



## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Mark Paoli, Manager of Policy Planning  
**Date:** Thursday, September 12, 2013  
**Subject:** **OPA 81 Summary of Comments and Recommended Revisions**

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### 1.0 Background:

In accordance with the *Planning Act*, in May, 2013 the Draft Revised OPA 81 was circulated to prescribed agencies, and individuals who requested Notice, and a Public Meeting was held. The Public Meeting was documented in report PD2013-18.

This report is to summarize the feedback at the Public Meeting or in comments that have been submitted, and the main revisions that are proposed by staff in response to the comments. Comments were submitted by landowners, community groups, industry associations, commenting agencies, and the province. The comments are shown in table form in Attachment 'A', and are available, in full, at the Planning Department. Staff responses to the comments are also shown in Attachment 'A'.

### 2.0 Discussion:

The main issues arising from the comments are discussed below.

#### 2.1 Mineral Aggregate Area

A number of concerns were raised about the mineral aggregate area mapping and policy framework.

##### *Background*

In February 2012, Planning Committee received for information report PD-2012-10 which included updated mapping of the extent of mineral aggregate resources in the County. As discussed in the February Planning report, the current County Official Plan 'Mineral Aggregate Area' overlay designation on Schedule 'A' shows sand and gravel resource areas of Primary significance. The sand and gravel resource areas of Secondary significance and Selected Bedrock resource areas are not included except in the case of approved pits and quarries. It was also noted that the current Official Plan designation shows the full extent of the Primary sand and gravel resource regardless of underlying designations. In discussion at Planning Committee and County Council, the question was raised as to whether it makes sense to show the resource in areas where extraction would not likely be realistic or permitted due to constraints such as Urban Centres, Hamlets, or natural features.

The proposed addition of sand and gravel resources of Secondary significance would result in a major expansion of the 'Mineral Aggregate Area' overlay. In light of this expansion, the land use constraints noted in discussion at Planning Committee and County Council, and the policy intent to show areas of high potential for mineral aggregate extraction, the current practice of showing the full extent of the resource area was reconsidered in the 5-Year Review.

The proposed mapping approach resulting from the review is that the Mineral Aggregate Area Overlay would consist of the following:

- sand and gravel areas of Primary Significance (shown in the current Plan);
- sand and gravel areas of Secondary Significance (added); and
- approved extraction areas lying outside of the above resource areas (shown in the current Plan).

Except in areas with existing approvals or recognition in the Plan, the following would not be included in the Mineral Aggregate Area Overlay:

- Urban Centres and Hamlets plus 300m;
- provincially significant wetlands and other wetlands; and
- significant woodlands.

### *Discussion*

Although the extent of the Mineral Aggregate Area overlay would change substantially, and is to be shown separately on its own Schedule, the purpose as set out in the current Plan continues to be to show areas of high potential for mineral aggregate extraction. New or expanded mineral aggregate operations within the Mineral Aggregate Area would not require an amendment to the County Official Plan. An amendment would be required outside of the Mineral Aggregate Area (in either case, rezoning is required which must conform with the County Official Plan policies). Where only a zoning amendment is required, the local municipality can require all necessary studies and reports.

The aggregate industry has expressed concerns that the areas not included in the Mineral Aggregate Area overlay are too extensive ('other wetlands' that have not been evaluated as provincially significant are one example). Some residents have expressed concerns that areas with previous approvals for mineral aggregate operations should not be included, and that the 300m distance around Urban Centres and Hamlets does not go far enough.

In terms of previous approvals, it was not the intent to undo Council or Ontario Municipal Board Decisions to allow or recognize mineral aggregate operations in the current planning documents.

For areas not included in the Mineral Aggregate Area overlay, the intent was to continue the policy in place today that requires future proposed operations outside of the Mineral Aggregate Area to go through the County Official Plan amendment process. In terms of the concern that excluding 'other wetlands' is too onerous, an Amendment would provide the basis to verify the wetland significance and apply the appropriate impact policy. In terms of the concern that 300m from Urban Centres and Hamlets is not enough, a rezoning application beyond this distance will still be required to address noise and other compatibility concerns.

### **2.2 Severance Date Transition**

OPA 81 proposes a change to the Secondary Agricultural Area lot creation policies that would provide consideration of one new residential lot from a parcel of land existing as of March 1, 2005. Staff received a number of inquiries and comments from landowners who had applications in late 2004 and early 2005, and are seeking clarification as to whether a severance could be considered under the proposed date.

Under the current April 13, 1999 date policy, the interpretation has been that: if a parcel was subject to a severance application that was submitted prior to that date, then the resulting severed or retained lots were deemed to have existed, and another severance could be considered, even though the severed or retained parcels did not legally exist on April 13, 1999. This interpretation aligns with the other time-sensitive policy, which is that the applicant has to own the lands for at least 5 years, for which staff also base compliance on the application date.

