generally located to the south of Highway 401 on the east side of Concession 7 are designated Rural Employment Area. Notwithstanding Section 6.8 or any other provisions in the Plan to the contrary, the following policies apply:

a) Permitted Uses

Notwithstanding Section 6.8.2 the uses permitted in the **PA7-11** area are limited to manufacturing, processing, fabrication and assembly of raw materials or repair, servicing, distribution and storage of materials is permitted. Accessory uses including the retail and sale of products produced on-site may be permitted. Commercial, service commercial, retail and office uses are not permitted. Outdoor storage and parking are to maintain the area's rural character and will not be permitted along the frontage of Concession 7. Loading areas are not permitted to face Concession 7 frontage.

b) Zoning

Appropriate regulations for the Rural Employment Area shall be included in the Township's Zoning By-law. Zoning provisions should address the following criteria:

- i. Land Use Compatibility: To ensure land use compatibility between industrial and sensitive land uses, a buffer area shall be established according to the following policies:
 - Where a proposed industrial use is located within 300 metres of a sensitive land use, or where a sensitive land use is proposed within 30 metres of an existing or planned industrial use, the Township shall apply the Ministry of the Environment, Conservation and Parks (MECP) D-6 Guidelines: Compatibility Between Industrial Facilities and Sensitive Land Uses.
 - For Class I or Class II industrial facilities (as defined by MECP D-6 Guidelines), a Land Use Compatibility Study or equivalent technical assessment may be required to evaluate potential impacts such as noise, odour, dust, vibration, or emissions. Based on the findings of these studies, additional separation distances, buffering, or mitigation measures may be prescribed.

All land use decisions shall have regard for the D-6 Guidelines and any successor documents, as well as the cumulative impacts of surrounding land uses. No Class III industrial facilities are permitted.

	<ul style="list-style-type: none"> ii. Parcel sizes: The need for a range of parcel sizes to accommodate diverse business needs, with an emphasis placed on the provision of larger parcels to support industries requiring significant land area. Lot fabric and subdivision design shall consider long-term flexibility and market trends in industrial land demand. iii. Design Guidelines: Where appropriate, design guidelines adopted by Township Council should be integrated as zoning requirements. iv. Buffer areas: Incorporate enhanced landscaping and setbacks, buffering and screening where employment area lands interface with rural residential uses, rural residential clusters, and/or sensitive land uses. A minimum 70 m setback shall be required from rural residential uses, rural residential clusters and/or sensitive land uses. The setback may be greater than 70 m based on the recommendations within a land use compatibility assessment. The required setback shall be landscaped and/or contain natural self-sustaining vegetation in a manner that respects and sustains the rural character. This 70 m setback shall only be reduced through an Official Plan Amendment. v. Holding Provisions: The Policy Area may be placed in an appropriate industrial zoning category and shall be subject to a Holding (H) provision. Prior to the removal of the Holding provision, Township Council shall require the submission and approval of associated technical reports, studies and any additional information deemed necessary by Township Council. <ul style="list-style-type: none"> c) Design Guidelines New development is encouraged to adhere to the design guidelines approved by Township Council for the area. d) Communal Wells In order to protect groundwater function and quality, future communal wells should not be Multiple Aquifer Penetrating. e) Road Infrastructure In all cases the cost for road infrastructure owned by the County and/or Township for development in the Rural Employment Area will be borne by the developer. f) Minimum Distance Separation (MDS) Minimum Distance Separation II (MDS II) relief may need to be considered for potential future expansions to livestock operations located at 4275 Concession 7 and 4278 Concession 7. Zoning relief may be used to consider such expansions and ensure future viability of these operations.”
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<p>PCH-R</p>	<p>“PA7-12 Maltby Road Future Development Area</p> <p>The lands identified as PA7-12 on Schedule B7-1 are Residential, Highway Commercial, Core Greenlands and Greenlands areas within the Secondary Urban Centre of Aberfoyle.</p> <p>Future Residential Lands Notwithstanding the provisions of Section 8.3 or any other provision of this Plan to the contrary, the lands within the Residential designation of PA7-12 are subject to the Future Development policies of Section 8.10 until such time as the County reallocates any Town of Erin residential surplus to 2051 to Puslinch in accordance with policy 3.5.1.</p> <p>The purpose of such reallocation is to allow the Township of Puslinch, without further amendment to this Plan, to rezone Residential lands within the PA7-12 area in accordance with the policies of the Residential designation.</p> <p><i>Development</i> of the lands within PA7-12 for residential purposes shall also be subject to the applicable policies of Sections 4.6, 4.9, 5.6, 6.10 and 10.1 of this Plan to provide for proper and orderly development, the protection of natural features and functions, and ensure that impacts are mitigated or avoided.</p> <p>Until such time as the Township has rezoned Residential lands within the PA7-12 area, the policies of this Plan, including Section 8.10, shall continue to apply.</p> <p>Highway Commercial Lands The future <i>development</i> of the Highway Commercial lands is subject to the applicable policies of this Plan, including but not limited to, Section 8.6, Wellington Road 46 local policy 9.8.1, and the lot creation policies of Section 10.1. The Highway Commercial lands are not subject to the allocation policies noted above.</p> <p>Maltby Road Urban-Rural Interface Area Future development along the southerly side of the Maltby Road right-of-way will be designed to provide a transition between development within the Township and the adjacent urban areas within the City of Guelph. Through the implementing zoning by-law amendment(s) and/or <i>development</i> applications, a setback of, generally, no less than 7.5 metres will be established from the property line along the southerly side of the Maltby Road right-of-way. In establishing a transition and appropriate setback, consideration will be given to built form, use of appropriate landscaping, building orientation, grading, existing land uses, and with width and design of the arterial road.”</p>
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PART 10 – CREATING NEW LOTS

PPS	<p>42. Section 10.1.3 Matters for Consideration is amended by deleting bullet a) in its entirety and replacing it as follows:</p> <p>“a. that any new lots will conform to the official plan policies and comply with zoning regulations;”</p>
PPS	<p>43. Section 10.3.1 New Lots is amended by:</p> <p>a. in the first paragraph adding the phrase “is discouraged and” immediately following the phrase “prime agricultural areas”.</p> <p>b. adding a new bullet “f) Infrastructure” to the end of this section.</p>
PPS	<p>44. Section 10.3.2 Agricultural Uses is amended by:</p> <p>in the first paragraph deleting the sentence “Smaller lots may only be considered where there is clear evidence that the farmer intends to conduct an agricultural pursuit which can be successful on a smaller property.”</p>
PPS	<p>45. Section 10.3.3 Agriculture-Related Uses is amended by deleting the first paragraph in this section in its entirety and replacing it as follows:</p> <p>“New lots for <i>agriculture-related uses</i> will minimize the amount of agricultural land removed from production and be kept to a minimum size necessary for the use and appropriate <i>sewage and water services</i>.”</p>
PPS	<p>46. Section 10.3.4 Residence Surplus to a Farming Operation is amended by deleting the text of this section in its entirety and replacing it as follows:</p> <p>“One new lot may be considered for an existing residence, together with any associated additional residential units, that are rendered surplus as a result of a farm consolidation, provided that:</p> <p>a) The remaining vacant farmland is large enough to function as a significant part of the overall farm unit; and</p> <p>b) The result of removing the surplus residence from the farm does not render the remaining farmlands difficult or inefficient to farm; and</p> <p>c) The new lot will be limited to the minimum size needed to accommodate the residential use and appropriate <i>sewage and water services</i>, which typically does not exceed 1 hectare in size. Environmental and topographic features may justify a larger lot, however, the inclusion of uncultivated lands (e.g., tree rows,</p>

	<p>extended garden or lawn areas) or <i>natural heritage features or areas</i> in the residential parcel, which could be left with the agricultural parcel, will generally not be supported; and</p> <p>d) The surplus residence is habitable and is not expected to be demolished by a future owner; and</p> <p>e) The <i>Minimum Distance Separation formulae</i> will be met. This applies when a surplus residence and an existing livestock or manure storage facility are on the same lot and the severance will separate them onto separate lots; and</p> <p>f) The vacant farmland is rezoned to prohibit a residential use.</p> <p>The intention of this policy is to retain rural housing and allow farmers to reduce their costs of acquiring additional farm parcels, where the impact on existing and future farm operations can be kept to a minimum. For the purposes of this policy a farmer:</p> <ul style="list-style-type: none"> • Must own and be the operator of the <i>farm operation</i> on the lands from which the surplus residence is proposed to be severed; and • Must provide proof of ownership of other farm properties, including proof of a valid Farm Business Registration number or valid exemption, applicable to those properties; and • Must own a residence elsewhere therefore rendering the residence on the subject property surplus; and • May include a limited company, sole proprietorship, incorporated company, numbered company, partnership, non-profit, or similar ownership forms, provided they have a valid Farm Business Registration number or valid exemption. <p>Notwithstanding the above, applications may be considered where there is a legally binding agreement of purchase and sale between a farmer and current landowner prior to a severance being applied for, and provided all other requirements of this policy are met.”</p>
PPS	<p>47. Section 10.3.5 Lot line Adjustments is amended by deleting the text of this section in its entirety and replacing it as follows:</p> <p>“Lot adjustments may be permitted for legal or technical reasons, such as easements, corrections of deeds, quit claims, and minor boundary adjustments, which do not result in the creation of a new lot.</p> <p>Minor lot line adjustments may also be permitted where no adverse effects to agriculture will occur where:</p> <ul style="list-style-type: none"> • more viable agricultural operations will result; • an undersized lot is made useable give the requirement for appropriate individual <i>sewage and water services</i>.”

PPS	<p>48. New Section 10.3.7 Infrastructure is added and the subsequent sections renumbered as follows:</p> <p>“10.3.7 Infrastructure Lot creation for <i>infrastructure</i> in <i>prime agricultural areas</i> is discouraged and should only be permitted where the use cannot be accommodated through an easement or right-of-way.”</p>
PPS	<p>49. Section 10.3.7 Minimum Distance Formula (MDS) is amended by:</p> <p>adding the letter “e” to the word “Formula” in the heading of this section.</p>
PPS	<p>50. Section 10.4.3 Agriculture-Related Uses is amended by deleting the first paragraph in this section in its entirety and replacing it as follows:</p> <p>“New lots for <i>agricultural-related uses</i> will minimize the amount of agricultural land removed from production and be kept to a minimum size necessary for the use and appropriate <i>sewage and water services</i> and will not hinder surrounding agricultural operations.”</p>
ERIN MINTO	<p>51. Section 10.4.4 Residential Lots is amended by:</p> <ul style="list-style-type: none"> a. changing the heading to “10.4.4 Residential Lots – Erin* and Minto”. b. adding the text “in the Town of Erin and in the Town of Minto” to the first sentence so that it reads: <p>“One new lot for residential purposes may be allowed from a parcel of land existing on March 1, 2005 in the Town of Erin or Town of Minto, provided that:”</p> c. deleting bullet f) in its entirety and replacing it with the following: <p>“ f) the use will not impede the efficient expansion of a <i>settlement area</i>.”.</p> d. adding the following text to the end of Section 10.4.4: <p>“*Refer to Section 3.5.1 and to the Town of Erin Official Plan for potential changes to this Section.”</p>
PCH-R	<p>52. New Section 10.4.5 Residential Lots – Puslinch is added and the subsequent sections renumbered as follows:</p> <p>“10.4.5 Residential Lots – Puslinch One new lot for residential purposes may be allowed from a parcel of land existing on May 1, 2025 in Puslinch, provided that:</p>

	<p>a) the lot generally meets a 0.4 ha minimum lot size and is not larger than needed to accommodate the intended residential use, consisting of the dwelling, accessory buildings and uses, and individual <i>sewage and water services</i>, while taking into account site constraints such as grading, sightlines, natural heritage features, <i>hazardous lands</i>, and <i>minimum distance separation formulae</i> requirements;</p> <p>b) the accessory buildings referred to in a) above may include a hobby barn, subject to local regulations;</p> <p>c) the lot has access to an open public road;</p> <p>d) the residential use will not hinder or preclude the present use or future potential for agricultural or <i>mineral aggregate operations</i>;</p> <p>e) the residential use is compatible with surrounding development;</p> <p>f) the use will not impede the efficient expansion of a <i>settlement area</i>;</p> <p>g) the lands have been owned by the applicant for at least 5 years.</p> <p>Residential lots in the Secondary Agricultural Area are to be considered part of the rural portion of the local municipal growth strategy. In considering new residential lots the County will assess whether other locations exist on the same property which would provide a more appropriate site given the overall policies of this Plan.</p> <p>For purposes of this section, if a parcel of land was the subject of a severance application that was submitted before May 1, 2025, then the severed and retained parcels will be deemed to have existed on May 1, 2025, and a new residential lot may be considered.”</p>
PPS	<p>53. Section 10.4.7 Minimum Distance Formula (MDS) is amended by: adding the letter “e” to the word “Formula” in the heading of this section.</p>
PPS	<p>54. Section 10.5.2 Mineral Aggregate Areas is deleted in its entirety and subsequent sections renumbered, which states: “10.5.2 Mineral Aggregate Areas A new lot may be allowed in a Mineral Aggregate Area to provide for the development of a mineral aggregate area provided that the lands will be appropriately zoned to allow the use.”</p>

PART 15 - DEFINITIONS

<p>PPS</p>	<p>55. PART 15 DEFINITIONS is amended by:</p> <p>a. adding the following new definitions to this section in alphabetical order:</p> <p>“Agricultural condition: Means in regards to <i>prime agricultural land</i> outside of <i>specialty crop areas</i>, a condition in which substantially the same areas and same average soil capability for agriculture will be maintained, restored or enhanced.”</p> <p>“Agri-tourism uses: Means those farm-related tourism uses, including limited accommodation such as a bed and breakfast, that promote the enjoyment, education or activities related to the farm operation.”</p> <p>“Energy storage system: means a system or facility that captures energy produced at one time for use at a later time to reduce imbalances between energy demand and energy production, including for example, flywheels, pumped hydro storage, hydrogen storage, fuels storage, compressed air storage, and battery storage.”</p> <p>“Farm operation: Means lands that are assessed as farmland and have a valid Farm Business Registration Number, or valid exemption from Agricorp, for purposes of the <i>agricultural use</i>.”</p> <p>“Normal farm practices: Means a practice, as defined in the Farming and Food Production Protection Act, 1998, that is conducted in a manner consistent with proper and acceptable customs and standards as established and followed by similar agricultural operations under similar circumstances; or makes use of innovative technology in a manner consistent with proper advanced farm management practices. Normal farm practices shall be consistent with the Nutrient Management Act, 2002 and regulations made under that Act.”</p> <p>“On-farm diversified uses: Means uses that are secondary to the principal agricultural use of the property, and are limited in area. <i>On-farm diversified uses</i> include, but are not limited to, home occupations, home industries, agri-tourism uses, uses that produce value-added agricultural products, and electricity generation facilities and transmission systems, and energy storage systems.”</p>
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“Rural areas:

means a system of lands within municipalities that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas.”

“Urban agriculture:

means food production in settlement areas, whether it is for personal consumption, commercial sale, education, or therapy. Examples include, but are not limited to, vertical agriculture facilities, community gardens, greenhouses, and rooftop gardens.”

- b. deleting the definition for “Agricultural Impact Assessment” and replacing it with the following:

“Agricultural Impact Assessment:

Means the evaluation of potential impacts of non-agricultural uses on the *agricultural system*. An assessment recommends ways to avoid or if avoidance is not possible, minimize and mitigate adverse impacts.”

- c. deleting the definition for “Agricultural System” and replacing it with the following:

“Agricultural System:

means a system comprised of a group of inter-connected elements that collectively create a viable, thriving agri-food sector. It has two components:

1. An agricultural land base comprised of *prime agricultural areas*, including *specialty crop areas* and *rural lands* that help create a continuous productive land base for agriculture; and
2. An *agri-food network* which includes agricultural operations, *infrastructure*, services, and assets important to the viability of the agri-food sector.”

- d. deleting the definition for “Agricultural use” and replacing it with the following:

“Agricultural use:

Means the growing of crops, including nursery, biomass and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture, apiaries, agro-forestry; maple syrup production; and associated on-farm buildings and structures, including, but not limited to livestock facilities, manure storages, value-retaining facilities, and housing for farm workers, when the size and nature of the operation requires additional employment.”

	<p>e. deleting the definition for “Agri-food network” and replacing it with the following:</p> <p>“Agri-food network: Within the <i>agricultural system</i>, a network that includes elements important to the viability of the agri-food sector such as regional infrastructure and transportation networks; agricultural operations including on-farm buildings and primary processing; infrastructure; agricultural services, farm markets, and distributors; and vibrant, agriculture-supportive communities.”</p> <p>f. deleting the definition for “Agriculture-related uses” and replacing it with the following:</p> <p>“Agriculture-related uses: means those farm-related commercial and farm-related industrial uses that are directly related to farm operations in the area, support agriculture, benefit from being in close proximity to farm operations, and provide direct products and/or services to farm operations as a primary activity.”</p> <p>g. deleting the definition for “Infrastructure” and replacing it with the following:</p> <p>“Infrastructure: means physical structures (facilities and corridors) that form the foundation for development. Infrastructure includes: sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications including broadband, transit and transportation corridors and facilities, active transportation systems, oil and gas pipelines and associated facilities.”</p> <p>h. deleting the definition for “Minimum distance separation formulae” and replacing it with the following:</p> <p>“Minimum distance separation formulae: means formulae and guidelines developed by the Province, as amended from time to time, to separate uses so as to reduce incompatibility concerns about odour from livestock facilities.”</p> <p>i. deleting the definition for “Prime Agricultural Areas” and replacing it with the following:</p> <p>“Prime agricultural areas: means areas where <i>prime agricultural lands</i> predominate. This includes:</p>
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- areas of *prime agricultural lands* and associated Canada Land Inventory Class 4 through 7 lands; and
- additional areas with a local concentration of farms which exhibit characteristics of ongoing agriculture.

Prime agricultural areas may be identified by a planning authority based on provincial guidance or informed by mapping obtained from the Ontario Ministry of Agriculture, Food and Agribusiness and the Ontario Ministry of Rural Affairs or any successor to those ministries.”

- j. deleting the definition for “Prime Agricultural lands” and replacing it with the following:

“Prime agricultural land:

means specialty crop areas and/or Canada Land Inventory Classes 1, 2, and 3 lands, as amended from time to time, in this order of priority for protection.”

- k. deleting the definition for “Residence surplus to a farming operation” and replacing it with the following:

“Residence surplus to a farming operation:

means one existing habitable detached dwelling, including any associated additional residential units, that are rendered surplus as a result of farm consolidation (the acquisition of additional farm parcels to be operated as one farm operation).”

- l. deleting the definition for “Specialty crop land” and replacing it with the following:

“Specialty crop areas:

means areas within the agricultural land base designated based on provincial guidance. In these areas, specialty crops are predominantly grown such as tender fruits (peaches, cherries, plums), grapes, other fruit crops, vegetable crops, greenhouse crops, and crops from agriculturally developed organic soil, usually resulting from:

- a) soils that have suitability to produce specialty crops, or lands that are subject to special climatic conditions, or a combination of both;
- b) farmers skilled in the production of specialty crops; and
- c) a long-term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services to produce, store, or process specialty crops.”

- m. adding the word “resource” to the end of the “Mineral aggregate” definition heading.

	n. deleting the “Secondary use” definition in its entirety.
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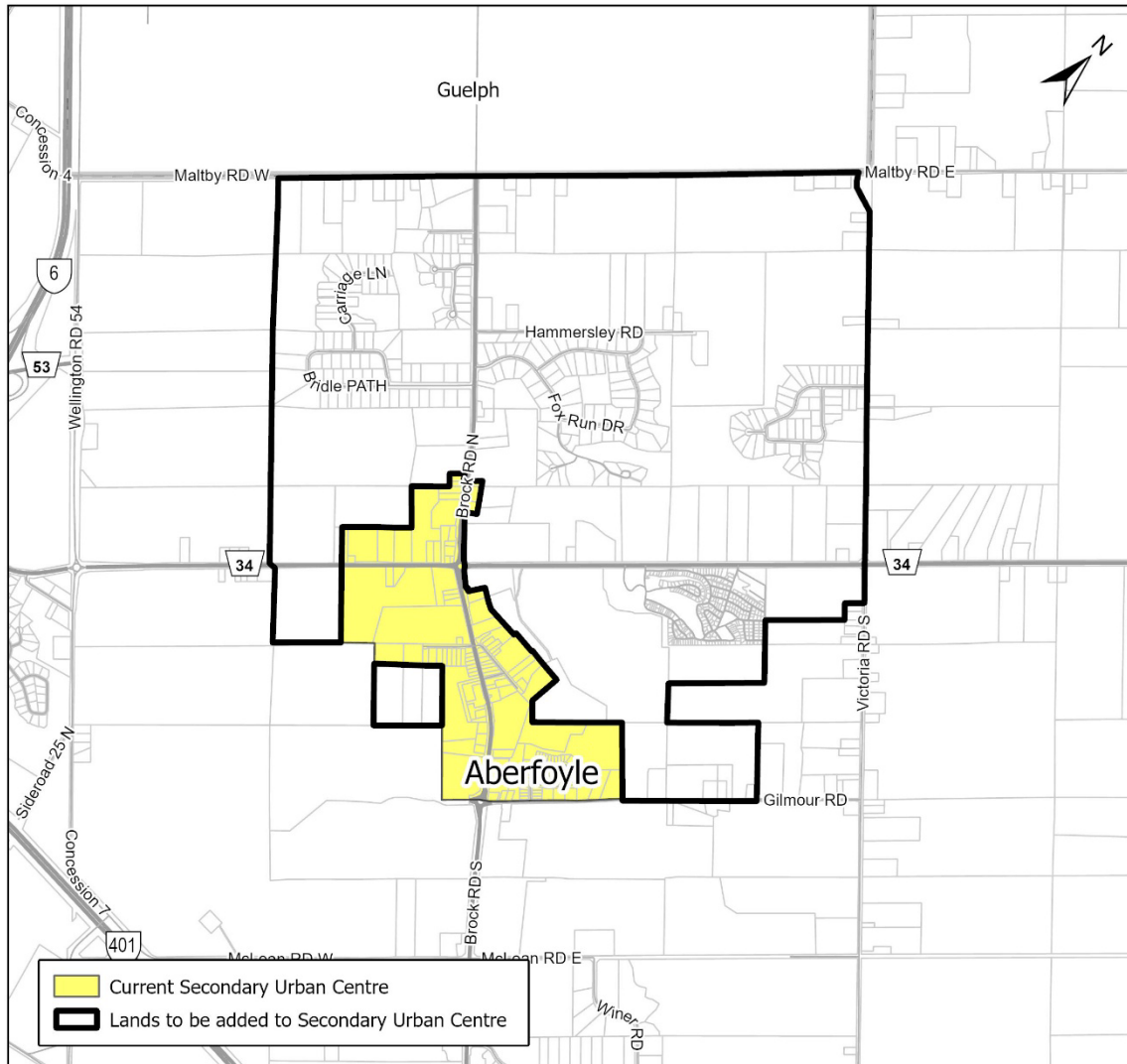
SCHEDULES

PCH-R	56. County Growth Structure Schedule A and Schedule A7 (Puslinch) is amended by identifying an expanded Secondary Urban Centre boundary for Aberfoyle as shown on Schedule “A-1”.
PCH-E	57. County Growth Structure Schedule A and Schedule A7 (Puslinch) is amended by identifying new Rural Employment Area lands as shown on Schedule “A-2”.
PCH-R	58. County Land Use Schedule B and B7 (Puslinch) is amended by expanding the Secondary Urban Centre of Aberfoyle as shown on Schedule “A-3”. The Core Greenlands and Greenlands designations are to remain unchanged, except for the addition of Core Greenlands and Greenlands as shown on Schedule “A-5”.
PCH-E	59. County Land Use Schedule B and B7 (Puslinch) is amended by redesignating lands from Secondary Agricultural, Core Greenlands and Greenlands to Rural Employment Area and Policy Area PA7-10 (Highway 401 and Concession 7, and Wellington Road 34 Prestige Rural Employment Area) and PA7-11 (Highway 401 and Concession 7 Rural Employment Area) as shown on Schedule “A-4”. The Core Greenlands and Greenlands designations are to remain unchanged, except for the addition of Core Greenlands and Greenlands as shown on Schedule “A-5”.
PCH-E	60. County Land Use Schedule B7 (Puslinch) is amended by adding references to the following local policies: <ul style="list-style-type: none"> a) “See Policy 9.8.1 Wellington Road 46” b) “See Policy 9.8.2 Puslinch Lake Area” c) “See Policy 9.8.3 Puslinch Industrial Policy” d) “See Policy 9.8.4 Regionally Significant Economic Development Study Area”.
	61. County Land Use Schedule B7-1 (Aberfoyle) is amended by adding reference to local policy 9.8.1, “See Policy 9.8.1 Wellington Road 46”.
PCH-R	62. County Land Use Schedule B7-1 (Aberfoyle) is amended as shown on Schedule “A-5” by identifying an expanded Secondary Urban Centre boundary for Aberfoyle and re-designating lands: <ul style="list-style-type: none"> a) from Secondary Agricultural and Country Residential to Residential;

	<ul style="list-style-type: none"> b) from Secondary Agricultural to Residential and Highway Commercial subject to Policy Area PA7-12 (Maltby Road Future Development Area); c) from Secondary Agricultural to Residential Transition Area, Industrial and Policy Area PA7-9 (County Aberfoyle Garage); and d) refined boundaries of existing policy area PA7-2 (Mill Creek Residential Area) and PA7-6 (Mini Lakes) as shown on Schedule "A-5". e) Core Greenlands and Greenlands designations are to remain unchanged, except for the addition of Core Greenlands and Greenlands as shown on Schedule "A-5".
PCH-R	f) County Land Use Schedule B7-1 (Aberfoyle) is amended by redesignating land from Secondary Agricultural to Residential Transition Area; from Industrial to Residential and Policy Area PA7-9; as shown on Schedule "A-6".
PCH-R	g) That any necessary changes to the Schedules and Appendices of the Official Plan be made to reflect the new boundary of Aberfoyle.

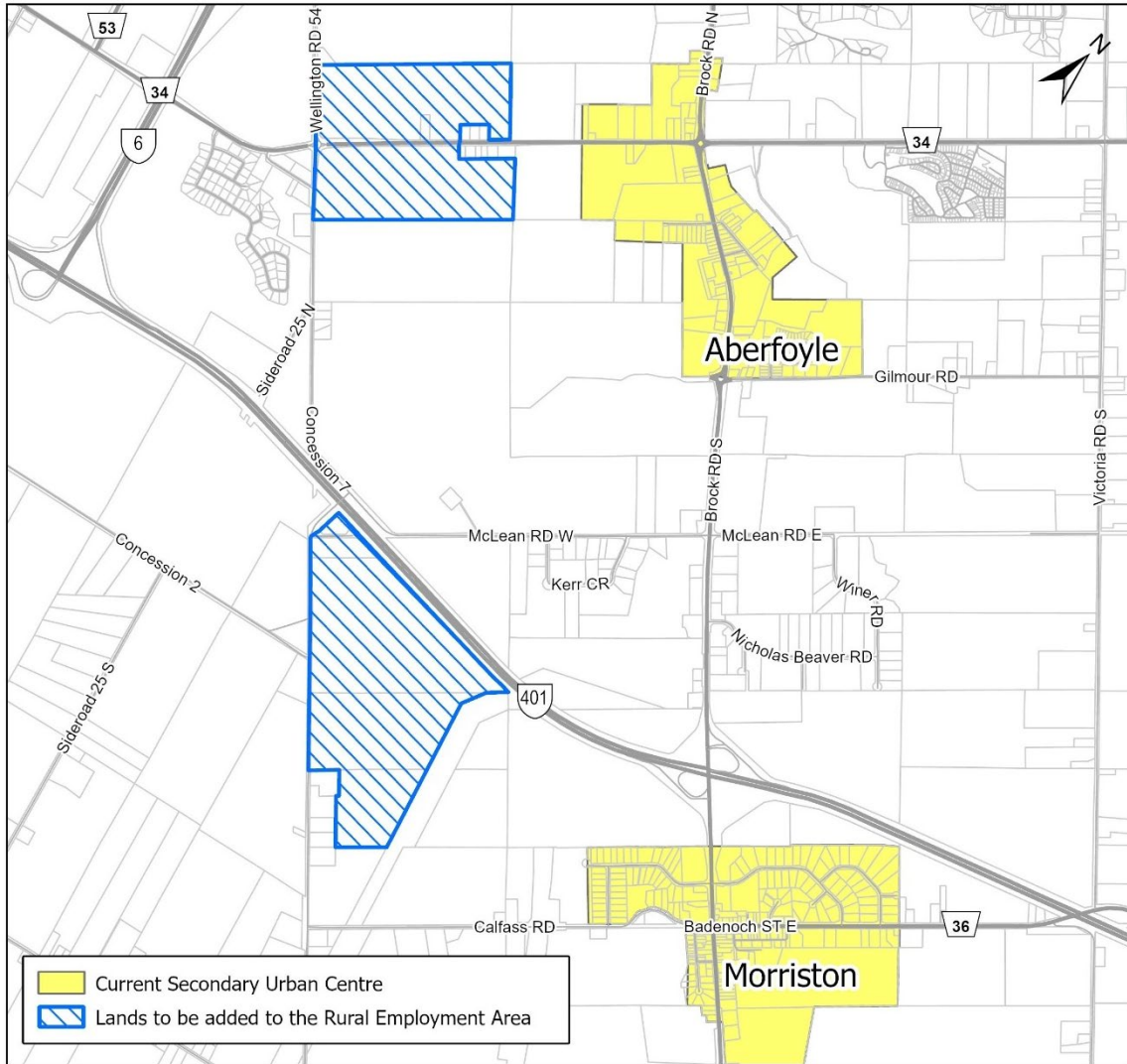
THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "A-1"
OF
OFFICIAL PLAN AMENDMENT NO. 131



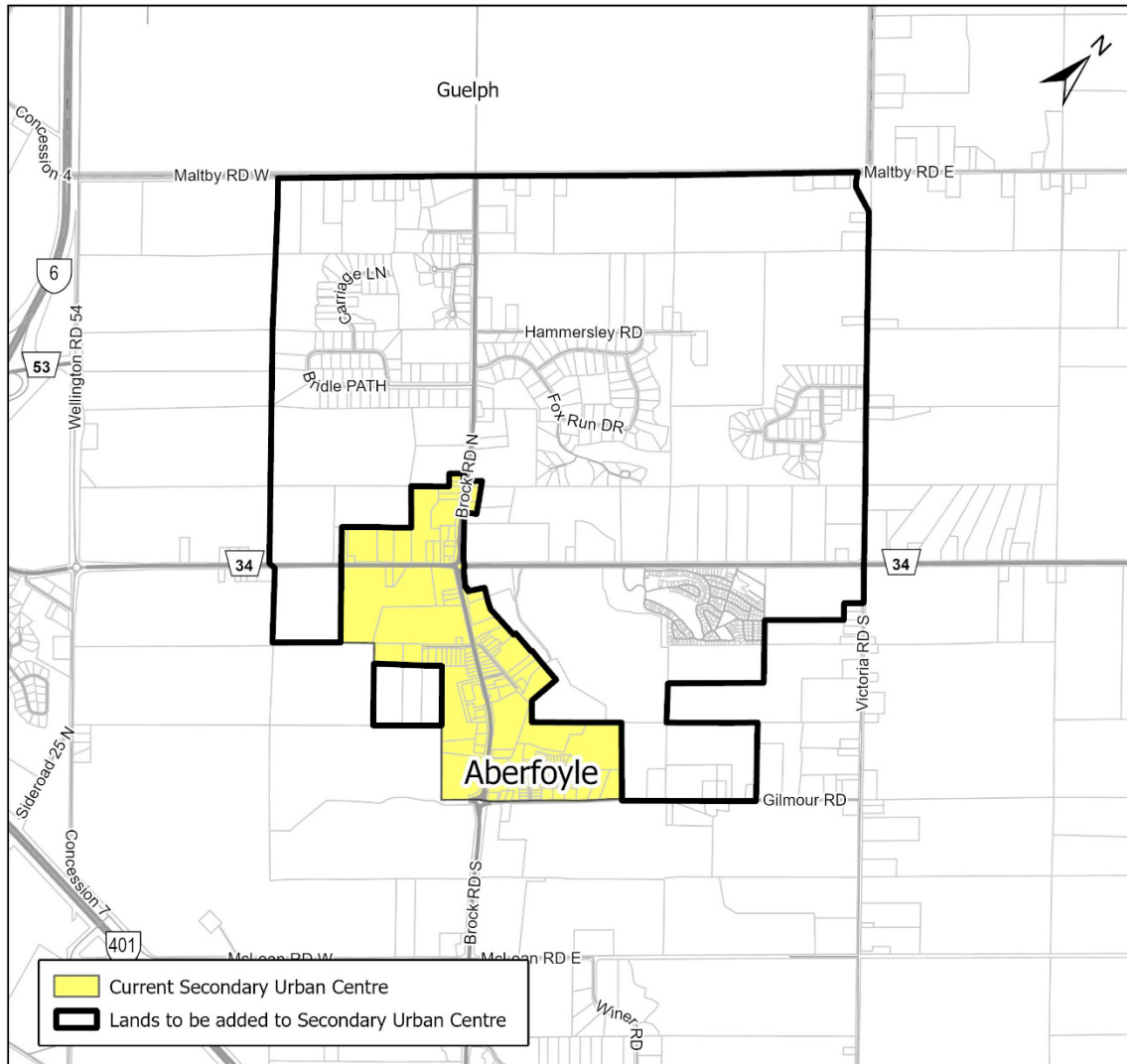
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SCHEDULE "A-2"
OF
OFFICIAL PLAN AMENDMENT NO. 131



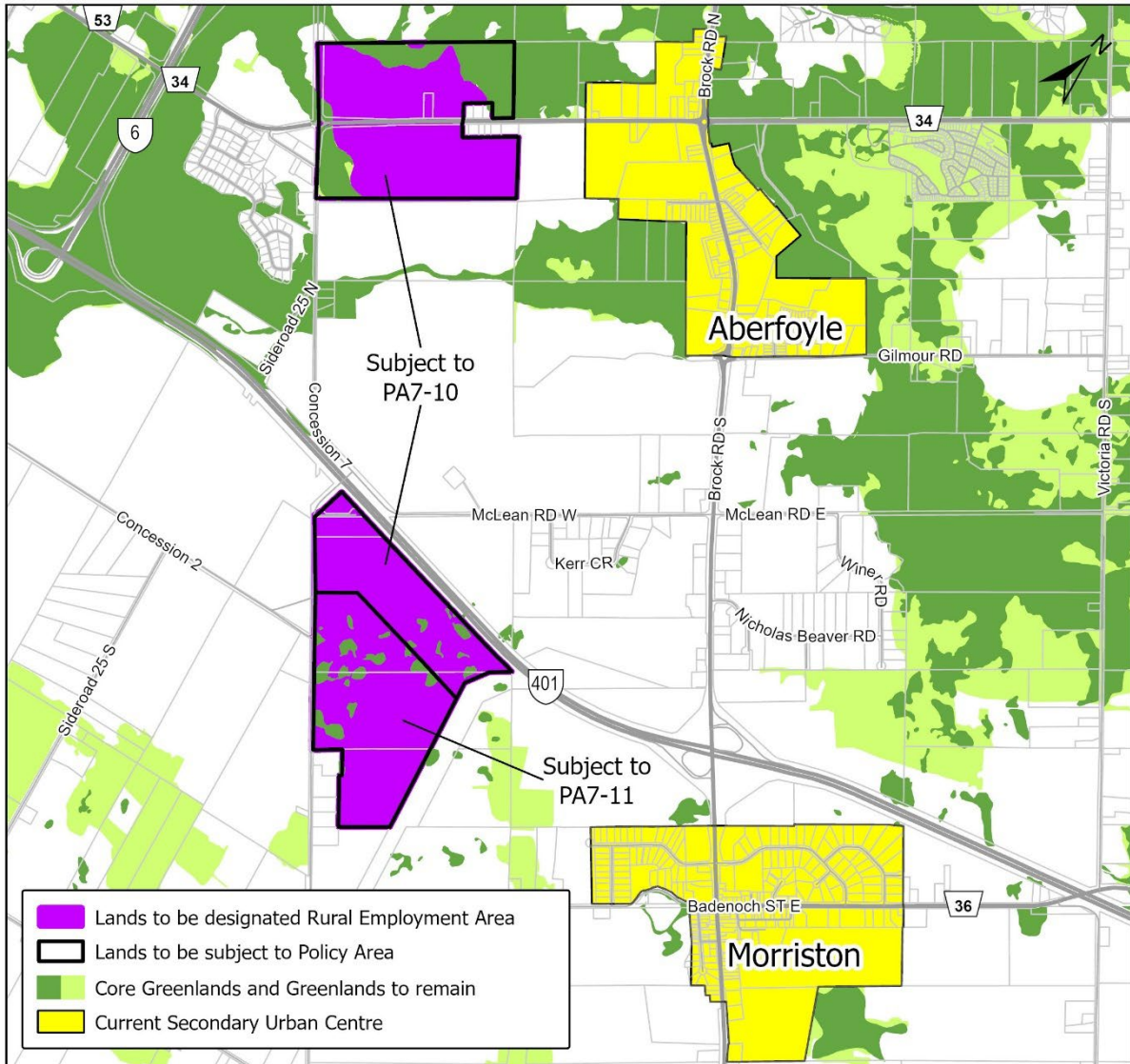
THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "A-3"
OF
OFFICIAL PLAN AMENDMENT NO. 131



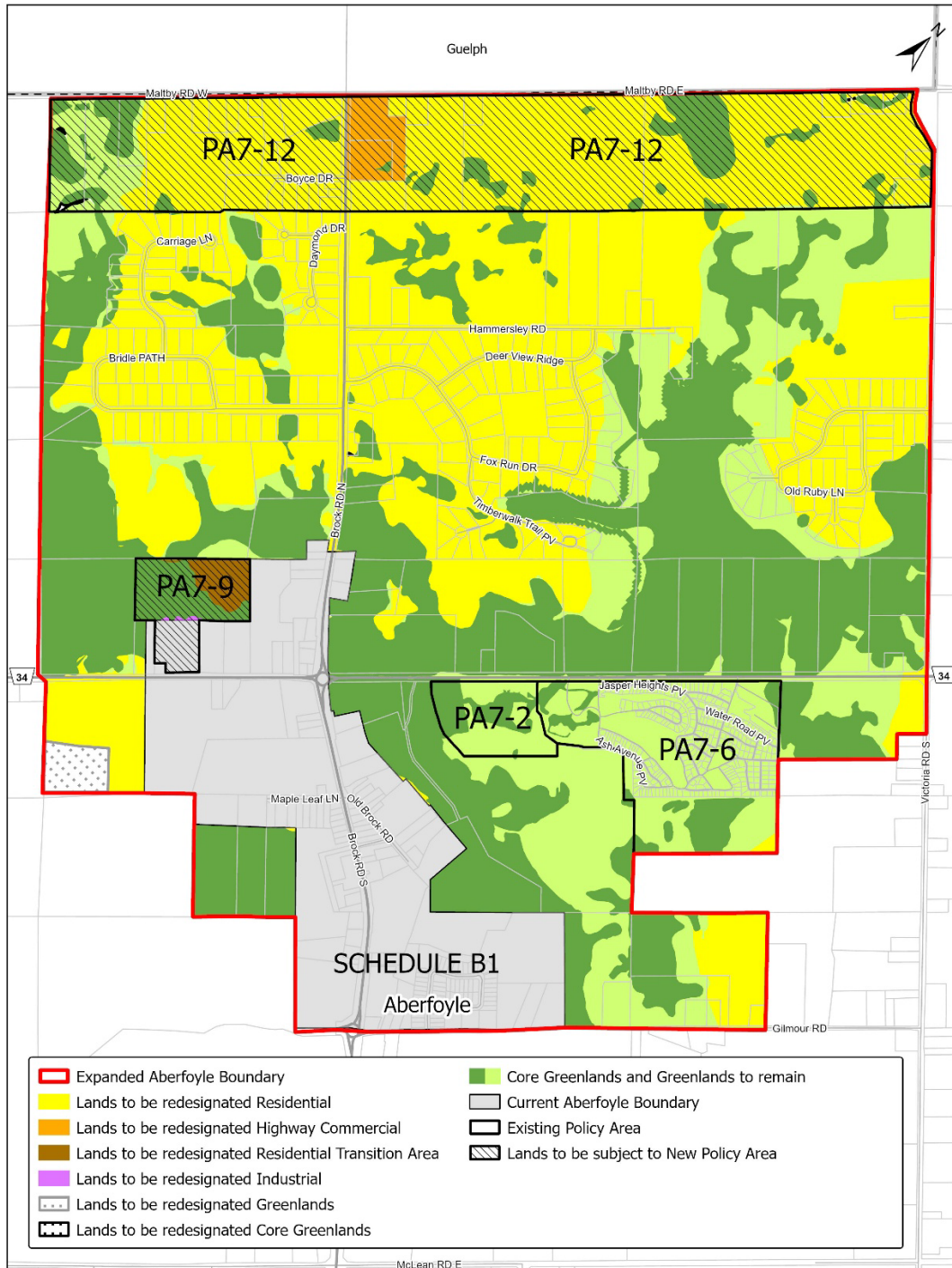
THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "A-4"
OF
OFFICIAL PLAN AMENDMENT NO. 131



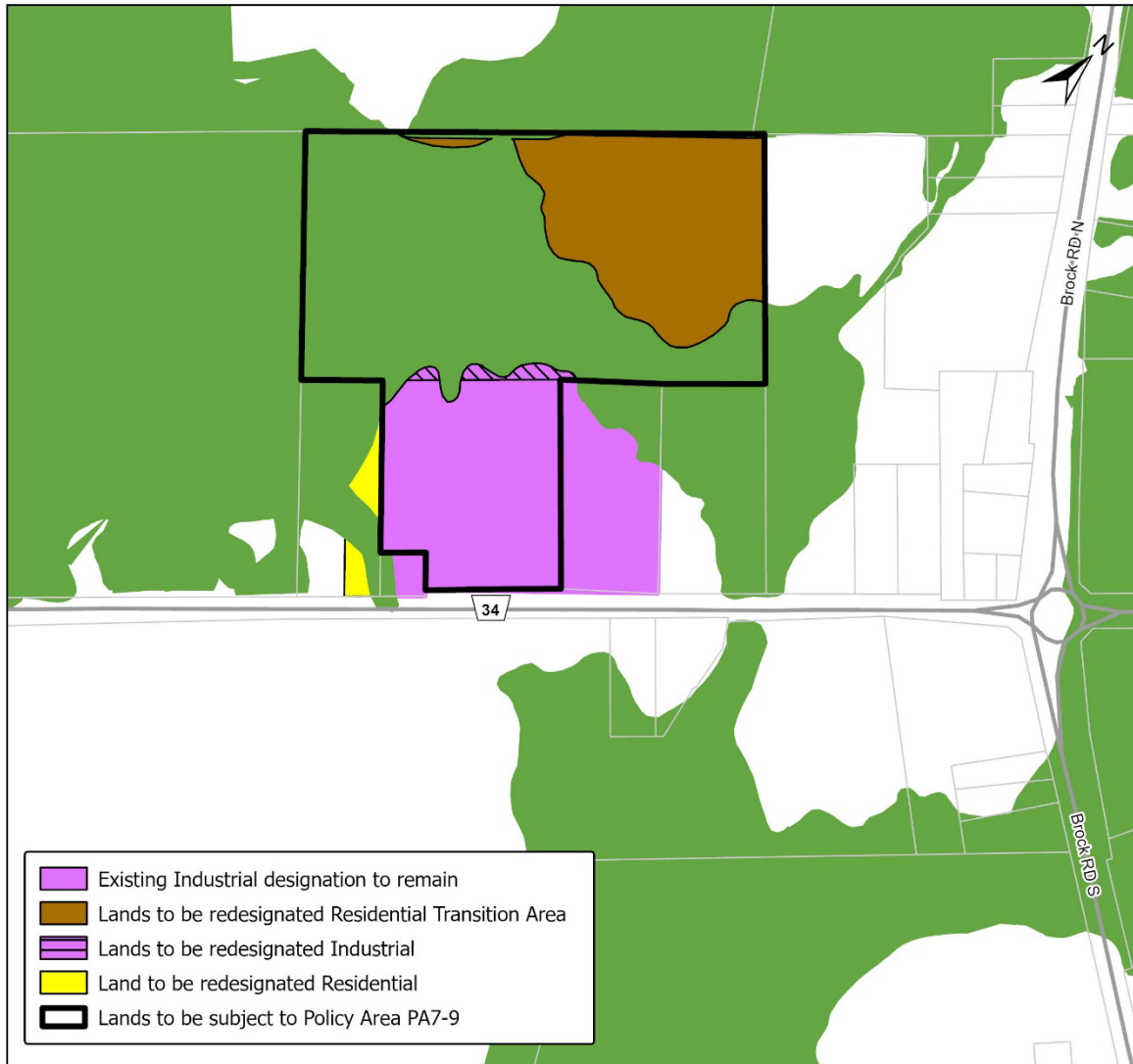
THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "A-5"
OF
OFFICIAL PLAN AMENDMENT NO. 131



THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "A-6"
OF
OFFICIAL PLAN AMENDMENT NO. 131



Appendix B

Overview of Changes to Draft OPA 131 with Rationale

The Final Draft of OPA 131 being recommended in this report may be found in Appendix A. The recommended changes between the September 11, 2025 Draft OPA and the April 9, 2026 Final Draft OPA cover the following areas:

- Erin Rural Residential Growth Review
- Puslinch Rural Residential Growth
- Puslinch Rural Employment Growth
- Provincial Planning Statement Rural Area Policy Consistency

A summary of the changes is provided below. Other changes which were considered but not recommended by staff are included in Appendices F1 to F7 (Summary of Comments and Responses).

B1.0 Changes related to Erin Rural Residential Growth Review

Changes between September 11, 2025 Draft and April 9, 2026 Final Draft OPA 131

Changes to OPA 131	Rationale
1. OPA 131 no longer has the effect of reallocating 120 rural households and a population of 300 from the Town of Erin to the Township of Puslinch.	Town of Erin Council’s March 12, 2026 resolution supporting further study of the matter and public input requesting more clarity and local engagement (see Appendix F6 public comments, page 4 and 5).
2. Changes to Section 3.5 to reflect a range for the rural population and rural household forecasts to 2051 for the Town of Erin.	To provide flexibility for the Town of Erin to conduct a review of its rural residential growth shortfall.
3. Addition of a new policy, 3.5.1 Erin Rural Residential Growth Review which would: <ul style="list-style-type: none"> • support a local review of potential options for addressing a rural residential growth shortfall in the Town of Erin • allow the Town of Erin to implement potential changes within its own Official Plan • allow flexibility for the County to reallocate any surplus to the Township of Puslinch, if necessary 	<p>Same as above.</p> <p>Allows the Town of Erin to further review the matter locally. The policies of the County Official Plan will continue to apply, but potential implementation of the results of the review through amendment to the Town’s Official Plan is intended to avoid duplication in policies and approval processes.</p> <p>This provides the opportunity for the Town to consider additional detail or clarity with respect to important local issues.</p>
4. Addition of text at the end of Section 10.4.4 (Residential Lots – Erin and Minto) to refer to the Town of Erin Official Plan for potential changes to this Section.	To support potential changes to the severance cut-off date by the Town of Erin through a local official plan amendment, if applicable, without the need for an amendment to the County Official Plan.

B2.0 Changes related to Puslinch Rural Residential Growth

Changes between September 11, 2025 Draft and April 9, 2026 Final Draft OPA 131

Changes to OPA 131	Rationale
<p>5. Revisions to add new Puslinch policy area PA7-12 Maltby Road Future Development Area as part of the Aberfoyle expansion to account for the lack of certainty concerning Town of Erin Council’s position regarding whether or not to retain its rural residential growth shortfall.</p> <p>The Future Development policies will apply to the Residential lands within the PA7-12 area. If the County is able to reallocate rural residential growth to Puslinch, Residential lands may be rezoned by the Township. This allows for a phased approach to growth within the expanded Aberfoyle boundary.</p> <p>Additional policies address details of future Residential and future Highway Commercial development. The policy area also implements a minimum 7.5 metre wide urban-rural transition area between Puslinch and Guelph.</p>	<p>This policy is related to Section 3.5.1 Erin and Puslinch Rural Residential Growth (see Section B1.0 above). Section 3.5.1 provides for Erin’s shortfall to be reassigned to Puslinch later, if some or all of it is deemed surplus by the Town. In the interim, future residential development along Maltby Road in Aberfoyle will be phased.</p> <p>The other rural residential growth options are maintained including the Phase 1 expansion of Aberfoyle (outside of the PA7-12 Phase 2 area), May 1, 2025 severance date in OPA 131, and the supply set aside for expansion of Arkell (future location(s) to be determined). See Figure C-2 of Appendix C for further supply details.</p> <p>The transition area policies are in response to City of Guelph comments regarding the 7.5 metre minimum and 10 metre maximum transition approved as part of the OLT decision for the adjacent Clair Maltby Secondary Plan.</p> <p>The minimum required front yard in the Agricultural (A) Zone which currently applies to lands fronting Maltby Road is 10 metres.</p>
<p>6. Revision to include an additional property in the secondary urban centre boundary of Aberfoyle (Area D2 – 7589/7597 Wellington Road 34).</p>	<p>This minor addition requested by Township Council was originally excluded from consideration as it is relatively small and would not significantly contribute to the land need. There also appeared to be a Minimum Distance Separation (MDS I) conflict with an unoccupied livestock operation at 7632 Wellington Road 34.</p> <p>Staff have determined that the structure in question was previously rezoned to eliminate its ability to house livestock in association with severance B146/12. Therefore, there is no MDS conflict and staff are supportive of the request.</p>
<p>7. Map changes to remove new Greenlands designations based on the 2018 Natural Heritage System (NHS).</p>	<p>As a Secondary Urban Centre, Aberfoyle is technically part of the Rural System and therefore the 1 ha threshold for significance in the Urban System shouldn’t have been applied. There is one woodland which remains for designation as it is over 4 ha in size and is not a plantation.</p>

	The County will be completing a detailed review of its Core Greenlands and Greenlands designations as part of future phase(s) of the Official Plan Review and the 2018 NHS may be revisited at that time.
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B3.0 Changes related to Puslinch Rural Employment Growth

Changes between September 11, 2025 Draft and April 9, 2026 Final Draft OPA 131

Changes to OPA 131	Rationale
To update to remove reference to “proposed” interchange and add references to Highway 6 N to renumbered 9.8.3 a) (formerly 9.8.3b)	Minor edits provide additional clarity.
To add heading “Urban Design Guidelines” to 9.8.3 b)	Minor edits provide additional clarity.
To clarify the intent of the Transportation Plan identified in Section 9.8.3d)	In response to comments from the City of Guelph staff has included additional text to clarify that as part of a Transportation Plan to establish an internal road and external road network for lands west of Highway 6 N that these “connections shall be designed to direct all traffic to the midblock interchange at Highway 6 N (Hanlon Expressway) via Wellington Road 53...” and that “...no truck or motor vehicle traffic generated by any use(s) will utilize Sideroad 20 N. Further that no driveway access or accesses for any employment or other non-agricultural uses shall be permitted onto Sideroad 20 N.”
9.8.3g)	Minor spelling correction.
To revise the reference to Policy Areas for Section 9.8.6	Revision to replace reference to “Special Policies” with “Policy Areas”.
To revise the Prestige Rural Employment Area policies in Puslinch (PA7-10) to include setback to residential and sensitive land uses	Lands on the north and south side of Wellington Road 34 (Areas G and H) to be redesignated for Prestige Rural Employment Area use require a minimum 70 m setback due to existing rural residential uses, rural residential clusters and/or sensitive land uses. This revision to PA7-10 is consistent with the approach to Rural Employment lands along Concession 7 to the south of Highway 401 (PA7-11).
To revise the Highway 401 and Concession 7 Rural Employment Area (PA7-11) Policy Area	To correct a typo by removing a duplicate reference to “or raw materials”.

B4.0 Changes related to Provincial Planning Statement Rural Area Policy Consistency

Changes between September 11, 2025 Draft and April 9, 2026 Final Draft OPA 131

Changes to OPA 131	Rationale
<p>Planning staff have made several updates to OPA 131 as a result of Provincial feedback on the circulation draft of OPA 131.</p>	<p>Provincial comments generally focused on achieving stronger consistency with Provincial Planning Statement, 2024 and applicable provincial guidance material.</p> <p>Provincial comments and planning staff responses are documented in Appendix F1 (Provincial Comment and Response).</p>
<p>Revised policy 6.4.4 On-farm Diversified use as follows:</p> <p>“... Uses that attract large numbers of customers, employees or other people to the farm, create compatibility issues or have high water or wastewater needs will <u>may</u> not be considered on-farm diversified uses and will be directed to Primary Urban Centres or other appropriate land use designations. ...”</p>	<p>In response to comments received from the public on proposed policy 6.4.4, planning staff revised the language of this section from “will” to “may” when contemplating larger more intensified On-farm Diversified uses. This change clarifies that a full range of On-farm Diversified uses may be considered on a case-by-case basis, while still providing direction around certain characteristics that typically exceeds what is considered an On-farm Diversified use in the County.</p>
<p>Removed the “Bona Fide Farmer” defined term from the proposed On-farm Diversified use policy 6.4.4 i) and replaced it with the defined term “Farm Operation”.</p>	<p>In response to comments received from the public raising concerns regarding the “Bona Fide Farmer” definition and its link to the On-farm Diversified use policy, planning staff have proposed to use a new “Farm Operation” definition.</p> <p>The change to the “Farm Operation” definition provides for a consistent approach for proponents to demonstrate they have a legitimate farm operation and meet the threshold to benefit from the flexible On-farm Diversified use provisions in the prime agricultural area.</p>
<p>Revised policy 6.5.5 to include new bullet e) as follows:</p> <p>“e) the use will not preclude or hinder new or existing <i>mineral aggregate operations</i> or access to mineral aggregate resources identified on schedule D of this Plan;”</p>	<p>In response to comments received regarding the proposed revisions to Section 6.5.5, planning staff have added new provision (e) to improve consistency with PPS Policies 4.5.2.4 and 4.5.2.5, particularly as they relate to the protection of mapped mineral aggregate resources and existing mineral aggregate operations.</p>

<p>Revised the Residence Surplus to a Farming Operation severance policy (10.3.4) as follows:</p> <ul style="list-style-type: none"> • Removed the link to “Bona Fide Farmer” definition. • Added link to the new “Farm Operation” definition. • Revised policy 10.3.4 c) to clarify that certain features that extend the residential parcel will generally not be supported. • Revised policy 10.3.4 e) to clarify when Minimum Distance Separation (MDS) applies to these types of severances. • Added additional provisions to implement the “Farm Operation” definition and clarify policy requirements: <ul style="list-style-type: none"> - Clarifying that the farmer must own and be the operators of the <i>farm operation</i> of the lands subject to the severance. - Clarify that the farmer must own additional parcels with valid Farm Business Registrations numbers. - Clarify that the farmer must own an additional residence elsewhere making the existing residence surplus; - Clarifying that a farmer can include various ownership forms. - Clarify that applications may be considered where there is a legally binding purchase and sale agreement in place prior to the consent being finalized. 	<p>In response to comments received from the public, the Wellington Federation of Agriculture, the Township of Wellington North, and the Ontario Ministry of Agriculture, Food and Agribusiness, planning staff have made several updates to the 'Residences Surplus to a Farming Operation' policy framework to reflect stakeholder feedback:</p> <p>Planning staff received specific feedback emphasizing that the residential parcel created through these severances needs to be the minimum size necessary to accommodate the residential use. In response, planning staff further revised policy 10.3.4 c) to list specific features, such as tree lines and extended lawn areas, that will typically not be considered as rationale for increasing the size of the residential parcel.</p> <p>Planning staff received feedback requesting clarification about the application of Minimum Distance Separation for these severances. In response planning staff clarified in 10.3.4 e) that MDS applies when livestock facilities/manure storage facilities are separated onto a separate lot from the residence as a result of the severance.</p> <p>Planning staff received mixed feedback regarding the “Bona Fide Farmer” definition. As a result of this feedback, planning staff are proposing to shift to a new defined term “Farm Operation”. As a result of this shift, we have added further provisions to the policy to assist with the implementation of the new “Farm Operation” definition.</p> <p>Planning staff proposed further changes to the policy clarifying requirements of applicants seeking a Residence Surplus to a Farming Operation severance; including demonstrating ownership of other farmlands and a dwelling; and providing consideration of a surplus farm dwelling severance where a farmer is in the process of purchasing a farm operation.</p>
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<p>Deleted the “Bona Fide Farmer” definition.</p>	<p>In response to critical comments received from the public about the “Bona Fide Farmer” definition, planning staff undertook an additional review of the proposed definition and followed up with other jurisdictions where this term has been implemented. Discussions with municipal counterparts revealed implementation challenges with the definition as proposed and shifts in policy approaches towards the “Farm Operation” definition suggested in feedback the County received.</p>
<p>Added a new “Farming Operation” definition defined as follows:</p> <p>“Lands that are assessed as farmland and have a valid Farm Business Registration Number, or valid exemption from Agricorp, for the purpose of the <i>agricultural uses</i>.”</p>	<p>In response to comments received from the public and consistent with feedback provided, planning staff are proposing a shift from the “Bona Fide Farmer” definition to a “Farm Operation” definition in the Residence Surplus to a Farming Operation policies and On-farm Diversified use policy frameworks.</p> <p>The “Farm Operation” definition provides for a clearer implementation path and achieves the original goals of the “Bona Fide Farmer” definition by requiring applicants to demonstrate that they are engaged in a legitimate farming operation prior to being eligible to pursue development under the policies. The revised definition better aligns with provincial guidance, well-known requirements in the agricultural industry related to Farm Business Registration and information readily available to landowners.</p>

Appendix C

Provincial Policy Review

C1.0 Background

A detailed review of planning policies was previously completed as part of the following technical studies in support of OPA 131:

- Urban Structure and Growth Allocations (June 16, 2021) and Amended (January 31, 2022), and Land Needs Assessment Report (August 29, 2022) prepared by Watson & Associates Economists Ltd.
- Puslinch by Design: Employment Land Study (2024 – 2025)
- Aberfoyle Expansion Planning Impact Assessment (September 2025)
- Aberfoyle Expansion Agricultural Impact Assessment and Minimum Distance Separation (MDS) Study (September 2025)
- Aberfoyle Expansion Aggregate Impact Assessment (September 2025)

These documents are available through the Official Plan Review project webpage (www.wellington.ca/planwell). A summary of additional policy matters is provided below.

C2.0 Provincial Planning Statement (PPS), 2024

Rural Residential Growth		
Policy Area	2024 PPS	OPA 131
Growth Forecasts	Requires the County to identify and allocate population, housing and employment projections for the municipalities in Wellington.	OPA 131 is based on the County Official Plan forecasts and allocations approved by the Province in July 2024.
Growth Plan and Ministry of Finance Protections	Allows for Wellington County to continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.	<p>The Official Plan forecasts are based on those previously issued by the Province for land use planning via the Growth Plan for the Greater Golden Horseshoe.</p> <p>Staff note that the 2024 Ministry of Finance Projections (MOF) have been replaced with lower 2025 MOF Projections. County staff and consultants (Watson and Associates Economists Ltd.) will continue to monitor annual MOF projection updates. However, the County isn't required to transition to MOF projections until the next Official Plan review cycle and will use the most recent projections available at that time.</p>

Rural Residential Growth (continued)

Policy Area	2024 PPS	OPA 131
Land and Unit Supply	Requires land and unit supply to be based on and reflect the allocation of population and units by the upper-tier municipality.	OPA 131 provides a phased approach to growth as part of the expansion of Aberfoyle which aligns with the current allocation of population and units for Puslinch. See Figure C-1 and C-2 below for additional details.
Rural Settlement Areas	Places a priority on growth and development in rural settlement areas with consideration of local circumstances.	OPA 131 directs growth to rural settlement areas in Puslinch (the Secondary Urban Centre of Aberfoyle and the Hamlet of Arkell). Matters related to scale and service levels will be addressed through future review of development applications. Staff anticipate future residential development to be low density and small scale.
Rural Lands	Residential development, including lot creation, is permitted on rural lands (outside of prime agricultural areas and outside settlement areas) where site conditions are suitable for provision of appropriate sewage and water services.	While the PPS provide more flexibility for residential development, the policies leave it up to municipalities to determine how. OPA 131 retains options for rural residential development in the form of Secondary Agricultural Area severances, where needed.

Figure C-1 Puslinch Rural Residential Need
Based on current Official Plan Forecasts

		PUSLINCH
DEMAND	2051 Rural Household Forecast	3,560
	2021 Census Households	2,860
	Rural Area Buildout Since Census to End of 2023	100
	Growth Required to Achieve Forecast	600
SUPPLY	Vacant Designated Rural Lands	73
	Existing Vacant Rural Lots	73
	Potential New Severances under Current Policies	204
	Existing Vacant Supply	350
NEED	Long-Term Rural Housing Demand	600
	Existing Vacant Rural Residential Supply	350
	Rural Area Residential Need (negative value = shortfall)	-250

Source: County of Wellington 2024 Rural Residential Growth Analysis (PD2024-29)

Figure C-2 Additional Supply to meet Puslinch Rural Residential Need (shown in red text)
Based on current Official Plan Forecasts

		PUSLINCH
DEMAND	2051 Rural Household Forecast	3,560
	2021 Census Households	2,860
	Rural Area Buildout Since Census to End of 2023	100
	Growth Required to Achieve Forecast	600
SUPPLY	Vacant Designated Rural Lands	73
	Existing Vacant Rural Lots	73
	Potential New Severances under Current Policies	204
	Subtotal – Existing Vacant Supply	350
OPA 131 SUPPLY	OPA 131 Phase 1 Expansion of Aberfoyle	115
OPA 131 SUPPLY	OPA 131 New Severances under New Date	160
ARKELL RESERVE	Potential Expansion of Arkell	50
	Subtotal – OPA 131 and Arkell Supply	325
	Total – Existing, OPA 131 and Arkell Vacant Supply	675
NEED	Long-Term Rural Housing Demand	600
	Existing Vacant Rural Residential Supply	675
	Rural Area Residential Need	+75*
	(positive value = surplus)	

*NOTE: This surplus is considered modest as it includes:

- approximately 19 units of rounding out of an existing parcel fragmented by the current Aberfoyle boundary
- approximately 24 units of infilling north and south of Bridle Path

Aberfoyle Phase 2 is comprised of approximately 100 units of rural residential growth along Maltby Road. See Final Draft OPA policy 3.5.1 (Erin Rural Residential Growth Review) and policy area PA7-12 (Maltby Road Future Development Area) for further details.

Agricultural		
Policy Area	2024 PPS	OPA 131
General Polices for Agriculture	Requires the County to use an Agricultural System approach to protect the agricultural land base and foster and support the longer term economic prosperity and productive capacity of the agri-food network.	OPA 131 introduces the Agricultural System approach into the County Official Plan and establishes a policy framework that defines the Agricultural System in Wellington and establishes a policy framework to protect and support the system. This includes revisions to the agricultural impact assessment policies and requiring the consideration of impacts on the Agricultural System.

Agricultural (continued)

Policy Area	2024 PPS	OPA 131
Permitted Uses	Defines a specific range of uses that that are permitted within the Prime Agricultural Area and provides direction to planning authorities on the establishment of these uses and necessary compatibility considerations.	OPA 131 establishes a policy framework in the Official Plan to implement permitted uses in the Prime Agricultural Areas of the County consistent with PPS, 2024 and provincial guidance on permitted uses in Ontario’s Prime Agricultural Area. This includes updated policies related to On-farm Diversified uses and Agriculture-related uses.
Lot Creation and Lot Adjustments	Outlines a narrow range of circumstances when lot creation in the Prime Agricultural Area may be permitted.	OPA 131 revises the Prime Agricultural Area lot creation policies of the Official Plan to strengthen protection of agricultural land and better align with the PPS, 2024.
Removal of lands from Prime Agricultural Areas	Clarifies that municipalities may only remove land from the Prime Agricultural Area for the expansion or identification of settlement areas.	OPA 131 adds clarity to various sections of the Official Plan to align with this section of the PPS, 2024. Specifically, OPA 131 requires a Local Policy Area approach to permitting new or expanding non-agricultural uses in the Prime agricultural Area.
Non-Agricultural uses in the Prime Agricultural Area	Sets out strict policy requirements planning authorities must consider when contemplating non-agricultural uses in the Prime Agricultural Area.	OPA 131 aligns the County’s policies related to non-agricultural uses in the Prime Agricultural Area, with this section of the PPS, 2024. OPA 131 further links various non-agricultural land use designations that exist in the rural area of the County, to this policy framework when considering new or expanding uses.
Supporting local Food and the Agri-food Network	Encourages planning authorities to support local food production and the agri-food network.	OPA 131 introduces the agri-food network into the Official plan as a new defined term and as an element of the Agricultural System within Wellington. Through this approach a policy framework to protect the agri-food network is established through considerations of impacts on the broader Agricultural System. Additional policies proposed support local food production, including urban agriculture.

Agricultural (continued)

Policy Area	2024 PPS	OPA 131
Definitions	Defines various terms that aid in the implementation of the Provincial Policy direction for Agriculture.	OPA 131 updates the existing defined terms in the Official Plan consistent with new Provincial definitions and adds various new terms where they did not previously exist in the Official Plan.

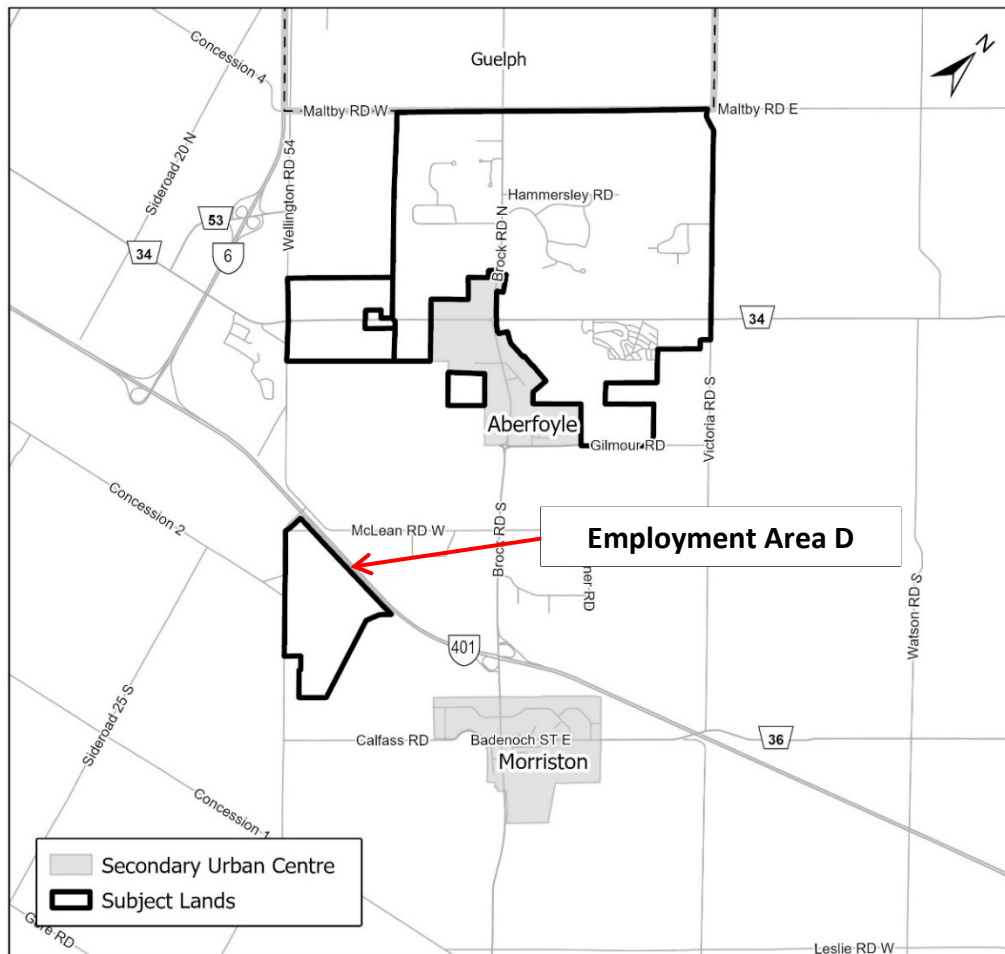
Employment and Mineral Aggregate Resources

Policy Area	2024 PPS	OPA 131
Strategic Sites	Requires planning authorities to identify strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment.	<p>The Township of Puslinch has identified a strategic site on the south side of Highway 401 for designation as a Rural Employment Area in OPA 131. See Figure C-3 below for the location of “Area D” in the Puslinch by Design Employment Land Study.</p> <p>This is the only remaining site in Puslinch with Highway 401 frontage combined with proximity to interchanges at Hwy 401/Hwy 6 S and Hwy 401/Hwy 6 N. Area D is near the existing Puslinch industrial park and is not constrained by the Greenbelt Plan or designated Prime Agricultural Area lands.</p>
Mineral Aggregate Resource Deposits	Prohibits development in (and adjacent to) known deposits of mineral aggregate resources if they would preclude or hinder the establishment of new operations or access to the resources unless certain criteria apply (Section 4.5.2.5 a) or b) and c).	<p>A portion of Employment Area D is within the Mineral Aggregate Resource Overlay of the Official Plan and within 300 m of the resource. Designation of such lands as Rural Employment would not necessarily impact access to the resource. Regardless of the current or proposed land use designation, a County Official Plan Amendment is required for all new or expanded mineral aggregate operations.</p> <p>In addition, as a “strategic site” staff consider the proposed land use to serve a greater long-term public interest as stated above.</p>

Employment and Mineral Aggregate Resources (continued)

Policy Area	2024 PPS	OPA 131
Mineral Aggregate Operations	Requires that mineral aggregates operations be protected from development and activities that would preclude or hinder their expansion or continued use or would be incompatible.	The designation of Area D as Rural Employment would be compatible with and not impact existing mineral aggregate operations across Concession 7.

Figure C-3 Location of Employment Area D



PPS 2024 Conclusion

Planning staff are satisfied that OPA 131 is consistent with the 2024 Provincial Planning Statement.

C3.0 Provincial Greenbelt Plan, 2017

All decisions on planning applications shall conform with the policies in the Greenbelt Plan. The Greenbelt Plan identifies where urbanization should not occur to provide permanent agricultural and environmental protection. There are no settlement area expansions or Rural Employment Area expansions proposed within the Greenbelt.

Greenbelt Plan (2017) Conclusion

Planning staff are satisfied that OPA 131 conforms with the Greenbelt Plan.

Appendix D

OPA 131 Public Open House Meeting Summary

Wellington County Official Plan Amendment No. 131 Virtual Public Open House Meeting Summary

Prepared by LURA Consulting

Background

On February 5, 2026, the County provided an update on the Official Plan Review process and an overview of the proposed Official Plan Amendment (OPA) No. 131. This amendment proposes changes to the Official Plan related to: County-wide PPS rural area policy consistency, Erin rural residential growth re-allocation, Puslinch rural residential growth and Puslinch rural employment growth. It is part of Rural Phase 3B of the County's Official Plan Review. Community members were invited to attend the open house, listen to the presentation, and ask questions or share comments with staff.

Meeting Promotion

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

A public notice regarding the Virtual Open House was published in the Wellington Advertiser in the January 15, 2026 edition. The meeting notice was also posted on the Official Plan Review webpage and promoted through the County's Official Plan Review Project email circulation list, with almost 300 contacts, to raise awareness.

Meeting Overview

The Virtual Open House was held on February 5, 2026, to:

- Provide an overview of OPA 131.
- Provide the public with an informal opportunity to discuss OPA 131.
- Allow the public to ask questions and identify additional planning issues that can be addressed.

Seventy-nine (79) participants attended the meeting. Susan Hall (Facilitator from LURA Consulting) began the meeting by reviewing the agenda and the purpose. Sarah Wilhelm (Manager of Policy Planning at the County of Wellington) provided introductory remarks and reviewed the official plan and policy review context. The presentation regarding OPA 131 covered the following topics:

- Official Plan Review Context
- Rural Growth and Policy Updates
- County-wide changes
- Rural Residential Growth Re-allocation
- Puslinch Rural Residential Growth
- Puslinch Rural Employment Area Growth
- Consultations to Date
- Questions
- Next Steps

Susan Hall facilitated a discussion to gather public feedback and comments. Below is a summary of the discussions and comments received until 19 February 2026. This report was

written by LURA Consulting, the independent community engagement team retained to deliver community engagement. It summarizes and reflects the community's diverse inputs during the open house. It is not intended to be a verbatim record of responses; rather, it summarizes and synthesizes the feedback shared throughout the meeting.

What We Heard

Following the presentation, participants were invited to ask questions and share comments regarding OPA 131. The questions, answers, and comments are included thematically below. Questions are marked with a 'Q', comments with a 'C', and answers and responses are noted with an 'A'.

Land Use Designations and Planning Terms

Q: What is a Rural Employment Area?

A: Rural employment area lands are lands where you would expect to see industrial-type uses, areas which would generate jobs. In Puslinch, these would be dry industrial uses that would not typically use a lot of water.

Q: What is a Residential Transition Area?

A: The residential transition area is a land-use designation that is meant to provide a transition between different uses. Recognizing that there are some residential uses nearby. We did not want the back portion behind the Aberfoyle garage to be industrial. We wanted to put it in the residential transition category so it might be considered public uses, but we recognize we need to be mindful of the residential uses nearby.

Q: Can you explain the practical impacts to current residents of changing the land use designation from agriculture to residential?

A: There are a lot of properties that would not have intensification potential necessarily. They would be moving from one designation to another, and it would have very little impact on those properties, because it would just be moving from a secondary agricultural designation, which permits residential designation, to a residential designation.

Q: A couple more that are specific, and then a little bit more general on the timeline. There appears to be a change in zoning for the land at 34 and Brock Road, near the floodplain. Can you clarify?

A: It might be helpful if we have this conversation offline. I need to clarify exactly where that is. I know there's a small sliver of core Greenland that is being added to the map, and that area, I believe, is related to wetlands, but if there's something else, perhaps you might want to reach out to me by e-mail or give me a call and show me exactly where it is.

Q: Please explain the significance of removing the rural clusters clause 6.5.4. Does this now allow rural clusters?

A: The rural cluster policy was modified through OPA 119. That was the first amendment we did, and the province had concerns because it applied in prime agricultural areas that didn't meet provincial policy. We also had comments from the Town of Minto. They wanted us to look at rural clusters a little more closely, or the potential for them, in light of the Growth Plan and potential limitations associated with the provincial agricultural system and the provincial natural heritage system, and how that might limit individual severances.

What we did was change the clause and made it a placeholder to review rural growth as part of the Official Plan Review and look at what type of limitations those systems might pose. Since that time, the Growth Plan has largely been removed. Some of those limitations were no longer a factor and because we have done the detailed analysis of rural growth it is no longer needed. Currently, the way it's written, it only allows for severances in secondary agricultural area that would qualify under the March 1st, 2005 date. It doesn't allow for anything more than that.

Severance in Erin and Puslinch

Q: My question is primarily about the land severance in the Town of Erin. I had a land severance three years ago, and recently spoke with my planner, who mentioned that the Town of Erin will not allow a second severance after one has been done on the property, they mentioned that the County is moving away from Erin development and moving towards Puslinch. Could I get in contact with someone in the city to discuss this further and confirm this?

A: You can reach me, Sarah Wilhelm. My contact information is at the end of the presentation, or we can be reached at planwell@wellington.ca. I'm happy to have further conversations about that.

Q: What is the severance reset year? 2025 or 2026.

A: The resetting of the severance date, is May 1st, 2025, for the Township of Puslinch.

Q: Can you explain the significance of the May 2025 date and how this will affect a resident interested in proposing a severance that has not submitted a proposal yet? Also, when will this policy become finalized?

A: When we did our background work, staff did a lot of work to estimate how much potential there would be for severances, depending on what date is set. We looked at a few different options. Rather than focusing on the date, think about how many units a certain date would release into the supply. The selected date is basically the date that balances things out, when we no longer have a shortfall, and so that's the significance of the date.

If someone is looking to benefit from the new date, we cannot consider applications under it until the new date is in full force and effect. We still have a long way to go. We need to consider the comments that we receive here tonight and also at the public meeting, and then report back through the committee and council. Ultimately, we will be sending the council adopted amendment, to the province for approval. And once they're done, then we would expect it to be finalized. We cannot estimate when things would be finalized because we do not control the provincial timeframe, but we are certainly hoping to move things along with the OPA.

Q: Is it defensible to keep the severance dates different in Erin and Puslinch?

A: Once we hear all of the feedback, we will be certainly be arriving at a professional planning opinion. We can use different dates in the Official Plan. Municipalities can grow at different rates, and the County is responsible for allocating growth. We feel that that's an appropriate approach at this point.

Q: What does the May 1st, 2025, severance date mean?

A: If somebody has property in Puslinch that is designated secondary agricultural, they will need to meet all the existing criteria for a rural residential lot. If somebody has already had a severance since 2005, if the dates have been reset, then that one criterion would be met, and it

would no longer be an obstacle; all of the other criteria would still need to be met. We encourage people to do a pre-consultation with our development staff, but we would ask that folks wait until the policies are in play.

Q: For the Puslinch Township Severance, did you say that if we had not applied before May 2025, we don't stand a chance, or how does it work?

A: No, it means that if you have already had a severance since 2005, once that date changes to May 1st, 2025, it resets the date, and it means that you will qualify to have another one considered. Provided that you meet the other policies.

Q: What constraints can be used so that land speculators are not buying land just to sever it to make a quick profit?

A: One of the policy criteria for residential lot creation in the secondary agricultural area is that you need to have owned the property for at least 5 years before you can apply for a severance. Certainly, interested if there are any other comments or ideas around that, but that is the policy we have used over the span of the Official Plan to try to discourage land speculation.

Q: Is there a deadline to submit the severance application?

A: Here are a few things you should know about the proposed May 1, 2025, severance cut-off date as part of Draft Official Plan Amendment (OPA) 131:

Planning staff is unable to consider applications under any proposed new policies until the policies are approved and in effect. This means it is too early to submit an application because the policies in the Official Plan haven't yet been changed, and they may change along the way. OPA 131 needs to first be considered in final draft format and adopted by County Council. Next, we send OPA 131 to the Province for their review and approval.

If you like, I can add you to the list to be notified of County Council's decision on OPA 131 so that you'll know when that happens. Please confirm that with me.

Once a Provincial decision has been made, I suggest you speak with planning staff at the County before applying to review all applicable policies.

Agriculture and Rural Impacts

Q: Has there been any consideration of the effects of additional rural residences in Puslinch on agriculture, and removing the cut-off date for severances would result in a lot of agricultural fragmentation?

A: What we have seen through the new Provincial Planning Statement and the removal of the Growth Plan for the Greater Golden Horseshoe is that the provincial government has created some additional flexibility for having some lot creation in rural areas of the province. The severances that we are looking at would not be on prime farmland, but they would be on what we refer to as secondary agricultural areas, which are generally the less productive or have lower soil capability so that is where that comes from.

In some cases, yes, the severances will come off farms. In other cases, severances will come off existing residential or primarily residential properties, but the prime agricultural areas will continue to be protected. We have an idea of where there is potential for severances to happen, but they each will need to be reviewed on their own merits when they come in. There will be an opportunity for more severances if the date is changed and our policies provide for that type of growth to happen in Wellington.

Q: Agriculture is an industry with the changes in tariff policies, which is becoming more difficult to access parts for agricultural equipment. If they're coming from the US, we need to develop local small-scale industries to assist local farmers in keeping their equipment functional. Expanding the range of uses available in rural secondary agriculture areas could strengthen local agriculture. Would it not be wise to consider more flexibility in the plan to strengthen local agriculture?

A: It's always a balancing act, and we have done pre-consultation with the province with primary focus on the work that has been done, and that has informed some of the policy directions that we are going in, particularly around the size of agricultural lots. We are happy to consider those comments and will review them alongside those we have received from other agricultural stakeholders.

Just to supplement that, in terms of expanding the range of uses available in the secondary agricultural area. The permitted uses in the prime agricultural area we are talking about through OPA 131, the agriculture-related uses and the on-farm diversified uses, are also permitted in the secondary agricultural area. Beyond that, there is existing policies in the plan that do support small-scale commercial, institutional, and industrial uses. So there are existing policies in the plan that offer flexibility to those in the secondary agricultural area designation to pursue certain small-scale industries that you are discussing.

Q: How will the proposed OPA impact the agricultural areas with respect to additional residential growth?

A: By prioritizing growth within Aberfoyle and directing some growth to Arkell, that is trying to concentrate growth within an area that has already been developed and taken out of agricultural production. That is one way to reduce impacts on agricultural areas.

Q: Is it possible to comment on being able to allow Puslinch residents to retain their wells and septic systems?

A: If a development application were to come forward for a subdivision, then those are the types of things that would need to be looked at as part of a development application. So that would be something that a developer would need to speak to, and it would be reviewed as part of development applications coming forward to make sure that there would not be impacts.

Q: Will Erin consider additional industrial employment on prime agricultural land along the side of Road 17 or expanding the urban boundary to access additional employment land designated opportunities?

A: There is a need for more additional industrial land in Erin, and that would be urban industrial land. The Town of Erin has opted to develop its own Official Plan, and their Official Plan covers both urban and rural areas because of that we would be expecting that they would be a big part of that and to take the lead in helping determine what direction they want to see that growth go, but there is a need for additional industrial land in the Town of Erin.

Housing Allocations and Growth Targets

Q: Who designated the numbers for housing the 120/460/250 rate?

A: In our presentation, we referenced the report that the analysis was set out in detail. The County tracks housing through the development pipeline from vacant through to building permit issuance. Those numbers were covered off through the analysis that we did.

Q: Who will determine the housing that is allowed?

C: I need a bit more context on that question. If the question is about secondary agricultural severances or whether it is a question about the housing in an expanded Aberfoyle. I just need to know where.

Q: Who allows or determines what is being built on the land that we are providing? Is it to help with the housing or lack of, or is it to help offload severance, which has been in the pipeline since 2005?

A: OPA131 is proposing to put a residential designation in place, and the residential designation permits residential uses. There will need to be zoning put in place to allow for multiple uses. If a property is large enough for a subdivision, it would need to go through a rezoning and development approval, that would be when more detailed zoning standards would be put in place for the property looking at things like lot size and coverage. Servicing is private in Puslinch. There will still be larger lots, but the number of residential units within a dwelling would be governed by the zoning. That is a Township responsibility. There are notification requirements for that as well. Either the Township would lead a process to put new zoning in place, or it will happen on a site-specific basis when development applications come forward.

Q: How does the County handle the encroachment of Guelph versus the addition of 250 housing units, and how does it relate to water use?

A: We have been reviewing issues around water with our risk management official here at the County, who will be providing comments and speaking to the extent of housing. The amount of water usage in Guelph is clearly considerably more than what we would expect from 250 households. We expect this housing to develop over the years. We will also need to submit technical information and water-related information with their development applications as they bring them forward.

Aberfoyle Expansions

Q: Do you have background reports that were used to delineate the line between the residential and Greenland lines in the Aberfoyle expansion area?

A: Yes, there is a Natural Heritage System study that was completed by the County. The Grand River Conservation Authority did the bulk of the work and coordinated with all our conservation authorities. The study itself is not there, but there is a link to the mapping prepared through the study. The link can be accessed [here \(https://www.wellington.ca/business-development/planning-development/major-projects/wellington-county-natural-heritage-system\)](https://www.wellington.ca/business-development/planning-development/major-projects/wellington-county-natural-heritage-system)

Q: Can you expand on the reasons for expanding the boundary of Aberfoyle?

A: The idea for the expansion originated from the Puslinch Council a few years ago. This was brought forward by Puslinch Council, and then subsequently council set the study area boundary that they wanted us to look at. One of the objectives in provincial policies and also in the County Official Plan is that we have a hierarchy for allocating or distributing growth. Existing settlement areas are meant to be given higher priority because they already have some of the building blocks for complete communities. That is where services are concentrated and where there might be a mix of uses. That is one of the reasons we would look to direct more growth to an area like Aberfoyle in Puslinch, because that is the largest urban centre that they have.

Employment and Industrial Lands

Q: Will there be properly serviced industrial lots South of Highway 401 and in the Puslinch area? If yes, when will they be ready? This is specific to water and wastewater.

A: I'm not sure what proper service refers to; perhaps that could be clarified, but if it refers to municipal servicing, municipal servicing is not available in Puslinch. Water and wastewater would be privately provided; there is no municipal water or wastewater servicing in Puslinch.

Q: Has anything changed with the OPA from what was proposed in the Puslinch by design with regards to the additional language further protecting Side Road 20 N?

A: We have not changed the Official Plan Amendment since the draft that was published. There have not been any changes. There very well could be changes to the Official Plan Amendment between now and when we bring forward the final draft, but we would make sure to clearly report what those changes are and why we make them.

Q: How long does the province normally take to approve a county's proposal, and is there a fixed timeline for provincial approval of the OPA and its adoption?

A: In my experience of us having four previous Official Plan Amendments, it has taken between a year and two years, maybe a little bit less than a year. We really don't know, it's up to the province. You are welcome to ask the province at the appropriate time once it has been referred to them for a decision.

Q: Will there be any changes regarding the property zoning at Wellington Road 34 and Brock Road in Aberfoyle?

A: There will be no changes to the Core Greenland designations proposed for this property under OPA 131.

Presentation, Public Engagement and Accessibility

Q: Will the slides be made available following the presentation

A: The presentation slides are available on the project website at www.wellington.ca/planwell.

Q: Will the in-person Public Meeting have different information, or only if asked by the public? Is it the same presentation for the in-person session? Will the Questions and Answers from tonight be in a written format before February 19?

A: Yes, it will essentially be the same. We might just add a bit of commentary about what happened tonight, but the slides are almost identical. The Question and Answer of today will not be published before February 19. We want to make sure people have time to submit comments after hearing the information today, and then they have until the 19th to be able to provide comments.

Q: For those of us with mobility issues, will this type of accessibility and accommodation be available for us on February 12th to be able to attend?

A: If you would like to send more details or connect with the team about specific accessibility needs that you are looking for, that would be great. I can confirm that the public meeting next Thursday will be in person. It is not a virtual Question-and-Answer like we are doing right now. It is at our office in Guelph. We do take written comments as well, and written comments are every bit as important as hearing from people verbally. If there's any concern about parking, our County clerk is available to speak with anyone who might need some accommodation.

Q: What kind of comments could influence those decisions, given that a professional planner develops them? Is it worthwhile for us to comment that we support this solution, given that it was transparent throughout the process? I'm concerned that one-off comments can influence. How much influence could a single comment have on the final decision that part of the OPA?

A: I cannot answer that right now because we still need to complete our detailed review and prepare the recommendation report. I do not know what changes may or may not occur, but I need to be clear that changes are possible. I do not mean to cause concern, but in fairness, everyone should be aware of that.