Staff recommend that this interpretation continue to be applied to the proposed date, and that this interpretation should be set out within the applicable lot creation policy section. The wording proposed is:

“For the purposes of interpreting this section, if a parcel of land was the subject of a severance application that was submitted before March 1, 2005, then the severed and retained parcels created from that application will be deemed to have existed on March 1, 2005.”

### **2.3 Maximum Size for New Lots in the ‘Secondary Agricultural Area’ designation**

The current Official Plan limits the size of new residential lots in the ‘Secondary Agricultural Area’ to 0.8 ha (unless existing natural features or development patterns make a larger lot more practical). The intent of the policy is to provide for lots that are large enough for a residence, private services, and some amenity area. The keeping of a small number of horses or other animals was not intended. The policy also provides a clear distinction between a new residential lot, as opposed to a new agricultural lot. Among other matters, this provides the ability to determine if a parcel has already had the one new residential severance under the effective date policy discussed above.

In April, 2013, staff provided an information report for discussion at Planning Committee with planning background and the following options for consideration of lot sizes for severances in the ‘Secondary Agricultural Area’ designation:

1. No change: size range is 0.4 – 0.8 ha;
2. Increase maximum lot size policy: size range would be 0.4 – 2 ha or 0.4 – 4ha; or
3. Remove the maximum lot size policy: minimum size would continue to be 0.4 ha with no upper limit.

The report and options were then circulated for input from the Township of Puslinch, Town of Minto and Town of Erin which have ‘Secondary Agricultural Area’ designations in their municipalities. At time of writing this report:

- The Town of Minto passed a Council resolution “That rural lot creation policies in the updated County plan eliminate the maximum lot size with policies included that ensure severed and retained lots are sized based on intended use, topography, grading, road access, environmental sensitivity and natural lands, proximity to more intensive agricultural uses and similar [sic]”
- The Township of Puslinch passed a Council Resolution “That the Township recommends that the maximum lot size be removed and the minimum size continues to be 0.4 ha with no upper limit”.
- Erin Council has not taken a formal position on the matter.

The ability to raise and house animals, and horses in particular, is a popular aspect of the rural residential lifestyle that is not accommodated within the current policy framework. From discussion at the Public Meeting and with local Councils, staff heard that the current policy seems arbitrary, and that the policy should not prevent consideration of larger lots to allow a small number of livestock in conjunction with the residential use. It was also noted that landowners with the ability to keep animals would generally be more tolerant of agricultural practices, and would increase demand for local agricultural products (such as hay and straw).

Staff interpretation of this feedback is that it is calling for a shift in the intent of the policy from: allowing a residence; to also allowing a residence along with enough area to keep a few animals. Staff would support this shift in principle while raising the following:

- In the discussions of this policy, the trend towards smaller farms was raised. Smaller farm lots are already dealt with in a separate section on new lots for agricultural uses;
- The ability to distinguish a new residential lot from a new agricultural lot should be retained;
- The policy should avoid encouraging oversized lots that might be created on speculation that the possibility of a future lot creation date change would create potential for another lot;

Based on the foregoing, staff propose a policy revision that would be similar in intent to the Town of Minto's recommendation. The proposed policy is shown below:

#### **10.4.4 Residential Lots**

One new lot for residential purposes may be allowed from a parcel of land existing on March 1, 2005 provided that:

- 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 individual sewage and water services, while taking into account site constraints such as grading, sightlines, natural heritage features, hazardous lands, and Minimum Distance Separation requirements;
- b) the accessory buildings referred to in a) above may include a small barn for housing livestock, subject to local by-law regulations;

#### **2.4 Provincial Approval**

Unlike other County Official Plan Amendments, the County is not the approval authority for OPA 81. Once adopted by County Council, this amendment will be forwarded to the province for their approval, with potential for modifications, so there is a further opportunity for individuals and organizations to raise their concerns with the province. Development applications in process will continue to be reviewed under the current Official Plan. We will also comment if there is an issue under the new policies.

### **3.0 Conclusion:**

The planning policies to be revised or established through OPA 81 are a result of extensive community and agency input. Recent revisions to the amendment address comments that are discussed above or are shown in Attachment 'A'.

With the proposed amendment, the County Official Plan will conform with the Greenbelt Plan and will be up to date with enabling provincial legislation on site plan control, complete applications and preconsultation, and notice regulations for propane operations. OPA 81 further strengthens the County's ability to address growth management pressures and respond to local concerns about the environment and agriculture. Conformity with Places to Grow and consistency with the Provincial Policy Statement, which were already achieved in previous amendments, will be even more evident as a result of a number of wording changes. Once this process is complete, staff will begin looking at provincial legislation on second residences and, likely a new Provincial Policy Statement.