Additional Comments and Questions Received

Following the public open house, participants were invited to ask questions and share comments regarding OPA 131 from February 5, 2026, until February 19, 2026. All written comments received following the public open house will be included in the County's final recommendation report on OPA 131 with responses where appropriate.

Next Steps

Susan Hall of LURA Consulting provided participants with the project team's contact information for any additional feedback and wrapped up the meeting. Participants can provide additional feedback and comments until February 19, 2026, and are invited to attend the public meeting on February 12, 2026, at the County Administration Centre. Members of the public can contact the project team by email or by phone at:

Contact: Sarah Wilhelm, Manager Policy Planning
519-837-2600 ex 2130, planwell@wellington.ca

Jameson Pickard, Senior Policy Planner
519 837 2600 ex 2300, planwell@wellington.ca

Mailing Address: ATTN Planning & Development Department
74 Woolwich Street, Guelph, ON, N1H 3T9

Appendix E

OPA 131 Public Meeting Minutes



Corporation of the County of Wellington

Planning Committee

Official Plan Amendment No. 131 Rural Growth and Policy Updates Minutes

February 12, 2026
Council Chambers

Present: Warden Chris White
Councillor James Seeley (Chair)
Councillor Gregg Davidson
Councillor Michael Dehn
Councillor Shawn Watters

Also Present: Councillor Jeff Duncan
Councillor Matthew Bulmer
Councillor Campbell Cork

Staff: Kim Courts, Deputy Clerk
Allie Gorman, Junior Planner
Thomas Freeman, Planner
Carli Rietkerk, Planning Administration Clerk
Troy Van Buskirk, Planning Technician
Jameson Pickard, Senior Policy Planner
Sarah Wilhelm, Manager of Policy Planning
Aldo Salis, Director, Planning and Development
Scott Wilson, CAO

Members of the Public: There were 39 members of the public in attendance who signed the sign-in sheet for the meeting. Staff have recorded their names in the project file as part of the public record.

1. Call to Order

Chair Seeley welcomed everyone and called the meeting to order at 11:00 am.

2. Opening of Meeting - Chair Seeley

Chair Seeley declared that this public meeting is related to Official Plan Amendment 131 which is a public meeting to deal with updating the County Official Plan as required under Section 26 of the Planning Act.

This public meeting is being hosted by the County Planning Committee on behalf of County Council.

The Chair reminded members of the public in attendance to sign the attendance sheet.

3. Declaration of Pecuniary Interest

There were no declarations of pecuniary interest.

4. OPA 131**4.1 Purpose of Meeting - Chair Seeley**

Chair Seeley announced that the purpose of the meeting is to present information and receive public input regarding proposed amendment 131 to the County of Wellington Official Plan as part of the County's Official Plan Review.

4.2 Statement Read - Chair Seeley

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

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

Official Plan Amendment 131 requires approval from the Minister of Municipal Affairs and Housing. Pursuant to Section 17(36.5) of the Planning Act there is no appeal in respect of a decision of the approval authority if the approval authority is the Minister.

4.3 OPA 131 Staff Presentation

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

1. Official Plan Review Context
2. Overview of OPA 131
 - County-wide Changes
 - Rural Residential Growth Re-allocation (120 units from Erin to Puslinch)
 - Puslinch Rural Residential Growth
 - Puslinch Rural Employment Growth
3. Consultation to Date
4. Next Steps

The full presentation is attached to the meeting agenda and is available on the Official Plan Review webpage.

4.4 Public Input - Chair Seeley

Chair Seeley invited those who wish to speak to address the Committee and note that all comments and questions should be put to the Chair. Speakers should give their name and address for the record. Personal opinions and comments made by the public attending this meeting may be collected and recorded in the meeting minutes.

As per the County's Procedural By-law, there is a 10-minute maximum for all oral delegations.

Dave Aston of MHBC spoke on behalf of Puslinch Development GP Inc. regarding 4631 Sideroad 20 N in Puslinch. Mr. Aston distributed written comments (attached) to Committee members and provided a summary of his client's property, the proposed employment use and their engagement in the Puslinch by Design Study. He explained that the area is surrounded with employment areas in Puslinch and Guelph and that his clients' site represents a logical extension of the existing employment uses in the area. Mr. Aston highlighted that the recommended site (area D) south of the 401 has constraints and represents a leap frogging of the 401 to establish a new employment area. His clients have been preparing applications in consultation with the Township and have owners that are investment ready. Mr. Aston asks that County Council consider the Prestige Employment Area designation on his client's property.

Andreas Presch, a Township of Puslinch resident, asked various questions regarding future development on the lands proposed to be added to the Aberfoyle Urban centre. Questions related to the timing of development, the

type of development to be expected, grading, drainage, flooding, impacts to water supply, future road widenings and traffic impacts.

Chair Seeley advised that the timing of development is unknown but could be 2-5 years following provincial approval. It was noted that development is expected to be single detached homes and that technical evaluations submitted in support of development proposals would review areas of concern raised. Chair Seeley noted that road widenings would be considered through the development review process. Planning Staff noted that future development lands will need to be rezoned. Details related to the type of housing and other details will be determined through the rezoning process which requires public engagement.

Claudio Balbinot of Agora Research Group Inc., spoke on behalf of his clients at 7547 Hammersley Road, Puslinch. Mr. Balbinot raised concerns regarding the delineation of the Greenland and Residential designations on his client's property as proposed through OPA 131. Mr. Balbinot highlighted that there are several clusters of plantations on his client's property and that these areas are not typically considered natural features. He requested that revisions be made to the mapping related to the plantation clusters on his client's property. Mr. Balbinot advised that he will be following up with written comments and detailed mapping related to his request.

Dr. Wevers, a Town of Erin resident, provided a presentation (attached) and raised various concerns about the proposed changes to the severance policies through OPA 131. Dr. Wevers commented that OPA 131 is discriminatory and that there are no restrictive dates elsewhere in the Province for lot creation. Dr. Wevers noted that lot severances would create tax revenues that Erin desperately needs and that Planners have kept the status quo for 20 years despite section 10.4.4 being intended to be updated every 5 years. Dr. Wevers noted that the Town and County both have planning staff creating duplications and roadblocks that prevent Erin landowners from building homes, and that false and misleading information has been provided about the proposed policy changes. Dr. Wevers requests that section 10.4.4 be updated to allow the residents of Erin to build rural homes that benefit local businesses and farm families. She asks that the County consider innovative rural planning that allows smaller rural farms that can help with affordability and succession planning. Dr. Wevers asks that we don't give Erin's multi-generational wealth to Puslinch and update section 10.4.4 to allow new severances in Erin. Dr. Wevers also raised concerns with the Town of Erin's process related to OPA 131.

Dr. Wevers noted that slide #57 indicates that OPA 131 may be further revised. She inquired how she could be part of this process. Chair Seeley advised that Planning Staff will review all comments and feedback received and provide a recommendation to Planning Committee on how to proceed.

Dr. Wevers inquired further about the approval process. Chair Seeley advised that the amendment would go to the Planning Committee and then to County Council for consideration.

Dr. Wevers requested clarification about being able to delegate, noting problems with past requests to delegate to Council. Chair Seeley advised that the County Clerk would follow up to clarify the delegation requirements. Chair Seeley noted that the Province can make further changes to the amendment once adopted by County Council.

Following the meeting on February 18, 2026, Dr. Wevers provided additional information via email supporting her public meeting comments (attached).

Ed McKelvey, a Town of Erin resident, raised various concerns about the proposed changes to severance policies through OPA 131. Mr. McKelvey noted he obtained a severance in 2005, and that the severance process was not an easy process. He followed up with County Planning Staff to discuss another severance for his daughter and was advised that he was not eligible, but there could be changes in the future. At the time he was directed to speak with Town Planning Staff. Town Planning Staff advised that they do not deal with severances. Mr. McKelvey was puzzled by the changes to the severance policies in the Town and thought they were unfair and discriminatory.

Chair Seeley advised that County Planning Staff is responding to direction from Town of Erin Council to address the 120-unit shortfall through additional residential units.

Tom Carroll, a Town of Erin resident, raised various concerns about the proposed changes to severance policies through OPA 131. Mr. Carroll stated that if OPA 131 is approved, Erin will lose millions of dollars from development revenues, and that the Town has current revenue challenges. Mr. Carroll noted that he is angry and has the right to be angry when his property rights are being trampled. He and others presented at Erin Council to provide feedback on the proposed changes and were ignored. Mr. Carroll noted that the Town CAO suggested a further review of impacts would be necessary. This is a bureaucratic delay, which may never happen and cost the Town. Mr. Carroll noted that we need to question information from staff equally as information from outside and that aspersions have been cast on their opinions. Mr. Carroll noted that Town Council is failing its duty and an attempt to ban lot severances is radical and precedent setting. The community can benefit from the additional lots and farmers are the majority and should be treated fairly. Mr. Carroll was blindsided by the changes and no politician or bureaucrat advised them of these changes. He requests that OPA 131 be revised to give Erin back its 120 units.

Following the meeting on February 18, 2026, Mr. Carroll provided his public meeting statements via email (attached).

Donna Christie, a Township of Puslinch resident, spoke on behalf of the citizens group “Help Protect Puslinch” which represents 300 Puslinch residents. Mrs. Christie noted that the group is not anti-growth or business, but pro-planning and supported the transparent Puslinch by Design Process that was done in consultation with the community. Mrs. Christie noted that Area D was identified as the most suitable area, and Council added areas G and H. Adding other less suitable lands would put strain on community infrastructure. She noted that Official Plans are not suggestions, they are legal documents. When exceptions are made, they undermine credibility in the process. Mrs. Christie noted that their group has retained legal counsel to help them ensure Official Plan policies are implemented.

Frank Dyon, a Town of Erin resident, raised various concerns about changes to severance policies through OPA 131. Mr. Dyon noted that we are living in unprecedented times and was surprised by Erin leaderships decision and felt it was short sighted planning. He is currently cash cropping his land but wants to diversify away from cash cropping. A severance would help achieve this and allow his son to live nearby and help on the farm. Mr. Dyon noted that we need flexibility in planning and this planning discriminates and abandons responsibility.

Brad Lavery, a Town of Erin resident, raised various concerns about the proposed changes to severance policies through OPA 131. Mr. Lavery noted that severances provide support for families and that he feels unsupported by the Town Council. OPA 131 closes the door to families. A severance is the difference between people surviving or not. Mr. Lavery noted that additional residential units are not as flexible as severances and is asking Wellington County to maintain flexibility and balance. He notes that his son has been working in the agricultural industry and needs access to resources to build his own agricultural future. Severances help agricultural businesses and families survive. Mr. Lavery asks Council to consider the young farmers and struggling families when making decisions.

Following the meeting on February 18, 2026, Mr. Lavery provided his public meeting statements via email (attached).

Autar Kambo, a property owner in the Township of Puslinch, asked specific questions about restrictions applicable to his property in Puslinch.

Chair Seeley directed Mr. Kambo to connect with County CAO as an initial point of contact, who could further direct Mr. Kambo to the appropriate County Staff.

Bob Santos, spoke on behalf of his brother Bill Santos, who was unable to attend the meeting. Mr. Santos's comments noted that his family owns land in the Town of Erin and that these lands will be passed down to him and his brother. He wants to responsibly subdivide the land so that the family can stay on the land and support his aging mother and kids. Mr. Santos noted that planning decisions are required to be consistent with the Provincial Planning Statement. Provincial policy supports a range and mix of housing options, rural communities and protection of prime agricultural areas. Small family severances are different than large developments. Severances align with Provincial housing objectives. Mr. Santos recognized that these are difficult decisions and wants to ensure planning decisions are clearly documented. He asks Council to consider the human impact of these decisions. This is about a family and supporting family.

Following the meeting on February 18, 2026, Mr. Santos provided his public meeting statements via email (attached).

Christian Santos is not a current resident of the County but grew up on his family's property in Erin. Mr. Santos noted that he must travel long distances to visit and help his grandmother maintain her property. Affordability and access make it challenging for young people to live in the community and be able to come back to Erin. Multi-generational living is stabilizing. Mr. Santos commented that this decision will determine if their family can stay in the community and notes that this is a possibility for future generations to come home.

Following the meeting on February 18, 2026, Mr. Santos provided his public meeting statements via email (attached).

Isabel Santos, a Town of Erin resident, provided an overview of how her family arrived in Ballinacree and their life on the property. She noted that it was hard for her to maintain the property and needed help. Mrs. Santos noted that her family must travel far distances to visit and that her sons have been trying to build homes on the property for a long time. She asks that we please help her live with her family.

Barclay Nap, spoke on behalf of the Wellington Federation of Agriculture (WFA). Mr. Nap highlighted the importance of agriculture in Ontario and the role Wellington County plays. Mr. Nap referenced a recent surplus farm dwelling severance that was before the Land Division Committee. WFA supports that surplus farm dwelling severances should only be permitted where the dwelling existed at the time that the property was purchased as part of a farm consolidation. WFA requests that a stipulation should be added to the official plan to require that the residence be constructed prior to January 1, 2000, to be considered for a surplus farm dwelling severance.

5. Closing of Meeting

Chair Seeley asked if there were any further questions or comments and seeing none, declared the Public meeting for OPA 131 adjourned at 1:40 pm, and the meeting closed.

James Seeley
Chair
Planning Committee



PLANWELL^{OM}

Wellington County
Official Plan Review

OPA 131 Rural Area Policies and Growth

Public Meeting
February 12, 2026



Purpose of Public Meeting

- Hosted by County Planning Committee to receive input from the public on Official Plan Amendment 131
- A virtual Open House hosted by Planning and Development Department was also held February 5, 2026
- Both meetings are required under Section 26 of Planning Act and the staff presentations are essentially the same

OPA 131

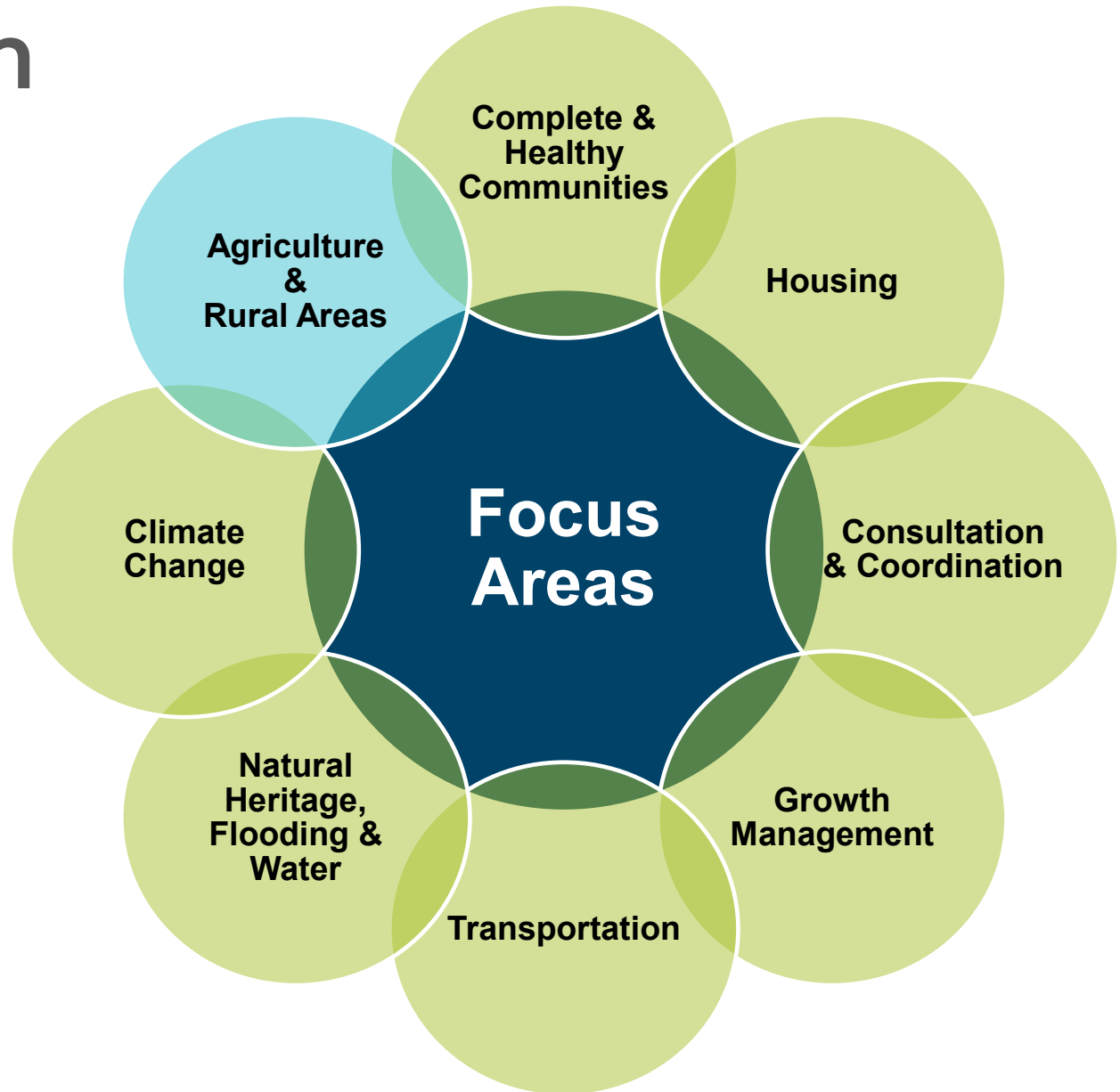
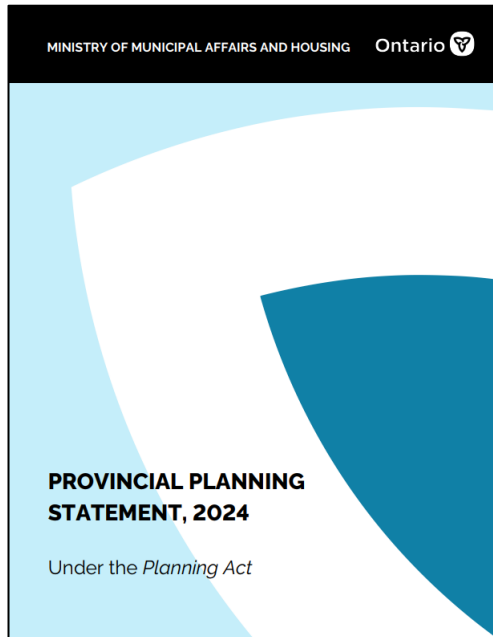
Official Plan

Review Context

Official Plan Review

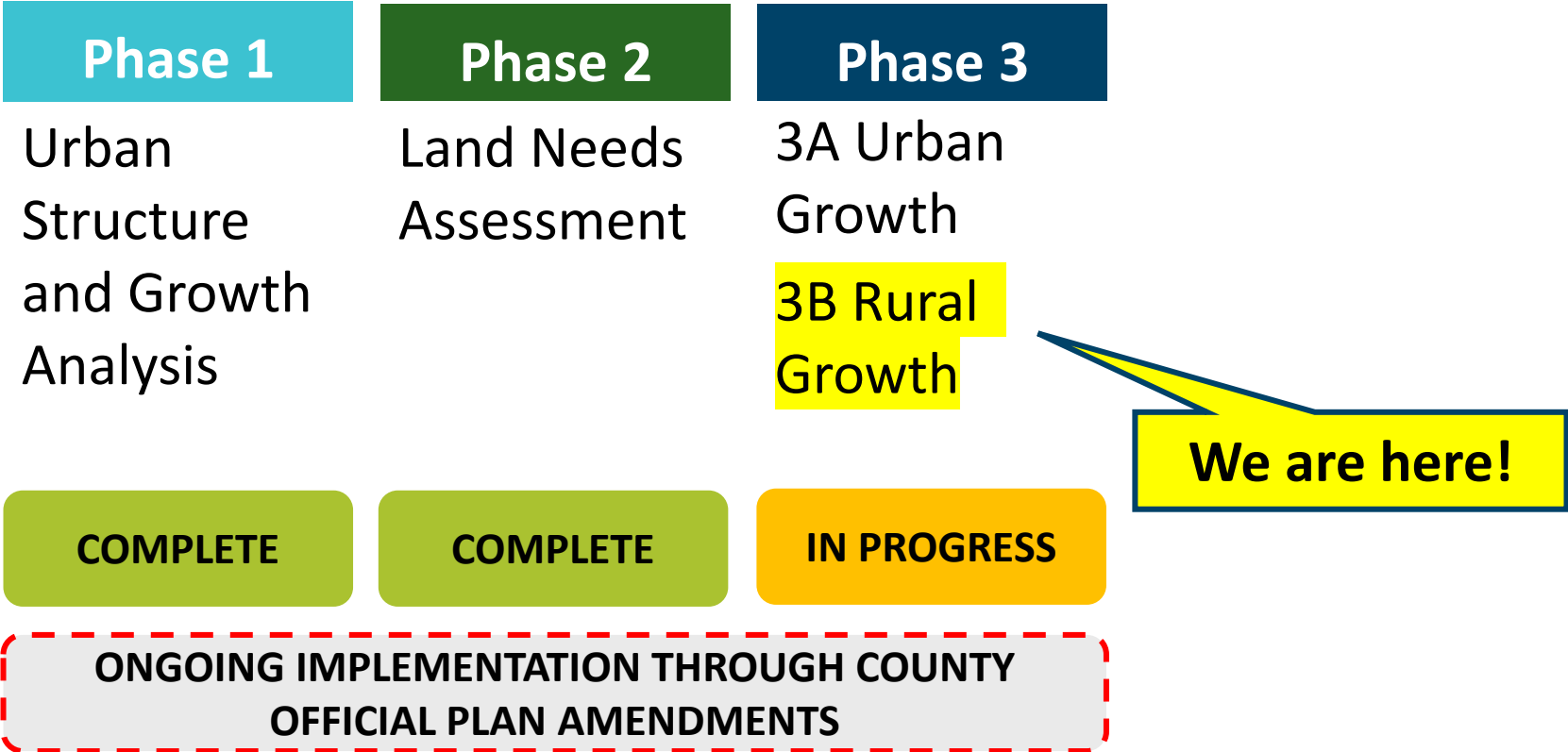


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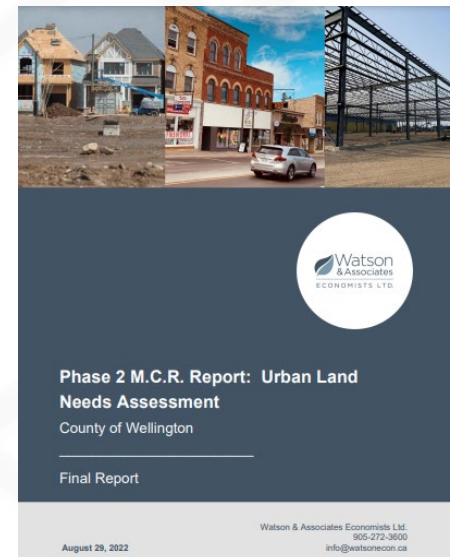
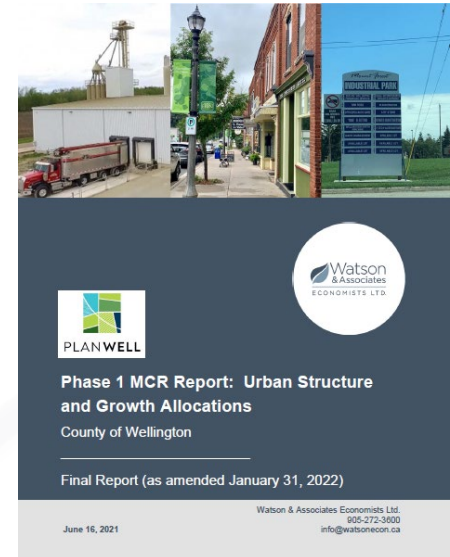
Three key phases of technical work to date:



Implementation

Technical work implemented through a series of Official Plan Amendments:

1. **OPA 119 (County Growth Structure)**
Approved
2. **OPA 120 (County Growth Forecast)**
Approved
3. **OPA 123 (Future Development Lands)**
Approved
4. **OPA 126 (Urban Boundary Expansions)**
Approved
5. **OPA 131 (Rural Area Policies and Growth)**
In Progress



OPA 131

Rural Growth and Policy Updates



Purpose of Amendment

- To align the rural area policies with the 2024 Provincial Planning Statement (PPS)
- Complete Rural Phase 3B of the Official Plan Review

Key Areas of Policy Change

- Targeted County-wide Provincial Planning Statement updates
- Erin rural residential growth re-allocation to Puslinch
- Puslinch rural residential growth
- Puslinch rural employment growth
- Other policy and mapping changes



Beyond the Scope of OPA 131

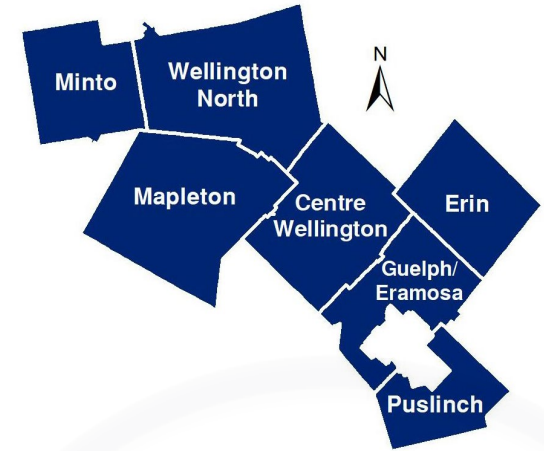
The following matters are **NOT** part of OPA 131:

- Site-specific Hamlet expansions
- Expansion of Morriston in Puslinch
- Redesignation of Prime Agricultural Area lands to other site-specific uses
- Redesignation of Secondary Agricultural Area lands to other site-specific uses (beyond those included in draft OPA 131)
- No Greenbelt Plan related changes

County-wide Changes

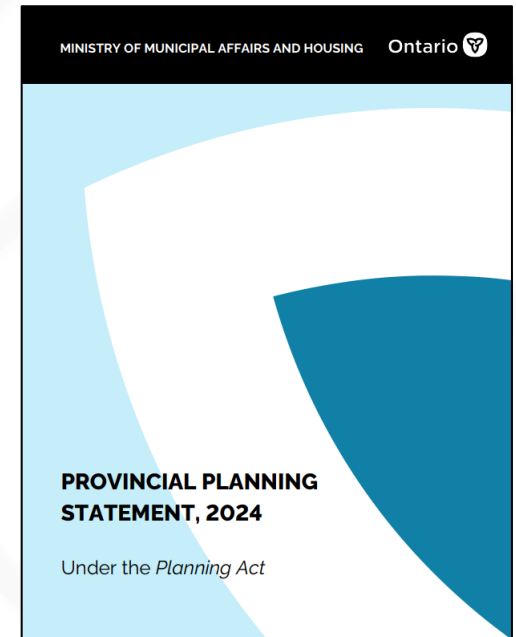


2024 Provincial Planning Statement (PPS)

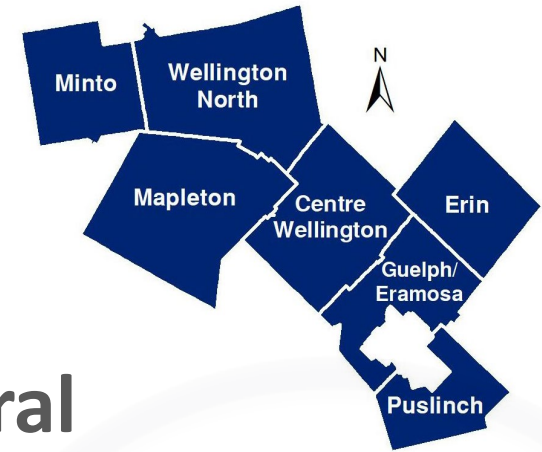


Focus of Changes:

- Align permitted uses in the Prime Agricultural Area with PPS
- Incorporate an Agricultural Systems approach to rural planning in the County
- Update Lot Creation policies in the Prime Agricultural Area
- Other changes to clarify and improve consistency with the PPS

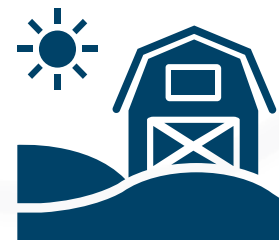
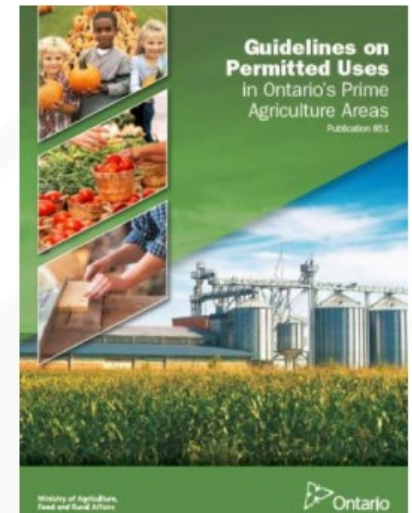


2024 Provincial Planning Statement (PPS)

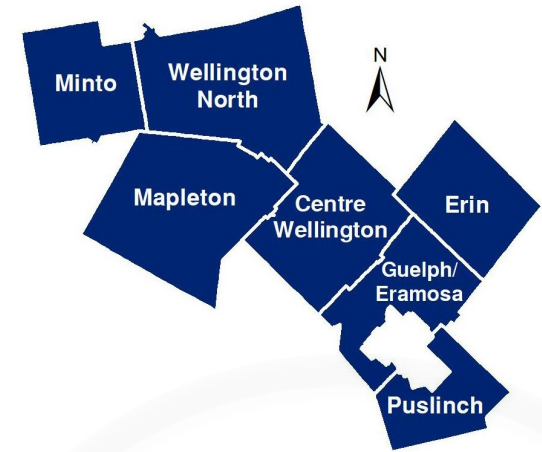


Permitted uses - Prime Agricultural Area

- Align permitted uses with the PPS and Provincial guidance
- Establish a new framework to support:
 - Agricultural-related uses
 - On-farm diversified uses

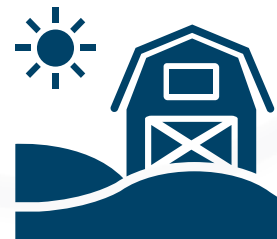


2024 Provincial Planning Statement (PPS)

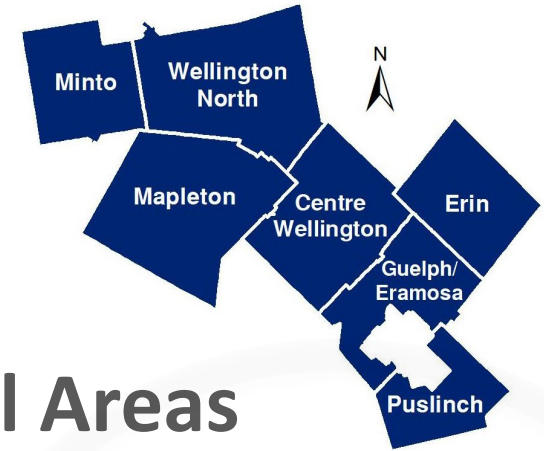


Agricultural System Approach

- Recognize an Agricultural System in Wellington County consisting of:
 - Agricultural land base (Prime and Secondary Agricultural Areas)
 - Agri-food network
- Establish policies to protect and support the Agricultural System

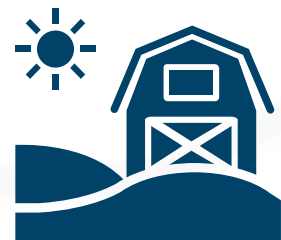


2024 Provincial Planning Statement (PPS)

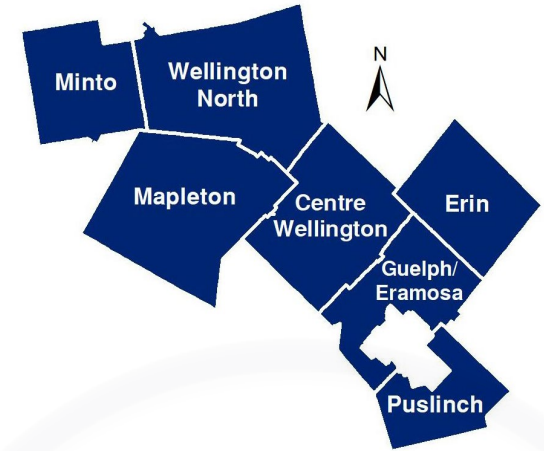


Lot Creation in Prime Agricultural Areas

- Remove consideration of smaller agricultural lots in Prime Agricultural Areas
- Strengthen Residence Surplus to a Farming Operation severance policies
- Permit lot creation for infrastructure in Prime Agricultural Areas



2024 Provincial Planning Statement (PPS)



Other PPS Changes

- Align the Rural System policies with the Rural Area policies of the PPS
- Update definitions related to agriculture
- Remove outdated policies related to the expansion of rural employment areas
- Clarify that County amendments to Schedule A are not required for employment removals where a local Official Plan Amendment has been approved

Rural Residential Growth Re-allocation



Where we are now...

Projected Household Growth in Erin and Puslinch from 2021 to 2051



Erin is projected to grow by 4,970 households
(4,340 urban and 630 rural)

Puslinch is projected
to grow by 710 rural
households

What OPA 131 proposes...

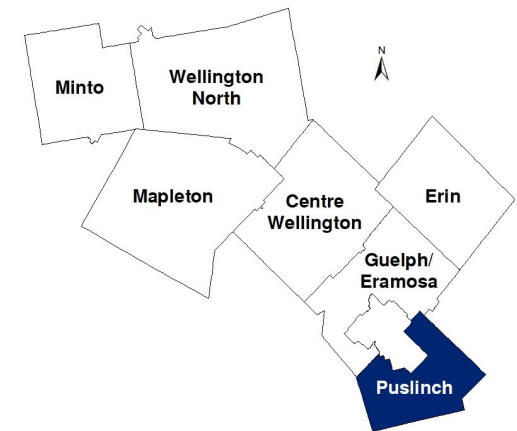
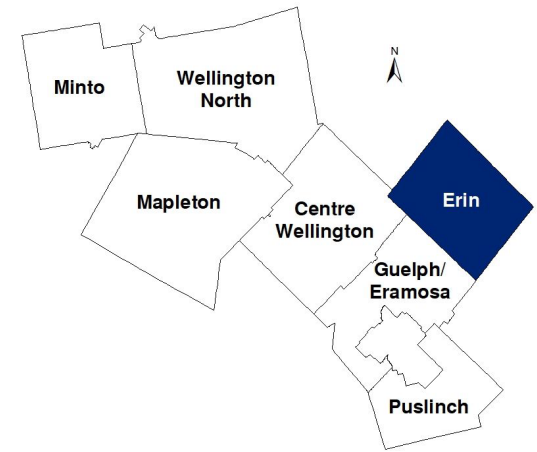
Changes to re-allocate a portion of the Town of Erin's projected rural growth to 2051 to the Township of Puslinch



300 people



120 households





How we got there...

Report #1 - 2024 Rural Residential Growth Analysis

When	What
September 2024	<ul style="list-style-type: none">• Reported to County Planning Committee and Council (PD2024-29)• Direction to consult with Puslinch, Erin and Wellington North (only municipalities with a shortfall)• Report distributed to all Member Municipalities• Report posted to project website• Notification through email distribution list
November 2024	<ul style="list-style-type: none">• Received municipal feedback from Puslinch Council
March 2025	<ul style="list-style-type: none">• Town of Erin Workshop with Policy Planning Presentation by County staff• Included content about rural residential growth and need for feedback from the Town about how to address the 120 household shortfall
April 2025	<ul style="list-style-type: none">• Received municipal feedback from Erin Council

Rural Residential Supply and Shortfall

Erin



460 Unit Supply Breakdown

- 112 units on vacant designated rural lands
- 70 existing vacant rural lots
- 278 potential new severances under current policies

Rural Residential Supply and Shortfall

Erin



- 120 additional units needed in Erin's rural area to meet 2051 household forecast
- Feedback from the Town about how to address the 120 household shortfall

Rural Residential Supply and Shortfall

Puslinch



350 Unit Supply Breakdown

- 73 units on vacant designated rural lands
- 73 existing vacant rural lots
- 204 potential new severances under current policies

Rural Residential Supply and Shortfall

Puslinch



- 250 additional units are needed in Puslinch's rural area to meet 2051 household forecast
- Feedback from the Township about how to address the 250 household shortfall

Municipal Feedback

Erin

April 10, 2025 Erin Council:

- Request to use Additional Residential Units (ARUs) to make up 120 unit shortfall
- Did not support Hamlet expansions or amending the severance policies for Secondary Agricultural Areas (e.g. change to severance date of March 1, 2005)

Puslinch

November 27, 2024 Puslinch Council:

Request to remove rural residential severance date of March 1, 2005 and replace it with a policy allowing one severance every 5 years subject to review every 5 years



How we got there...

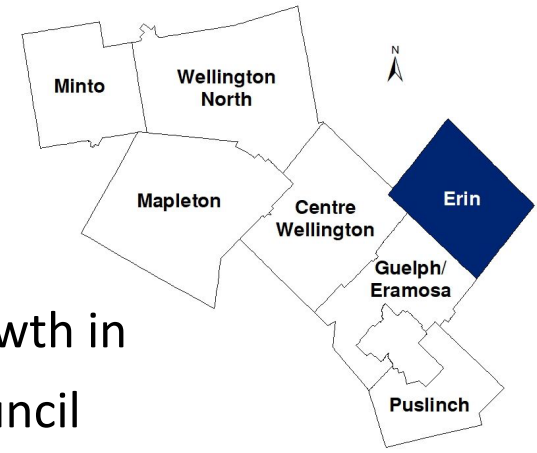
Report #2 - Phase 3B Rural Residential Growth

When	What
June 2025	<ul style="list-style-type: none">• Reported to County Planning Committee and Council (PD2025-20) about addressing shortfall of rural residential units in Erin and Puslinch• Staff directed to implement policy considerations in report as a Draft Official Plan Amendment• Report distributed to all Member Municipalities• Report posted to project website• Notification through email distribution list
June 18, 2025	<ul style="list-style-type: none">• County staff invited to attend and present to Puslinch Council
July 23, 2025	<ul style="list-style-type: none">• County staff invited to attend and present to Puslinch Council

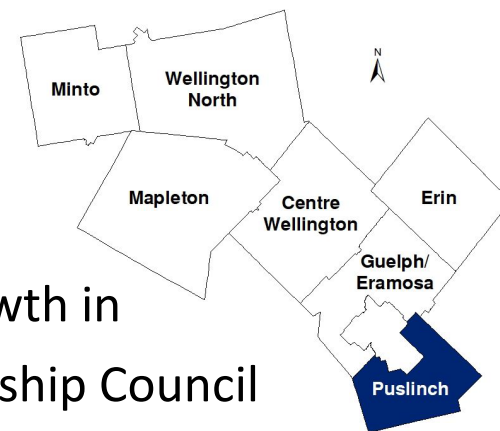
Options for Erin

Staff considered the following options for directing growth in Erin in accordance with applicable policy and Town Council input:

- Additional Residential Units (ARUs)
 - Erin Council preferred to have ARUs to make up 120 unit shortfall
 - Adjustment to forecasts to account for rural ARUs was not recommended by staff at this time
- The Province requires the County of Wellington to identify and allocate population and units to Member Municipalities and therefore:
 - Staff are recommending County Council to redirect surplus to Puslinch



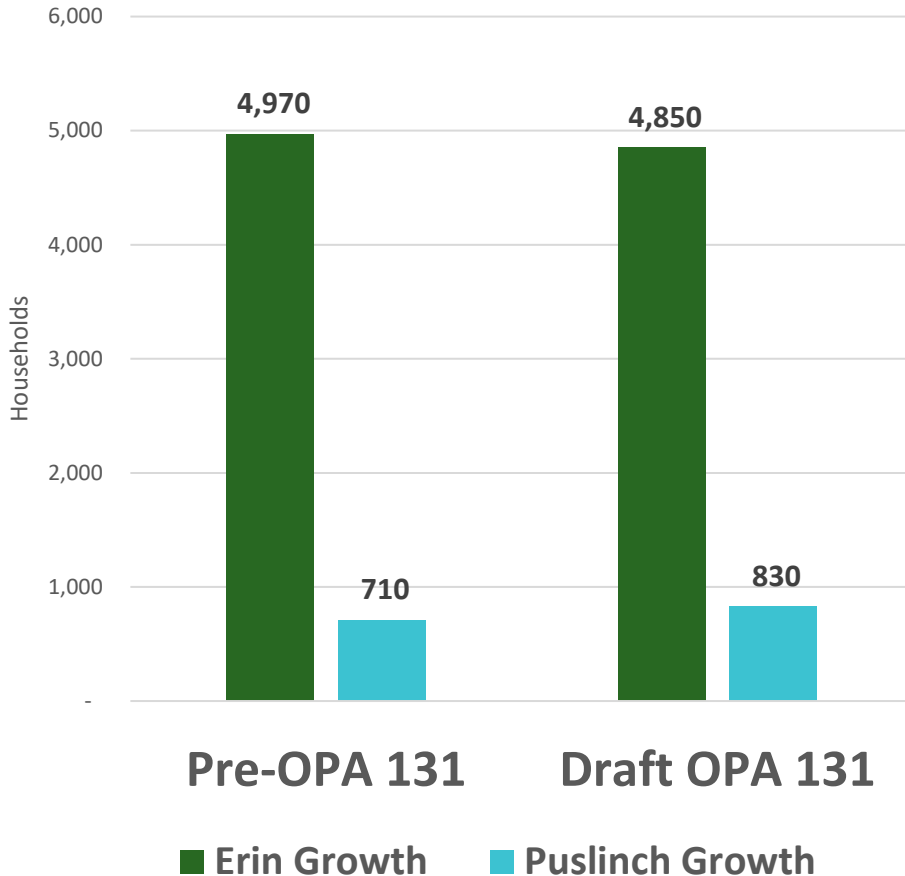
Options for Puslinch



Staff considered the following options for directing growth in Puslinch in accordance with applicable policy and Township Council input:

- That Puslinch assume 120 surplus units to address its rural growth in addition to its 250 unit shortfall
- Expand Aberfoyle by approx. 200 units
- Expand Arkell by approx. 50 units
- Severances :
 - One every 5 years (too many units)
 - Move date to March 1, 2015 (not enough units)
 - Move date to May 1, 2025 (generally in balance)

Draft OPA 131 Revised Rural Growth



Over a 30-year horizon
Draft OPA 131 projects:

- Erin to grow by 4,850 urban and rural households
- Puslinch to grow by 830 rural households

What this means for Severance Policies

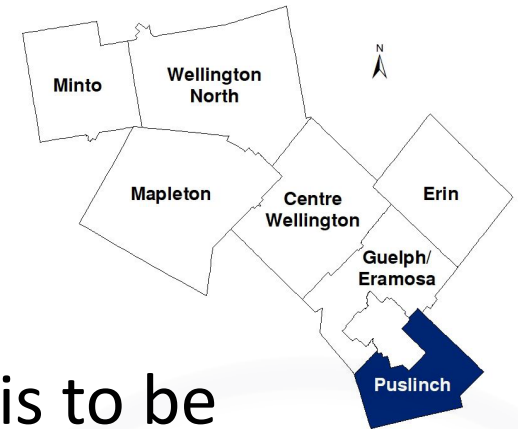
Draft OPA 131

- Modifies the severance cut-off date in Puslinch to May 1, 2025 for rural residential lot creation in Secondary Agricultural Area
- Maintains the March 1, 2005 date in Erin and Minto
- Removal of rural cluster policy 6.5.4 as necessary assessment has been completed