Based on the foregoing revisions arising from the 5-Year review process, staff are satisfied that the Final Draft of OPA 81 is ready to be Adopted by County Council and forwarded to the province for Approval.

The Final Draft of the 5-Year Review Amendment (OPA 81) is posted online at:

<http://www.wellington.ca/en/business/fiveyearreview.asp>

### **Recommendation:**

That County Council adopt the following resolutions:

1. THAT County Council declares that the proposed 5-Year Review Amendment (OPA 81): conforms with provincial policy; has regard to matters of provincial interest as indicated in Section 2 of the Planning Act; and is consistent with Provincial Policy Statements.
2. THAT OPA 81 be Adopted, and staff be authorized to forward OPA 81 to the Minister of Municipal Affairs and Housing for approval.

Respectfully submitted,



Mark Paoli  
Manager of Policy Planning

## **ATTACHMENT 'A'**

### **Summary of Comments and Staff Responses**

## Public Meeting and Formal Circulation - Public Comments and Staff Responses

(note: does not include letters with no concerns or requests for Notice only)

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
May 4, 2013	Roger Will, Puslinch	<p>Re: moving to date of 2005 for new lots in Secondary Agricultural Area: Our property on part Lot 1 Gore Conc. Had a restriction on development until the approval of a transportation study for a new arterial road to be built. The road has been upgraded and authority giving to Waterloo Region and this process delayed my application to sever a lot until just recent. I did however manage to build a home on the property in 1999 and severed same just last year while road construction was approved and in progress. I would ask that our property be included in the potential severance policy because the delays were beyond our control and because the house was already in existence.</p> <p>Re: Regional arterial route I believe that there may still be a proposed arterial route going through our property. It would be appreciated if you could let me know if this still exists or will be taken out of the new official plan. The Region of Waterloo was placed a restriction of Controlled Access to all properties on Townline which conflicts with the current land uses due to zoning.</p> <p>Re: Regional services and urban/rural fringe I also feel that some sort of allowance should be made to provide for the extension of water and sewer to those on Townline. Maybe the fringe policy needs to be reviewed along the borders of Cambridge as growth on the Cambridge side has reached the fringe and good planning policies usually requires both sides of a road to be compatible versus the urban/rural situation that has now been created.</p>	<p>Do not recommend providing consideration to applications submitted after March 1, 2005 as it would defeat the purpose of establishing a date, and would not be possible to administer fairly for all previous applicants.</p> <p>Waterloo region has advised that an Environmental Assessment (EA) for the arterial road is ongoing and requested that the "Proposed Major Roadway" shown on the current Official Plan remain unchanged until the EA is concluded.</p> <p>The extension of water and sewer services would not be allowed under the PPS, and would lead to annexation pressures, among other issues. The fringe policy is fulfilling its intended purpose to provide a clear distinction between urban and rural areas (Puslinch and Cambridge in this case).</p>
May 14, 2013	Frank Spoelstra, North Wellington Aviation Services	<p>We have no questions or concerns at this time but ask that the Planning and Development Department will take into consideration the existence of the registered public aerodrome (CPR 3) at Teviotdale.</p>	<p>No change recommended. Currently shown as 'Airfield' on Minto Schedule and protected by policies that "the County will not allow development which would have an adverse impact on existing airfields."</p>

May 28, 2013	Daniel Bratton, Inverhaugh	...would like to voice an objection to the proposed amendment to the Official Plan for Wellington County regarding the location of aggregates (pits) within adjoining hamlets, villages and towns. Although this is a move in the right direction, the grandfather clause allowing pits that fall within this designation needs to be revisited...Since development of the pit on the Musselman house has not begun, it needs to be revisited in light of the new official plan.	see Report Discussion
May 28, 2013	Shaindel Zimmerman, Inverhaugh	...expressing my concern that mineral aggregate areas will be exempt from the proposed legislation. The part that disturbs me is the grandfather clause which exempts existing approved extraction areas. My point is very simple: If it is now considered to be a bad idea to have pits close to residential areas, wetlands and forests, then permitting licensed pits to proceed in this area is still a bad idea...So it is my view that all pits, existing ones as well, should not be exempt from this legislation. It is reasonable, therefore, that all licensed pits which have not as yet broken ground, be subject to the same restriction.	see Report Discussion
May 28, 2013 Public Meeting	Jeff Charbonneau, Puslinch	<p>Inquired as to the reason for having a maximum lot size in the current Official Plan, and would support removing the maximum lot size.</p> <p>Asked about the Paris and Galt Moraines and what was meant by planning approval for small scale development proposals. What did this mean when applying for building permits?</p>	<p>The Planning Department worked with the Wellington Federation of Agriculture in the late 1990s and they were concerned about the loss of farmland. The issue is being looked at now because perhaps a maximum lot size may not be the right approach today.</p> <p>‘Planning approvals’ in the draft policy means Planning Act applications such as severances and rezoning, so the policy would not apply to a building permit that complies with zoning.</p>