Puslinch Rural Residential Growth



Planning for Residential Growth in Puslinch

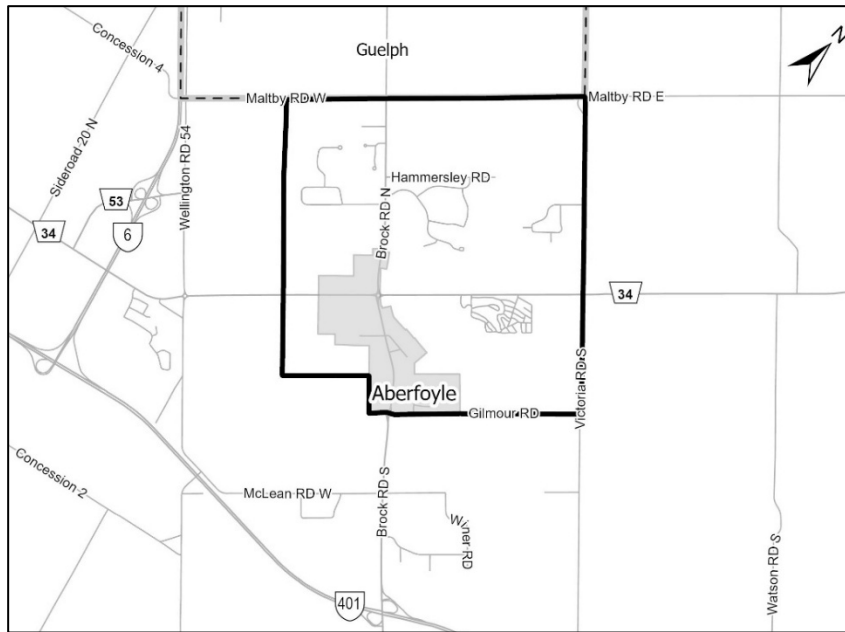


Residential growth shortfall in Puslinch is to be addressed in three areas:

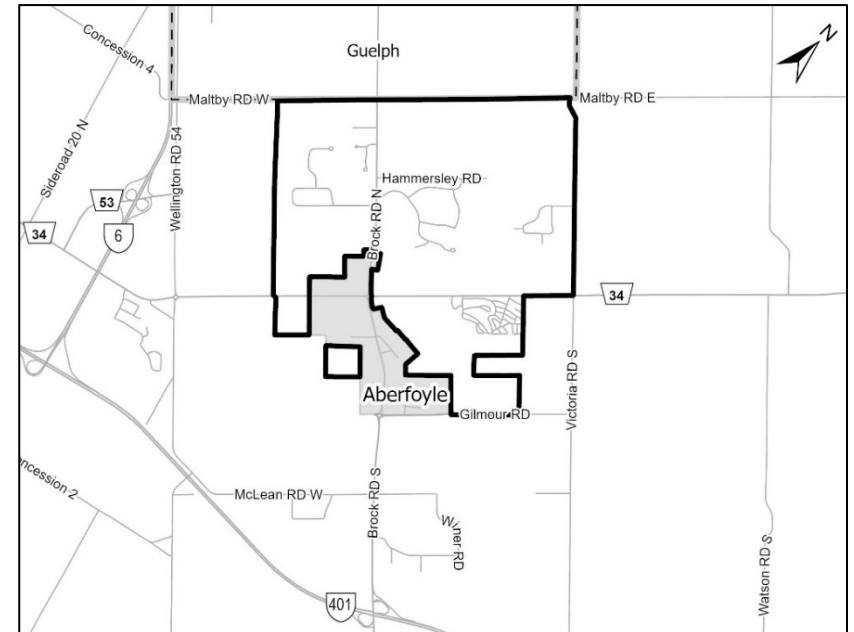
1. **Aberfoyle** expansion for approximately 200 more units
 - Location options and technical analysis was part of OPA 131
2. **Arkell** expansion for approximately 50 more units
 - Location options and technical analysis not part of OPA 131
 - Will need to be considered as part of a privately-initiated planning application(s)
3. **Secondary Agricultural Area** severances
 - Change in severance date to May 1, 2025 for approximately 160 more units

Aberfoyle Expansion

Study Area



Proposed Expansion Area



Aberfoyle Expansion













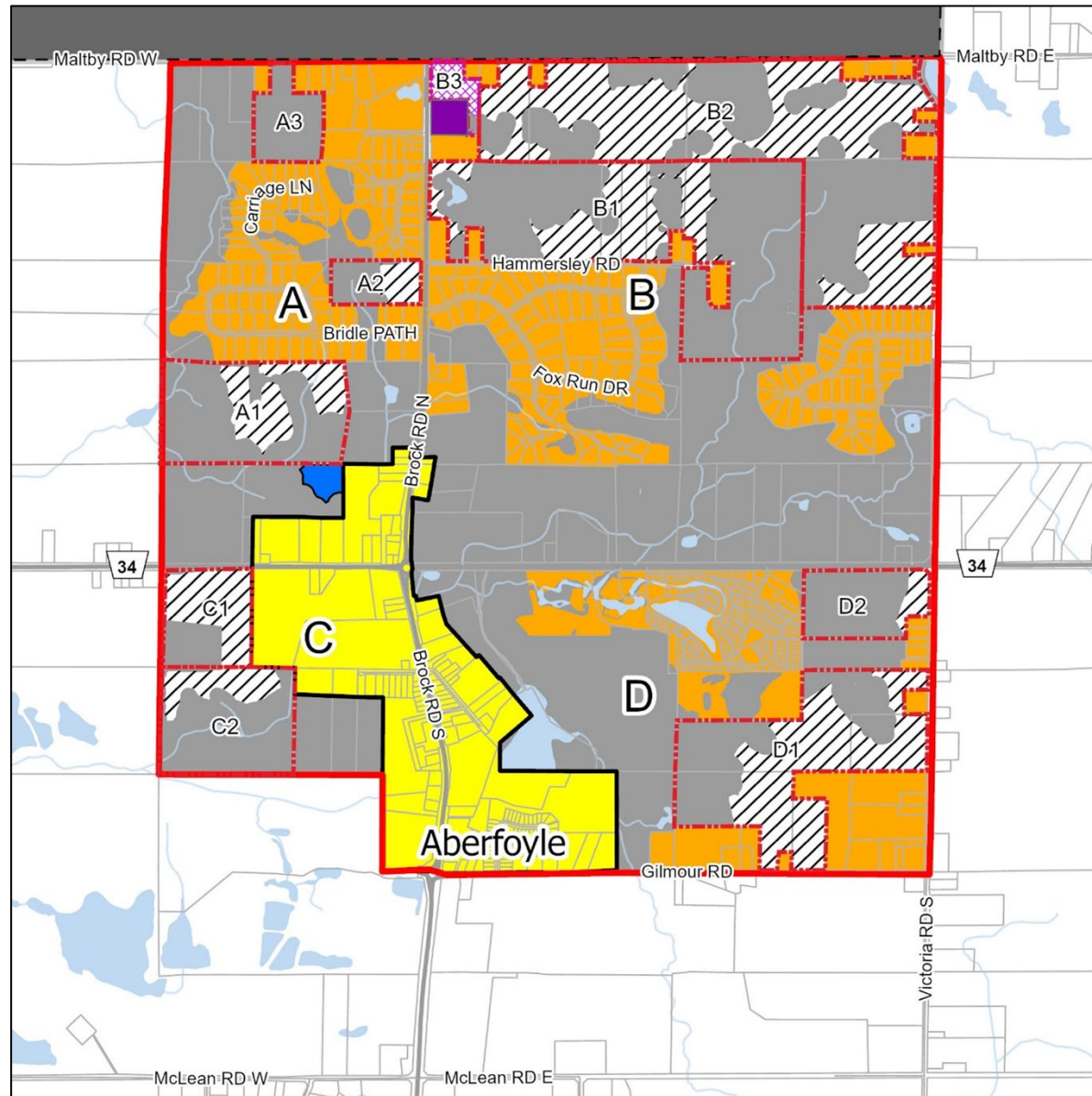
Basis for Draft OPA 131 Boundaries

- Provincial and County Official Plan policy tests for boundary expansion
- County-led Agricultural Impact Assessment with consultant support
- County-led Aggregate Impact Assessment
- County-led Planning Impact Assessment

Aberfoyle Expansion

Study Area Development Constraints











-  Aberfoyle Expansion Study Area
- A** Quadrants
-  Focus Areas
-  Current Aberfoyle Boundary
-  Potential Residential Areas
-  Potential Commercial Area
-  All Constraints
-  Existing Residential
-  Existing Commercial
-  County Owned Land
-  City of Guelph Boundary

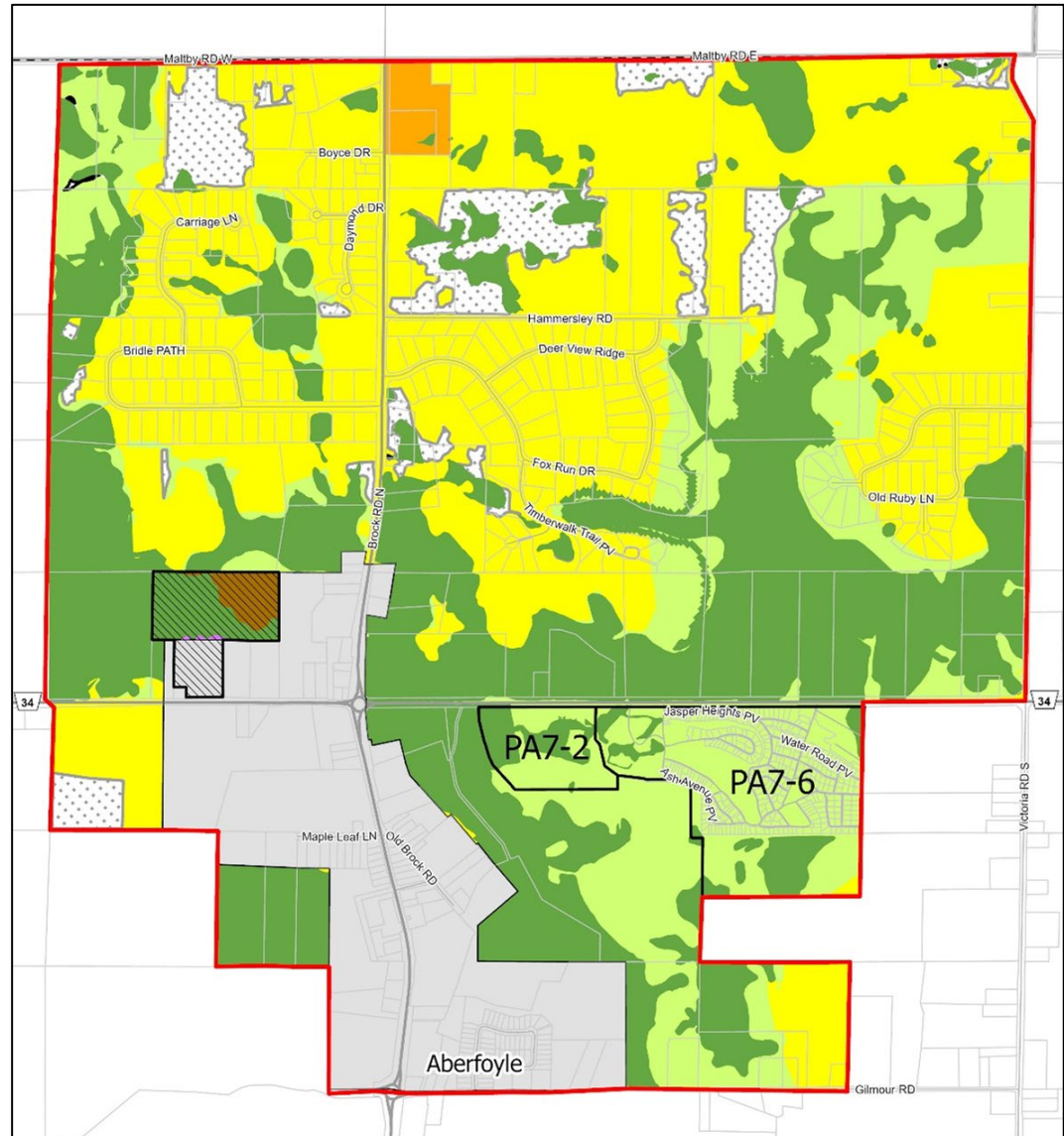


Aberfoyle Expansion

Draft OPA 131

- New Residential, Highway Commercial, Industrial, Core Greenlands and Greenlands
- Correction of PA7-2 (Mill Creek) and PA7-6 (Mini Lakes) limit

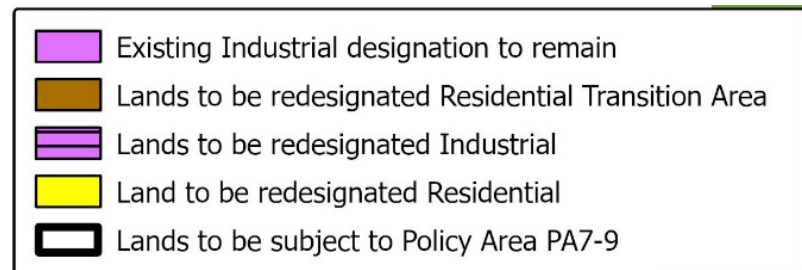
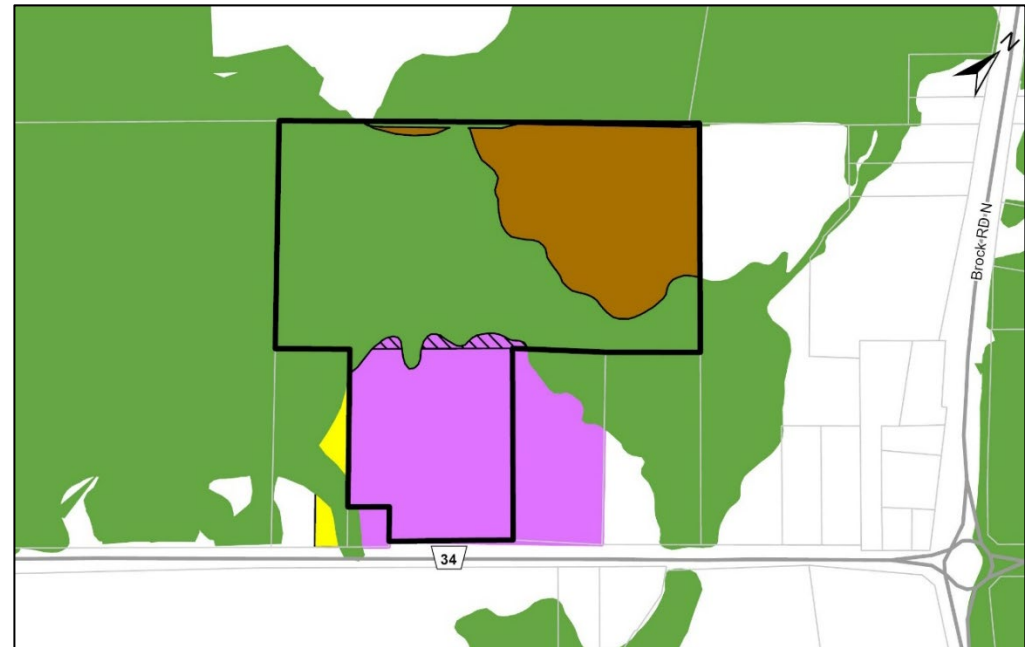
-  Expanded Aberfoyle Boundary
-  Lands to be redesignated Residential
-  Lands to be redesignated Highway Commercial
-  Lands to be redesignated Residential Transition Area
-  Lands to be redesignated Industrial
-  Lands to be redesignated Greenlands
-  Lands to be redesignated Core Greenlands
-  Core Greenlands and Greenlands to remain
-  Current Aberfoyle Boundary
-  Lands to be subject to Policy Area PA7-9



Other Changes

Draft OPA 131

- New Industrial and Residential Transition Area
- New PA7-9 County Aberfoyle Garage Policy Area to consider potential public uses at the back of the property
- Residential parcel correction

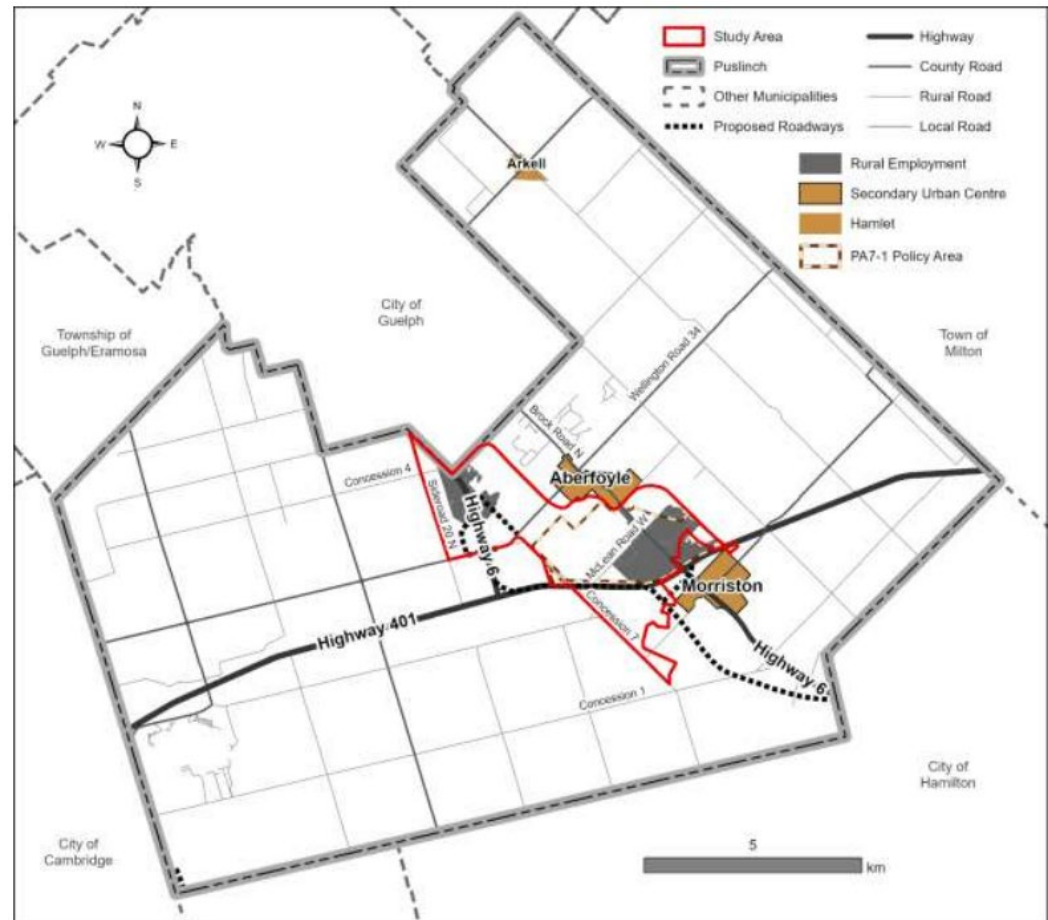


Puslinch Rural Employment Area Growth



Puslinch by Design Employment Land Study

- Township and County partnership
- Study to identify opportunities for employment lands in Puslinch
- 30+ ha need



Source: NPG Planning Solutions. Puslinch by Design – Employment Land Study. Detailed Planning Study Report, February 2025.

Puslinch by Design Employment Land Study

- Background Report
- Detailed Planning Study
- Land Options Report
- Recommended Land Option and Land Use Report
- Addendum Report

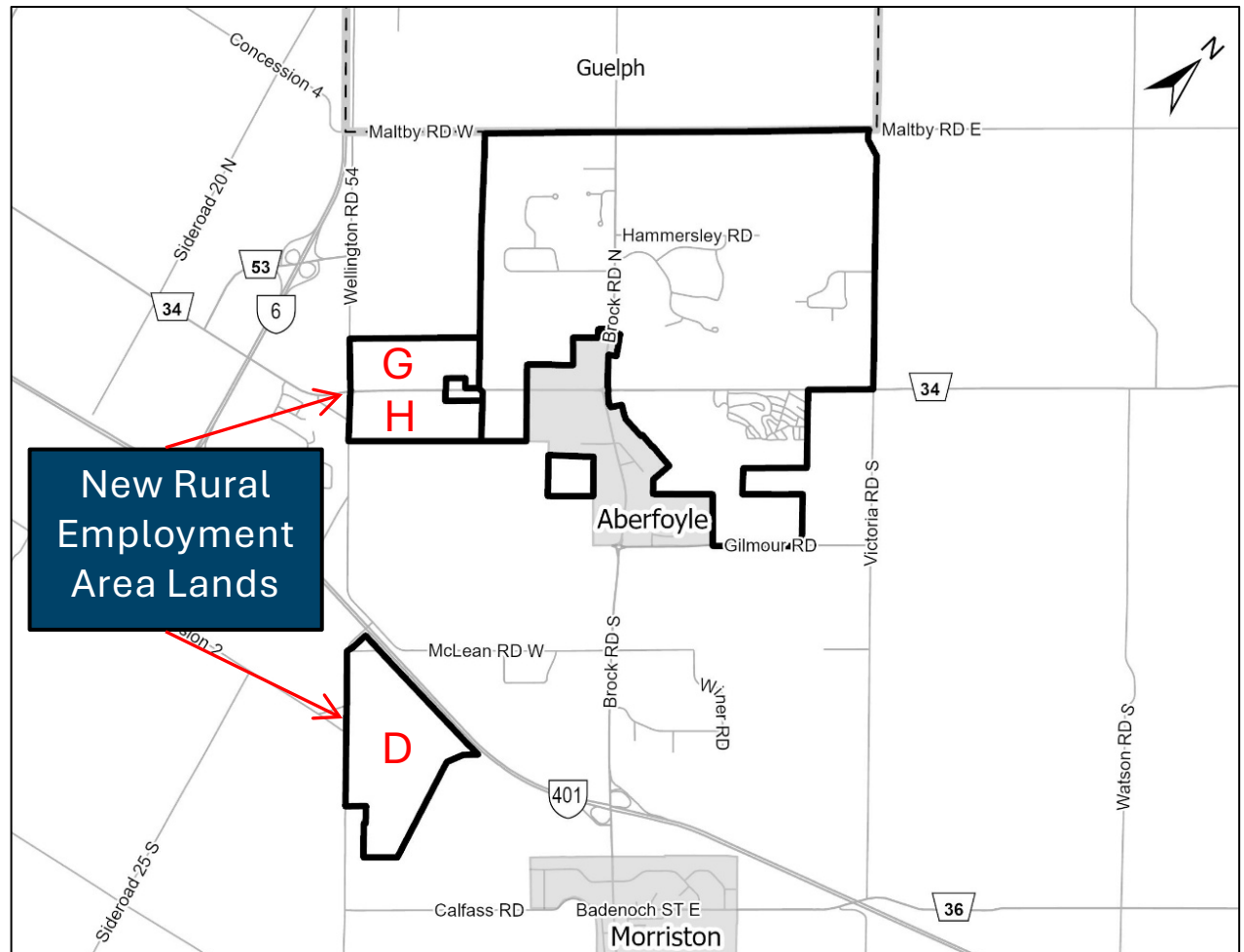


Construction
of Highway 6 interchange

Source: County of Wellington

Locations Recommended

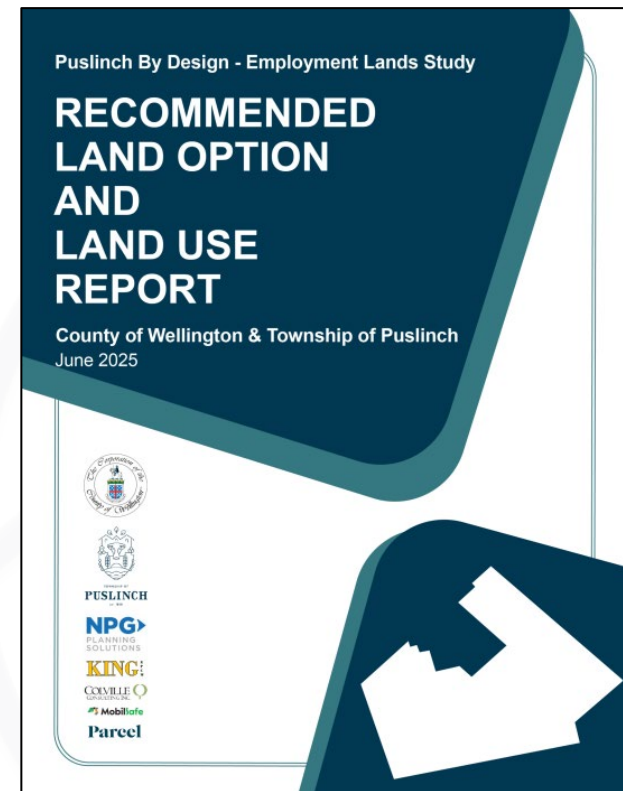
Area G and H provide additional development options if potential in Area D isn't fully realized



Implementation through OPA 131

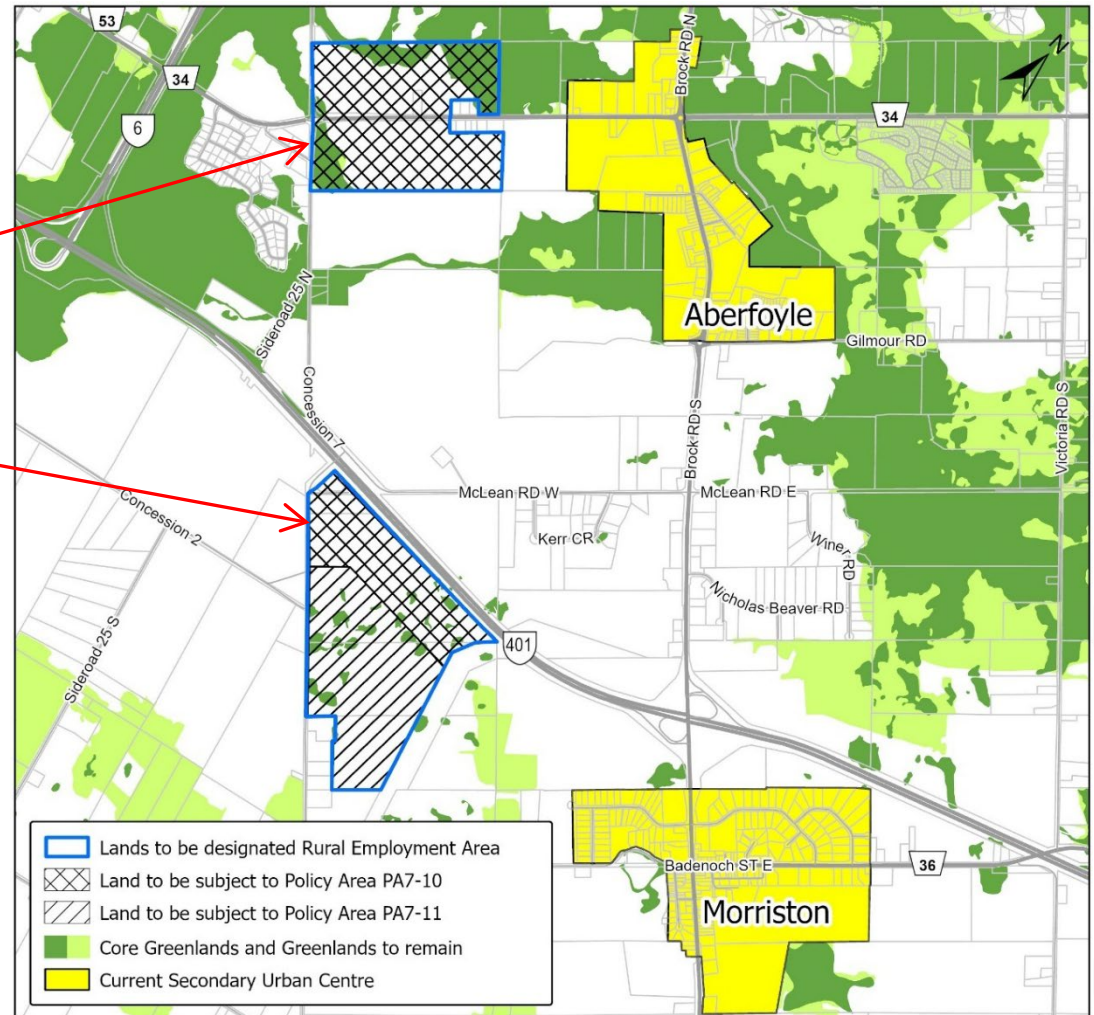
Draft OPA 131 implements
location and policy
recommendations:

1. New Rural Employment Areas
2. New policy area (PA7-10)
3. New policy area (PA7-11)
4. Modifications to 9.8.3 Puslinch
Industrial Policy



Implementation through OPA 131

- 1. Redesignation**
Change land use designation from Secondary Agricultural to Rural Employment Area



Lands to be designated Rural Employment Area

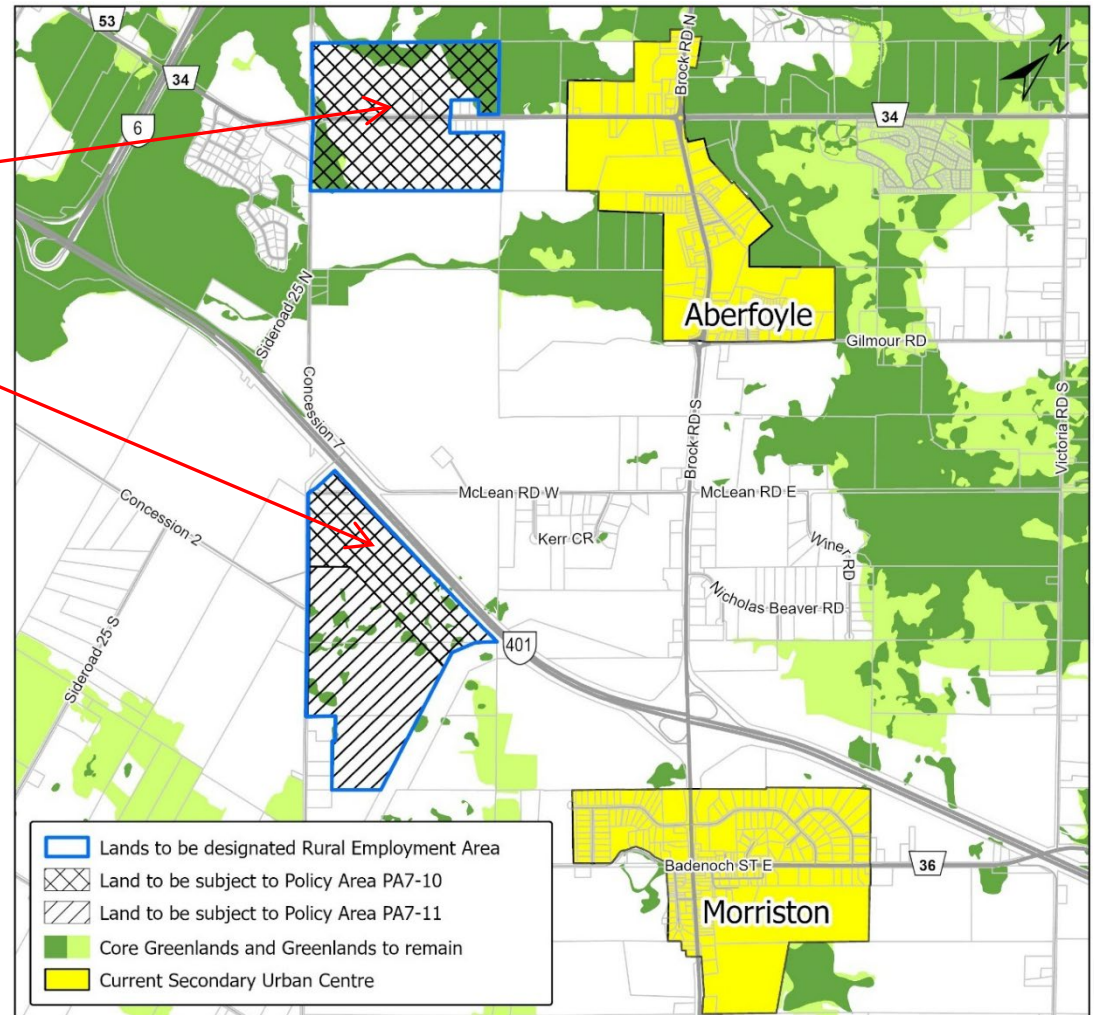
Implementation through OPA 131

2. PA7-10

Add new policy area for newly identified prestige rural employment areas

Intent of PA7-10 Prestige Rural Employment Areas

- Scoped uses
- Higher design standards
- Compatibility
- Buffering
- ...and more



 Land to be subject to Policy Area PA7-10

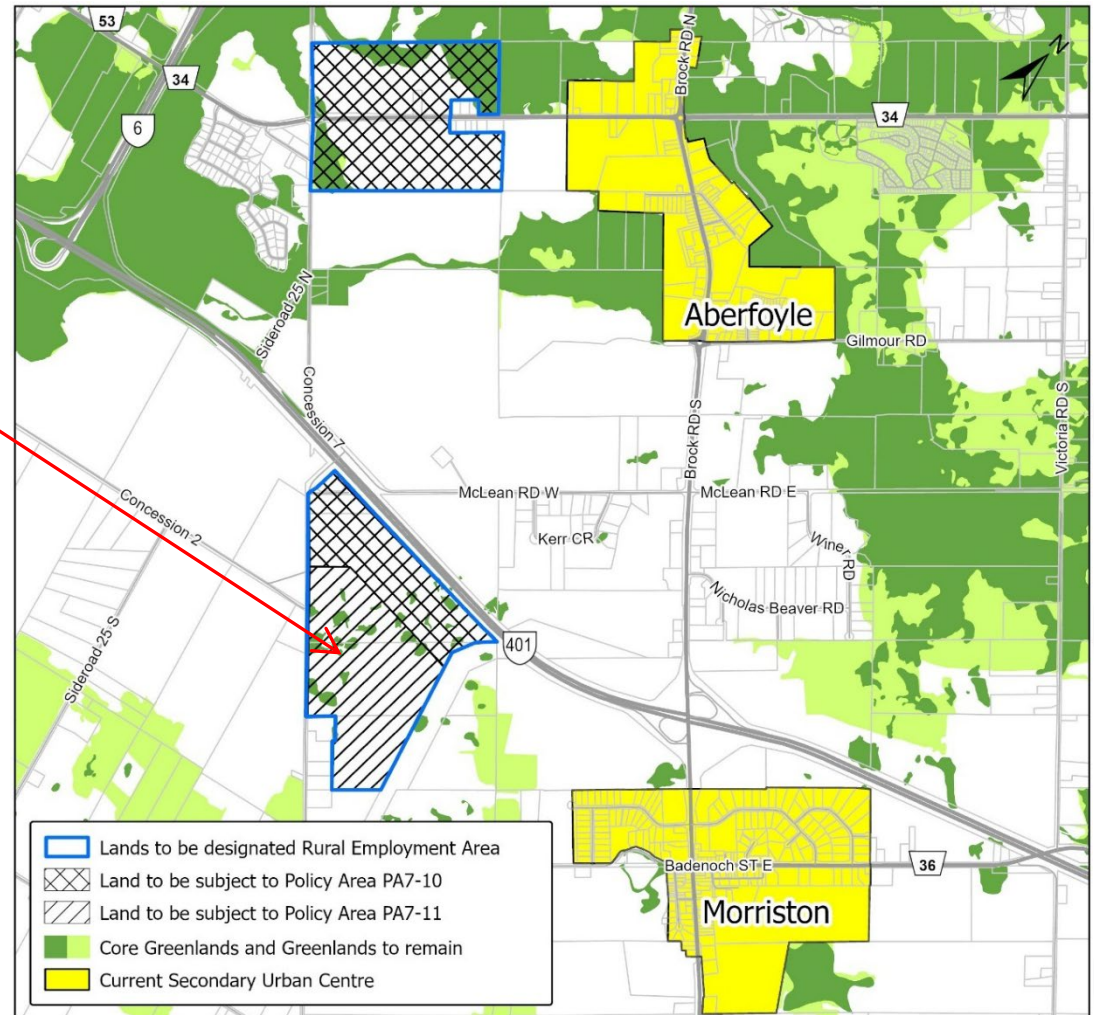
Implementation through OPA 131

3. PA7-11

Add new policy area for newly identified rural employment areas

Intent of PA7-11 Rural Employment Area

- Scoped uses, but less so than PA7-10 area
- Design standards
- Compatibility
- Buffering
- ...and more



 Land to be subject to Policy Area PA7-11

Implementation through OPA 131

4. **Revise Section 9.8.3 Puslinch Industrial Policy** to implement Puslinch by Design Study to address:
 - road infrastructure
 - transportation
 - concept plan
 - communal wells
 - land use compatibility

Applies to large parcels east and west of Highway 6 N (Hanlon Expressway) that are designated Rural Employment.

Consultation to Date

OPA 131



Circulation for Comment

Draft OPA 131 was circulated to:

- Ministry of Municipal Affairs and Housing for 90-day review
- Municipalities, Agencies and Indigenous Communities with a comment deadline of **November 12, 2025**

Other Consultation

- County has exceeded minimum requirements for public consultation for OPA 131
 - Email broadcast list of approximately 400 subscribers
 - Landowner notices January 2026 (after postal-strike)
 - Ongoing reporting through Planning Committee and County Council
 - Project webpage updates
- Comments have also been recorded through earlier phases of Official Plan Review

Member Municipality Comments

Erin Council

- Received delegations and considered County Draft OPA 131 Report and Town staff report on November 13, 2025
- Erin Council provided no comments or concerns to County

Member Municipality Comments

Erin Council

- Received delegations and considered County Draft OPA 131 Report and Town staff report on November 13, 2025
- Erin Council provided no comments or concerns to County

Puslinch Council

- Considered County Draft OPA 131 Report on October 8, 2025
- Endorsed OPA 131
- Requested that additional areas along Victoria Road S, Wellington Road 34 and Gilmour Road be added to Aberfoyle (Area D1 and D2)

Member Municipality Comments

Erin Council

- Received delegations and considered County Draft OPA 131 Report and Town staff report on November 13, 2025
- Erin Council provided no comments or concerns to County

Puslinch Council

- Considered County Draft OPA 131 Report on October 8, 2025
- Endorsed OPA 131
- Requested that additional areas along Victoria Road S, Wellington Road 34 and Gilmour Road be added to Aberfoyle (Area D1 and D2)

Wellington North Council

- Considered County Draft OPA 131 Report on November 3, 2025
- Provided comments of support and for further revisions related to County-wide agricultural policy updates.

Provincial and Agency Comments

Province

January 13, 2026 comments mainly related to the following:

- Prime Agricultural Areas, Agricultural System, Agricultural Impact Assessments, MDS, Mineral Aggregate Area Resources and Rural Employment Areas

Conservation Authorities

Credit Valley Conservation (CVC), Saugeen Valley Conservation Authority (SVCA), Grand River Conservation Authority (GRCA):

- No objections or revisions to OPA 131 requested

Public Comments

Puslinch

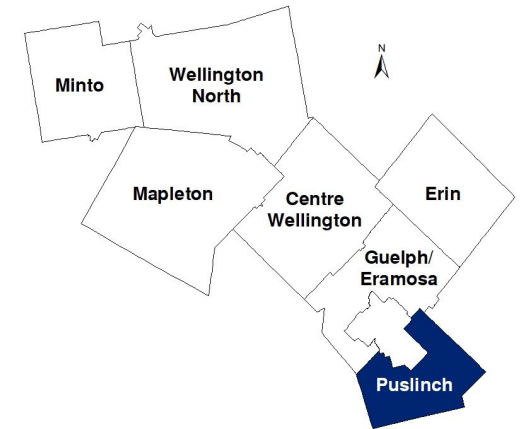
Key Themes

Support for:

- More residential severances in Secondary Agricultural Area
- Expansion of Aberfoyle
- Employment Area H
- More growth in Puslinch
- Changes to designate more Rural Employment Area land and to expand Arkell

Concerns with:

- Impact on future potential mineral aggregate operations
- Employment Area G and H



Public Comments

Erin

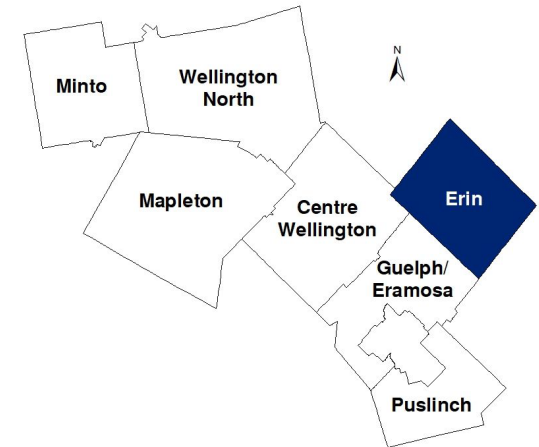
Key Themes

Support for:

- Changing March 1, 2005 severance cut-off date to allow more residential severances in Secondary Agricultural Area in Erin
- Changes to expand Ospringe

Concerns with:

- Potential economic impacts related to the proposed transfer of 120 households from Erin to Puslinch

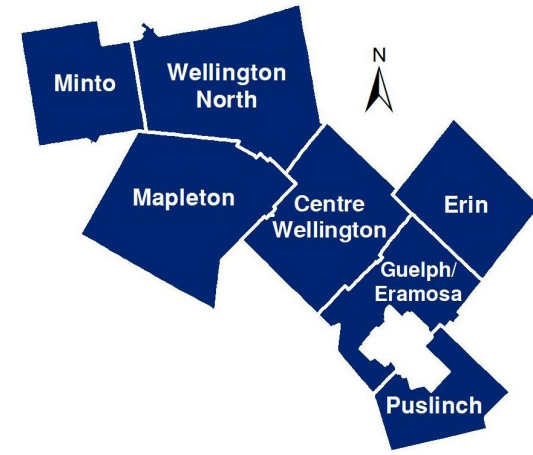


Public Comments

County-wide

Key Themes

- Concerns with rural-urban interface policy
- Wellington Federation of Agriculture (WFA) comments focus on the protection of agricultural lands and suggestions to improve proposed agricultural policies



OPA 131

Next Steps



Next Steps

- Review of all comments and submissions through circulation of OPA, Open House and Public Meeting
- Preparation of final draft OPA
- Recommendation report to County Council for adoption
- Submission to Province for a final decision

Draft OPA 131 may be revised in response to input and further review prior to County Council's consideration.

How to Provide Written Comments

Please send to the County of Wellington Planning and Development Department no later than:

February 19, 2026

By email: planwell@wellington.ca

By regular mail: Sarah Wilhelm, Manager of Policy Planning
Wellington County Planning and
Development Department
Administration Centre
74 Woolwich Street, Guelph, ON N1H 3T9



PLANWELL^{OM}

Thank you for joining us!