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
May 28, 2013 Public Meeting	Perry Groskopf, Rockwood Concerned Residents Coalition (CRC)	<p>From presentation tabled at Public Meeting: The CRC is still evaluating proposed Amendment Number 81 to the County of Wellington Official Plan and will be submitting more detailed comments, as requested, by June 15. However, tonight I would like to make a few comments about OPA 81.</p> <p>The CRC welcomes the new complete application and pre-consultation policies that are proposed to be added to the County of Wellington Official Plan, but would like to see the list of studies that can be required for an application expanded to also include visual impact. Visual impact was a major reason why the Ontario Municipal Board recently denied the proposed Rockfort Quarry in Caledon and this OMB decision substantiates the importance of visual impact and the need for a specific study of visual impact to be listed in the County of Wellington Official Plan.</p> <p>The CRC would also like to see the list of alternative heritage mitigation and conservation methods listed in Section 4.6.7 to include what should always be the first form of mitigation considered and that is “avoidance”. In other words, potential mitigation needs to be able to contemplate the possibility that the best way to mitigate, in our case, the impacts of a quarry, is not to have the quarry in the first place.</p> <p>The CRC welcomes the additional recognition and protection given to the Paris and Galt Moraines in Amendment 81 and to the additional protection afforded to the Greenlands System, Water Resources and Farmland Protection. But we aren’t sure that the additional protection given to these various resources goes far enough, and we will address this issue in more detail in our subsequent comment on the proposed amendment.</p> <p>The CRC is, on the other hand, very concerned about the additional lands that are proposed to be identified on Schedule A-50 as Proposed Mineral Aggregate Resource Area. We believe this approach tilts the playing field inappropriately in favour of a gravel pit or quarry applicant and does not provide the necessary balance to ensure a proper evaluation of mineral aggregate extraction applications.</p>	<p>Recommend change as suggested.</p> <p>List was taken from Ministry of Culture supporting information sheets in order to provide more detail on what mitigation and avoidance may include. No change recommended.</p> <p>See Report Discussion</p>

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
May 28, 2013 Public Meeting	Janet Harrop, Wellington Federation of Agriculture	Re: maximum lot sizes for new lots in Secondary Agricultural Area Not putting a maximum area on residential lots is frightening as it impacts nutrient management and is an animal protection issue. Larger lots also have commercial and industrial operations that are difficult to police. Secondary Agricultural lands can still be farmed and should be maintained.	This policy only applies to Secondary Agricultural Areas where there seems to be some interest in somewhat large lots to allow the keeping of a limited number of animals.
May 28, 2013 Public Meeting	Bev Wozniak, Puslinch	Re: Paris –Galt Moraine policies  What is meant by “large scale” development proposals in the Paris and Galt Moraines policies?  Ms. Wozniak asked about large scale developments such as bridges and cloverleaf roads and who will be maintaining the water.	Large scale development proposal would generally mean larger than a severance or a minor zone change.  Infrastructure such as highways and bridges are subject to the Environmental Assessment process and not under municipal control through the Planning Act.
May 28, 2013 Public Meeting	Linda Sword, Guelph/Eramosa	Re: Paris –Galt Moraine policies Would large scale development in the moraine policies include quarries? How could moraine functions be maintained, restored or enhanced through a quarry development?  Re: significant woodlands Noted that 30% woodland coverage is needed to maintain water quality, and that the current County coverage is 17%. Are the 4ha woodlands to be protected in addition to the 17%?	Yes. Under the policies, the onus would be on the applicant to demonstrate.  The 4ha + woodlands to be added to the Greenlands are part of the existing woodland coverage of the County.
June 14, 2013	George Laurencio, Capital Paving Inc.	Overall, we find current draft of OPA 81, as written, reasonable and do not have any significant concerns at this time. We offer a couple of comments below.  “Capital is concerned that the proposed 300m setbacks to urban and hamlet areas may be excessive and should perhaps not be as prescriptive...If a proponent can demonstrate that impacts can be mitigated by meeting legislative and regulatory requirements and limits, then the proponent should be allowed to operate a site if it happens to be within 300m of urban boundaries.”  Capital accepts the policies on the prohibition of development in Provincially Significant Wetlands; however, the policy goes on to essentially prohibit all wetlands within the County Core Greenlands system...Site level assessments should be done in order to determine the significance of a particular wetland to the natural system and a determination made rather than restricting it in the Official Plan policies.	see Report Discussion  see Report Discussion