For more information

Sarah Wilhelm
Manager of Policy Planning
sarahw@wellington.ca
519.837.2600 x2130

Jameson Pickard
Senior Policy Planner
jamesonp@wellington.ca
519.837.2600 x2300

Project website: www.wellington.ca/planwell

Project email: planwell@wellington.ca

February 12, 2026

Warden Chris White and Members of Council
 County of Wellington
 74 Woolwich Street
 Guelph ON N1H 3T9

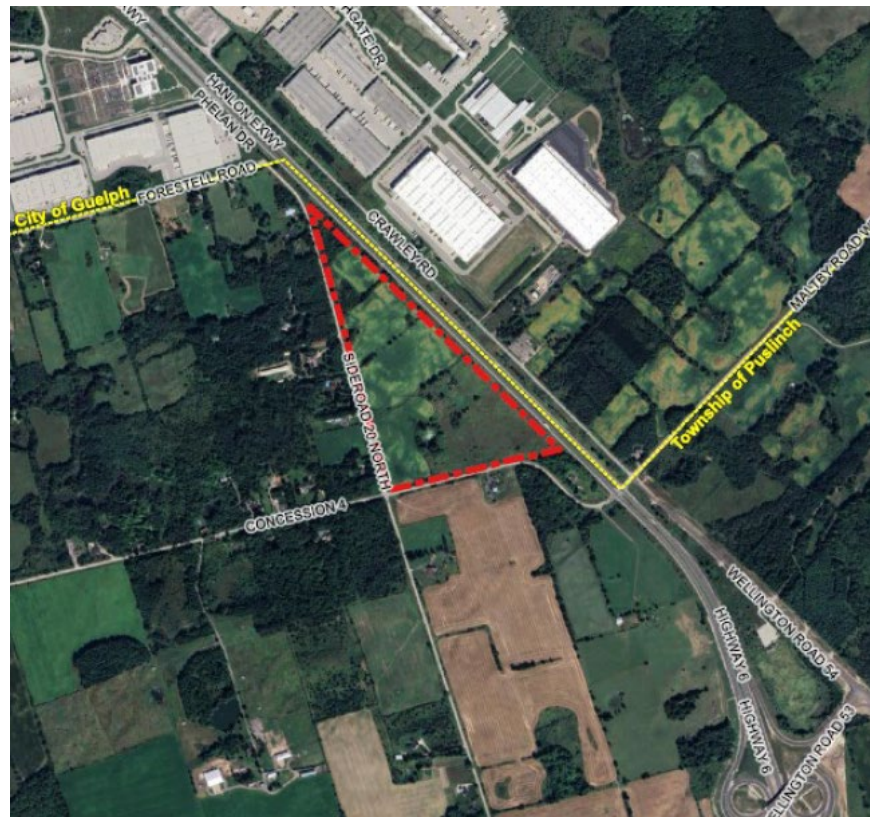
Dear Warden White and Members of Council:

**RE: Comments on County of Wellington Official Plan Amendment 131 (OPA 131)
 4631 Sideroad 20 North, Puslinch
 OUR FILE 22451A**

On behalf of our client, Puslinch Developments GP Inc., please accept this letter with comments on the draft Official Plan Amendment 131 (OPA 131) as it relates to the lands municipally addressed as 4631 Sideroad 20 North, in the Township of Puslinch (the "subject lands").

The purpose of this letter is to request that Official Plan Amendment 131 to the County of Wellington Official Plan be modified to designate the Area C lands to permit Prestige Rural Employment Area uses.

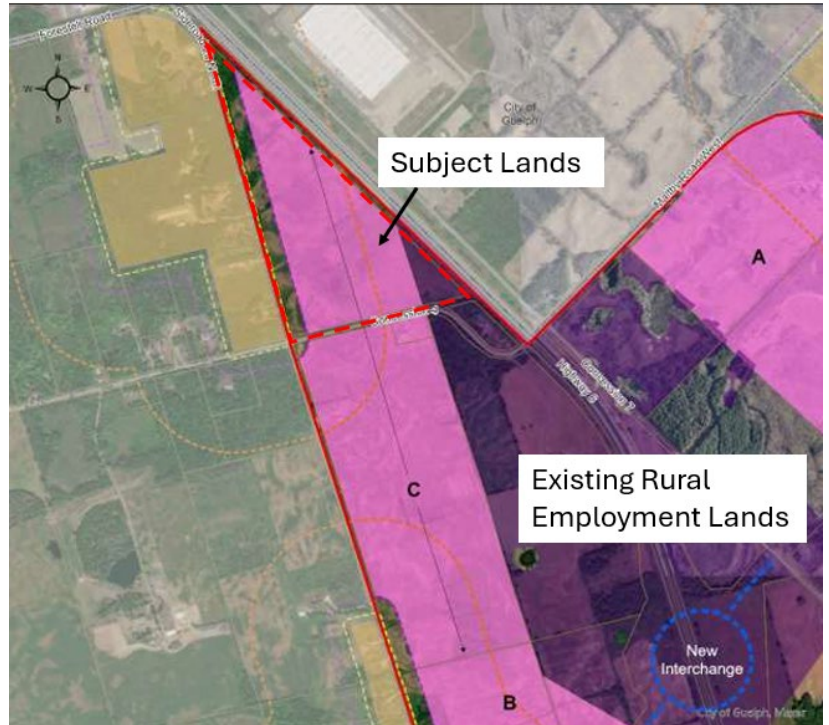
Our client has a vision to develop the land as a prestige employment campus comprised of office, manufacturing, warehousing and associated uses. Development of the subject lands as contemplated represents significant employment investment in the Township. We have been working with the Township for over a year on realizing the opportunity for this investment in the Township and have initiated a site specific planning process for the



subject lands to establish appropriate policies and regulations to permit the proposed development (File No. OP-2025-01).

The southeastern portion of the subject lands is currently designated Rural Employment Area in the Wellington County Official Plan. The remaining portion of the subject lands are designated Secondary Agricultural by the County of Wellington Official Plan and were included in the Regionally Significant Economic Development Study Area. The Regionally Significant Economic Development Study proceeded through the Puslinch by Design Study.

The subject lands were identified as being within the northern portion of Area C in the Puslinch by Design Study. Through the Study, Area C was ranked favorably across most categories in the Land Option Assessment and were comparable to the lands recommended for inclusion in the Rural Employment Area through OPA131.



Adjacent to Area C are lands currently designated Rural Employment along the Hanlon Expressway. These lands are constrained for development until access is provided. Including Area C in the Rural Employment Area represents the logical expansion of the designation, completes an employment corridor along Highway 6 and unlocks the potential for development of the existing Rural Employment Areas. This is of particular importance as a result of proposed Section 9.8.3 d) set out in OPA 131 which requires:

For lands west of the Hanlon Expressway designated as Rural Employment on Schedule B7, a Transportation Plan establishing an internal road network and external road connections shall be required as part of any future development application. For clarity, the Transportation Plan must establish, to the satisfaction of the Township, that no employment generated traffic will utilize Sideroad 20 N. Further, no driveway accesses for employment uses shall be permitted to Sideroad 20 N.

In our view, the subject lands and Area C address the evaluation criteria established in the Puslinch by Design Study and represent an excellent location for employment lands. They also represent the best opportunity for a timely development within the employment area and allow for consideration of a transportation solution to facilitate development of the existing Rural Employment Areas located to the west of the Hanlon Expressway. Further, it is our understanding that the other lands that are proposed to be designated "Prestige Rural Employment Area" and "Rural Employment Area" are not in a ready position to move forward with development, particularly the southern portion of the lands

proposed to be designated PA7-11 as they are subject to an active Aggregate Resources Act application.

We respectfully request that the County designate the Area C lands Rural Employment Area and establish policies to permit Prestige Rural Employment development through Official Plan Amendment 131. To assist Council, we have prepared the attached Resolution describing the requested modification to OPA 131.

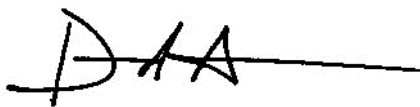
The Prestige Rural Employment Area designation is considered to be appropriate for the subject lands as it will ensure a high-quality, employment-focused development in a strategic area adjacent to Highway 6 and adjacent to existing and planned employment lands. Applying this designation to Area C will support the development of businesses and industries that require professional, visually appealing environments with enhanced design standards while ensuring land use compatibility with adjacent development and enhancing the overall economic profile of the municipality. It also represents the local extension of the existing Rural Employment designation that applies to a portion of the subject lands and completion of an employment corridor along Highway 6. Through the ongoing Zoning By-law Amendment process appropriate regulations can be established and detailed design will occur through site plan approval.

Our clients own the lands and intend to relocate their existing operations from other locations outside the Township. Our clients are eager to realize the investment that has been made and further invest significantly in the Township with the construction of new buildings that support new long-term jobs. The designation of the subject lands to permit Prestige Rural Employment Area will result in further investment on the subject lands for employment uses that will generate significant economic benefits to the Township, the County and the Province.

Thank you for consideration of these comments.

Yours truly,

MHBC



Dave Aston, MSc, MCIP, RPP
Partner



Emily Elliott, BES, MCIP, RPP
Partner

cc. Jim Estill, Mike Stanley, Rob Wigood

DRAFT RESOLUTION

That Council direct staff to update OPA 131 to include the lands identified as Area C in the Puslinch by Design Study within the Rural Employment Area designation on Schedule "A-2" to Official Plan Amendment 131; and

That Council direct staff to update OPA 131 to establish area specific policies for the lands identified as Area C in the Puslinch by Design Study to allow for Prestige Rural Employment Area development.

CUT THE RED TAPE

DO NOT PASS the current form of
OPA 131

Policy is Discriminatory

Erin and Pushlinch

Should both benefit

Equally

**There are no restrictive dates
anywhere else in the province**

Erin Needs the Tax Revenue

Lot severances are cost neutral to the Town
Generate a Continuous Revenue Base for Life
Tax revenues can be used for a much needed fire
truck, Road Safety Improvements, Community
projects and Cash Reserve

Current Planners have kept the status Quo For over 20 years

They have prevented a severance update
Which has Contributed directly to the current
Erin Rural housing crisis and Rural Shortfall.

Section 10.4.4 was intended to be updated every
5 Years to allow slow Rural Growth in Erin

**Erin is a Town of 12, 000 people
2 full time planners plus all the
Wellington County planners**

**Duplication and unnecessary road blocks prevents
Erin landowners from building homes.**

**We have been provided with false and misleading
information by several Planners, Staff and Councillors**

**Increased Development Charges contribute to
unaffordable houses.**

Solution:

Update the severance date of Section 10.4.4
And allow the Residents of Erin to build much
needed Rural homes that benefit our local
businesses, local farm families, allow succession
planing and Benefits the entire community

Consider Innovative Rural Planning

Secondary Agricultural lands could be divided into smaller packages that could accommodate small rural farms. Many Erin properties are already currently divided into 3-11 parcels. This makes each more affordable and allows succession planning. This would provide small parcels of land for young farmers

Follow the Model of European and Quebec Small Acreage Farms

There are many viable small vegetable and small livestock operations that have learned to farm on small parcels. This is a form of intensification that has been proven to be successful.

The model provides food self sufficiency and helps maintain the small family farms that are the backbone of Canadian Agriculture

Allow Erin to Thrive

Do not give away our multigenerational wealth to Pushlinch. We need the Erin Tax Revenue!!!!
We need the small acreages for rural family farms

Update Section 10.4.4

to allow new severance in Erin
Stop stealing our resources

Good afternoon, Chair and Members of Council.

My name is Bill Santos, my brother and I are the next generation who will inherit land from my mother in the Town of Erin.

I am here today not just to speak about planning policy, but to speak about the future of my family, my children, and my ability to care for my aging mother on land that my father intended would support generations of our family.

The decisions being discussed today are not abstract to me. They will directly determine whether families like mine can remain in Erin — or whether planning direction will make that impossible.

My brother and I share a long-term vision for our land.

Our goal is to responsibly subdivide so that:

- We can each build homes for ourselves
- Our children can choose, if they wish, to live on the family property
- We can provide care for our mother in her twilight years
- And continue the legacy our father hoped for

Before he passed, it was my father's wish that this property remain a place where his children and grandchildren could live.

We are not proposing large-scale development.

We are talking about family housing on land we already own and steward.

This is about whether rural families can:

- Stay together
- Care for aging parents
- Keep younger generations in rural communities
- Maintain long-term stability in places like Erin

When reasonable rural family housing is restricted, young families leave, aging parents lose support networks, and rural communities lose generational continuity.

Under **Section 3(5) of the Planning Act**, municipal decisions must be **consistent with the Provincial Policy Statement**.

The Provincial Policy Statement contains several directions that are directly relevant here.

Housing Supply — PPS 1.1.1(b) and 1.4.3

The PPS requires municipalities to:

- Provide an appropriate range and mix of housing options
- Maintain the ability to accommodate residential growth
- Meet current and future housing needs

Family severances on existing rural land help provide small-scale housing supply that directly supports those goals.

Rural Communities — PPS 1.1.4.1

The PPS also requires support for:

- Sustainable rural housing opportunities
- Long-term vitality of rural communities
- Opportunities for families to remain in rural municipalities

Multi-generational family housing is exactly what this section is describing.

Agricultural Balance — PPS 2.3.4.1

The PPS protects prime agricultural areas, and I support that.

But it also recognizes that limited, carefully managed lot creation may occur where impacts are minimal and agricultural viability is protected.

A small number of family severances on existing land is very different from large-scale fragmentation.

Ontario Housing Direction — Provincial Expectations

Recent provincial housing legislation and direction, including the More Homes Built Faster Act, emphasize:

- Increasing housing supply
- Removing unnecessary barriers
- Supporting housing solutions across Ontario
- Including small towns and rural municipalities

Family housing on existing rural properties aligns with these objectives.

I am concerned because recent Planning Committee discussion indicated that Erin may not want additional rural severances.

At the same time, we are hearing that approximately **120 potential lots may be reallocated from Erin to Puslinch.**

This creates a difficult situation:

If growth is reduced in Erin and shifted elsewhere, then Erin residents lose access to housing opportunities that provincial policy is encouraging municipalities to support.

Landowners make life decisions based on planning policy.

When growth expectations change dramatically:

- Housing opportunity changes
- Property expectations change
- Family planning changes
- Generational plans are disrupted

We maintained this land with the reasonable expectation that responsible family severances would remain possible.

I want to acknowledge that these are difficult planning decisions.

At the same time, given the requirements of Section 3(5) of the Planning Act, I believe it is important that Council be confident that the final direction can be clearly demonstrated to be consistent with Provincial Policy.

I would also encourage Council to ensure the planning rationale is clearly documented, particularly given the increasing scrutiny being applied to municipal housing decisions across Ontario.

This is not about speculation or large development.

This is about:

- One family
- Land already owned
- Housing for children
- Care for an aging parent
- Honouring our father's wish for this land

This is stable, community-rooted rural living.

I respectfully ask Council to:

Reconsider reducing growth opportunity in Erin,

Or at minimum,

Ensure Erin landowners are not restricted from reasonable family severances that align with Provincial Policy Statement direction and Ontario's housing supply objectives.

Before I finish, I want to step away from policy for just a moment.

For my brother and me, this is not about development.
This is about family.

We are trying to build homes where our children can grow up connected to their land, their community, and their grandparents.

We are trying to create a place where our mother can be cared for with dignity, surrounded by her family, in the years when she will need us most.

And we are trying to honour our father, who believed this land should remain a place where his children and grandchildren could live, not just own — but live!

Planning policy shapes communities.
But it also shapes families.

I am simply asking that the decisions made here leave room for families like mine to stay, to care for each other, and to continue contributing to the rural community we love.

Thank you for listening and thank you for considering the human impact behind these policies.

Good afternoon Chair and Members of Council,

My name is Christian Santos. My address is 100 Claremont Lane, Woodbridge. I am one of the grandchildren connected to my family's land in Ballinafad.

I want to begin with something important.

I do not currently live in Erin.

I live about 40 minutes away — and over an hour if I'm not using the 407.

That distance may not sound dramatic, but over time it changes the shape of family life. It turns weekly visits into occasional ones. It turns simple support into scheduling and logistics.

I grew up on that property.

My grandfather built treehouses for us there — not because he had to, but because he wanted us outside, together, exploring. He mowed a trail through the forest so we could walk to what we called “our rock” — a massive boulder that felt like a mountain to us as kids. That land wasn't just property. It was where we learned to climb, to build, to imagine.

It was where family felt permanent.

When my grandfather spoke about the future of that land, he didn't talk about resale value. He talked about generations. He believed his children and grandchildren would one day build their homes there — within walking distance of each other.

He believed it would keep us together.

After he passed, the meaning of that land changed for me.

In the summers, I drive out to maintain the grass and gardens because my grandmother can't. In the winters, I make that same drive to shovel snow so she can get groceries or go to church. Those drives aren't obligations — they're responsibilities. And they're reminders that proximity matters.

I don't mind making that drive.

But I would rather live close enough that care doesn't require a highway.

We often hear that young people are leaving rural communities.

I'm standing here telling you I want to come back — and build my life here.

My generation is navigating one of the most difficult housing environments in decades. Many young families are not leaving small towns because they want to — they're leaving because affordability and access leave them no option.

What makes this especially difficult is knowing that our family already owns land — land that has been responsibly stewarded for generations — and still questioning whether there will be space for us on it.

We understand that growth must be responsible, and that rural land must be protected. We are not asking for anything excessive — only for the opportunity to responsibly create space for family.

We are not asking to change the character of Erin.

We want to strengthen it.

I want the ability to live near my grandmother as she ages — not manage her care from a distance.

I want my future children to grow up knowing their great-grandmother in ordinary, everyday life — not just on holidays.

I want my father and uncle to experience what my grandfather envisioned: looking out and seeing their children nearby.

Multi-generational living isn't outdated. It's stabilizing.

It strengthens families.

It strengthens communities.

It keeps roots deep instead of scattered.

When families cannot build modest homes on land already meant for them, the outcome isn't preservation — it's separation.

Separation of generations.

Separation of support systems.

Separation of legacy from lived reality.

Small towns are defined by continuity — by families who stay, who invest, who return. I am asking for the chance to be one of those families.

I understand that Council has complex considerations.

But I ask you to consider something simple:

What does it mean when a grandson stands before you and says,
“I want to build my life on the land my grandfather prepared for me.”

For my grandfather, this land symbolized unity.

For my father’s generation, it represented responsibility.

For my generation, it represents possibility — if we are allowed to pursue it.

This decision will determine whether families like mine are able to remain rooted here — not just as owners, but as residents, neighbours, business owners, volunteers, and contributors to this community.

All we are asking for is the chance to stay together — and to build our future where our family’s story already began.

Please leave room for the next generation to come home.

Thank you for your time.

Brad Lavery – OPA 131 Severances, Erin Resident Statement

My name is Brad Lavery, and I'm here as a resident of Erin to speak about severances under OPA 131.

For many families in Erin, the ability to create a small, reasonable severance isn't about development or speculation. It's about helping a son or daughter build a home, allowing aging parents to stay close to family, and giving local people a realistic chance to remain in the community they grew up in.

Right now, many residents feel those opportunities are slipping away, and frankly, many of us are deeply disappointed that Erin Council has not stood behind its own residents on this issue.

If OPA 131 is adopted in a restrictive form, it could effectively shut the door on future severances in our township. For many families, this removes one of the last practical and affordable ways to stay in Erin – and once that door closes, it may never reopen.

We also need compassion for members of our community facing real financial hardship. Some farm families and long-time property owners are struggling, and without options they risk losing farms and investments that have often been in families for generations. In many cases, a modest severance could provide the financial relief needed to help families stay afloat or move forward with dignity.

This concern was raised at the first Erin Council meeting but was quickly dismissed, with only one councillor speaking in support. For residents facing these realities, that was deeply discouraging.

We also cannot ignore that many families are still dealing with the fallout from COVID. Businesses closed, savings were lost, and many people are still recovering financially. These impacts remain very real, yet many feel little sympathy has been shown for those still struggling. Compassion must be part of these decisions.

There is also a broader financial reality facing both residents and the township. Recent budget discussions show that the Town of Erin itself is facing financial pressures and may need to rely on reserve funds to manage upcoming expenses. At a time when both families and municipalities are feeling financial strain, we

should support practical solutions that help residents remain stable while also contributing to the local economy.

Responsible severances bring tangible benefits to Erin. Each new home supports local trades, construction workers, suppliers, and businesses, while generating permit fees, development charges, and long-term property tax revenue that fund township services. Responsible, small-scale growth helps support municipal finances and reduces pressure on existing taxpayers. Turning away this kind of responsible growth also turns away needed economic activity.

There is also discussion about using Additional Residential Units, or ARUs, to make up for the shortfall of approximately 120 lots. However, in practice, ARUs are often not a workable solution in rural areas. They can be costly to build, difficult to service, and often do not provide good resale value. As a result, they are unlikely to replace the housing opportunities that would be lost if severances are restricted, and they should not be viewed as an equivalent solution.

We all understand the importance of protecting farmland and rural character. Let me be clear: prime agricultural land is fully protected under OPA 131, as severances are only allowed on secondary agricultural land. This ensures the most productive farmland remains untouched while still giving families practical options to build homes and stay in Erin. Thoughtful, case-by-case severances on secondary land can protect rural values while supporting real people with real housing needs.

I'm asking Wellington County to support Erin residents by keeping severance policies flexible so responsible applications can still be judged on their individual merits.

This decision is about balance — protecting what makes Erin special while still giving families and future generations the chance to put down roots here.

Please don't let this be the decision that quietly ends these opportunities for our community.

My son Owen is 16 years old and has already spent four years working in agriculture — from beef cattle to cash crops and many other aspects of farming. He represents the future of our community at a time when farmers are aging and fewer young people are entering the industry.

Owen hopes to rent land and farm on his own one day, but to do that he'll need access to land and the ability to invest in equipment. If our family is able to obtain a reasonable severance, it would allow us to financially support both our existing farm operations and help Owen get started with the equipment and resources he needs to pursue his own agricultural future. While he will continue helping on our farm with agritourism and the tree farm, he also wants to build his own operation. Opportunities like this are what allow the next generation of farmers to actually stay and farm here.

This is why reasonable severances matter. The impact spreads across the Township — supporting farm families, sustaining local agriculture, and helping rural businesses survive. It creates a positive domino effect throughout our community.

Unfortunately, it feels like Erin Council has not fully recognized the reality many farm families are facing. I've personally spoken with several families who are on the verge of losing their farms, just a mortgage payment or two away. This is a very real and frightening situation for people who have invested their lives into agriculture here.

I ask that you take these families, and the future of young farmers like Owen, into consideration when making your decision.

Thank you for your time.

Economic Impacts: OPA131

David Scofield, Ph.D.

February 12, 2026

UPDATE

Executive Summary

- County Official Plan Review (PD2025-20; drawing on PD2024-29) estimates that by 2051 Erin requires 580 rural lots but has 460 lots of supply identified (**shortfall = 120**).
- OPA 131 is tied to Growth Plan-based forecasts (2016/2021; 2051), which are lower than the more recent Ministry of Finance projections (2024-2051) and therefore may understate long-term growth for Wellington County and Erin.
- Using MOF 2024 projections (8-10% higher County population by 2051, depending on allocation assumptions), the implied Erin shortfall is in the **160–180 rural lot range**.
- Applying three CVA scenarios for new rural dwellings (Low = \$1.0M, Mid = \$1.35M, High = \$1.80M), gross Town inflows from 120 rural lots (2026-2050) are approximately:
 - NPV (2025\$): \$11.8M (Low) to \$18.7M (High); Mid case \$14.9M.
 - Nominal: \$25.6M to \$41.1M.
- Gross inflows include Town property tax, Town development charges, and building/septic permits; no deduction for incremental operating or capital costs.

Executive Summary - Cont.

- 120 rural homes represent roughly **\$66.0M of construction investment for Erin**, about **\$39.8M in GDP and approximately 616 job-years of employment**.

More lots (150-200) would push these figures higher.

- If buyers who are unable to purchase a rural lot in Erin mostly relocate within Wellington (for example to Puslinch or other County municipalities), much of the construction GDP remains in-County. However, if a portion of buyers instead purchase in Halton or Peel, Wellington faces a real risk of construction GDP and employment leaking to neighbouring municipalities.

Base Assumptions

Parameter	Value / Unit	Notes
Time line	2026–2050; even phasing	25 years; 4.8 lots/year (120-lot case)
Inflation (CPI)	Permits & tax: 2% CPI (assumption); DCs: annual index = Non-Residential Building Construction Price Index (NRBCPI)	Taxes & permit fees: 2025 base, indexed at 2% CPI (assumption). DC base shown is 2026 (\$34,619 rural single/semi).
Discount rate (nominal)	5% per year	=3% real + 2% inflation; NPV to 2025
Municipal tax rate (Town share)	0.00869471 (Town = 0.00716471 General + 0.00153000 Infrastructure) of CVA	Town portion only; excludes County & Education
Assessed value (mid)	\$1.35 million / dwelling \$0.99 million (low) 1.80 million (high)	Scenario (CVA). Town uses \$600k for an average assessed home; new rural builds assess higher.
Development Charge (rural SF)	\$34,619 per unit	Town DC pamphlet (Jan 2026)
Building permit (min)	\$3,580 per dwelling	Fees & Charges By-law (2026)
Septic permit	\$825 per system	Fees & Charges By-law (2026)
Dwelling size	2,200 sq. ft.	Assumption (conservative for new rural detached homes). MPAC data for new single-detached units constructed 2020– 2024: Erin median 3,096 sq ft; Puslinch Township median 3,079 sq ft
Hard costs	\$250/ sq. ft (mid); \$210–\$285 range	Altus Group 2024 Canadian Construction Cost Guide - GTA, wood-framed single-family residential (range table).
GDP per \$ of investment	0.603	Taken from Statistics Canada Housing Economic Account (HEA) 2024; GDP- to-investment ratio for residential.
Employment multiplier	9.336 job-years / \$1M	Statistics Canada Input-Output multipliers (Table 36-10-0595-01, Ontario; Residential building construction; total jobs).

Erin Lots Required

OPA vs MOF Population Forecasts (low/mid/high)

- County population (excl. Guelph) 2051:
 - OPA 131 / County Official Plan forecast: 160,000
- MOF projections (2024-2051) are reported for Wellington Census Division (County + Guelph). An illustrative allocation implies County-only population of roughly 172,000-176,000 by 2051 (assumption).
- Implication for Erin rural lots:
 - County rural growth analysis: Need =580 lots; Supply =460 lots → Shortfall 120 lots (as of July 2024).
 - If demand scales with population (+8-10%), implied need rises to 626-638 lots → shortfall = 166-178 lots.

CVA × Lots - Town Gross Inflows (Nominal and NPV, 2026–2050)

Lots	CVA	CVA per unit (\$)	Nominal Total (\$M)	NPV (\$M, 2025\$)	NPV: Tax / DCs / Permits (\$M)
120	Low	\$990,000	\$25.50	\$11.79	\$8.17 / \$3.25 / \$0.37
120	Mid	\$1,350,000	\$32.25	\$14.76	\$11.14 / \$3.25 / \$0.37
120	High	\$1,800,000	\$40.69	\$18.47	\$14.85 / \$3.25 / \$0.37

If 120 rural lots are removed, Erin forgoes the following inflows (gross).
CVA scenario (Low / Mid / High), 2026–2050:

Low CVA (approx. \$1.00M): \$25.6M nominal; \$11.8M NPV (2025\$).

Mid CVA (approx. \$1.35M): \$32.5M nominal; \$14.9M NPV (2025\$).

High CVA (approx. \$1.80M): \$41.1M nominal; \$18.7M NPV (2025\$).

These amounts include Town property tax, Town development charges, and building/septic permits; these are gross inflows only.

A full net fiscal analysis would consider operating and capital costs for roads, winter plowing, etc. though these would likely be minor as rural lot severance doesn't involve the creation of new roads in Erin.

Construction Economic Impacts by Lot Program

Lots	Construction Investment (\$M)	GDP impact (\$M)	Employment (job-years)
120	\$66.00	\$39.80	616
150	\$82.50	\$49.75	770
200	\$110.00	\$66.33	1027

How substitution drives GDP loss for Wellington (120 homes)

- Scenario A - All prospective Erin-oriented buyers remain in Wellington County:
 - Buyers substitute into Puslinch or other Wellington municipalities.
 - Result: Little or no loss of County-wide construction GDP; impact is primarily distributional (Erin vs other municipalities).
- Scenario B - 50% of prospective Erin-oriented buyers choose homes outside Wellington (e.g., Halton/Peel):
 - Roughly half of the construction associated with these 120 dwellings occurs out-of-County.
 - Illustrative loss to Wellington: \$19.9M in GDP and 308 job-years.
- Scenario C - 100% of prospective Erin-oriented buyers choose homes outside Wellington:
 - All of the construction activity for this 120-home program is realized in neighbouring municipalities.
 - Illustrative loss: \$39.8M in GDP and 616 job-years.

Note: Actual outcomes would likely be a mix of in-County substitution and out-of-County moves.

ARUs: Not a Substitute for Titled Lots

1) ARUs are not a substitute for creating new titled rural lots.

Families who want to buy their own rural property still need an adequate supply of lots in Erin (min. 120 rural lot deficit)

2) Mortgage and financing

Adding an ARU usually means borrowing more money for construction. This often happens through a HELOC (if available), or a construction loan. Lenders will look at the new loan-to-value ratio and debt-service ratios.

3) Impact on CVA and property taxes (MPAC)

When an ARU is built and permitted, MPAC is notified and reassesses the property based on the increased living area, quality, and income potential. The Current Value Assessment typically increases and annual property taxes go up. From a fiscal point of view, ARUs contribute to assessment growth and raise the tax base, though they do not create new titled lots for new families to purchase.

4) Two smaller homes vs one large home – which has higher CVA?

All else equal, a lot with two legal dwellings that together total (for example) 4,000 ft² will usually have a higher CVA than a lot with a single 4,000 ft² home. ARUs can bring potentially higher taxes, and the additional unit will make the property more expensive to sell and potentially less marketable.

5) Planning and policy implication

ARUs are a valuable tool for adding density and tax base on existing parcels. However, they are not a substitute for new titled lots that will bring new families and economic activity to Erin.

Recommendations

- 1) Increase Erin's rural lots by at least 120, preferably in the 150–200 lot range.

Changing Section 10.4.4 cut-off year for severance applications from March 1, 2005 to 2015, 2020, or 2025 can unlock approximately 142–195 potential lots.

NB: This does not mean all eligible lots will become housing, as changing the cut-off year does not alter the rigorous review all applications must pass in order to gain permission to sever a lot.

- 2) Use MOF population projections (Ontario, 2024–2051) alongside Growth Plan-based forecasts when assessing long-term rural housing demand.

- 3) Monitor and update forecasts regularly.

Revisit rural allocations and year cut-off policies at least every 3–5 years, consistent with updated population projections and local land needs assessments.

Method Appendix

MOF - County allocation and lot conversion

MOF - County allocation and lot conversion

- 1) MOF Census Division projection (2024-2051): Wellington Census Division (County and Guelph) = 400,166 people by 2051.
- 2) Allocation assumption: County share 43%-44% of the Census Division total → 172,000-176,000 County-only population by 2051.
- 3) Compare to County forecast used in OPA 131: 160,000 (County-only) by 2051 → difference 12,000-16,000 (+8% to +10%).
- 4) Apply to Erin rural lot requirement: $580 \times (1.08-1.10) = 626-638$ lots; with supply of 460, shortfall = **166-178 lots**.

Notes: Figures are rounded.

DR. M. WEVERS

4935 Wellington 125
Acton, Ontario
L7J 2L9

FEB 19 2026

Position Summary For OPA 131 Public Comments:

This submission is in addition to the Slide presentation at the Public Meeting on Feb 12, 2026

Section 10.4.4 Recommendations:

Revise the current Draft OPA 131 to be non discriminatory and prevent Economic hardship to Erin land owners, business owners and Citizens

Update the lot severance date to be the same as Puslinch

Ensure that this change is evaluated and update every 5 years

Promote a draft OPA 131 that recognizes the need for housing of all types in every Municipality and Addresses our existing Erin Rural Housing Shortfall.

Recognize that the Rural development of land on secondary agriculture is distinctly different from current urban development and is a vital part of the Rural Socioeconomic Viability that help with succession planning for our young farmers, provides rural jobs, maintains and enhances rural businesses and provides for rural apprenticeships.

Section 6.5.4 Recommendations:

Decline to remove or Rural Cluster Policy Section 6.5.4 This section was previously put in place to address the need for Rural Housing and could be used to examine areas that are already clusters and thereby allow for Rural Infill Housing.

The current planners have Never allow anyone to use it and now are attempting to remove without justification and against the Provincial Plan Rural growth policies.

Additional Comments:

I would also like to request that the whole process be evaluated as there are significant breeches in protocol that provided road blocks and obstruction to public input.

Standardize the planning process to prevent discriminatory and vindictive planning requirements and allow for a fair and equal process that lowers the costs for planning and building much need rural housing

Tom Carroll
4935 Wellington 125
Erin, Ontario
L7J 2L9

The County of Wellington
Planning Dept.

FEB 19 2026

Good morning. My name is Tom Carroll and I have been resident in Erin township for 28 years I'm here to speak to the changes being proposed by OPA 131. Specifically, the transfer of 120 severances to Puslinch township and the failure to change the date that allows for gradual controlled growth in our town.

If approved, the town of Erin will lose 10s of millions of dollars in business, jobs and tax revenue. Rural severances cost the town very little as water and septic costs are born by the individual property owners. For the record, septic systems properly designed and installed do not contaminate the environment.

Erin has approximately 70000 acres and 12000 residents. Even if all the home proposed Erin were sold we still wouldn't be more than 20000 residents. One hundred and twenty severances on this amount of land with this number of people should be easily accommodated ... as it is being accommodated in Puslinch.

Our council is constantly complaining that we don't have enough money. We need a new fire truck for over 600000 dollars I'm told. We're heading into our reserve funds and we're being sued at the Ontario land tribunal for excessive development charges. We haven't attracted a new business for the town in this entire term. Our mayor was quoted recently in the Wellington Advertiser being in favour of accepting thousands of loads of fill into a spent quarry in Hillsburgh so that the town can collect money on tipping fees. For a decade residents of Hillsburgh will have to put up with this disruptive and road wrecking decision. Three trucks per min in and three trucks per min out and the risk of contaminated soil too. Not a green decision by any means.

Erin council is adamant, however, that rural severances not be allowed despite the obvious economic benefits. We're told to be patient, as if 20 years wasn't long enough. We're told not to be angry... well I am angry and I claim the right to be angry when my rights are being trampled upon.

Retirement funds for farmers and landowners often come from severance sales . You're taking that from me and other residents of this town.

As a property owner I think I qualify as a stake holder in this discussion. Property rights, a corner stone of capitalist societies, are being changed as if our lands were some kind of public park. Attempts to participate in this process have been opaque, difficult and vexatious

The red tape and number of bureaucrats involved in municipal planning and decision making in general are becoming unmanageable and unreasonable. I refer you to Better Farming February 2026, a well written publication that OFA members like us receive . There are two articles in February's edition on navigating municipal red tape. One farmer quoted Ronald Reagan who said " the 9 most feared words in the English languageIm from the government ; I'm here to help"

Of course this isn't only about Wellington County and Erin township but we do have some issues that are peculiar to us. We are the only county in all of Ontario with the 2005 date restricting rural lot severances It was done to prevent developers from buying farms while allowing farmers and long term residents to occasionally sever a single lot from their lands. Hearsay! Declared CAO Mr Wilson,

an interesting word to use as it's so close linguistically to heresy. In any event he later conceded that it was true and not hearsay

We have to suffer a lot of duplication in this town and the processes required. Go to Wellington township and inquire about rural severances and they will direct you to Erin where some residents have been told by the planner there that they know nothing about rural severances and rural growth.

So, back to Wellington county where after much obfuscation, Dr Wevers was able to present to council on the matter. Then, you guessed it, back to Erin to present there.

There were 5 presenters at this meeting; myself, a journeyman carpenter since 1996, Dr Wevers a farm owner and veterinarian, professor Schofield, a real estate economics expert, Mr Ed McKelvey, a retired farmer and long time resident and Mr Brad Lowry a firefighter and ag tourism business owner. The presentations were video taped and I invite you to see them and in particular pay attention to councils reactions and responses.

We had a lot of information to present to council and a great deal of it was factual, logical, and pertinent to the matter at hand. Our points were ignored and had aspersions cast upon them. No decision was made and our award winning town manager thought the answer was ... wait for it .. to order more studies, spending money we don't have, knowing full well that by the time it was never done it would be too late and a moot point. A kick it down the road and run out the clock suggestion if ever there was one.

Councillor Allard said we would have to vet prof Schofield numbers that outlined the 10s of millions of dollars at stake if the town lost 120 severances. She never asked about his credentials, she never said who was or could vet his numbers or if we could pause the process to look into these matters. She did not out and out deny the economic impact so I guess that's progress of a sort.

Our own town planner reported to council that there is no economic impact from this OPA change. This is factually and categorically untrue. Our council should be questioning internal info as hard as they questioned ours.

I outlined in my presentation the numbers and kinds of jobs created by the construction of a custom home. Councillor Allard said there's no way to know if these jobs were local or not, attempting to deflect the issue while not being able to say that there were no jobs at stake. A backhanded concession that this will cost Erin real jobs that are needed now more than ever.

Our council is failing in it's principle duty of looking out for the interests of the residents of Erin. They are advocating transferring our wealth and tax base to a neighbouring township. The response from some councillors and most of the bureaucrats we've spoken to has been somewhere between indifference and mean spirited. You're told to apply and if you don't like the answer, go to the Land Tribunal. Them's the rules! They seem to welcome the notion of spending our time and money until we're worn down and quit the effort all together. It's a stark contrast to our interactions 20 years ago with town manager Lisa Hass who was helpful and transparent. She recognized we were landowners and not developers as has been erroneously suggested by our own mayor, again casting aspersions upon us.

Residents and owners of land can make money from owning land. Indeed it's why it's called REAL estate. Puslinch can proceed. Everyone else in Ontario can proceed. Only in Erin has this radical an approach being tried. It's precedent setting and we should all be very worried about the broader implications of this.

We have widows who would like to age in place and a severance would allow them to

We have retirees who would like an adult child to build on a severance and help them with the farm

We have small farmers who could use a severance to retire and get another generation of farmers working - Secession planning in other words

NO we won't have it. If you don't like it sell, we are told. It's cold and mean spirited . It feels like rural residents are being punished for the failures in urban development.

Mr Wilson, the CAO for Wellington county told Dr Wevers that he and his planners haven't approved date changes to allow for severances in 20 years and "HE'S PROUD OF IT", revealing a troubling bias that should not exist. This date should have been changed 15 years ago and every 5 years after that.

Even small children know that if everyone got something and they did not that they're being treated unfairly. We are not asking Wellington county for anything other than fairness. Treat us the same as other residents of this county.

Erin residents have had the rug pulled out from under them. We thought we knew the rules and we were inquiring for YEARS about the never ending coming of the town plan updates. We have been blindsided by this attempt to take away our rights and not one politician from Erin or one bureaucrat that so many of us spoke to said anything about as radical a change as is being proposed here. It discriminates against Erin residents.

The loss of business and tax revenue is unconscionable. It boggles the mind and given Erin's precarious financial position I would go so far as to call it a dereliction of duty
OPA131 is a radical, unprecedented in all of Ontario, attempt to ban rural lot severances in Erin township. No one voted for this. If that was your plan we should have been told a great deal more and a whole lot sooner.

Revise OPA 131. Give Erin back its severances, change the date to 2025

This change appears to have been done in meeting rooms between Erin politicians and planners without consultation with the residents . It should not be allowed to stand.

Along time ago an Irish business man told us :

“ if you're right ya fight

If you're wrong you apologize “

We are owed apologies for this and more

- 1) for attempting to limit delegations to 5 mins instead of 10
- 2) for telling residents lots couldn't be severed in the green belt
- 3) for claiming the 5 year date change was hearsay
- 4) for claiming there's no economic impact on Erin from this decision
- 5) for calling us greedy developers
- 6) for failures in timely responses to emails and phone calls
- 7) for calling us impatient
- 8) for saying that the decision has been made at the mayors breakfast when mayor Dehn knew full well it required further public input, Wellington council approval and approval from the province

Brad Lavery – OPA 131 Severances, Erin Resident Statement

FEB 19 2026

My name is Brad Lavery, and I'm here as a resident of Erin to speak about severances under OPA 131.

For many families in Erin, the ability to create a small, reasonable severance isn't about development or speculation. It's about helping a son or daughter build a home, allowing aging parents to stay close to family, and giving local people a realistic chance to remain in the community they grew up in.

Right now, many residents feel those opportunities are slipping away, and frankly, many of us are deeply disappointed that Erin Council has not stood behind its own residents on this issue.

If OPA 131 is adopted in a restrictive form, it could effectively shut the door on future severances in our township. For many families, this removes one of the last practical and affordable ways to stay in Erin — and once that door closes, it may never reopen.

We also need compassion for members of our community facing real financial hardship. Some farm families and long-time property owners are struggling, and without options they risk losing farms and investments that have often been in families for generations. In many cases, a modest severance could provide the financial relief needed to help families stay afloat or move forward with dignity.

This concern was raised at the first Erin Council meeting but was quickly dismissed, with only one councillor speaking in support. For residents facing these realities, that was deeply discouraging.

We also cannot ignore that many families are still dealing with the fallout from COVID. Businesses closed, savings were lost, and many people are still recovering financially. These impacts remain very real, yet many feel little sympathy has been shown for those still struggling. Compassion must be part of these decisions.

There is also a broader financial reality facing both residents and the township. Recent budget discussions show that the Town of Erin itself is facing financial pressures and may need to rely on reserve funds to manage upcoming expenses. At a time when both families and municipalities are feeling financial strain, we

should support practical solutions that help residents remain stable while also contributing to the local economy.

Responsible severances bring tangible benefits to Erin. Each new home supports local trades, construction workers, suppliers, and businesses, while generating permit fees, development charges, and long-term property tax revenue that fund township services. Responsible, small-scale growth helps support municipal finances and reduces pressure on existing taxpayers. Turning away this kind of responsible growth also turns away needed economic activity.

There is also discussion about using Additional Residential Units, or ARUs, to make up for the shortfall of approximately 120 lots. However, in practice, ARUs are often not a workable solution in rural areas. They can be costly to build, difficult to service, and often do not provide good resale value. As a result, they are unlikely to replace the housing opportunities that would be lost if severances are restricted, and they should not be viewed as an equivalent solution.

We all understand the importance of protecting farmland and rural character. Let me be clear: prime agricultural land is fully protected under OPA 131, as severances are only allowed on secondary agricultural land. This ensures the most productive farmland remains untouched while still giving families practical options to build homes and stay in Erin. Thoughtful, case-by-case severances on secondary land can protect rural values while supporting real people with real housing needs.

I'm asking Wellington County to support Erin residents by keeping severance policies flexible so responsible applications can still be judged on their individual merits.

This decision is about balance — protecting what makes Erin special while still giving families and future generations the chance to put down roots here.

Please don't let this be the decision that quietly ends these opportunities for our community.

My son Owen is 16 years old and has already spent four years working in agriculture — from beef cattle to cash crops and many other aspects of farming. He represents the future of our community at a time when farmers are aging and fewer young people are entering the industry.

Owen hopes to rent land and farm on his own one day, but to do that he'll need access to land and the ability to invest in equipment. If our family is able to obtain a reasonable severance, it would allow us to financially support both our existing farm operations and help Owen get started with the equipment and resources he needs to pursue his own agricultural future. While he will continue helping on our farm with agritourism and the tree farm, he also wants to build his own operation. Opportunities like this are what allow the next generation of farmers to actually stay and farm here.

This is why reasonable severances matter. The impact spreads across the Township — supporting farm families, sustaining local agriculture, and helping rural businesses survive. It creates a positive domino effect throughout our community.

Unfortunately, it feels like Erin Council has not fully recognized the reality many farm families are facing. I've personally spoken with several families who are on the verge of losing their farms, just a mortgage payment or two away. This is a very real and frightening situation for people who have invested their lives into agriculture here.

I ask that you take these families, and the future of young farmers like Owen, into consideration when making your decision.

Thank you for your time.

Good afternoon, Chair and Members of Council.

My name is Bill Santos, my brother and I are the next generation who will inherit land from my mother in the Town of Erin.

I am here today not just to speak about planning policy, but to speak about the future of my family, my children, and my ability to care for my aging mother on land that my father intended would support generations of our family.

The decisions being discussed today are not abstract to me. They will directly determine whether families like mine can remain in Erin — or whether planning direction will make that impossible.

My brother and I share a long-term vision for our land.