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
June 14, 2013	Quentin Johnson, Rockwood	<p>1. Mineral Aggregate Overlay - "The 300 metre exclusion is far too short...I propose that the minimum exclusion should be at least 5km from the boundaries of any hamlet, village, and town as listed in the current document. 300 metres is inadequate based on the new extraction technologies used by gravel pit operators whose impact spread far beyond 300 metres.</p> <p>2. Policies and Procedures on Mineral Aggregate Extraction - "Wellington County does not have any policies and procedures regarding licensing of mineral aggregate extraction. I strongly recommend that Wellington County develop such policies and procedures on mineral aggregate extraction and incorporate them into the current amendment plans. In particular the protection of water sources both surface and underground should take precedence over any application to extract gravel or any other mineral."</p> <p>3. Gravel extraction in neighbouring and adjoining regional governments - "The Region of Halton has a By-law which requires the applicant of any application for License to extract and rezoning in a neighbouring/adjoining municipality to notify the Region of Halton and requires the applicant to submit the plans and proposals and that the proponent must cover the cost of the evaluations by submitting payment of fees. I strongly recommend that the County of Wellington adopt the same policies and procedures..."</p>	<p>See Report Discussion</p> <p>No change recommended. The County Official Plan policies for mineral aggregate planning process include: list of environmental matters to be considered; information to be made available to the public; and mining below the water table. The licensing process is set out in the Aggregate Resources Act administered by the Ministry of Natural Resources.</p> <p>No change recommended. This is not a planning policy matter for the Official Plan, but rather a procedural matter.</p>
June 14, 2013	Ontario Stone, Sand and Gravel Association	<p>"OSSGA is pleased that the county has decided to map sand and gravel resource of secondary significance in the new Schedule "C"...OSSGA does have some questions about the constraints applied to mapping, primarily 'wetlands'. While Provincially significant wetlands are a constraint to aggregate applications, local features are not. OSSGA requests clarity on this change..."</p> <p>"OSSGA is also concerned about the inclusion of 'all other wetlands' in Policy 5.4 Core Greenlands. Provincially significant wetlands are protected by PPS policy, and local features should not be elevated to the same protected status as PSWs. ... also concerned about the Woodlands definition in Section 5.5.4 The reduction of what constitutes woodland in the rural area from 10 ha to 4 ha represents a significant change in policy."</p> <p>"OSSGA is concerned about the deletion of policy 4.3.3a)ii) as it is contrary to PPS direction on extraction in prime agricultural areas."</p>	<p>see Report Discussion</p> <p>No change recommended. Inclusion of 'all other wetlands' in Core Greenlands is current policy; the addition to the bullet points is to highlight and clarify. Also, see Report Discussion</p> <p>No change recommended. Deleted wording removed extraction areas from the Prime Agricultural Area. Extraction is a permitted use in the Prime Agricultural Area, subject to rezoning and the policies of the Plan. Mineral aggregate operations in Prime Agricultural</p>

			Areas retain the underlying Prime Agricultural Area designation during and after extraction.
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Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
June 14, 2013	John Martin, Ennotville	This property (6000 Hwy 6 in Ennotville) is currently zoned agricultural and was at one point functioning as a poultry farm. Today this is not an option and it would be impossible to accommodate any kind of agricultural/livestock operation due to its size and the current manure regulations...We would ask that you seriously consider including this property in the boundary of Ennotville.	No change needed. This property is already proposed to be included in the Ennotville Hamlet boundary in Draft OPA 81.
June 13, 2013	Rob Stovel, for the Murray Group	..TMGL has a pending OPA with the County dealing with lands in Moorefield...The County's revised OPA 81 illustrates on part of the site as 'Pending OPA 77'. In fact, the lands that are shown as industrial on your draft Schedule A4-2 also form part of this OPA. As the decision on the OPA 77 application is still pending, I suggest that all of the lands in question be shown differently on the county revised land use schedule.	Recommend that the 'Pending OPA 77' area should encompass all of the lands subject to OPA 77.
June 13, 2013	Arthur and Lena Nagel, Puslinch	<p>...I wish to have the date of the amendment to the severance applications dated for March, 2005, to be changed or have exceptions.</p> <p>In 2004, previous severance was applied for and granted provisional consent subject to conditions. "All of these conditions were met with the Reference Plan being registered on March 1, 2005. Unfortunately, because of the delay of our Surveyor &amp; Planner, we require an exception if you are implementing the March, 2005 date.</p>	Previous practice with the current date was based on application date, such that a new lot may be considered from a lot resulting from an application that was submitted prior to April, 1999. Staff recommend that this practice should continue with the new date, and that a policy to this effect should be added to Section 10.4.4
June 14, 2013	Brad Whitcombe, Puslinch	<p>I would like to congratulate you and your staff, as well as County Council, on the good work to date. I will direct my comments to two components of the update:</p> <ul style="list-style-type: none"> <li>- the severance policy</li> </ul> <p>I support the proposed update to the severance policy.</p> <ul style="list-style-type: none"> <li>- Greenspace (Natural Heritage System) overlay</li> </ul> <p>The Greenbelt Act has provisions for the County of Wellington to refine the Greenspace (Natural Heritage System) overlay at the time of OP compliance. I feel the County of Wellington should pursue this opportunity and afford the citizens of Wellington County a mechanism to ensure that planning designations affecting their properties are accurate.</p> <p>I object to the Greenspace (Natural Heritage System) Overlay that currently exists on our property, Part Lot 20 Concession Gore, as it does not accurately represent either current conditions or future opportunities, and appears to</p>	<p>No change requested.</p> <p>Staff are not prepared to recommend a review of the Greenbelt Natural Heritage System, as it is not clear that it can be done in a reasonable time frame, or that it would result in substantive changes.</p>

		have little basis in science, and has not been ground-truthed.	
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June 14, 2013	Chris Tyrell, MMM for Telfer Glen Developments	<p>“At this time, we request that the County consider a site-specific policy to be included in OPA 81 which recognizes that the landowner intends to seek an adjustment of the Greenbelt Plan at the 10-year review (anticipated to be undertaken in 2015), and that the Subject Lands may provide for a logical expansion of the Morriston Urban Centre.</p> <p><b>9.9.7.X Site-Specific Policy Area (Telfer Glen Estates, Morriston)</b>  <i>The policies of Section 9.9.7 a) support the long term vitality of settlements through modest growth that is compatible with the long-term role of these settlements as part of the Protected Countryside. It is recognized that the subject lands are located on the periphery of the Protected Countryside designation of the Greenbelt Plan, and immediately adjacent to the Morriston Urban Centre boundary, and are therefore not contemplated for future urban development at this time. However, it is further recognized that the landowner intends to seek an adjustment of the Greenbelt plan Protected Countryside designation at the time of the 10-year review of the Greenbelt Plan.</i></p> <p><i>Subject to the Province’s 10-year review of the Greenbelt Plan, the County will evaluate the adjustment of the Morriston Urban Centre boundary to include the Subject Lands at the time of the next municipal comprehensive review, and in accordance with the policies of this Plan.</i></p> <p>We...request that the County consider the addition of this policy, or similarly worded policy, in OPA No. 81.”</p>	<p>It is not possible to expand Urban Centres on private services under current Greenbelt Plan policies. This policy would prejudice the direction of growth without the benefit of a comprehensive review as required by Places to Grow and the County OP.</p> <p>At the time of provincial consultation on the Greenbelt Plan 10-Year Review, if expansion on private services can be considered, the Township may wish to examine all lands on the Morriston fringe, including the subject lands, for analysis of appropriate directions for growth.</p>
June 13, 2013	Rob Stove, for The Murray Group	<p>Re: Plume Pit OPA 83  <i>There is an ongoing OPA on the subject lands that will be brought forward for a decision soon. Mr. Stovel asked that we consider identifying the lands as Pending OPA 83.</i></p>	<p>The Land Use Schedule should be changed to reflect recent Saugeen Conservation Authority comments on the application. If the amendment is approved by County Council, we would support a request for provincial Modification on the subject lands.</p>
June 14, 2013	Rob Stovel, for Dave Bouck	<p>re: Morriston Schedule A7-2, lands subject to Bouck subdivision application  “...we note that there are two polygons of Core Greenland on his property. It is anticipated that these polygons relate to flood plain mapping prepared by Halton Conservation. We are presently reviewing the flood plain mapping prepared by Halton Conservation as part of the draft plan of subdivision process, and we hope to have revised mapping available shortly. In the interim, we suggest that the Core Greenland polygons...as it relates to Mr. Bouck’s property, be deferred until we are able to meet with Halton Conservation.”</p>	<p>If the Conservation Authority and applicant reach agreement on revised boundaries, staff would support a request for provincial Modification to reflect the changes.</p>