Our goal is to responsibly subdivide so that:

- We can each build homes for ourselves
- Our children can choose, if they wish, to live on the family property
- We can provide care for our mother in her twilight years
- And continue the legacy our father hoped for

Before he passed, it was my father's wish that this property remain a place where his children and grandchildren could live.

We are not proposing large-scale development.

We are talking about family housing on land we already own and steward.

This is about whether rural families can:

- Stay together
- Care for aging parents
- Keep younger generations in rural communities
- Maintain long-term stability in places like Erin

When reasonable rural family housing is restricted, young families leave, aging parents lose support networks, and rural communities lose generational continuity.

Under **Section 3(5) of the Planning Act**, municipal decisions must be **consistent with the Provincial Policy Statement**.

The Provincial Policy Statement contains several directions that are directly relevant here.

Housing Supply — PPS 1.1.1(b) and 1.4.3

The PPS requires municipalities to:

- Provide an appropriate range and mix of housing options
- Maintain the ability to accommodate residential growth
- Meet current and future housing needs

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Family severances on existing rural land help provide small-scale housing supply that directly supports those goals.

Rural Communities — PPS 1.1.4.1

The PPS also requires support for:

- Sustainable rural housing opportunities
- Long-term vitality of rural communities
- Opportunities for families to remain in rural municipalities

Multi-generational family housing is exactly what this section is describing.

Agricultural Balance — PPS 2.3.4.1

The PPS protects prime agricultural areas, and I support that.

But it also recognizes that limited, carefully managed lot creation may occur where impacts are minimal and agricultural viability is protected.

A small number of family severances on existing land is very different from large-scale fragmentation.

Ontario Housing Direction — Provincial Expectations

Recent provincial housing legislation and direction, including the More Homes Built Faster Act, emphasize:

- Increasing housing supply
- Removing unnecessary barriers
- Supporting housing solutions across Ontario
- Including small towns and rural municipalities

Family housing on existing rural properties aligns with these objectives.

I am concerned because recent Planning Committee discussion indicated that Erin may not want additional rural severances.

At the same time, we are hearing that approximately **120 potential lots may be reallocated from Erin to Puslinch.**

This creates a difficult situation:

If growth is reduced in Erin and shifted elsewhere, then Erin residents lose access to housing opportunities that provincial policy is encouraging municipalities to support.

Landowners make life decisions based on planning policy.

When growth expectations change dramatically:

- Housing opportunity changes

- Property expectations change
- Family planning changes
- Generational plans are disrupted

We maintained this land with the reasonable expectation that responsible family severances would remain possible.

I want to acknowledge that these are difficult planning decisions.

At the same time, given the requirements of Section 3(5) of the Planning Act, I believe it is important that Council be confident that the final direction can be clearly demonstrated to be consistent with Provincial Policy.

I would also encourage Council to ensure the planning rationale is clearly documented, particularly given the increasing scrutiny being applied to municipal housing decisions across Ontario.

This is not about speculation or large development.

This is about:

- One family
- Land already owned
- Housing for children
- Care for an aging parent
- Honouring our father's wish for this land

This is stable, community-rooted rural living.

I respectfully ask Council to:

Reconsider reducing growth opportunity in Erin,

Or at minimum,

Ensure Erin landowners are not restricted from reasonable family severances that align with Provincial Policy Statement direction and Ontario's housing supply objectives.

Before I finish, I want to step away from policy for just a moment.

For my brother and me, this is not about development.

This is about family.

We are trying to build homes where our children can grow up connected to their land, their community, and their grandparents.

We are trying to create a place where our mother can be cared for with dignity, surrounded by her family, in the years when she will need us most.

And we are trying to honour our father, who believed this land should remain a place where his children and grandchildren could live, not just own — but live!

Planning policy shapes communities.

But it also shapes families.

I am simply asking that the decisions made here leave room for families like mine to stay, to care for each other, and to continue contributing to the rural community we love.

Thank you for listening and thank you for considering the human impact behind these policies.

Good afternoon Chair and Members of Council,

My name is Christian Santos. My address is 100 Claremont Lane, Woodbridge. I am one of the grandchildren connected to my family's land in Ballinafad.

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I want to begin with something important.

I do not currently live in Erin.

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I live about 40 minutes away — and over an hour if I'm not using the 407.

That distance may not sound dramatic, but over time it changes the shape of family life. It turns weekly visits into occasional ones. It turns simple support into scheduling and logistics.

I grew up on that property.

My grandfather built treehouses for us there — not because he had to, but because he wanted us outside, together, exploring. He mowed a trail through the forest so we could walk to what we called "our rock" — a massive boulder that felt like a mountain to us as kids. That land wasn't just property. It was where we learned to climb, to build, to imagine.

It was where family felt permanent.

When my grandfather spoke about the future of that land, he didn't talk about resale value. He talked about generations. He believed his children and grandchildren would one day build their homes there — within walking distance of each other.

He believed it would keep us together.

After he passed, the meaning of that land changed for me.

In the summers, I drive out to maintain the grass and gardens because my grandmother can't. In the winters, I make that same drive to shovel snow so she can get groceries or go to church. Those drives aren't obligations — they're responsibilities. And they're reminders that proximity matters.

I don't mind making that drive.

But I would rather live close enough that care doesn't require a highway.

We often hear that young people are leaving rural communities.

I'm standing here telling you I want to come back — and build my life here.

My generation is navigating one of the most difficult housing environments in decades. Many young families are not leaving small towns because they want to — they're leaving because affordability and access leave them no option.

What makes this especially difficult is knowing that our family already owns land — land that has been responsibly stewarded for generations — and still questioning whether there will be space for us on it.

We understand that growth must be responsible, and that rural land must be protected. We are not asking for anything excessive — only for the opportunity to responsibly create space for family.

We are not asking to change the character of Erin.

We want to strengthen it.

I want the ability to live near my grandmother as she ages — not manage her care from a distance.

I want my future children to grow up knowing their great-grandmother in ordinary, everyday life — not just on holidays.

I want my father and uncle to experience what my grandfather envisioned: looking out and seeing their children nearby.

Multi-generational living isn't outdated. It's stabilizing.

It strengthens families.

It strengthens communities.

It keeps roots deep instead of scattered.

When families cannot build modest homes on land already meant for them, the outcome isn't preservation — it's separation.

Separation of generations.

Separation of support systems.

Separation of legacy from lived reality.

Small towns are defined by continuity — by families who stay, who invest, who return. I am asking for the chance to be one of those families.

I understand that Council has complex considerations.

But I ask you to consider something simple:

What does it mean when a grandson stands before you and says,
“I want to build my life on the land my grandfather prepared for me.”

For my grandfather, this land symbolized unity.

For my father’s generation, it represented responsibility.

For my generation, it represents possibility — if we are allowed to pursue it.

This decision will determine whether families like mine are able to remain rooted here — not just as owners, but as residents, neighbours, business owners, volunteers, and contributors to this community.

All we are asking for is the chance to stay together — and to build our future where our family’s story already began.

Please leave room for the next generation to come home.

Thank you for your time.

My name is Ed McKelvey. My wife Midge and I own an operating farm at 5022 Trafalgar Rd. We have lived there for 44 years.

In 2005 we severed a lot on our farm. You are aware that this is not a simple task. The requirements as set by the County are very strong as they should be. We worked with Henry Holman a long time ago.

Six years ago our daughter was retiring and asked if we could sever off another lot where she could live and help care for her aging parents. We went through the various requirements and decided that we had a lot that would comply.

We contacted Sarah Wilhelm in the County office where we learned that after March 2005 only one lot could be severed.

I kept in contact with Sarah once or twice a year to see if any rule changes were made. She advised that Provincial requirements and growth numbers could change to allow further agricultural lot severances.

My last inquiry was about five months ago. Her office advised me that the Erin Town Planner could help me. I was surprised by this but went to the Town office and saw David Watters. David told me that the Town had nothing to do with agricultural lot severances and was surprised that the County Office had sent me. However, shortly after I heard about the changes.

I understand that the Planners decided that lots could be required in Puslinch and Erin. However it was decided that it would only be allowed in Puslinch.

It appears that one vote in the Erin Council of five could determine that no lots, on rural agricultural properties in Erin, can be separated. This is unfair and discriminatory.

Appendix F1

PROVINCIAL Comments and Responses

County Official Plan Amendment 131 – Rural Area Policies and Growth (MMAH File: 23-OP-256956), January 13, 2026

Revisions to Draft Official Plan/Official Plan Amendment Suggested to Implement the Planning Act, Provincial Policy Statement, 2024 and Provincial Plans					
Item	OP Policy Number Or Schedule	Comments/Concerns and Policy Basis	Related Provincial Ministries	Reference to Planning Act, PPS or Provincial Plan Section or Policy	Proposed Revision
1	4.2.2 Conversion	PPS 2024 policy 2.8.2.5 sets out different criteria for removing lands from employment areas.	MEDJCT and MMAH	PPS 2024 policy 2.8.2.5	Suggest replacing OP policy 4.2.2 with PPS 2024 policy 2.8.2.5 regarding removing lands from employment areas.
<p>Item 1 County Response: County Staff acknowledge this comment and note that a future amendment will be undertaken to address the employment area policy framework of the PPS, 2024.</p>					
2	4.3.1 Prime Agricultural Areas	The PPS 2024 sets out that prime agricultural areas are to be designated.	OMAFA	PPS 2024 policy 4.3.1.2	Prime Agricultural Areas will be designated identified and protected so that normal farming operations are not hindered by conflicting development. <u>Within prime agricultural areas, Class 1, 2, and 3 lands will be given the highest level of protection followed by class 4 through 7 lands, in this order of priority.</u>
<p>Item 2 County Response: Section 4.3.1 has been updated to reflect Provincial comments.</p>					

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

3	OPA 131 – Item 10 4.3.3 Policy Direction	<p>OP policy 4.3.3 a) appears to suggest that lands may be removed from a prime agricultural area if a municipal scale study is completed, or studies demonstrate that limited non-residential uses are appropriate.</p> <p>PPS 2024 policy 4.3.4 sets out that the County may only exclude land from the prime agricultural area for expansions of or identification of settlement areas. PPS 2024 policy 4.3.5 provides direction for Non-Agricultural Uses in Prime Agricultural Areas, whereby limited non-residential uses may be permitted within the prime agricultural area, subject to the criteria identified. In all cases, non-agricultural uses contemplated through PPS 2024 policy 4.3.5 would result in consideration for the additional use(s) while maintaining the prime agricultural area designation.</p>	OMAFAs	PPS 2024 policy 4.3.4, 4.3.5	<p>a) Class 1, 2, and 3 agricultural lands, associated Class 4 to 7 lands and additional areas where there is a local concentration of farms which exhibit the characteristics of ongoing agriculture, and specialty crop areas will be designated as prime agricultural areas, unless:</p> <ul style="list-style-type: none"> i) municipal scale studies demonstrate that the land would more appropriately be placed in a greenlands or secondary agricultural designation in consultation with the OMAFA; ii) studies demonstrate that limited non-residential use is appropriate.
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Item 3 County Response:
Section 4.3.3 a) has been updated to reflect Provincial comments. It is noted that this section is re-numbered to section 4.3.4 a) through OPA 131.

4	4.4.6 Additional Residential Units	It is unclear how OP policies regarding additional residential units address PPS 2024 policy regarding additional residential units in prime agricultural areas. For example, how are the criteria provided in PPS 2024 policy 4.3.2.5 addressed?	OMAFAs	PPS 2024 policy 4.3.2.5	It is recommended that the County review OP policy 4.4.6 regarding additional residential units, to ensure it is consistent with PPS policy regarding additional residential units in prime agricultural areas.
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Item 4 County Response:
County staff have made updates to section 4.4.6.1 to clarify that compliance with MDS, where applicable, is required for new additional residential units proposed inside of an existing residential dwelling. Further, clarification has been added to section 4.4.6.2 a) to ensure units are compatible with, and would not hinder, surrounding agricultural operations.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

5	4.6.5 Agricultural Impact Assessment	<p>OP policy 4.6.5 sets out that Council may require the completion of an Agricultural Impact Assessment (AIA) for non-agricultural uses proposed in the prime agricultural area.</p> <p>The PPS 2024 requires that an AIA be completed for non-agricultural uses proposed within the prime agricultural area.</p>	OMAFA	<p>PPS 2024 policy 4.3.5.2</p> <p><u>Draft Agricultural Impact Assessment (AIA) Guidance Document</u></p>	<p>PPS 2024 policy 4.3.5.2 states “Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.”</p> <p>It is recommended that the County review OP policy 4.6.5 to ensure direction related to agricultural impact assessments is consistent with the PPS 2024 and relevant provincial guidance.</p>
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Item 5 County Response:

Section 4.6.5 Agricultural Impact Assessment has been updated to reflect policy direction in PPS 2024 policy 4.3.5.2. Various sections throughout the Plan have also been revised to link more clearly to policy 4.3.4 c) which outlines requirements for the consideration of non-agricultural uses in the prime agricultural area, including an AIA or equivalent analysis. Existing section 4.6.5.1 Rural Development in Prime or Secondary Agricultural Areas has been deleted.

6	<p>OPA 131 – Item 11</p> <p>4.7.1 Distinct Urban-Rural Boundary</p>	<p>OP policy 4.7.1 a) prohibits new development adjacent to existing settlement areas (within 1 km). Policy 4.7.1 b) also appears to refer to existing livestock facilities being permitted, provided they comply with the MDS formulae. Together these policies appear to prohibit new livestock facilities from being sited within 1 km of a settlement area.</p> <p>The PPS 2024 sets out that in prime agricultural areas, all types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with provincial standards. Agricultural uses are also permitted on rural lands, in accordance with provincial standards.</p>	OMAFA	<p>PPS 2024 policy 4.3.1.2, 4.3.2.1</p>	<p>It is recommended that policy 4.7.1 b) be revised to include: “new or expanding livestock facilities, and other agricultural uses, that are proposed adjacent to an existing urban boundary are permitted, provided they comply with the minimum distance separation formulae, and any other applicable policy in this plan.”</p> <p>An alternative approach could be to remove policy 4.7.1 b) and include new and expanding livestock facilities, as well as other agricultural uses, in the list of development types at the end of policy 4.7.1 that are exempt from this development prohibition.</p>
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Item 6 County Response:

Section 4.7.1 b) has been updated to reflect Provincial comments.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

7	4.8.2 Primary Urban Centre Expansion Criteria	<p>PPS 2024 policy 2.3.2.1 sets out that in identifying a new settlement area or allowing a settlement area boundary expansion, the County consider 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 assessment or equivalent analysis, based on provincial guidance.</p> <p>It is unclear from policy 4.8.2 j) if the settlement area must comply with the minimum distance separation formulae before or after expansion. PPS 2024 policy 2.3.2.1 sets out that compliance with the MDS formulae should be considered as part of a settlement area expansion.</p>	OMAFRA	PPS 2024 policy 2.3.2.1	<p>g) any adverse impacts on the <u>agricultural system agri-food network</u>, including agricultural operations, <u>are considered</u> from expanding settlement areas <u>and</u> would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an <u>agricultural impact assessment or equivalent analysis, based on provincial guidance;</u></p> <p>j) <u>whether</u> the <u>expanded</u> settlement area to be expanded is in compliance <u>complies</u> with the <i>minimum distance separation formulae</i> <u>has been considered</u>.</p>
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Item 7 County Response:

Section 4.8.2 g) and j) have been updated to reflect Provincial comments. County Staff further revised bullet g) to include the word “whether” to be consistent with the PPS criteria 2.3.2.1 f).

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

8	OPA 131 – Item 12	The rural area in the County of Wellington is primarily comprised of prime agricultural areas.	OMAFRA	PPS 2024 policy 4.3.1, 4.3.2	<p>Section 6.1 Defined is amended by:</p> <p>a. deleting the first sentence of this section in its entirety and replacing it with the following:</p> <p>“The Rural System is a relatively stable part of the County landscape devoted to economic activities based on natural resources. The Rural System primarily consists of prime agricultural areas, natural resource land, <i>natural heritage features and areas</i> and other uses typically found in nonurban areas.”</p>
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Item 8 County Response:

This section already lists Prime Agricultural Areas as a component of the Rural System in the bullet list immediately following the referenced Section of 6.1.

No change recommended to OPA 131.

9	OPA 131 – Item 13	PPS 2024 policy 4.3.1.1 provides direction related to the agricultural system approach and provides that this approach should “maintain and enhance a geographically continuous agricultural land base”.	OMAFRA	PPS 2024 policy 4.3.1.1	<p>Section 6.2 Purpose is amended by deleting the three paragraphs in this section in their entirety and replacing them with the following:</p> <ul style="list-style-type: none"> • Support a connected <i>agricultural system</i> that protects and enhances the agricultural land base, supports local food production and a robust <i>agri-food network</i>.
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Item 9 County Response:

Section 6.2 has been updated to reflect Provincial comments.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

10	OPA 131 – Item 14 6.3 Planning Approach	5 th paragraph The PPS 2024 does not contemplate non-farm related housing in the prime agricultural area. (PPS 2024 policy 4.3.2.4) 8 th paragraph The PPS 2024 provides direction related to limited non-agricultural uses in the prime agricultural area. If a waste management facility is being contemplated in the prime agricultural areas these policies would apply. Uses that are not permitted in the prime agricultural area may be considered as limited non-agricultural uses, provided the policy criteria for these uses are satisfied. (PPS 2024 policy 4.3.5.1)	OMAFA	PPS 2024 policy 4.3.2.4, 4.3.5.1	5 th paragraph Rural housing primarily supports natural resource activities such as farming. Non-farm related housing may be considered <u>outside of the prime agricultural area</u> in areas which do not conflict with resource related or other rural uses. 8 th paragraph Waste Management Facilities may be allowed in the Rural System subject to the Environmental Assessment Act or the Environmental Protection Act, and the Environmental Services policies of this Plan, <u>and prime agricultural area policies as applicable.</u>
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Item 10 County Response:

Section 6.3 has been updated to reflect Provincial comments. County Staff added additional clarity to this section by linking to the non-agricultural use framework in proposed section 4.3.4 c)

11	OPA 131 – Item 15 6.4.1 Defined	The PPS 2024 sets out that prime agricultural areas will be designated and protected for the long-term use for agriculture.	OMAFA	PPS 2024 policy 4.3.1.2	Section 6.4.1 Defined is amended by deleting the first paragraph of this section in its entirety and replacing it with the following: “Canada Land Inventory Class 1, 2, and 3 lands and associated Class 4 through 7 lands, and additional areas where there is a local concentration of farms which exhibit characteristics of ongoing agriculture will be designated as prime agricultural areas. These areas will be protected for <u>long-term use for agriculture.</u> Currently there are no known <i>specialty crop areas</i> in the County. Should any areas be identified, the County will develop policies to govern their protection and development.”
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APPENDIX F1 PROVINCIAL Comments and Responses (continued)

Item 11 County Response:

Section 6.4.1 has been updated to reflect Provincial comments. Section 6.4.1 was further modified to clarify how Prime Agricultural areas will be identified.

12	<p>OPA 131 – Items 16-23</p> <p>6.4.3 Permitted Uses</p> <p>AND</p> <p>General comment re. Section 6.4 more broadly</p>	<p>PPS 2024 policy 4.3.2 provides direction on the uses permitted within a prime agricultural area. This includes agricultural uses, agriculture-related uses, and on-farm diversified uses. Additionally, the PPS 2024 clarifies that “A principal dwelling associated with an agricultural operation shall be permitted in prime agricultural areas as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1.c.” The PPS 2024 also provides direction and criteria related to additional residential units in prime agricultural areas.</p> <p>Some of the uses currently contemplated under OP Section 6.4 are not consistent with the PPS 2024 (e.g., are not permitted as of right or are missing criteria provided by the PPS 2024).</p>	OMAFA	PPS 2024 policy 4.3.2 and related definitions	<p>It is recommended that the County further review the permitted use policies for prime agricultural areas in the OP, to ensure they are consistent with the PPS 2024. For example, community service facilities are not permitted in the prime agricultural area, and it is unclear how the PPS 2024 criteria for additional residential units in the prime agricultural area have been addressed. Consider that licensed mineral aggregate operations are permitted as an interim use (PPS 2024 policy 4.5.4.1) and require the completion of an agricultural impact assessment (PPS 2024 policy 4.3.5.2).</p> <p>PPS 2024 policy 4.3.2 provides direction on the uses permitted within a prime agricultural area. This includes agricultural uses, agriculture-related uses, and on-farm diversified uses. The PPS 2024 also provides direction related to principal dwellings associated with an agricultural operation (policy 4.3.2.4), as well as additional residential units (policy 4.3.2.5) in prime agricultural areas. Uses that are not permitted in the prime agricultural area may be considered as limited non-agricultural uses, provided the policy criteria for these uses are satisfied. The Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas provides helpful context in this regard.</p>
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APPENDIX F1 PROVINCIAL Comments and Responses (continued)

Item 12 County Response:

Section 6.4.3 Permitted Uses has been revised to address Provincial comments as follows:

- Revised “Single detached homes” to “Single detached dwellings associated with an *agricultural use*”.
- Added new bullet “f) a single detached dwelling on an existing vacant lot in accordance with the local zoning by-law”. This change is necessary to clarify that existing vacant lots are permitted a dwelling in the Prime Agricultural Area. Linking to municipal zoning by-laws provides the appropriate Minimum Distance Separation considerations for the development of these lots and captures any site-specific residential restrictions on vacant lots resulting from a residence surplus to a farming operation severance.
- Revised existing bullet k) to state: “licensed *mineral aggregate operations* as an interim use”.

Regarding comments related to ARUs, please see planning staff’s response to Ministry Comment #4 above.

Regarding the mineral aggregate policy framework in the Official Plan, the County will undertake a further amendment at a later date to address broader compliance with the mineral aggregate policy framework of the PPS, 2024.

Regarding Community Service Facilities, this policy framework provides for a narrow range of uses that may be justified in prime agricultural areas which are related to public safety and/or government service delivery. These uses and their location are largely driven by service delivery standards and response time requirements legislated by upper levels of government, often necessitating a rural location to efficiently deliver service in our rural communities (e.g., public works garages, police stations, ambulance depots). The policies generally direct these uses through the non-agricultural use framework and have effectively facilitated the delivery of critical facilities servicing the needs of Wellington and the City of Guelph residents. No change to OPA 131 is proposed in this regard.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

13	OPA 131 – Item 25 6.5.2 Identification	OMAFAs notes that secondary agricultural areas are effectively rural lands for the purpose of PPS 2024 policy. In this context, rural lands are defined as “lands which are located outside settlement areas and which are outside prime agricultural areas.”	OMAFAs	PPS 2024 definition for rural lands and prime agricultural areas	<p>Consider that the identification of secondary agricultural areas may be more accurately described using the PPS 2024 definition of rural land or in the context of prime agricultural areas.</p> <p>For example:</p> <p>Secondary Agricultural Areas will be determined either by:-</p> <p>a) the existence of large blocks of land which are not <u>prime agricultural areas</u>, Canada Land Inventory Class 1, 2, and 3 lands or specialty crop areas;”</p> <p>b) an alternative evaluation system developed with the cooperation of the Ministry of Agriculture, Food and Rural Affairs which examines the land base in greater detail to determine the long term agricultural potential based on:</p> <ul style="list-style-type: none"> • -Canada Land Inventory • -farm investment • -nature of agricultural operations • -constraints and opportunities for farming • -land use patterns • -land fragmentation • -other matters.
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Item 13 County Response:

Section 6.5.2 has been revised to address Provincial comments. Planning staff have further revised this section to clarify that a planning authority would identify these areas through a study based on provincial guidance or informed by provincial mapping.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

14	OPA 131 – Item 29	<p>PPS 2024 policy 4.3.5.1 b) provides direction for Non-Agricultural Uses in Prime Agricultural Areas, whereby limited non-residential uses may be permitted within the prime agricultural area, subject to the criteria identified.</p> <p>Additionally, PPS 2024 policy 4.3.5.2 requires that impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.</p>	OMAFRA	PPS 2024 policy 4.3.5.1, 4.3.5.2	It is recommended that the County review OP policy 6.8.4 in the context of PPS 2024 policies 4.3.5.1 and 4.3.5.2.
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Item 14 County Response:

Section 6.8.4 Existing Employment Areas outside of Settlement Areas - is proposed to be deleted in its entirety through OPA 131. In response to provincial comments, Planning Staff are proposing to add additional language to Section 6.8.1 Defined – that would clarify that new or expanding Rural Employment Areas in Prime Agricultural Area will meet the policies of section 4.3.4 c) of the Official Plan, which outlines policy requirements for non-agricultural uses in prime agricultural areas. Planning Staff further clarify that these amendments will result in the establishment of a Local Policy Area under Part 9 of the Official Plan which will not result in the Prime Agricultural Area designation being removed.

15	6.6 Mineral Aggregate Areas	<p>PPS 2024 introduced new and revised policies that manage mineral aggregates, some of which interface with the protection of agricultural interests. For example, this includes the requirement that an AIA be completed for mineral aggregate operations proposed within a prime agricultural area.</p>	OMAFRA	PPS 2024 policy 4.3.5.2, 4.5.4	It is recommended that the County review the Mineral Aggregate Areas policies in the OP, to ensure that direction related to aggregates and agriculture is consistent with the PPS 2024.
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Item 15 County Response:

Regarding the mineral aggregate policy framework in the Official Plan, the County will undertake a future amendment to address broader compliance with the mineral aggregate policy framework of the PPS, 2024.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

16	6.7 Recreational Areas	<p>It appears that OP policy 6.7 regarding Recreational Areas may contemplate the removal of land from the prime agricultural area designation.</p> <p>PPS 2024 policy 4.3.4 sets out that the County may only exclude land from the prime agricultural area for expansions of or identification of settlement areas. PPS 2024 policy 4.3.5 provides direction for non-agricultural uses in prime agricultural areas, whereby limited non-residential uses may be permitted within the prime agricultural area, subject to the criteria identified. In all cases, non-agricultural uses contemplated through PPS 2024 policy 4.3.5 would result in consideration for the additional use(s) while maintaining the prime agricultural area designation.</p>	OMAFA	PPS 2024 policy 4.3.4	<p>Recreational areas are normally land associated with lakes, reservoirs, ponds, rivers or other scenic resources which have potential for the development of recreational or seasonal residential uses relying on recreational activities. New Recreational Areas will be established by amendments to this Plan, <u>that do not result in the removal of land from the prime agricultural area designation</u>. Where new Recreational Areas are proposed in Prime Agricultural Areas, the policies of Section 4.3.3 c) shall be met.</p>
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Item 16 County Response:

Section 6.7.1 has been revised to clarify that new or expanding Recreational Areas in the Prime Agricultural Area will meet the policies of section 4.3.4 c) of the Official Plan. This section outlines policy requirements for non-agricultural uses in prime agricultural areas. Planning Staff further clarified that these amendments would result in the establishment of a Local Policy Area under Part 9 of the Official Plan which would not result in the Prime Agricultural Area designation being removed.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

17	9.8.6 Puslinch Local Policies and new policy area PA7-10	<p>The OPA proposes two new local policy areas to be added to Section 9.8.6 of the OP, one of which (PA 7-10 adjacent to Highway 401) partially overlaps primary sand and gravel deposits that have been identified by the province and appear to align with the OP Schedule D: Mineral-Aggregate Resource Overlay mapping for this area.</p> <p>PA-7-10 is proposed as a Prestige Rural Employment Area and does not permit industrial uses. As such, the redesignation of these lands may preclude or hinder future access to primary sand and gravel deposits in this area.</p> <p>PPS 2024 policy 4.5.1 requires that mineral aggregate resources be protected for long-term use.</p> <p>PPS 2024 policy 4.5.2.5 states that in known deposits of mineral aggregate resources and on adjacent lands, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:</p> <ul style="list-style-type: none"> a) resource use would not be feasible; or b) the proposed land use or development serves a greater long-term public interest; and c) issues of public health, public safety and environmental impact are addressed. <p>It does not appear that a feasibility assessment within and adjacent to these known primary sand and gravel deposits was prepared to avoid or minimize land use conflicts.</p>	MNR	PPS 2024 policy 4.5.1, 4.5.2.5	To be consistent with PPS 2024 policy 4.5.2.5, it is recommended that resource use feasibility be assessed within and 300 metres adjacent to the primary sand and gravel deposit on the west half of the PA 7-10 policy area adjacent to Highway 401, to ensure future access to or use of the mineral-aggregate resources are not restricted by the proposed new policy area and associated redesignation.
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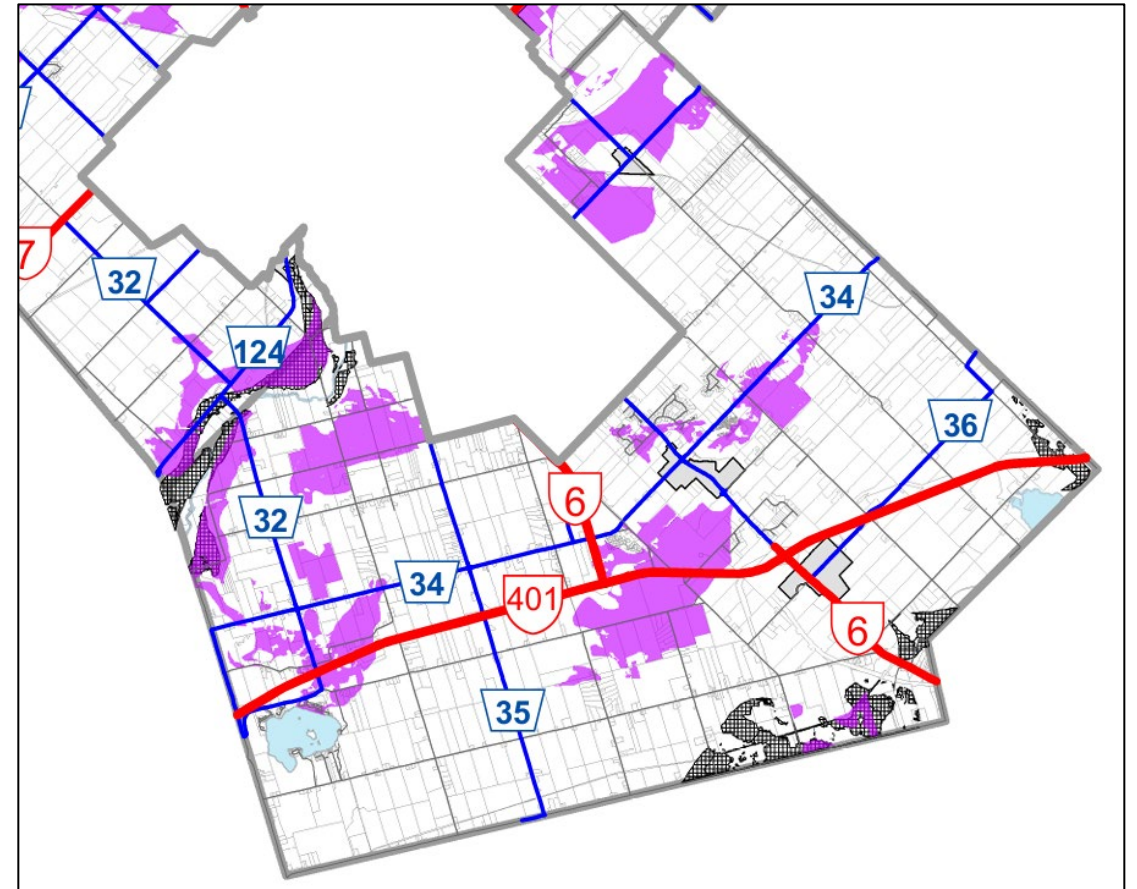
APPENDIX F1 PROVINCIAL Comments and Responses (continued)

Item 17 County Response:

Planning staff acknowledge that the consultants for Puslinch by Design did not complete an aggregate feasibility assessment within and adjacent to these known primary sand and gravel deposits. The County recognizes that this was, however, the preferred land option for employment growth based on an extensive multi-disciplinary study, land evaluation, public process and Township Council decision. The County continues to seek inclusion of these lands without such an assessment given justification under PPS Section 4.5.2.5(b) that the proposed land use or development serves a greater long-term public interest. As expressed in Section 2.8 Employment of the PPS, planning authorities are also required to identify strategic sites for investment, including market-ready sites like this one.

Area D represents the last opportunity for rural employment area land to be designated with Highway 401 frontage near interchanges at Hwy 401/Hwy 6 S and Hwy 401/Hwy 6 N. Area D is just south of the existing Puslinch industrial park and is not constrained by the Greenbelt Plan or designated Prime Agricultural Area land. Staff also note that designation of lands within Area D as Rural Employment would not necessarily impact access to the resource: regardless of current or proposed land use designation, a County Official Plan Amendment is required for all new or expanded mineral aggregate operations.

There are other resource areas of the Township that can potentially provide access to these resources for extraction (See County Official Plan - Schedule D Mineral Aggregate Resource Overlay excerpt at right).



18	OPA 131 – Item 30 and 31	The PPS 2024 requires that “New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae” for both prime agricultural areas and rural lands. It is unclear how PPS 2024 direction related to MDS is addressed in OP policy 9.8.3.	OMAFA	PPS 2024 policy 2.6.5, 4.3.2.3	It is recommended that the County address PPS 2024 requirements related to MDS. The PPS 2024 requires that “New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae”.
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Item 18 County Response:

Policy 9.8.3 has been in the County Official Plan since 1999 and refers specifically to existing designated Rural Employment Areas. The proposed revisions to Section 9.8.3 do not designate new Rural Employment Areas and therefore do not trigger an MDS calculation in this instance.

19	10.1.3 Matters for Consideration	The PPS 2024 requires that the County “use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.”	OMAFA	PPS 2024 policy 4.3.1.1, 4.3.3.1	The County may wish to address considerations related to the agricultural system as it relates to lot creation (e.g., to maintain and enhance a geographically continuous agricultural land base).
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Item 19 County Response:

Proposed Section 4.3.1 Agricultural System - provides policy direction related to the protection and continuity of the agricultural land base. No change is recommended to OPA 131 in this regard.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

20	<p>OPA 131 – Item 33-39</p> <p>10.3 Prime Agricultural Land (Lot Creation)</p> <p>10.3.6 Community Service Facilities</p>	<p>OP policy 10.3.1 lists the circumstances where a new lot in a prime agricultural area may be created. This includes circumstances beyond those listed in PPS policy 4.3.3.1.</p>	OMAFA	<p>PPS 2024 policy 4.3.3.1, 4.3.3.2</p>	<p>It is recommended the OP lot creation policies in prime agricultural areas be reviewed to ensure the circumstances when a new lot may be created are consistent with the PPS 2024.</p>
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Item 20 County Response:

Community Service Facilities in the prime agricultural area are reviewed under the non-agricultural policies of Section 4.3.3 (to be 4.3.4) of the County Official Plan. Lot creation under Section 10.3.6 remains a secondary consideration, contingent upon a local zoning by-law amendment and the verification that land leasing is not a viable alternative. Although these uses are not explicitly identified in the PPS, County Planning Staff recognize their role in supporting public safety and rural community integration within Wellington. Consequently, this policy framework provides limited flexibility to establish essential facilities for residents who rely exclusively on horse-drawn transportation. No change is recommended to OPA131 in this regard.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

21	<p>OPA 131 – Item 36</p> <p>10.3.4 Residence Surplus to a Farming Operation</p>	<p>In OP policy 10.3.4 it is unclear what the intent is in referencing “good farmland”. PPS 2024 policy 4.3.3.1 sets out that the new lot will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services, and does not reference the quality of the farmland.</p> <p>It is also unclear what is meant by “the Minimum Distance Separation formulae will be met” in the context of OP policy 10.3.4. Implementation Guideline #9 in the MDS Document provides municipalities with options on how to apply MDS setbacks from surrounding livestock facilities on different lots than the residence surplus to a farming operation proposed to be severed.</p>	OMAFA	<p>PPS 2024 policy 4.3.3.1</p> <p><u>The Minimum Distance Separation (MDS) Document, Publication 853</u></p>	<p>Consider more closely aligning the wording of OP policy 10.3.4 c) with PPS 2024 policy 4.3.3.1 c).</p> <p>There are three common approaches for enhanced local criteria to address lot creation for surplus farm dwellings:</p> <ol style="list-style-type: none"> 1. A planning authority can choose to prohibit lot creation for residences surplus to a farm operation. 2. A planning authority can permit lot creation for a residence surplus to a farm operation, but only for abutting parcels. 3. A planning authority can adopt more detailed policies that either add additional criteria for lot creation for a surplus farm dwelling (e.g. the age of the dwelling) or provide greater clarity or detail around an existing PPS 2024 criterion (e.g. limitations on distance between non-abutting parcels). <p>OMAFA rural planners are available to provide examples of additional local requirements for surplus farm dwelling lot creation applications.</p> <p>Consider providing additional clarity regarding what is meant by “the Minimum Distance Separation formulae will be met” in the context of OP policy 10.3.4. Further guidance to assist with the development of local MDS policies can be found in Section 8.1 ‘Incorporating this MDS Document into Local Planning Documents’ of the MDS Document (Minimum Distance Separation (MDS) Formulae (gov.on.ca)). Detailed information on Guideline # 9 (referred to as Option B) can be found in Section 8.1, beginning on page 95.</p>
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Item 21 County Response:
 Section 10.3.4 Residence Surplus to a Farming Operation has been revised to address Provincial comments. Planning Staff made further revisions to this policy to address additional feedback received. See Appendix B of this report for more details.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

22	10.3.5 Lot Line Adjustments	<p>The PPS only permits minor boundary adjustments that do not result in the creation of a new lot. This means that a lot adjustment cannot result in a greater number of parcels after the application is approved than existed before the application. An application to recreate two lots that had previously merged on title does not constitute correction of deeds for the purposes of the PPS.</p> <p>It appears that the first item in the bulleted list may be describing a surplus farm dwelling severance.</p> <p>OMAFA rural planners are available to provide additional information about minor boundary adjustments in the context of PPS policy 4.3.3.2.</p>	OMAFA	PPS 2024 policy 4.3.3.2 and definition of legal or technical reasons	<p>Lot adjustments may be permitted for legal or technical reasons, such as easements, corrections of deeds, quit claims, and minor boundary adjustments, <u>which do not result in the creation of a new lot.</u></p> <p>Minor lot line adjustments may also be permitted where no adverse effect on agriculture will occur where:</p> <ul style="list-style-type: none"> • two abutting farms are merged (merged means the joining of farm parcels under the same ownership) and an existing farm residence is made surplus to the resulting enlarged farm parcel; • more viable agricultural operations will result; • an undersized lot is made useable given the requirement for appropriate sewer and water systems. <p>Lot line adjustments are deemed not to create new lots for the purposes of this plan.</p>
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Item 22 County Response:

Section 10.3.5 has been updated to reflect Provincial comments.

23	10.5.2 Mineral Aggregate Areas	OP policy 10.5.2 permits a new lot to be created for a mineral aggregate operation within the County's Rural System. Within a prime agricultural area, the PPS 2024 does not permit lots to be created for mineral aggregate operations.	OMAFA	PPS 2024 policy 4.3.3	It is recommended that the County review the circumstances in the plan where a lot may be created in a prime agricultural area, to ensure consistency with the PPS 2024.
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Item 23 County Response:

Section 10.5.2 Mineral Aggregate Areas has been deleted to address Provincial comments.

APPENDIX F1 PROVINCIAL Comments and Responses (continued)

24	Various	MTO recommends the county review section 3.3 of the <u>Ontario Ministry of Transportation Guidelines for Municipal Official Plan Preparation and Review</u> document and include language regarding the <i>Public Transportation and Highway Improvement Act</i> .	MTO	<i>Public Transportation and Highway Improvement Act</i> , MTO's Highway Corridor Management Manual, and PPS 2024 policy 3.2, 3.3	
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Item 24 County Response:

The County acknowledges these comments and notes it will be completing future amendments to address PPS Infrastructure and Facilities policy requirements. At that time, we will review appropriate guidance material and language to be included in the Plan to achieve consistency with the PPS.

25	Various	Suggest replacing all references to the various ministries of the Province with “the Province”.	MMAH	Ministry names are used throughout the official plan. References to specific Ministries of the Province would be replaced with “the Province” to avoid confusion and future housekeeping amendments when Ministry names change.	Suggest replacing all references to the various ministries of the Province with “the Province”.
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Item 25 County Response:

The County acknowledges these comments and notes it will complete these housekeeping updates at a later date.

Appendix F2

MEMBER MUNICIPALITY Comments, Background and Responses

County Official Plan Amendment 131 – Rural Area Policies and Growth

F2.1 Background – First Report (2024 Rural Residential Growth Analysis)

Prior to drafting and circulating an Official Plan Amendment regarding rural growth, County staff prepared an analysis of rural residential growth needs across the County and presented the findings in report PD2024-29 (County Official Plan Review – 2024 Rural Residential Growth Analysis). To meet the 2051 rural household forecast:

- 580 units are needed in Erin;
- 600 units are needed in Puslinch; and
- 165 units are needed in Wellington North.

As shown in Figure F2-1 below, almost 80% of the 580 unit forecast for Erin can be met through an available supply of 460 units of designated land, existing vacant lots and properties eligible for a severance under the current March 1, 2005 cutoff date. A 120 unit shortfall remains.

For Puslinch, as shown in Figure F2-2 below, almost 60% of the 600 unit forecast for Puslinch can be met through an available supply of 350 units. A 250 unit shortfall remains.

Wellington North's long-term forecast of 165 units is satisfied with a supply of 115 units, leaving a modest shortfall of 50 units. No other municipalities in Wellington County had a rural supply shortfall.

The report sets out four potential policy options to grow the vacant rural residential supply in Erin and Puslinch:

1. Rural settlement area expansions (Secondary Urban Centres and Hamlets)
2. Country residential areas¹
3. Secondary Agricultural Area lot creation
4. Rural clusters²

With no Secondary Agricultural Area land in Wellington North, only hamlet expansion may potentially be considered.

County Council directed County planning staff to consult with Erin, Puslinch and Wellington North to determine the appropriate approach to addressing rural growth needs in these municipalities. The September 2024 Report was also distributed to all Member Municipalities, posted to the Official Plan Review project website and notification was sent through the Official Plan Review email distribution list.

¹ There are existing Country Residential Areas designated on Schedule B of the Official Plan in Puslinch, Erin and Wellington North, but are largely built out. The County Official Plan does not permit new Country Residential Areas to be established.

² Rural Clusters policy 6.5.4 was added by staff to the County Official Plan through OPA 119 in response to comments from the Town of Minto. Minto has enough supply to 2051 to meet its growth needs without identifying rural clusters.

Figure F2-1 Rural Erin Forecast, Supply and Shortfall³

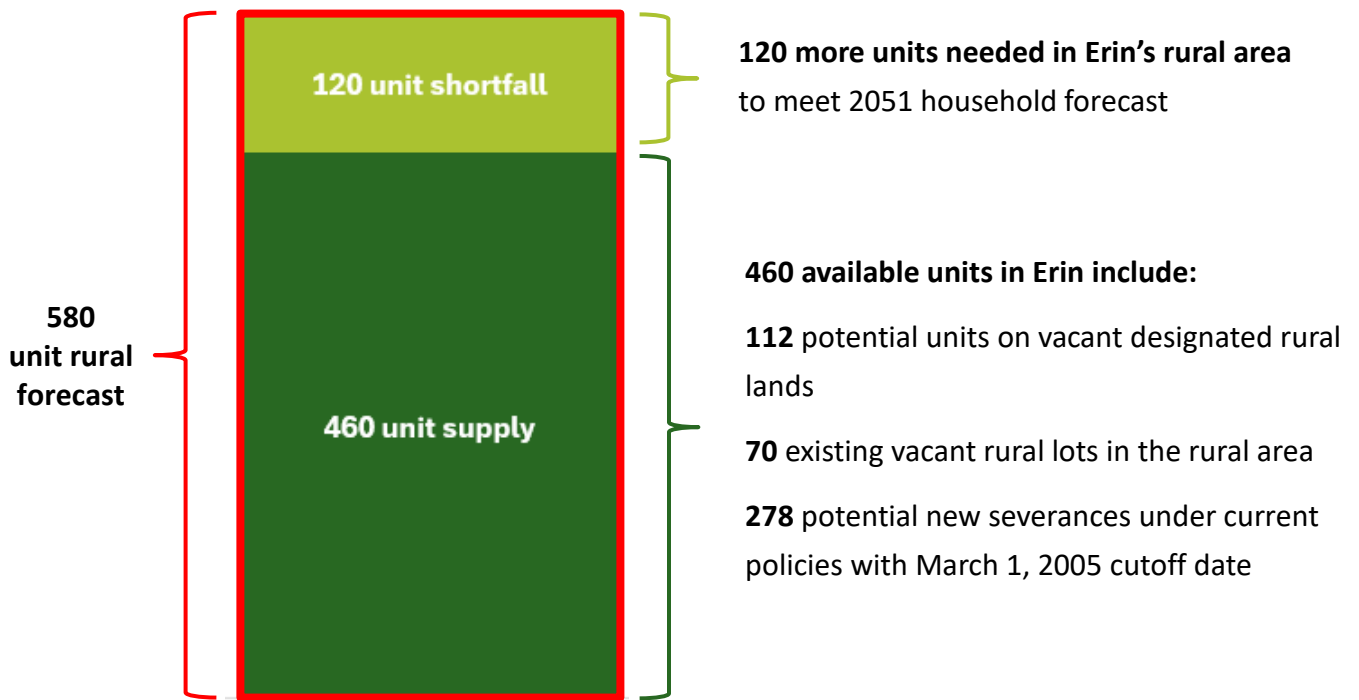
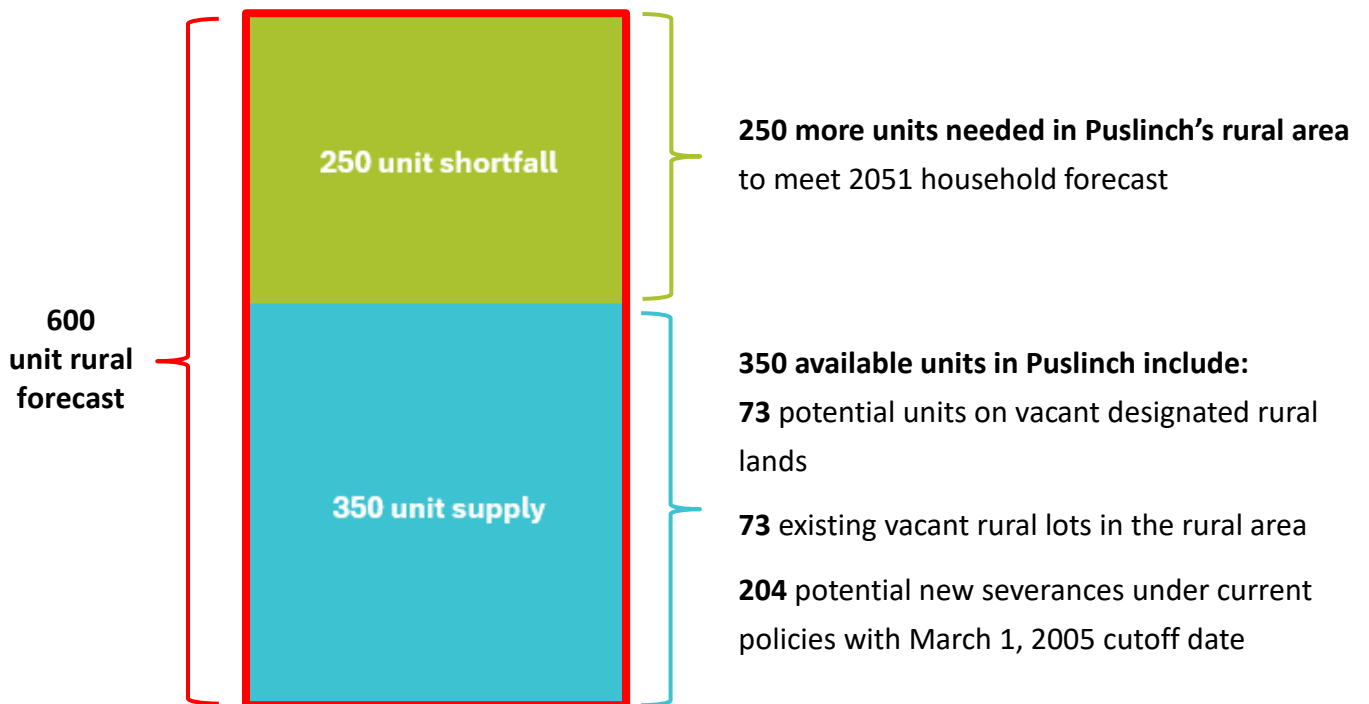


Figure F2-2 Rural Puslinch Forecast, Supply and Shortfall⁴



³ See September 2024 County of Wellington Report PD2024-29 (County Official Plan Review – 2024 Rural Residential Growth Analysis) for further information.

⁴ Ibid.

Staff note that prior to the above-noted County report, Puslinch Council commented on the severance cutoff date through resolutions of December 29, 2021, October 19, 2022 and November 27, 2024:

- December 2, 2021 • Puslinch Council requested that the County report back on the 2005 eligibility date for severance applications.
- October 19, 2022 • Puslinch Council requested that the County OP Review “include removal of the severance criteria date forward from March 1, 2005 or at the very least moving the date to March 1, 2015 to permit additional severances...”
- November 27, 2024 • Puslinch Council requested that the County remove the rural residential severance date of March 1, 2005 and allow a property one severance every five years with a review of the provision every five years.

The County received feedback from Puslinch Council on the September 2024 report:

- December 13, 2024 • Puslinch Council requested that “the County remove the rural residential severance date of March 1, 2005, and control growth by allowing a property one (1) severance every five (5) years, as its preferred option for accommodating lot creation in Secondary Agricultural Areas with a review of this provision every five years.”
- January 22, 2025 • Puslinch Council requested an update about when a determination would be made in respect to the review of the 2005 severance date and attached all of the above resolutions.

Additional details are provided below.

Township of Puslinch Feedback to County – November 27, 2024

Township Consultant Report	Council Resolution
<p>NPG Planning Solutions was requested to comment on County report “County of Wellington Official Plan Review - 2024 Rural Residential Growth Analysis” in relation to Secondary Agricultural Area lot creation (policy option 1).</p> <p>Three options were provided for Council’s consideration regarding lot creation in Secondary Agricultural Areas while continuing to focus lot creation in settlement areas:</p>	<p>Resolution No. 2024-439 was passed:</p> <p>“That Correspondence Items 10.1 entitled Township Planning Consultant Comments regarding County of Wellington Planning Committee Report regarding Official Plan Review – 2024 Rural Residential Growth Analysis be received for information; and,</p> <p>Whereas the County has the flexibility to amend the Official Plan to allow for rural residential growth in accordance with the current Provincial Planning Policies.</p> <p>Therefore, that Puslinch Council requests that the County remove the rural residential severance date of March 1, 2005, and control growth by allowing a property one (1) severance</p>

<ol style="list-style-type: none"> 1. Reset the rural residential severance date of March 1, 2005 to a more recent date. 2. Increase the number of permitted lots. 3. Restrict the number of permitted rural residential severances based on the size of the original Township lot size. 	<p>every five (5) years, as its preferred option for accommodating lot creation in Secondary Agricultural Areas with a review of this provision every five years; and</p> <p>That Council direct staff to forward this Council resolution and NPG Planning Solutions Official Plan Review - 2024 Rural Residential Growth Analysis report to the County of Wellington Planning Committee for consideration in respect to the Official Plan Review of Rural Residential Growth.”</p>
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Township of Puslinch Feedback to County – January 22, 2025

Council for the Township of Puslinch passed resolution No. 2025-030:

“That Council receive correspondence item 10.2 Review of the County of Wellington’s Report regarding the 2024 Provincial Planning Statement presented by Township Planning Consultant Jesse Auspitz, Principal Planner, NPG Planning Solutions Inc. be received for information; and

Whereas Council has reviewed the attached planning report from its consultant and remains concerned about the 2005 rural residential severance date restriction; and

Whereas Council has requested several times for the 2005 severance date be reviewed as noted in the attached Council resolutions;

Therefore, that Council direct staff to request that County Planning staff provide information related to future consultation with affected municipalities related to rural residential severances and a timeline of when a determination will be made in respect to the 2005 restriction date; and

That Council request that County Planning staff attend an upcoming Puslinch Council meeting to provide the information as requested.”

The following Council resolutions were attached to demonstrate previous requests for review of the 2005 rural residential severance date restriction:

1. Resolution No. 2021-338

“That the Consent Agenda item 6.1.1 listed for NOVEMBER 3, 2021 Council meeting regarding the discussion with the County of Wellington regarding the County Official Plan Review – Consultation and Engagement Overview report be received; and

That Council request that the County report back regarding the 2005 eligibility date for severance applications when this information becomes available.”

2. Resolution No. 2022-350

“Whereas the Township has will have limited land opportunities available for rural residential growth with the pending designation of Prime Agricultural Areas, Natural Heritage System and Greenbelt Expansion (which will take up 93% of Puslinch lands)

The Township of Puslinch requests that the County as part of it’s Official Plan Update include removal of the severance criteria date forward from March 1, 2005 or at the very least moving the date to March 1, 2015 to permit additional severances and that the Township requests that the County advise when this new date is likely to be known; and

That Council direct staff to forward this resolution to Township of Guelph Eramosa and Township of Erin.”

3. Resolution No. 2024-439

Referenced above.”

County policy planning staff were invited to present at an Erin Council Workshop in March 2025. The presentation included content about rural residential growth and the need for feedback from the Town about how to address the 120 household shortfall.

In April 2025, Town Council considered a report from their planning staff and provided comments on the County’s September 2024 report.

Town of Erin Feedback to County – April 10, 2025

Town Staff Report	Council Resolution
<p>On April 10, 2025, Council for the Town of Erin considered a report prepared by Erin planning staff regarding County Planning Report PD2024-29 (Official Plan Review – 2024 Rural Residential Growth Analysis).</p> <p>Erin planning staff recommended that “Council endorse the policy option of a minor expansion of the Hamlet Settlement Area boundaries within the Town of Erin outside of the Greenbelt Plan to accommodate the additional units required to achieve the 2051 rural growth forecast.”</p>	<p>Resolution No. 25-71 was passed:</p> <p>“That Council hereby receives report number PD2025-10 “County of Wellington Official Plan Review – 2024 Rural Residential Growth Analysis” for information;</p> <p>And that Council endorses promoting Additional Residential Units (ARUs) to accommodate the additional units required to achieve the 2051 rural growth forecast.”</p>

County staff will continue to work with the Township of Wellington North to address their modest shortfall of 50 units.

F2.2 Background – Second Report (Phase 3B Rural Residential Growth Report)

County planning staff prepared a follow up report PD2025-20 (County Official Plan Review – Phase 3B Rural Residential Growth) in response to the above municipal input from Erin and Puslinch about how to address their long-term rural residential growth needs.

Staff considered Erin Council’s request to have additional residential units (i.e. accessory or basement apartments, etc.) make up the 120 unit shortfall. ARUs are supported in the County Official Plan in many urban and rural areas of the County, subject to criteria. As part of the Phase 2 MCR Report: Urban Land Needs Assessment, the County’s consultants Watson and Associates Economists Ltd. (Watson) analyzed annual ARU building permit activity from 2011 to 2021 and prepared an annual ARU forecast by Urban Centre and this factored into the urban housing supply.

A similar exercise was not completed for rural areas because there was little uptake of ARUs at that time. Staff do not recommend adjusting the rural forecast to account for rural ARUs as such a change would need to be considered County-wide. This would have a ripple effect not only on the rural household forecasts, but also on the related population forecasts because ARUs have a different number of persons per unit. Staff will continue to track urban and rural ARUs annually to determine how they should be factored into the next update to the County’s long-term growth forecast.

Erin Council did not support any other policy options (Hamlet expansions, Country Residential Areas, Secondary Agricultural Lot Creation or rural clusters). This means that the 120 unit shortfall would still potentially be available for growth which was not desired by Erin Council. Therefore, County planning staff recommended reassigning the growth to the Township of Puslinch, where more rural growth was requested.

After the June 2025 County Report was considered by Council, Council directed staff to bring forward a draft Official Plan Amendment(s). The report was distributed to all Member Municipalities, posted to the Official Plan Review project website and notification was sent through the Official Plan Review email distribution list.

Township of Puslinch

The Township of Puslinch invited County staff to present to Council in June and July 2025 and provided feedback summarized below.

- | | |
|---------------|---|
| June 18, 2025 | <ul style="list-style-type: none">• Puslinch Council authorized County staff to proceed with Aberfoyle boundary expansion, inclusive of Area D subject to further review, and to reset the rural residential severance date to May 1, 2025. |
| July 23, 2025 | <ul style="list-style-type: none">• Puslinch Council supports Aberfoyle expansion study area boundary including Area D for continuing technical work and to reset the rural residential severance date to May 1, 2025. |

Additional details are provided below.

Township of Puslinch Feedback to County – June 18, 2025

County Presentation	Summary of Council Resolution
<p>County presentation provided an update to Council about Rural Phase 3B in Puslinch. This included consideration of future expansions for Aberfoyle by about 200 units and for Arkell by about 50 units.</p> <p>The County set out a work plan to assist with technical work for considering a 200 unit expansion of Aberfoyle addressing planning policy, MDS I, agricultural impact, aggregate resources and water resources.</p> <p>The County set aside 50 units of expansion growth for Arkell but that the location(s) would need to be determined through a privately-initiated planning application.</p>	<p>Council received the County staff presentation and endorsed the recommendations of the June 2025 Second Report and presentation (including a May 1, 2025 rural residential severance date and Aberfoyle expansion including Area D subject to further review).</p> <p>County staff were also asked to report back on the feasibility of including Area D in the Aberfoyle boundary expansion and rural residential lot size.</p>

Council Resolution

On June 18, 2025 Council for the Township of Puslinch passed resolution No. 2025-215:

“That Correspondence item 10.4 Presentation by Sarah Wilhelm, Manager of Policy Planning regarding Wellington County Official Plan Review – Phase 3B Rural Residential Growth be received for information; and

Whereas Council has previously requested policy changes regarding residential growth such as the expansion of the boundaries of Aberfoyle and changing the rural residential severance date of March 1, 2005;

Therefore, that Council endorse the recommendations outlined in the Wellington County Official Plan Review - Phase 3B Rural Residential Growth report and the recommendations outlined in the presentation, including the process steps and timelines, to proceed with the Aberfoyle boundary expansion, inclusive of area D subject to further review, and to reset the rural residential severance date to May 1, 2025; and

That County Planning staff report back on the feasibility of including area D in the Aberfoyle boundary expansion and the potential for a rural residential lot size review at the July 23 Special Council meeting.”

Township of Puslinch Feedback to County – July 23, 2025

On July 23, 2025 Council for the Township of Puslinch considered a presentation by County staff. Council passed resolution No. 2025-252:

County Presentation	Summary of Council Resolution
County presentation provided follow up regarding Area D and rural residential lot size. County staff agreed to include Area D as part of the detailed assessments and evaluation of locations as part of the Aberfoyle Expansion Study Area.	Council received the County staff presentation and supported the final Aberfoyle Expansion Study Area boundary including Area D and to reset the rural residential severance date to May 1, 2025

July 23, 2025 Council resolution No. 2025-252:

On July 23, 2025 Council for the Township of Puslinch passed resolution No. 2025-252:

“That Correspondence Item 7.2 Presentation by Sarah Wilhelm, Manager of Policy Planning, and Jameson Pickard, Senior Policy Planner, for the County of Wellington regarding Follow Up Phase 3B: Puslinch Residential Growth be received for information; and,

Whereas Council has previously requested policy changes regarding residential growth such as the expansion of the boundaries of Aberfoyle and changing the rural residential severance date of March 1, 2005;

That Council supports the final Aberfoyle Expansion Study Area boundary including Area D as set out in the presentation as the basis for continuing with the technical work and to reset the rural residential severance date to May 1, 2025.”

F2.3 Comments on Draft OPA 131

Our office prepared an information report about OPA 131 in September 2025 and formally circulated the draft amendment for comment on October 2, 2025. As outlined below, staff received comments on Draft OPA 131 from the Town of Erin, the Township of Puslinch and the Township of Wellington North. No other comments were received from our Member Municipalities.

1. TOWN OF ERIN

Town of Erin – November 13, 2025

At a meeting on November 13, 2025 Town of Erin Council heard five delegations primarily seeking a change to the March 1, 2005 severance cut-off date to allow for severance of an additional rural residential lot in the Secondary Agricultural Area. Other concerns were raised by the delegates such as the transfer of 120 housing units to Puslinch, reliance on ARUs, lack of transparency, need for more local consultation, economic impact, etc.

Later in the meeting, Council received an information report from Erin planning staff and passed resolution No. 25-216: “That Council receives report number PD2025-28 “County of Wellington Draft Official Plan Amendment 131” for information. No further feedback on Draft OPA 131 was provided through Erin Council Resolution 25-216.

Town of Erin – March 12, 2026

At a meeting of March 12, 2026 Town of Erin Council heard four delegations primarily seeking a change to the March 1, 2005 severance cut-off date to allow for severance of an additional rural residential lot in the Secondary Agricultural Area. Other concerns were raised by the delegates such as the transfer of 120 housing units to Puslinch, reliance on ARUs, lack of transparency, need for more local consultation, loss of tax revenue, etc.

Later in the meeting, Council received an information report from Erin planning staff and passed resolution 26-45 (below).

Town of Erin Feedback to County – March 12, 2026

Town Staff Report	Council Resolution
<p>On March 12, 2026, Council for the Town of Erin considered a report prepared by Erin planning staff regarding proposed Official Plan Amendment 131. Erin planning staff proposed two recommendations for Council’s consideration:</p> <ol style="list-style-type: none"> 1. That Wellington County be requested to reallocate the 120 residential units proposed to be assigned to the Township of Puslinch through Official Plan Amendment No. 131 back to the Town of Erin, and that these units be allocated to Additional Residential Units to achieve the Town of Erin’s 2051 rural growth forecast. <p>Or;</p> <ol style="list-style-type: none"> 2. That staff be directed to retain a consultant to undertake a planning justification report on whether extending the existing severance cutoff date of March 1, 2005 to allow for additional lot creation in Erin’s Secondary Agricultural Areas, could assist in addressing the Town’s 120-unit rural housing shortfall, and to report back to Council. 	<p>Resolution No. 26-45 was passed:</p> <p>“That Council receives report number PD2026-07 “County of Wellington Proposed Official Plan Amendment 131” for information;</p> <p>And that staff be directed to retain a consultant to undertake a planning justification report on whether extending the existing severance cutoff date of March 1, 2005, to allow for additional lot creation in Erin’s Secondary Agricultural Areas, could assist in addressing the Town’s 120-unit rural housing shortfall, and report back to Council;</p> <p>And that this staff report and Council resolution be forwarded to the County of Wellington.”</p> <p>Additionally, a proposed motion (below) was not adopted and was included in correspondence from the Town to show the complete record of the decision:</p> <p>“That Council recommends to the County of Wellington that the existing severance cutoff date of March 1, 2005, be amended by OPA 131 to March 1, 2015.”</p>

Comments – Further Study by Town of Erin: County planning staff are supportive of Town Council’s direction to its staff to retain a consultant to further investigate the severance date and its rural

housing shortfall. Proposed changes to the Final Draft of OPA 131 enable a more detailed review outside of OPA 131 as part of an amendment to the Town’s Official Plan, if necessary (see Appendix B for further details).

2. TOWNSHIP OF PUSLINCH

The County received feedback from Puslinch Council on the September 2025 report and Draft OPA 131:

October 8, 2025	Puslinch Council restated its position that areas D1 and D2 be included in Aberfoyle boundary expansion and that landowner in area D2 expressed support for inclusion.
March 9, 2026	<p>Puslinch Council supported the Arkell residential development in principle, subject to Planning Act requirements in light of 50 residential units being assigned as part of County’s background work.</p> <p>Puslinch Council did not want the inclusion to delay submission of OPA 131 to the Province and sought County confirmation and advice on the matter.</p> <p>Otherwise requested that the County consider the Arkell expansion as part of the next OPA.</p>

Additional details are provided below.

Township of Puslinch Council – October 8, 2025

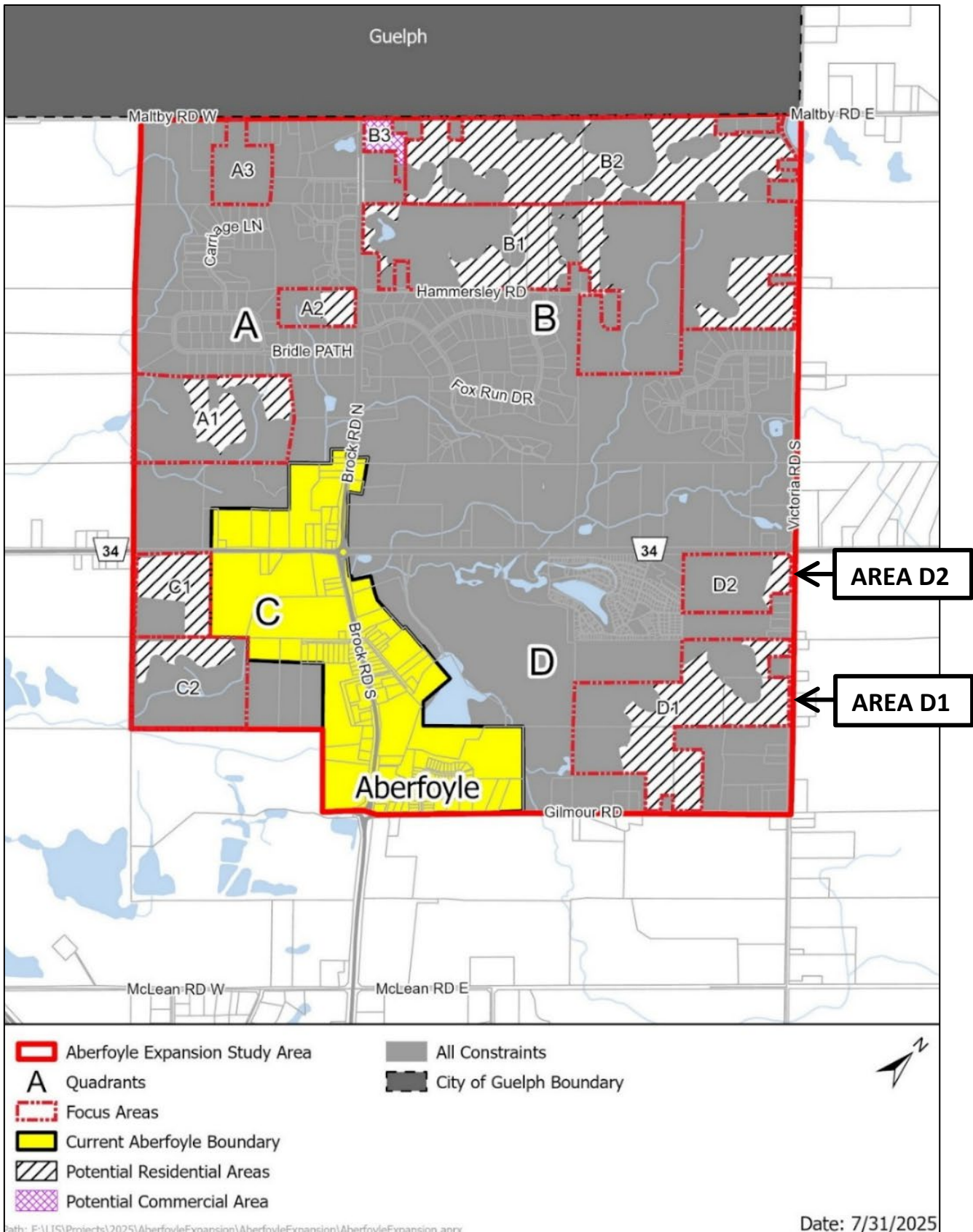
Through comments of October 8, 2025 (resolution No. 2025-034) Township of Puslinch Council provided their support for OPA 131, subject to inclusion of additional lands known as focus areas “D1” and “D2” in the Aberfoyle Boundary Expansion (Figure E2-3 below) by stating the following:

“That Council direct staff to endorse the OPA 131 Rural Growth Policy Updates report and restate its position that areas D1 and D2 be included in the Aberfoyle Boundary Expansion as the landowner in area D2 has expressed support for inclusion of the lands.”

Appended to the resolution was a statement from James Knapton, land owner of 7589/7597 Wellington Road 34 requesting inclusion of the properties within the proposed Aberfoyle boundary expansion.

Comments – Area D2: County planning staff support the inclusion of Area D2 (7589/7597 Wellington Road 34) as part of the Final Draft of OPA 131 (see Appendix B for further details).

Figure E2-3 Focus Area “D1” and “D2”, Aberfoyle Expansion Study Area with Constraints



Comments – Area D1: Staff considered Township Council’s request to further expand Aberfoyle to include all of Area D1. Area D1 was part of the original study area for the Aberfoyle Expansion Review completed by the County of Wellington in September 2025 which included a Planning Impact Assessment, Agricultural Impact Assessment and Aggregate Impact Assessment. As part of those detailed assessments, staff were only able to recommend inclusion of a small portion of Area D1 for the following reasons:

- The area is constrained by natural environment features, mineral aggregate area resources, and parcel fragmentation which makes residential use less viable.
- The Aggregate Impact Assessment recommends that the unconstrained resource area identified in Area D not be included in the proposed expansion area.

In addition to the above staff also note:

- There is not a need to add more land for residential units in Aberfoyle under the current forecasts.
- This change is not considered minor and would trigger the need to recirculate OPA 131, give notice and host an additional public meeting(s).

For the above reasons, staff continues to be unable to support expanding the Aberfoyle boundary to include the balance of Area D1.

Township of Puslinch Council – March 4, 2026

On March 4, 2026, the Council for the Township of Puslinch received a delegation from property owners with lands within and adjacent to Arkell. Council passed resolution No. 2026-061:

“That the Delegation by Rob Stovel, Agent on behalf of Timberworx Custom Homes Inc., Slood Construction Ltd., and John Slood Investments Ltd., regarding item 6.1.1 be received for information; and

Whereas the Township supports residential growth that is directed to designated settlement areas; and

Whereas Township Council supports, in principle, the Arkell residential development, subject to the requirements and processes of the Planning Act;

That Puslinch Council supports the inclusion of the Arkell settlement boundary expansion within Official Plan Amendment No. 131 to accommodate the proposed development, recognizing that the 50 residential units proposed for Arkell were incorporated into the residential land needs analysis forming part of the OPA 131 background work, provided that such inclusion does not result in a delay in the submission to the province of OPA 131; and

That Council request that should the County not include this in OPA 131, that the Arkell boundary expansion be included in the next Official Plan Amendment;

That Council requests confirmation from the County regarding this matter, including advice on whether the inclusion of the Arkell settlement boundary expansion would require a delay in the processing or approval of OPA 131.”

Comments – Proposed Arkell Expansion: Staff reviewed Puslinch Council’s resolution of March 9, 2026 regarding expansion of the hamlet of Arkell to the northeast (Part of Lots 7, 8 and 9, Concession 10). These lands were part of a 2006 application for a County Official Plan Amendment (OP-2006-06) to redesignate the lands from Prime Agricultural and Secondary Agricultural to Hamlet (Arkell) to facilitate a 38 lot subdivision (Draft Plan of Subdivision 23T-06003). Part of the property with frontage on Watson Road South is within the Arkell boundary. At that time, a hamlet expansion was not warranted under the Official Plan forecasts and the recently approved Growth Plan for the Greater Golden Horseshoe required such boundary expansions to be municipally-led. Since then, the files remained inactive for about 15 years but the County allowed the files to remain open.

In 2024, Provincial policy changes opened the door for privately-initiated applications to expand rural settlement areas like Arkell, subject to policy criteria. Also in 2024, County staff prepared the necessary technical analysis to confirm that an expansion of Aberfoyle by approximately 200 units and of Arkell by approximately 50 units would be warranted.

The County established a work plan to complete the Aberfoyle Expansion Study on behalf of the Township set out in a presentation to Puslinch Council of June 18, 2025, but were not asked to consider potential expansion of Arkell. Instead, County planning staff resources were focused on the larger 200 unit supply needed for Aberfoyle. This included preparing the necessary planning, aggregate and agricultural assessment to support the Aberfoyle expansion over the summer to put Draft OPA 131 into circulation in September 2025 and conduct public meetings in February 2026.

Consideration of this expansion of Arkell as part of OPA 131 would cause delays. From a process perspective staff note the following:

- Expanding a Hamlet to this extent is not considered minor and would trigger the need to recirculate OPA 131, give notice and host an additional public meeting(s).
- While the landowners have been working with Township and County staff to bring forward updated applications for the Arkell expansion/subdivision with the necessary supporting studies, some submissions were filed as recently as 2026 and would require peer reviews and municipal review.

As a result, staff continue to recommend that the expansion be dealt with through privately-initiated applications and have not included expansion of Arkell in the final Draft OPA 131.

Comments – Phased Approach to Aberfoyle Expansion: In light of Erin Council’s March 12, 2026 resolution, the Town’s 120 unit shortfall is no longer recommended to be reallocated directly to the Township of Puslinch at this time. Staff reviewed options for Puslinch to address its original shortfall and recommend the following:

- Incorporating a phased approach to growth in the expanded Aberfoyle boundary which would hold back potential rural residential development along Maltby Road
- Maintaining the 50 units set aside for expansion of Arkell
- Maintaining the May 1, 2025 severance date in OPA 131

Through the above approach Puslinch would have a modest surplus between its supply and growth forecast (see Appendix B and Figure C-2 of Appendix C for further details).

3. TOWNSHIP OF WELLINGTON NORTH

Through comments of November 3, 2025 (resolution No. 2025-319) Township of Wellington North Council provided support for the following parts of OPA 131:

- Revisions to the residence surplus to a farming operation severance policies which strengthen lot size requirements.
- Revisions to existing definitions and the addition of new definitions which align with the PPS including the new bona fide farmer definition. This new definition will ensure that the policies are available to only be utilized by farmers and support agriculture as they are intended.
- Support the revisions and updates to the Farm Help Residence policies which will– support farmers by providing clarity related to farm help residences which will strengthen the reliability of the local food supply chain.

Township Council also provided comments seeking further revisions to OPA 131:

- Stronger wording should be considered to avoid unnecessary loss of cultivated land related to Agriculture-related Uses - The use should avoid cultivated lands and keep the amount of land used for new or expanding agriculture-related uses to the minimum necessary to support the use and its servicing needs.
- While the Township strongly supports the goal to limit the size of surplus farm dwelling lots and the new wording “typically does not exceed 1 hectare in size” for Residence Surplus to a Farming Operation there are many instances where, based on natural heritage features and building situation that a much smaller lot area would be appropriate.
- Clarification should be added to the Residence Surplus to a Farming Operation policies that a row of trees, garden or similar feature does not mean it’s not prime agricultural land. These features can still be valuable to the farm operation and can be utilized as agricultural land. The features should not be considered as part of the residential lot by right and have to be included with the residential lot. What’s “underneath” the lawn, garden, or trees may still be valuable agricultural land.

Comments: County planning staff acknowledge the comments of support related to several of the policy changes proposed in OPA 131 and note the following:

The proposed framework for Agriculture-Related Uses and associated lot creation (section 6.4.5 and 10.3.3) is consistent with the Township's feedback. These policies require applicants to avoid cultivated

land and restrict the use to the minimum lot size necessary for the use and its water/wastewater services. It is important that the Official Plan policy remains flexible to consider the different types of agricultural-related uses that could be contemplated under Provincial policy and afford differing local approaches across the County. It is noted that the Townships Zoning By-law will be instrumental in regulating the development of these uses. Under the Township's current zoning, a Zoning By-law Amendment is required for these uses, through the establishment of the Agricultural Commercial (AC) zone. Any proposal to establish an Agriculture-Related use will be reviewed and require technical documentation to justify its establishment. Given the above no changes to OPA 131 are recommended in this regard.

Regarding the Township's comments on the Residence Surplus to Farming Operation severance policy. Planning Staff acknowledge and agree that lots smaller than 1 ha can often be appropriate outcome of these severances and note that 1 ha size is included as an upper limit. Further, OPA 131 has been revised to incorporate the Township's feedback and now identifies specific features—such as existing tree lines and extended lawn areas—that will not typically be accepted as justification for increasing a residential lot's size.

It is noted that additional feedback from the public has been provided related to the proposed Residence Surplus to a Farming Operation severance policy. See Appendix B, F6 and F7 for additional details.

Appendix F3

ADJACENT MUNICIPALITY Comment and Response Table

County Official Plan Amendment 131 – Rural Area Policies and Growth

F3.1 Halton Region

(Staff Comments - January 15, 2025)

Halton Region has no comments on OPA 131.	
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F3.2 City of Guelph

(Staff Comments - February 4, 2026)

Key Comments	Staff Response
<p>City staff have provided input into the comments below which the City offers for your consideration. The comments reflect the main areas of interest for the City, generally related to:</p> <ol style="list-style-type: none"> 1. Groundwater and surface water quality and quantity 2. Transportation Services; 3. Application of Urban-Rural Interface policies; 4. Expansion Area; and, 5. Future approvals and requirements. 	<p>The County’s Risk Management Official has responded to groundwater and</p>
<p>Potential to impact water quality and quantity The City’s wellhead protection areas extend outside of the City limits, including south of the City into the Puslinch area/ Wellington County. More detailed points related to this area of</p>	<p>Noted.</p>

City of Guelph Comments (continued)

<p>interest are provided below for the County’s consideration, when and where the comments may be applicable.</p>	
<p>1. The Aberfoyle Expansion Review Planning Impact Assessment states that water studies will be required as part of future development. The City is concerned that there is a risk that future site-specific assessments of water quality impacts may not provide a comprehensive or cumulative analysis of potential impacts to groundwater or surface water. Given the potential limitations of site-specific assessments, it is requested that the County consider a comprehensive approach to address water quality-related impacts through future studies or site-specific development proposals in advance of expansions.</p>	<p>This comment relates to potential limitations of site-specific assessments of water quality impacts. Regarding potential water quality impacts to the City of Guelph’s municipal drinking water system, it is noted that very little of the proposed OPA 131 expansion area is within the City of Guelph wellhead protection areas (WHPAs) for water quality (24 hectares) and that these 24 hectares are located in a WHPA-D. No significant drinking water threats for water quality are present or possible within this WHPA-D and therefore, pursuant to the <i>Clean Water Act</i> requirements, there is no significant drinking water quality threat to the City of Guelph municipal water system from activities or land uses in this area.</p> <p>Similarly, since the majority of the remaining 985 hectares of the OPA 131 study area is not within a City of Guelph or any municipal WHPA at all, there is no significant drinking water quality threat to an adjoining municipal water system in the remaining lands of the study area. It is noted that the City’s comment is likely intended to be broader and include a range of potential water quality impacts, however, the County and Township are not the regulatory authority(ies) related to these broader concerns. The Province of Ontario, through the Ontario Ministry of the Environment, Conservation and Parks, has the regulatory authority to address these concerns under various legislation including, but not limited to, the <i>Clean Water Act</i>, <i>Environmental Protection Act</i>, <i>Ontario Water Resources Act</i> and the <i>Safe Drinking Water Act</i>.</p>

City of Guelph Comments (continued)

<p>2. In accordance with agreements made between the City and County, as well as area municipalities, the City funds activities related to the implementation of the Grand River Source Protection Plan policies in areas outside of City limits. Increased development associated with the modification of the rural residential severance policy changes, and other potential increased development pressures associated with the expansion of privately serviced residential growth in Aberfoyle have the potential to increase the Source Protection Plan implementation costs to the City. The City requests that there be discussions on potential increased costs and approaches that might mitigate those costs prior to any approval of the plan.</p>	<p>Staff acknowledge and appreciate the funding arrangement, however, respectfully note discussion of that funding is out of scope to OPA 131. We would be pleased to discuss these concerns separately. Further, we note that the OPA 131 expansion area is almost completely outside of current City of Guelph WHPAs for quality, therefore, only within the draft WHPA-Q. This will limit the source protection implementation work to water quantity related work that, in our experience, is primarily related to planning application review. Further, our experience is that the more time intensive, source protection related planning application review is not associated with rural residential severances as identified in the City comments. In relation to private servicing, existing or future septic systems are not significant drinking water threats within the current City WHPAs within the OPA 131 expansion area. If the City WHPAs change then this may change, however, that would be related to City initiated changes in the WHPAs not the OPA 131 expansion.</p>
<p>3. Mitigation of impacts to water and natural heritage resources associated with potential development is important, and it has been considered to some extent in the supporting materials. As noted in Section 5.1 of the Puslinch By Design report, promoting environmentally sustainable development should also consider impacts from road salt and discharge from water softeners via septic systems. Notwithstanding the Township’s development regulations, the City requests that there be additional policy language considered to outline how infiltration of any water will ensure that only “clean water” sources are considered, especially when implementing permeable pavement design and stormwater ponds.</p>	<p>We note that there are policies addressing this comment in the Grand River Source Protection Plan policies. See policies WC-CW-21.4, WC-MC-23.1, WC-MC-23.2, WC-MC-23.4, WC-MC-23.5 and WC-MC-23.6. Please note that the municipally implemented policies are being voluntarily implemented in the draft WHPA-Q for the City of Guelph at this time since the City of Guelph / Guelph / Eramosa Township WHPA-Q has not been approved by the Province yet.</p>

City of Guelph Comments (continued)

<p>4. The Clair Maltby Secondary Plan process identified and resolved issues raised by the Township of Puslinch by making changes to the Master Environmental Servicing Plan (MESP) by emphasizing that both study and impacts to surface water and groundwater can extend beyond municipal boundaries, which is to ensure that the City is monitoring and ensuring that impacts are mitigated or avoided from development within the City to surface and groundwater in the Township of Puslinch. The City requests that similar language be included in the County's OP for development within the Township of Puslinch.</p>	<p>The Final Draft of OPA 131 has been revised to include a new local policy applicable to lands along Maltby Road. The Maltby Road Future Development Area (PA7-12) includes policies to provide for proper and orderly development, the protection of natural features and functions, and to ensure that impacts are mitigated or avoided. These changes are reflected in Appendix A and B.</p>
<p>Surface Water Quantity The stormwater management strategy for the Clair Maltby Secondary Plan includes 20mm of capture and infiltration at source (through low impact development measures), with large infiltrative Stormwater Capture Areas (SWCAs) throughout each sub-catchment intended for larger rain events. There is no outlet in the Clair Maltby Secondary Plan area, and all runoff must be infiltrated. The stormwater management strategy relies heavily on respecting the existing hummocky topography, which creates natural areas of water collection and infiltration. The SWCAs have strategically been located in existing low-lying areas. They are designed to accommodate a Regional Storm plus a buffer to account for potential future changes to climate. All SWCAs have an overflow relief (whether overland or piped, to be determined at the time of design) to an adjacent low-lying area, to mimic existing drainage patterns (refer to MESP section 3.3.6.2 and Figure 3.3.5 for details).</p>	<p>Noted.</p>

City of Guelph Comments (continued)

<p>5. The stormwater management strategy for the Clair Maltby Secondary Plan Area was established through the MESP, which was completed as a Class Environmental Assessment (EA). To comply with the requirements of Section 4.2 of the Provincial Planning Statement, 2024 (PPS), the MESP study included comprehensive surface water and ground/surface water modelling to understand impacts and establish mitigation measures at the subwatershed scale. The subwatershed boundary is cross-jurisdictional and extends into the Township of Puslinch.</p>	<p>No response required to this comment as it appears to be outlining background information and not requesting any action from the County.</p>
<p>6. A detailed study completed by the County or Township is necessary at the catchment/subwatershed scale to ensure no adverse impacts to properties along both sides of Maltby Road. To require the study at the time of development on a lot-by-lot basis poses a risk to the overall stormwater management strategy.</p>	<p>Both the County of Wellington and the Township of Puslinch have Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA) either approved or being reviewed by the Province. As discussed with the City, the CLI-ECA is the appropriate governing tool to address these concerns south of Maltby Road and therefore, a separate, detailed study is not necessary. Further detail could be provided from the County and / or Township engineers if required.</p>
<p>Site Servicing Infrastructure The Aberfoyle expansion is proposed in OPA 131 as part of addressing the identified growth need in Puslinch to 2051. A Municipal Servicing Analysis was undertaken as part of the County’s Municipal Comprehensive Review and states that growth should be directed to area municipalities with sufficient existing servicing capacity to accommodate future development. As stated previously, the Aberfoyle Expansion Planning Impact Assessment also states that appropriate studies will be required as part of future development applications to ensure that necessary infrastructure is in place to support new development.</p>	<p>Noted.</p>

City of Guelph Comments (continued)

<p>7. The Municipal Servicing Analysis states that the Township of Puslinch does not have municipal servicing infrastructure and therefore an analysis was not undertaken for this area municipality. All current and proposed development is to be serviced by private wells and private wastewater or septic systems. Assessments including stormwater management, water services and sewage services which address the protection of the quality and quantity of ground and surface water should be comprehensive and coordinated to understand cumulative impact of development.</p>	<p>The water quality aspect of this comment has been addressed above in comment 1. Although the County and its local municipalities share concerns about cumulative impacts to water quality and quantity, the County and Township are not the regulatory authority(ies) related to these concerns nor do either maintain a municipal drinking water system. The Province of Ontario, through the Ontario Ministry of the Environment, Conservation and Parks, has the regulatory authority to address both of these concerns under various legislation including, but not limited to, the <i>Clean Water Act</i>, <i>Environmental Protection Act</i>, <i>Ontario Water Resources Act</i> and the <i>Safe Drinking Water Act</i>.</p> <p>For cumulative impacts to water quantity and water taking, we direct the City to the draft water quantity policies related to the Water Resources Technical Working Group and the collaboration through those means including discussions with the Province. Additionally, we note that the City of Guelph and Guelph / Eramosa Township Tier 3 study, in the Guelph and Guelph / Eramosa Threats Management Strategy Appendix D, completed a sensitivity analysis that suggested there may be capacity within the WHPA-Q for increased non-municipal, non-dewatering permitted water takings under the confines of the assumptions used for the analysis including the City of Guelph lower water use demand for 2038. Updating this sensitivity analysis or similar analyses would be appropriate in future Tier 3 updates and would better address the City’s cumulative impact concerns. The County would be supportive of raising this issue through the Water Resources Technical Working Group and in particular with the Province and Grand River Source Protection Authority.</p>
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City of Guelph Comments (continued)

<p>Transportation Services Transportation Planning staff from Engineering & Transportation Services have reviewed the documents related to OPA 131, in the context of the City of Guelph’s mobility policies in our Official Plan, and with regard for our 2022 Transportation Master Plan and 2025 Goods Movement Strategy. The following comments are provided to the County for consideration.</p>	<p>The City of Guelph Official Plan and other City policy documents do not apply to the County of Wellington.</p>
<p><i>Future Rural Employment – East Side of Sideroad 20 North</i> 8. The City supports the transportation requirements outlined in OPA 131 Circulation Draft, Section 9.8.3, which states: “A Transportation Plan establishing an internal road network and external road connections shall be required as part of any future development application.” We recommend that this section includes explicit language indicating that these connections must be designed to direct traffic to the new interchange at Highway 6.</p>	<p>Staff agree that changes would improve the clarity of Section 9.8.3 and have proposed revisions to Section 9.8.3 d) as part of Final Draft OPA 131. These changes are reflected in Appendix B.</p>

City of Guelph Comments (continued)

<p>9. OPA 131 Circulation Draft, Section 9.8.3 also states: “No employment-generated traffic will utilize Sideroad 20 N. Further, no driveway accesses for employment uses shall be permitted to Sideroad 20 N.” We’d like to confirm that this restriction applies to all site-generated traffic not just trucks but also employee cars and other vehicles. As noted in the background report Recommended Land Use Option and Land Use Report, Section 3.2, the terms “truck traffic” and “employment use traffic” are different, with the latter indicating non-truck types.</p>	<p>See above. Terms “truck” and “motor vehicle” are from the Highway Traffic Act and are meant to apply to trucks, employee cars and other vehicles.</p>
<p>10. From the City’s perspective, we strongly recommend fully restricting both access and traffic flow on Sideroad 20 North for all vehicle types associated with new developments. This helps prevent cut-through traffic traveling to/from the north via Downey Road. It is important to note that Downey Road and Forestell Road are not designated truck routes under the City’s 2025 Goods Movement Strategy. The intersection at Downey and Forestell is designed for passenger vehicles. City may consider installing mitigation measures to discourage cut-through traffic, particularly by trucks.</p>	<p>No revisions to OPA 131 requested. The revisions proposed for item 8 above would restrict access and traffic flow on Sideroad 20 North.</p>
<p><i>Future Rural Employment – East of Concession 7 and South of Maltby Road</i></p> <p>11. During the development application process, please coordinate with City of Guelph staff to ensure access driveways are adequately spaced from the future Southgate Drive extension.</p>	<p>No revisions to OPA 131 requested. This comment applies to the review of future development applications.</p>

City of Guelph Comments (continued)

<p><i>Aberfoyle Urban Boundary Expansion</i> 12. Access spacing and separation distances should be carefully reviewed, in consultation with the City of Guelph Transportation Planning staff, along Maltby Road, especially near the Gordon/Brock/Maltby intersection and the future Streets F and G identified in the Clair-Maltby Secondary Plan.</p>	<p>No revisions to OPA 131 requested. This comment applies to the review of future development applications.</p>
<p>13. The City notes grade and sightline concerns along Maltby Road east of Gordon Street and Brock Road. We recommend that any new development proposals in this area be subject to review by City staff to ensure safety and design compliance.</p>	<p>No revisions to OPA 131 requested. This comment applies to the review of future development applications.</p>
<p>14. The proposed commercial area located at the southeast corner of Maltby Road and Brock Road is adjacent to the Gordon/Brock/Maltby intersection, which is included in the current Gordon Street Environmental Assessment. Should a roundabout be implemented at this location, it may require land acquisition from this corner, and access points near the roundabout could be subject to restrictions.</p>	<p>This is an advisory comment for future development applications. No revisions to OPA 131 requested.</p>
<p>15. The City supports the continuation of a four-lane cross section to support the transit corridor along Gordon Street and Brock Road.</p>	<p>Outside of scope of OPA 131. Planning staff note that (1) the City of Guelph has initiated a Municipal Class Environmental Assessment (MCEA) Study for improvements to Gordon Street, including from Clair Road to Maltby Road; and (2) the County of Wellington has initiated a Wellington Road 46 (Brock Road) Traffic Study.</p>

City of Guelph Comments (continued)

<p>Application of Urban-Rural Interface policies The City’s Official Plan includes policies related to the Urban-Rural Interface with the areas outside of the City limits and provides a reciprocal framework for coordinating on planning matters such as infrastructure, transportation, water resources, and other land use planning matters. The objective of these policies is to “promote a clear demarcation between the urban uses with the settlement area boundary of the City and the agricultural/rural lands within the surrounding townships.” The following comments related to potential growth pressures are rooted in the Urban-Rural Interface policies and are offered for your consideration.</p>	<p>The City of Guelph Official Plan does not apply to the County of Wellington.</p>
<p>16. The City’s Clair Maltby Secondary Plan was approved by the Ontario Land Tribunal in 2023 following significant collaboration with the Township of Puslinch and the County. As a result of this process, the Clair Maltby Secondary Plan includes a policy (11.3.8.2.4) which delineates a required setback from Maltby Road and requires consideration for transition to the rural area and states:</p> <p>“Development along the northerly side of the Maltby Road right-of-way and the westerly side of the Victoria Road right-of-way, will be designed to provide a transition between development within the City and the adjacent rural areas outside the city boundary. Through the implementing zoning bylaw and/or development applications, a setback of, generally, no less than 7.5 metres and no more than 10 metres will be established from the property line along the northerly side of the Maltby Road right-of-way and the westerly side of the Victoria Road right-of-way. In establishing</p>	<p>County planning staff note that Section 4.7.1 of the County Official Plan provides policy direction about maintaining a distinct urban-rural boundary and states in part:</p> <p>“In order to allow the efficient expansion of urban areas, and to maintain a clear distinction between urban and rural areas, the County of Wellington:</p> <ul style="list-style-type: none"> a) Prohibits new <i>development</i> adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion....” <p>The prohibition does not apply to the proposed expansion of Aberfoyle through OPA 131 as it represents an urban expansion.</p> <p>At the same time, staff recognize that there will be a much lower intensity and scale of development in Puslinch along Maltby Road compared to the City of Guelph. A transition on the south side of Maltby Road in Puslinch would be in keeping with the transition approved as part of the OLT</p>

a transition and appropriate setback, consideration will be given to built form, use of appropriate landscaping, building orientation, grading, existing land uses, and the width and design of the arterial road.”