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June 10, 2013	Fred Stahlbaum, Puslinch	<p>“There were a number of aggregate pits that had ANSI on their property and in their plans. According to the OP these areas are to be protected. I would like to know if any of these areas are still in or on the plans and if so how many and where they are located.”</p>	Sent maps showing ANSI areas in Puslinch.
June 13, 2013	Kelly McColeman, Guelph/Eramosa	<p>re: 7305 SR 14, RR #1 Ariss  ...Of great interest to us is the proposed policy changes to Secondary Agricultural Areas.</p> <p>Rick and I purchased... in September 2000 from Rick's parents, Frank and Nancy McColeman. Ideally his parents would like to have severed a separate lot from the existing 5.99 acre of land to build a smaller, permanent dwelling, but the Township of Guelph/Eramosa expressed that they would not support a severance at that time. The township did agree however to a 'garden suite' on a ten year agreement, with the option to renew every three years and that is what the four of us collectively work with. This arrangement has been in place for 13 years with the second renewal due in the fall of this year. Frank and Nancy built a smaller bungalow, keeping in line with the building restrictions put in place by the township. They are very happy here and have no desire to leave their comfortable home. It's unsettling to have to go through the process of renewing this agreement every three years.</p> <p>For future use, the lot size of this entire property is 5.99 acres. It's not nearly big enough to farm any crops and barely big enough to have animals that require pasture to graze. Currently we have the two houses on the property and a driving shed. The bulk of the remaining property is in grass.</p> <p>We hope that the changes in policy will allow the township to reconsider a severance request for this property.</p>	Clarified that the proposed policy changes about severances are for lands that are currently designated as 'Secondary Agricultural Area' in Puslinch Township, the Town of Erin and the Town of Minto. There are no lands designated as 'Secondary Agricultural Area' in Guelph/Eramosa, so the proposed amendment would change the consideration of a severance in this situation.
June 14, 2013	Jim and Sharon Marshall, Erin	<p>It appears that a new Greenlands designation is being proposed for a portion of our property that is actively farmed...In light of the fact that this property is actively cropped we are requesting that the Greenlands Designation be removed from this area of our property. We are also concerned that the Greenlands Designation will restrict our ability to construct future agricultural buildings on our property.</p>	Recommend that the Greenlands be revised to follow the edge of the woodland in that part of the property.

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
June 14, 2013	Rob Stovel, for Cox Construction	<p>The Snyder Woodlot forms part of an existing licensed property (Part of Lot 9, Con. 4). This woodlot is approved for extraction and it will be removed. We estimate that the woodlot is less than 4ha in size. We question why the County would designate this woodlot as Greenland if it is going to be extracted.</p> <p>“The Love Farm (Part of Lots 8 and 9, Con. 4) was licensed in 1988. OPA 81 illustrates a portion of these licensed lands as Core Greenlands and Greenlands. These lands will be extracted and it is our opinion that they do not meet the requirements of the Official Plan to be designated as Core Greenlands and Greenlands.</p>	<p>This woodlot is approximately 5.4 ha, meeting the 4ha criterion, but is zoned Extractive Industrial, subject to Holding zone (h-4) provisions. The following are cited from the h-4 provisions:</p> <p>“The purpose of this restrictive zoning is to delay the extraction of aggregate from the Snyder woodlot for a period of approximately 15 years in order to allow for the establishment of a ‘replacement woodlot’ being maintained by Cox Construction Limited...”</p> <p>Recommend designating the ‘replacement’ woodland as Greenlands and removing the proposed Greenlands designation from the Snyder woodlot.</p> <p>Recommend that the Greenlands and Core Greenlands not extend into the area zoned EX1.</p>
July 2, 2013	Chris Corosky, Armel Corporation	<p>re: lands east side of Victoria Rd., just south of Clair Rd., in Puslinch</p> <p>“...we object to the process for establishing, and the depiction of the ANSI boundary illustrated on Schedules A-22 and A-29 as it affects our land. We have numerous technical studies and reports which detail our concerns, and support our position. We would be happy to share and discuss these with you, with a view to reaching a mutually acceptable resolution of our concerns, and are prepared to meet at any time to discuss.”</p>	<p>The province is responsible for identifying, evaluating and mapping ANSIs. As the County has no authority to revise ANSI boundaries, the only avenue to address this objection would be to convince the Province to modify the ANSI in its Decision, or appeal the province’s refusal to modify the ANSI in its Decision.</p>
August 1 2013	Fred Stahlbaum, Puslinch	<p>Re: Areas of Natural and Scientific Interest</p> <p>“I feel it is time that we as a County should be the ones to look after and protect all the ANSIs that are in Wellington County. The Province has done a very poor job of protecting these features. MNR (as good as they are) have been downsized and no longer have the inspectors and staff to keep up with all the aggregate companies to protect what few ANSIs are left, whether they are Earth Science or Life Science features in Wellington County. There was a reason these features were singled out so why are they not protected? A few of the ANSIs in Puslinch Township have been destroyed. As you know, once the ANSIs are destroyed there is no getting them back.”</p>	<p>The County does not have jurisdiction over the identification and evaluation of ANSIs.</p> <p>ANSIs of regional significance (which includes all of the life science ANSIs in Puslinch) are included in the Greenlands designation of the County Official Plan.</p>