Further, this policy is supported by and complementary to the County’s existing policy 4.7.1. In addition, the City’s Official Plan Policy 3.14.3 states that consultation with the County and Township will be encouraged to prepare a coordinated planning approach in dealing with issues which cross municipal boundaries, including watershed, water/groundwater and source water protection issues, transportation, infrastructure and other public service facilities, and other land use planning matters requiring a coordinated approach. Given the policy objective to maintain the transition between the City limits and the rural area, the City requests that the County consider an implementation approach that achieves the same objectives with regards to the Aberfoyle expansion that was incorporated in the Clair Maltby Secondary Plan policies.

decision for the adjacent Clair Maltby Secondary Plan. As such, staff have developed similar policies to delineate a required setback from Maltby Road East and West which requires consideration for transition to the urban City of Guelph. These changes are reflected in Appendix A and B as part of new policy area PA7-12 (Maltby Road Future Development Area).

City of Guelph Comments (continued)

<p>Expansion Area The Planning Impact Assessment (2025) identifies that the Study Area evaluated 126 net hectares of developable residential land. The amount of developable and not serviced residential land required to accommodate the residential units that have been reallocated to Puslinch is 101 net hectares of developable residential lands, which is what is identified as the land needed for the 2051 planning horizon. Unlike the findings of the Phase 1 MCR Report: Urban Structure and Growth Allocations (January 2022) and the Phase 2 MCR Report: Urban Land Needs Assessment (August 2022). The Proposed Settlement Area Boundary includes 101 net hectares of developable residential land, including all of the evaluated lands and lands that not suitable for residential development, closest to the City’s corporate boundary.</p>	<p>See item 17 comments below.</p>
<p>17. Should the County reduce or modify the proposed expansion lands, in consideration of the rural-urban interface policies and other concerns, some of which are stated above, the City requests that where developable lands are removed from the proposed settlement area boundary, they be removed from the portions closest to the City of Guelph and in the northeast corner of the proposed Settlement Area Boundary Expansion Area abutting Maltby Road East.</p>	<p>Staff have recommended incorporating a phased approach to growth as part of the expansion of Aberfoyle which would hold back approximately 100 units of potential rural residential development along Maltby Road. The location is identified by new policy area PA7-12 (Maltby Road Future Development Area).</p> <p>See Appendix A, Appendix B and Figure C-2 of Appendix C for further details.</p>

City of Guelph Comments (continued)

<p><i>Future Considerations and studies</i></p> <p>18. As noted above, there are considerations related to development pressures on the local surface and groundwater systems in the general area, transportation services and the transition from the City limits that may require more detailed analysis. Staff understands that the County's position is that some of these items are more appropriately addressed at the Township level. To this end, the City has identified considerations that would assist in ensuring a comprehensive understanding of impacts related to growth as future development facilitated by OPA 131 may come forward.</p>	<p>The County has responded to the City's comments as above.</p>
<p>The City requests notification of any decisions or developments related to the subject file.</p>	<p>The County will provide notice of adoption to the City of Guelph regarding OPA 131. The City will receive notice of any future development applications from the applicable approval authority in accordance with the requirements of the Planning Act.</p>

Appendix F4

INDIGENOUS COMMUNITY Comment and Response Table

County Official Plan Amendment 131 – Rural Area Policies and Growth

Name/Date/ID	Key Comments	Staff Response
Chippewas of the Thames First Nation November 5, 2025 OPA131-001(I)	Chippewas of the Thames First Nation has no comments or concerns to provide at this time based on information that has been presented to them at this time.	No changes to OPA 131 requested.
Chippewas of the Thames First Nation February 26, 2026 OPA131-001(I)	Chippewas of the Thames First Nation appreciates the invitation to the Open House and Public Meeting. Given the proximity of the proposed amendment area to our First Nation, we encourage Wellington County to engage with other First Nations whose traditional territories or current communities may also be affected, including Mississaugas of the Credit First Nation.	
Chippewas of Kettle and Stony Point First Nation (CKSPFN) December 16, 2025 OPA131-002(I)	<p>CKSPFN has minimal concerns about this specific project based on community perspectives and priorities. They do have concerns about the cumulative impacts of all development and land use change in their territory. While this concern extends beyond this individual project, they want proponents to be aware and welcome collaboration or support in their community-led assessments on cumulative impacts.</p> <p>CKSPFN does not foresee any negative impacts with this proposed project but do wish to stay informed of any changes.</p>	No changes to OPA 131 requested.

Appendix F5

AGENCY Comment and Response Table

County Official Plan Amendment 131 – Rural Area Policies and Growth

Name/Date/ID	Key Comments	Staff Response
Credit Valley Conservation Authority (CVC) October 16, 2025 OPA131-001(A)	The Puslinch Employment Land Study Area is outside of CVC jurisdiction. As such, CVC staff will not be reviewing and/or providing comments.	No changes to OPA 131 requested.
Saugeen Valley Conservation Authority (SVCA) November 11, 2025 January 23, 2026 OPA131-002(A)	The amendment is generally acceptable to the SVCA and the OPA is consistent with the natural hazard policies of the PPS, 2024.	No changes to OPA 131 requested.
Grand River Conservation Authority (GRCA) November 12, 2025 OPA131-003(A)	GRCA has no objection to the approval of OPA 131. GRCA comments provide advice regarding GRCA permitting and potential study requirements within regulated areas and suggest early engagement with the GRCA for new development in the areas subject to OPA 131. Additional comments provide site-specific advice regarding features on properties and limiting future sensitive developments in flood-prone areas. Comments further advise that development, including lot creation, should generally be located outside of hazardous areas and areas where access would be compromised.	No changes to OPA 131 requested.

AGENCY Comment and Response Table (continued)

Name/Date/ID	Key Comments	Staff Response
<p>Upper Grand District School Board (UGDSB) February 13, 2026 OPA131-004(A)</p>	<p>The UGDSB would like to work with the County and Township as the expansion plans in Puslinch progress. The Board formally notes that future residential development may impact local enrollment capacity. Depending on the specific location, density, and scale of proposed developments within these new boundaries, there may be a requirement for a dedicated future school block.</p> <p>Currently, elementary students in this area are served by Aberfoyle Public School. Given the potential for growth introduced by OPA 131, UGDSB planning staff want to ensure that developers are aware early in the process that the Board will be monitoring these lands closely to ensure adequate pupil places and site designations are secured where necessary.</p>	<p>No changes to OPA 131 requested.</p>
<p>Wellington Source Water Protection March 27, 2026 OPA131-005(A)</p>	<p>Review completed in relation to the Clean Water Act and source water protection implementation. There is no significant drinking water quality threat to a municipal water system from activities or land uses in the OPA 131 expansion area.</p> <p>There are three Grand River Source Protection Plan – Wellington County Chapter policies for settlement area expansion, all related to water quantity. These policies are not in legal effect for the OPA 131 expansion area, as the City of Guelph / Guelph-Eramosa WHPA-Q is in draft and has not been approved by the Province. Regardless, the policies were reviewed and the policy requirements can be met or addressed as a condition of subdivision approval.</p>	<p>No changes to OPA 131 requested.</p>

Appendix F6

PUBLIC Comment and Response Table

County Official Plan Amendment 131 – Rural Area Policies and Growth

For convenience, comments have generally been organized depending on where they apply: County-wide, Erin, Guelph-Eramosa and Puslinch.

F6.1 County-wide

Name/Date/ID	Key Comments	Staff Response
<p>Van Harten Surveyors February 6, 2026 OPA131-011</p>	<p>Comments provided feedback related to specific Areas of Natural and Scientific Interest (ANSI) and policies regarding assessing impacts to these features when new development is proposed in or adjacent to these features. Comments highlighted different study requirements by the County over time.</p>	<p>OPA 131 does not propose broad updates to the County’s Greenland System policies. These policies will be reviewed through a future amendment under the Official Plan Review project.</p> <p>It is noted that the Provincial Planning Statement, 2024 requires the protection of Areas of Natural and Scientific Interest (ANSIs) from development unless it can be demonstrated that there will be no negative impact on the feature or its ecological function. Planning Staff provided specific information regarding the rationale for the delineation and protection of the ANSI feature referenced.</p> <p>No changes to OPA 131 recommended.</p>

<p>Stovel and Associates Inc. (SAI) November 12, 2025 OPA131-015-01</p>	<p>County-wide, Erin, Puslinch SAI has concerns with the urban fringe policies of Section 4.7.1 (Distinct Urban-Rural Boundary). Use of the word “prohibit” should be replaced with “limit”. The 1 km distance is an arbitrary measure and should be determined based on the characteristics of each community. Suggest that the County use an urban reserve area land use designation like North Middlesex.</p> <p>Additional comments support the 120 unit increase in the growth forecast for the Township of Puslinch, but not the removal of 120 units from the Town of Erin.</p>	<p>OPA 131 proposes to add the following policy language to provide more flexibility to Section 4.7.1:</p> <p>“In certain circumstances, the existence of natural or human made boundaries can be considered as rationale to support the increase or decrease in the 1 kilometre limit.”</p> <p>Planning staff is satisfied that this provides an appropriate degree of flexibility.</p> <p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town of Erin’s rural growth forecasts subject to further local review.</p> <p>No further changes to OPA 131 recommended.</p>
<p>MHBC February 3, 2026 OPA131-037</p>	<p>County-wide Comments raised concerns regarding the proposed 'Bona Fide Farmer' definition and its application within the On-farm Diversified uses and surplus farm residence severance policy frameworks. It was recommended that this definition be removed or as a compromise replaced with the more clear and attainable term 'farm operation,' defined as lands assessed as farmland with a valid Farm Business Registration Number for the purpose of agricultural uses.</p> <p>Additional comments requested the following revision to the On-farm Diversified use policies:</p>	<p>OPA 131 has been modified to address concerns raised in these comments, particularly to the use of the “Bona Fide Farmer” definition. For more details about changes to the Residence Surplus to Farming Operation severance policies please see Appendix B.</p> <p>With regards to the On-farm Diversified use policies, the proposed policy has been modified from “will” to “may” in the section referenced to better align with Provincial guidelines on Permitted Uses in Ontario’s Prime Agricultural Area.</p>

	<p>“...Uses that attract large numbers of customers, employees or other people to the farm, create compatibility issues or have high water or wastewater needs will <u>may</u> not be considered <i>on-farm diversified uses</i> and will be directed to Primary Urban Centres or other appropriate land use designations... .”</p>	
<p>Member of Public February 19, 2026 OPA131-057</p>	<p>Mapleton Comments raised concerns regarding a recent Residence Surplus to a Farming Operation severance application, where a house less than five years old was severed from the farm as part of a surplus residence severance. These comments requested a policy review to ensure tighter controls are in place for such applications.</p>	<p>Currently, the Official Plan does not have an age requirement for dwellings to be eligible for a surplus farm dwelling severance. This is consistent with the PPS, 2024 policies, which focuses on the existing house being habitable and surplus because of farm consolidation. Adding an age requirement for the existing dwelling may obstruct operators from growing their operations or leave newer homes in the rural area underutilized or vacant. No changes to OPA 131 recommended.</p> <p>For more details about changes to the Residence Surplus to Farming Operation severance policies please see Appendix B.</p>

F6.2 Erin

Name/Date/ID	Key Comments	Staff Response
Severance related		
<p>Members of Public Multiple comments received OPA131-016 OPA131-061</p>	<p>4935 Wellington Road 125, Erin Recommend changes to OPA 131 to update the severance cut-off date in Erin to May 1, 2025 and retain the rural cluster policy of Section 6.5.4. Other concerns were related to discrimination, economic hardship, lack of fairness, need for more frequent updates, housing need, rural socioeconomic viability, rural clusters, rural infill housing, planning justification and need to standardize planning. Other comments focused on rural benefits, rural jobs, loss of tax revenue, property rights, red tape, duplication in planning process, development charges, need for smaller farms, lack of clarity, economic impact, lack of public consultation, additional residential units (ARUs), housing crisis, policy duplication and process concerns.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p>
<p>Member of Public Multiple comments received OPA131-022</p>	<p>9015 Wellington Road 50 Recommend changing the severance cut-off date from March 1, 2005 to 2015, 2020 or 2025 to unlock about 152 to 195 potential lots, using Ministry of Finance population projections, and monitoring and updating forecasts regularly. Detailed submission concerning economic impacts of OPA 131 related to increased Erin shortfall based on 2024 Ministry of Finance projections, CVA scenarios, construction impacts, GDP loss and ARU limitations. Also requested that a vote on this matter be postponed until proper consultations have been conducted with Erin residents.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p> <p>Also refer to Appendix D Planning Policy Review regarding the Ministry of Finance Projections.</p>

<p>J.R. Finnie O.L.S. January 17, 2026 OPA131-034</p>	<p>Erin May 1, 2025 severance date should be applied to Erin. Other comments address the economy, policy flexibility, encouragement of agricultural innovation and that Secondary Agricultural land should allow for residential use.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p>
<p>Member of Public February 18, 2026 September 15, 2025 OPA131-050</p>	<p>9307 Sideroad 9, Erin Comments seeking more flexible severance policies in the Secondary Agricultural Area. Other comments address financial hardship, that additional residential units (ARUs) not equivalent to a severance, and economic benefits of new homes on a severed lot. Concerned that Erin residents did not have input into decision about allocation of Erin growth to Puslinch.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p>
<p>Member of Public Multiple comments received OPA131-053</p>	<p>2394 32 Sideroad, Erin Comments received from landowner, sons and grandson seeking to create additional residential lots in the Secondary Agricultural Area. Other comments address desire for family to live nearby, care for their aging mother and continue their father’s legacy. Concerns with the proposed shift of growth from Erin to Puslinch and the loss of housing opportunities.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p>
<p>Member of the Public September 9, 2025 OPA131-012</p>	<p>5922 Trafalgar Road, Erin Comments asking for more rural lot separations which would provide a major cost benefit to the Town. Allowance for severances in Puslinch is unfair and discriminatory.</p>	<p>Staff revised Section 3.5 (Allocating Growth) of OPA 131 so that the 120 rural households and population of 300 remain as part of the Town’s rural growth forecasts subject to further local review.</p> <p>See Appendix B and F2 for additional details.</p>

Name/Date/ID	Key Comments	Staff Response
Hamlet Expansion		
Member of Public February 9, 2026 OPA131-043	8863 Wellington Road 124, Erin Land owner would like this property considered for expansion of the Hamlet of Ospringle as part of OPA 131.	Town of Erin Council has not recommended assigning growth to hamlet expansions at this time. No changes to OPA 131 recommended.
Estate Residential		
Cox Construction Limited Guelph February 5, 2026 OPA131-041	Mulmur Aggregates Inc. Part Lots 11 and 12, Concession 2, Erin Comments note proposal to develop a small residential subdivision as an after-use to extraction of aggregate resources from two licensed pits on the property. Request the following changes to the Official Plan to facilitate proposal: <ul style="list-style-type: none"> • Remove prohibition of new Country Residential Areas. • Modify policy 4.7.1 (Distinct Urban-Rural Boundary) to limit (rather than prohibit) development within 1 km and/or remove the application of this policy to rural settlement areas like Hamlets. • Add 120 units to Puslinch projections while retaining 120 units for Erin 	The 2024 Provincial Policy Statement allows growth and development to be directed to rural lands outside of rural settlement areas but leaves it up to municipalities to determine how. See Appendix F2 for further details of Erin and Puslinch feedback on rural growth options. No changes to OPA 131 recommended.
Erin Village Expansion		
Member of Public February 5, 2026 OPA131-040	9538 Sideroad 17, Erin Follow up from Open House comments. Request to have property added to urban boundary of Erin Village to satisfy need for additional urban employment area land. Comments highlight the suitability of property for industrial purposes (or commercial/residential purposes).	This comment refers to urban employment area need in Erin which is outside of the scope of OPA 131. No changes to OPA 131 recommended.

F6.3 Guelph-Eramosa

Name/Date/ID	Key Comments	Staff Response
<p>MHBC June 20, 2024 February 9, 2026 OPA131-044</p>	<p>6831-6939 Wellington Road 124, Guelph-Eramosa Comments on behalf of client request for urban boundary expansion of the Highway 24 / Lake Road Hamlet Area to extend rural employment area designation onto this approximately 76 ha property. This is proposed as an after-use to the Spencer Pit.</p> <p>The submission provides a detailed policy assessment and discussed the benefits of this location due to its large size and access to major transportation routes and goods movement corridors.</p>	<p>As part of the Official Plan Review, Watson & Associates Land Economists completed an analysis of rural employment land need to 2051. Watson’s analysis determined that Guelph-Eramosa has a surplus of approximately 227 ha and therefore does not require additional land at this time.</p> <p>No changes to OPA 131 recommended.</p>

F6.4 Puslinch

Name/Date/ID	Key Comments	Staff Response
Aberfoyle Expansion		
<p>Thomasfield Homes Limited October 16, 2025 OPA131-017</p>	<p>381 Maltby Road East, Puslinch Thomasfield Homes Limited owns land within the study area. They are supportive of initiative to identify additional residential land to accommodate rural growth needs within Puslinch, particularly in Aberfoyle.</p>	<p>No changes to OPA 131 requested.</p>
<p>Agora Research Group Inc. February 18, 2026 OPA131-020</p>	<p>7547 Hammersley Road, Puslinch Subject property is to be added to expanded Aberfoyle boundary. Request to have a portion of the property currently to be redesignated Greenlands to be changed to a Residential designation through OPA 131.</p> <ol style="list-style-type: none"> 1 Request to remove an area of existing Official Plan Greenlands designation and replace it with a Residential designation because it is not reflected on the Natural Heritage Systems Map. 2 Request to remove proposed OPA 131 Greenlands designation in two areas identified as “plantation clusters” because they are approximately 3.5 ha and 3.1 ha in size when isolated from the adjacent forested areas on the property. 	<p>Regarding item 1, OPA 131 does not propose to remove any current Greenlands designations. The Greenlands area referenced protects lands which are part of an Environmentally Sensitive Area. Therefore, no changes to OPA 131 are recommended for this area.</p> <p>Regarding item 2, OPA 131 has been revised to remove the 3.5 ha plantation from the new Greenlands designation and has replaced it with a Residential designation. See additional comments under Appendix B.</p> <p>Regarding the 3.1 ha area, OPA 131 does not propose to remove any current Greenlands designations. Therefore, no changes to OPA 131 are recommended for this area.</p>

<p>MHBC November 11, 2025 OPA131-024</p>	<p>4454 Victoria Road South, Puslinch Comments on behalf of CBM Aggregates (application pending for Anthony Pit) seek changes to OPA 131.</p> <p>The subject property is located adjacent to the expanded Aberfoyle boundary in Draft OPA 131, placing it within the 1 km urban fringe policy of Section 4.7.1 (Distinct Urban-Rural Boundary). CBM has concerns with the application of Section 4.7.1 to a mineral aggregate operation and seek an exception to the policy.</p> <p>Alternatively, suggest that holding provisions or site-specific policies could be considered for lands adjacent to the proposed Anthony Pit that are proposed to be added to the urban area and designated residential to avoid land use compatibility issues.</p> <p>Other comments:</p> <ul style="list-style-type: none"> • Raise concerns with isolated pockets of residential areas surrounding the subject lands. • Question the Aggregate Impact Assessment evaluation which found the area unfeasible for extraction. • Include revisions to Section 6.5.5 (Commercial, Industrial and Institutional uses in Secondary Agricultural Areas). 	<p>New or expanded mineral aggregate operations are required to be established through an amendment to the County Official Plan.</p> <p>No changes to OPA 131 recommended.</p> <p>In response to comments provided related to section 6.5.5, OPA 131 has been revised to ensure better consistency with PPS 4.5.2.4 and 4.5.2.5, particularly as it relates to new development not precluding or hindering access to mineral aggregate resources and/or existing mineral aggregate operations.</p>
<p>GSP Group November 26, 2025 OPA131-032</p>	<p>30 Bridle Path, Puslinch Comments on behalf of the owner (Fusion Homes) express support for OPA 131. The subject lands are proposed to be included within the Aberfoyle Secondary Urban Centre through OPA 131 and their client is interested in the development potential of their lands which means:</p>	<p>No changes to OPA 131 requested.</p>

	<ul style="list-style-type: none"> • The land will be developed in a responsible and orderly manner that makes efficient use of the land, • Is in keeping with the general character of the Aberfoyle area, and • Provides for much needed new housing stock. 	
GSP Group December 18, 2025 OPA131-033	<p>219 Brock Road North, Puslinch</p> <p>Comments on behalf of the owner of Milburn Auto Sales and Service and the property at the southeast corner of Brock Road North and Maltby Road East. Interested in the proposed Highway Commercial land use designation and understanding how the Township intends to implement OPA 131 through their Zoning By-law.</p> <p>The comments are supportive of OPA 131 as proposed.</p>	No changes to OPA 131 requested.
JL Cox Planning Consultants Inc. January 21, 2026 OPA131-035	<p>7421 Wellington Road 34, Puslinch</p> <p>Comments on behalf of owner express support for OPA 131 as it relates to:</p> <ul style="list-style-type: none"> • Inclusion of property within Aberfoyle expansion and designation of lands as Residential. • Also support May 1, 2025 cut-off date for new residential lot creation. 	No changes to OPA 131 requested.
Member of Public February 18, 2026 OPA131-038	<p>461 Maltby Road, Puslinch</p> <p>Objection to Draft OPA 131. The proposed plan has been developed in isolation of the City of Guelph Clair Maltby Secondary Plan. Areas of concern include transportation, environmental protection of wildlife, protecting provincially significant wetlands, hydrogeological assessment or water supply source assessments, and financial impact.</p>	The City of Guelph provided comments on OPA 131 including matters related to potential impact on water quality and quantity, surface water quantity, transportation, urban-rural interface and the Aberfoyle expansion area. These comments and responses are detailed in Appendix F3.

		<p>If OPA 131 is approved, further studies would be required as part of future development applications to subdivide the lands.</p> <p>No changes to OPA 131 recommended.</p>
<p>Member of Public February 6, 2026 OPA131-039</p>	<p>7513 Wellington Road 34, Puslinch Question about change in zoning on the land across from the Puslinch Community Centre near the flood plain area.</p>	<p>Other than the rear portion of the property being added to the expanded Aberfoyle boundary, there are no land use changes as part of OPA 131 in this area. Pre-existing Core Greenlands designation on property is to remain.</p>
<p>Member of Public February 16, 2026 OPA131-048</p>	<p>451 Maltby Road, Puslinch Objection to OPA 131 and to any attempt to redesignate the large north-east corner parcel along Maltby Road East from agricultural to residential use. Concerns that the proposal is unsafe, unsound, and premature. Other concerns are related to flooding, groundwater security, wildlife protection, road capacity, and cumulative impacts of the Clair-Maltby OPA 70 in the City of Guelph.</p>	<p>The City of Guelph provided comments on OPA 131 including matters related to potential impact on water quality and quantity, surface water quantity, transportation, urban-rural interface and the Aberfoyle expansion area. These comments and responses are detailed in Appendix F3.</p> <p>Staff have made changes to OPA 131 to introduce new policies along Maltby Road to provide for proper and orderly development, the protection of natural features and functions, and ensure that impacts are mitigated or avoided. See Appendix A and B for further details.</p> <p>Staff note that if OPA 131 is approved, further studies would be required as part of future review of development applications.</p>

<p>Member of Public February 18, 2026 OPA131-049</p>	<p>7516 Hammersley Road, Puslinch Comments support rural residential severance date change from May 1, 2005 to May 1, 2025, request lands along Hammersley Road be redesignated Residential (not Greenlands) within Aberfoyle, and that the five year limitation not apply to residential lot creation in the expanded Aberfoyle boundary.</p>	<p>Staff clarify that the severance date limitation would not apply to residential lands within the expanded Aberfoyle boundary.</p> <p>With respect to the proposed new Greenlands designation on this property, staff has recommended changes to replace it with a Residential designation.</p> <p>Please see additional comments under Appendix B.</p>
<p>Member of Public February 18, 2026 OPA131-051</p>	<p>7589/7597 Wellington Rd 34, Puslinch Comments in favour of the expansion of the village of Aberfoyle and request that the subject property at the southwest corner of Wellington Road 34 and Victoria Road be included in the expanded boundary.</p>	<p>Changes to OPA 131 recommended to include subject property within Aberfoyle expansion as it represents a minor addition and MDS I can be met. See Appendix B for further details.</p>
<p>Maltby Community Association February 18, 2026 OPA131-052</p>	<p>7650 Maltby Road E, Puslinch Comments on behalf of the Maltby Community Association representing 76 residents do not support Draft OPA 131 at this time. Concerns are with the proposed redesignation to residential at the corner of Maltby Road East and specifically relate to groundwater and wells, traffic load and resident safety, and protection of kettle ponds and sensitive wildlife areas.</p>	<p>The City of Guelph provided comments on OPA 131 including matters related to potential impact on water quality and quantity, surface water quantity, transportation, urban-rural interface and the Aberfoyle expansion area. These comments and responses are detailed in Appendix F3.</p> <p>Staff have made changes to OPA 131 to introduce new policies along Maltby Road to provide for proper and orderly development, the protection of natural features and functions, and ensure that impacts are mitigated or avoided. See Appendix A and B for further details.</p>

		Staff note that if OPA 131 is approved, further studies would be required as part of future review of development applications.
Member of Public February 19, 2026 OPA131-054	50 Brock Road S, Puslinch Comments oppose OPA 131 in its current state as it does not include the financial impact or any estimated costs for the impending Aberfoyle expansion.	No changes to OPA 131 recommended.
Member of Public February 19, 2026 OPA131-055	Concession 8, Part of Lot 19, Puslinch Concerns about redesignation of Greenlands on property.	With respect to the proposed new Greenlands designation on this property, staff has recommended changes to replace it with a Residential designation. Existing Core Greenlands to remain. Please see additional comments under Appendix B.

Name/Date/ID	Key Comments	Staff Response
Arkell Expansion		
<p>Timberworx Custom Homes November 12, 2025 February 5, 2026 OPA131-030</p>	<p>Part of Lots 7, 8 and 9, Concession 10, Puslinch Comments note that OPA 131 does not expand the Hamlet of Arkell to include their lands. Comments highlight the ongoing technical work being completed to support the development of the lands and request that OPA 131 be revised to expand the hamlet of Arkell to include their lands. A sketch of the proposed development with approximately 44 proposed rural residential lots was included.</p> <p>Planning applications were filed in 2006 for an Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision and Timberworx has been working to address outstanding technical matters.</p>	<p>These comments relate to a Puslinch Council resolution of March 4, 2026. Refer to Appendix F2 Member Municipality Comments for further details.</p> <p>No changes to OPA 131 recommended.</p>
<p>Member of the Public February 27, 2026 OPA131-061</p>	<p>605 Arkell Road, Puslinch Strong support for expansion of hamlet of Arkell to include subject property to help facilitate access for a proposed subdivision. Also requests that the County reconsider the designation of the property as prime agricultural.</p>	<p>See comments above. No changes to OPA 131 recommended.</p>
<p>Member of the Public November 26, 2025 OPA131-031</p>	<p>540 Arkell Road, Puslinch Land owner would like this property to be considered for expansion of the Hamlet of Arkell as part of OPA 131. A sketch showing a 13 ha (32 ac) potential expansion area was included with proposed access onto Arkell Road and a connection to Boreham Drive. A new house is proposed on the retained farmland.</p>	<p>No changes to OPA 131 recommended.</p>

Name/Date/ID	Key Comments	Staff Response
Severance related		
Member of Public January 30, 2026 OPA131-036	Puslinch Comments in support of May 1, 2025 severance date.	No changes to OPA 131 requested.
Member of Public February 9, 2026 OPA131-042	Puslinch Land owner would like to pursue a severance of their property under the proposed severance policies contained in OPA 131.	Planning Staff responded to clarify the process and advise that the policies contained in OPA 131 are still in draft and need to be approved and in effect before development applications can be considered under them.
Member of Public February 9, 2026 OPA131-045	4620 Sideroad 20 N, Puslinch Land owner would like to pursue a severance of their property under the proposed severance policies contained in OPA 131.	Planning Staff responded to clarify the process and advise that the policies contained in OPA 131 are still in draft and need to be approved and in effect before development applications can be considered under them.
Member of Public February 11, 2026 OPA131-046	4588 Nassagaweya-Puslinch Townline, Puslinch Land owner would like to pursue a severance of their property under the proposed severance policies contained in OPA 131.	Planning Staff responded to clarify the process and advise that the policies contained in OPA 131 are still in draft and need to be approved and in effect before development applications can be considered under them.
Member of Public February 10, 2026 OPA131-047	Puslinch Comments in support of revising the date for severances within the secondary agricultural designation in Puslinch. Does not support taking primary agricultural land out of production.	No changes to OPA 131 requested.

Name/Date/ID	Key Comments	Staff Response
Rural Employment		
<p>MHBC October 7, 2025 November 11, 2025 February 13, 2026 OPA131-014</p>	<p>4275 Concession Road 7, Puslinch Comments on behalf of CBM Aggregates (Safarik Pit) seek changes to OPA 131.</p> <p>CBM would prefer that the entirety of the Safarik Pit lands be removed from proposed OPA 131 and remain designated 'Secondary Agricultural'. While aggregate operations are considered an interim use, CBM wants to ensure that the policies of OPA 131 do not conflict with the proposed use.</p> <p>CBM offers site specific policy revisions to clarify that changes will not impede the establishment of the proposed mineral aggregate operation on their lands and include revisions to Section 6.5.5 (Commercial, Industrial and Institutional uses in Secondary Agricultural Areas) and Section 9.8.3 (Puslinch Industrial Policy) of the Official Plan.</p>	<p>New or expanded mineral aggregate operations are required to be established through an amendment to the County Official Plan.</p> <p>A site-specific Official Plan Amendment has been submitted for below water aggregate extraction (file OP-2025-12) at 4275 Concession Road 7. Applicability of the Puslinch Industrial Policy (Section 9.8.3) as amended by OPA 131 is best dealt with as part of the site-specific OPA. No changes to OPA 131 recommended in this regard.</p> <p>In response to comments provided related to section 6.5.5, OPA 131 has been revised to ensure better consistency with PPS 4.5.2.4 and 4.5.2.5, particularly as it relates to new development not precluding or hindering access to mineral aggregate resources and/or existing mineral aggregate operations.</p>

<p>MHBC November 12, 2025 February 12, 2026 March 12, 2026 OPA131-025</p>	<p>4631 Sideroad 20 North, Puslinch The third set of comments on behalf of Puslinch Development GP Inc. related to OPA 131 seek modifications to the amendment to:</p> <ul style="list-style-type: none"> • Designate the subject lands and lands to the south as "Rural Employment Area" (Area C in the Puslinch by Design Study); and • Establish area specific policies to allow for Rural Employment Area development. <p>The submission provides a detailed analysis of the merits of Area C and identifies constraints for development of Area D.</p>	<p>A privately-initiated site-specific Official Plan Amendment has been submitted for 4631 Sideroad 20 North (file OP-2025-01). The proposed Official Plan Amendment is to redesignate the majority of the subject lands from secondary agricultural to rural employment area.</p> <p>At a meeting of July 23, 2025 Puslinch Council supported Area D, Area G and Area H (but not Area C) as locations for future rural employment area growth within the Study Area for Puslinch by Design. The addition of Area G and Area H was meant to account for potential constraints in Area D.</p> <p>No changes to OPA 131 recommended.</p>
<p>MGP November 11, 2025 OPA131-026</p>	<p>7335 Wellington Road 34, Puslinch Comments on behalf of the owners are generally supportive of the Prestige Rural Employment designation proposed for the property. Comments seek refinements to the amendment to ensure that the lands can be developed as intended, including:</p> <ul style="list-style-type: none"> • A site-specific policy be added to confirm development is permitted despite proximity to the Aberfoyle Urban Centre; • A site-specific MDS policy be added to confirm no additional MDS-based setbacks are required; • Urban design guidelines be removed from Official Plan policy; and • The proposed holding provision be removed. 	<p>These comments apply to Area H of Puslinch by Design Study, on the south side of Wellington Road 34.</p> <p>Given that urban design guidelines and holding provision(s) were recommended by the Puslinch by Design Study, staff do not recommend removal. Staff do not agree that site-specific policy provisions need to be added to address policy 4.7.1 (Distinct Urban-Rural Boundary) or MDS.</p> <p>No changes to OPA 131 recommended.</p>

<p>Member of the Public November 11, 2025 OPA131-027</p>	<p>Puslinch Comments provide positive feedback about the Puslinch by Design Employment Land Study process. Comments acknowledged that the recommendations coming from that study were directly added to OPA 131. A small spelling error was also noted.</p>	<p>Spelling error corrected.</p>
<p>Members of the Public November 12, 2025 OPA131-028</p>	<p>7376 Wellington Road 34, Puslinch Comments raise concerns regarding Puslinch Council's decision to designate parcels G and H along Wellington Road 34 and their inclusion in OPA 131, as their property is immediately adjacent. Comments indicate these lands are agricultural lands and that new employment lands should be located along Concession 7 and the parcel on the south side of Highway 401, not Wellington Road 34.</p>	<p>This parcel is to be added to the expanded Aberfoyle boundary through OPA 131. While the parcel is adjacent to the proposed rural employment area, the existing residential dwelling is approximately 300 m from the closest point of the new designation.</p> <p>No changes to OPA 131 recommended.</p>
<p>Help Protect Puslinch February 19, 2026 OPA131-056</p>	<p>4652 Sideroad 20 N, Puslinch Comments on behalf of Help Protect Puslinch representing approximately 300 residents in appreciation of the transparent and thorough work undertaken through the Puslinch by Design process.</p>	<p>No changes to OPA 131 requested.</p>

Name/Date/ID	Key Comments	Staff Response
Estate Residential		
Cox Construction Limited Guelph February 11, 2026 OPA131-058	Part Lots 11 and 12, Concession 4, Puslinch Comments note proposal to develop a small residential subdivision as an after-use to extraction of aggregate resources from a former pit on the property (Nigro Pit). Request for two changes to the Official Plan to facilitate proposal: (1) remove prohibition of new Country Residential Areas; and (2) add 120 units to Puslinch projections while retaining 120 units for Erin.	The 2024 Provincial Policy Statement allows growth and development to be directed to rural lands outside of rural settlement areas but leaves it up to municipalities to determine how. See Appendix F2 for further details of Erin and Puslinch feedback on rural growth options. No changes to OPA 131 recommended.

Appendix F7

STAKEHOLDER Comment and Response Table

County Official Plan Amendment 131 – Rural Area Policies and Growth

Name/Date/ID	Key Comments	Staff Response
<p>Wellington Federation of Agriculture (WFA) November 11, 2025 OPA131-023</p>	<p>Comments on behalf of the Wellington Federation of Agriculture (WFA) focus on the protection of agricultural lands and suggestions to improve proposed agricultural policies, including:</p> <ul style="list-style-type: none"> • Emphasizing the priority for preserving agriculture when planning for employment. • Revisions to the Residence Surplus Farming Operation severance policies to strengthen the protection of agricultural lands. • Revisions to the proposed “Agricultural Impact Assessment” definition. • Revisions to the proposed “Bona Fide Farmer” definition. • Revisions to the Prime Agricultural Area and Prime Agricultural Land definition. <p>WFA has indicated concerns with the proposed changes to the secondary agricultural severance date in Puslinch due to the lack of water and wastewater infrastructure and the potential to created increased impacts on agriculture:</p> <ul style="list-style-type: none"> • Suggest that the severance date remain as March 1, 2005 for Mino, Erin and Puslinch to consistently preserve farmland. 	<p>It is noted that WFA’s specific comment related to Rural Employment Growth in Puslinch is directed at text within the “Preamble” of the amendment. The referenced text is not a policy proposed to be included in the Official Plan. No changes are recommended to OPA 131 in this regard.</p> <p>It is noted that several of WFA’s comments seek modifications to Provincial Planning Statement definitions proposed to be incorporated into the Official Plan (Agricultural Impact Assessment, Prime Agricultural Areas, Prime Agricultural Lands). In order to maintain consistency with the policy objectives of the PPS Planning Staff do not recommend changes to OPA 131 in this regard.</p> <p>With regards to changes to the Residence Surplus to a farming operation severance policy and the “Bona Fide Farmer” definition please see Appendix B. With regards to specific comments seeking adjacency requirements for farm consolidations because of a surplus farm dwelling severance. Currently, the Official Plan allows farm consolidation to occur with farm operations on land elsewhere in the County or in a different municipality. This is consistent with the PPS, 2024</p>

	<ul style="list-style-type: none"> • More severances cause fragmentation of viable farmland and limits agricultural parcels from expanding operations in the future due to MDS II constraints. 	<p>and provides flexibility to the agricultural community to efficiently grow operations. The approach proposed would create significant barriers to the acquisition of viable farmland by producers. No changes are recommended to OPA 131 in this regard.</p> <p>With regards to severances in the rural area of Puslinch, OPA 131 proposes a large share of Puslinch’s future growth to an expanded urban centre of Aberfoyle. This will concentrate growth into an area that is largely developed with limited agricultural impacts. While a share of growth to 2051 in Puslinch will be realized through consents in the secondary agricultural area, other policy criteria continue to apply, including compliance with the Minimum Distance Separation formulae. Puslinch does not have any existing or planned municipal water and wastewater services.</p> <p>No changes are recommended to OPA 131 in this regard.</p>
<p>Wellington Federation of Agriculture (WFA) February 12, 2026 OPA131-023-01</p>	<p>Wellington Federation of Agriculture (WFA) provided additional comments related to the Residence Surplus to Farming Operation consent policies in the Official Plan. WFA raised concerns related to a recent surplus farm dwelling severance application where a recently constructed home was deemed surplus and severed. WFA encourages the County to adopt a more restrictive approach to these types of severances to avoid speculative lot creation on vacant farm parcels and require that the residence on the property be constructed before January 1, 2000 to be considered for a surplus dwelling severance.</p>	<p>Currently, the Official Plan does not have an age requirement for dwellings to be eligible for a surplus farm dwelling severance. This is consistent with the PPS, 2024 policies, which focuses on the existing house being habitable and surplus because of a farm consolidation. Adding an age requirement for the existing dwelling may obstruct operators from growing their operations or leave newer homes in the rural area</p>

		<p>underutilized or vacant. No changes to OPA 131 recommended.</p> <p>For more details about changes to the Residence Surplus to Farming Operation severance policies please see Appendix B.</p>
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