Date	Individual, Company or Organization	Main Comments, Requests or Recommended Changes	Staff Response
August 23, 2013	Greg Sweetnam, James Dick Construction	<p><u>Proposed Hidden Quarry, Guelph/Eramosa</u>  OPA 81 proposes to designate the majority of the subject lands as Greenlands while the Mineral Aggregate Area overlay is being removed from Schedule A3. Our applications predate OPA81 but we are concerned about possible misunderstandings related to the removal of the aggregate overlay and the proposed Greenlands designation and the perception of conflicting information. We would support the identification of our lands with an asterisk on the schedule to indicate to the public reading the document that there is currently an aggregate application under consideration on these lands. These lands have been subjected to a detailed environmental study which supports the removal of a portion of the managed plantation forest on the site.</p> <p><u>Erin Pit, Town of Erin</u>  In 2011, we applied for a site plan amendment under the Aggregate Resources Act to adjust the extraction limit of the Erin Pit....the MNR approved the site plan amendment and wetland swap on November 1, 2012 after consulting with the County and Town.</p> <p>In OPA 81, the newly retained wetland is proposed to be designated Core Greenlands. It appears that a portion of the small wetland to be removed (and now within the extraction area) is still designated Core Greenlands. This area is more appropriately designated Secondary Agricultural along with the other approved extraction areas in the Erin Pit.</p>	<p>No change recommended.</p> <p>Recommend change as suggested.</p>
August 23, 2013	James Parkin, MHBC Planning for James Dick Construction	<p><u>Official Plan Mapping</u>  ...In order to better convey information and ensure that the public are aware of the location of Mineral Aggregate Area and existing licensed operations, it would be helpful to cross-reference the schedules that show related information. Please consider whether the following notes should be added to Schedules A1-A7 and Schedule C, respectively:</p> <p>Schedules A1-A7:  Mineral Aggregate resource Areas are identified on Schedule C of the Official Plan. Licensed Aggregate Operations are identified on Appendix 2 of the Official Plan.</p> <p>Schedule C:  Licensed Aggregate Operations are identified on Appendix 2 of the Official Plan.</p>	<p>Recommend change as suggested.</p> <p>Recommend change as suggested.</p>

<p>James Parkin, MHBC Planning for James Dick Construction (continued...)</p>	<p><u>Section 5.4.1 Wetlands</u> We have significant concerns with the proposed inclusion of all wetlands as Core Greenlands. Small, non-provincially significant wetlands should not be designated on the same level as provincially significant wetlands. These non-provincially significant wetlands may not warrant the level of protection contemplated by the proposed policies particularly taking into account the need to balance resource interests and opportunities associated with rehabilitation and enhancement.</p> <p><u>Section 5.4.2 Habitat of Endangered or Threatened Species</u> This section should recognize that development and site alteration may be permitted in accordance with appropriate authorization under the Endangered Species Act.</p> <p><u>Section 5.5.1 Habitat</u> Section 5.5.1 states that wildlife habitat is included in the Greenlands System. This section should explicitly state “significant wildlife habitat” if these features are subject to the no negative impacts test.</p> <p><u>Section 5.5.2 Areas of Natural and Scientific Interest</u> Both regionally and provincially significant Areas of Natural and Scientific Interest (ANSI) are afforded the no negative impacts test. We have concerns with applying this to regionally significant ANSIs where many of these have not been reviewed or updated in several decades.</p> <p>A map of regionally and provincially significant Life Science ANSIs was recently provided. It would be helpful to review Earth Science ANSI mapping along with any background information on the significance of these ANSIs. It would also be relevant to know the degree of overlap with other components of the Greenlands System (e.g. significant wetlands, significant woodlands, etc.).</p> <p><u>Section 5.5.4 Woodlands</u> We have significant concerns with the proposed minimum size for significant woodlands in the Rural System (4ha). The minimum size criterion should be based upon the amount of forest cover in the County in accordance with the Natural Heritage Reference Manual. If woodlands cover is about 15-30% of the land cover, woodlands 20 ha in size or larger should be considered significant (please refer to Section 7.3.1 of the Natural Heritage Reference Manual).</p>	<p>No change recommended. An Official Plan Amendment provides the basis to verify the significance of the wetland and apply the appropriate policy.</p> <p>Recommend change as suggested.</p> <p>No change recommended. Second paragraph states that significant wildlife habitat is subject to the no negative impact test.</p> <p>No change recommended.</p> <p>The Natural Heritage Reference Manual notes that the size threshold should be reduced in the absence of the other two criteria (ecological functions; and economic and social functions). Staff estimate that County woodland cover is 18%. The next threshold is for woodland cover of 5-15% for which woodlands of 4 ha should be considered significant. The County is also not restricted by the Natural Heritage Reference</p>
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	<p>James Parkin, MHBC Planning for James Dick Construction (continued...)</p>	<p>We support the concept that exceptions to woodland significance be provided to plantations for the purposes of interim stewardship activities. However, the proposed exception in Section 5.5.4 may be too narrow as stewardship activities could include reforestation efforts. We recommend that the proposed exception be replaced with the following:</p> <p><i>“Exceptions may include a plantation established and continuously managed in accordance with a forest management plan, as demonstrated with documentation acceptable to the County.”</i></p> <p>Section 5.5.4 states that more detailed studies may determine that significant woodlands (based on size) have additional significance due to a range of criteria. This section should also recognize that woodlands may have varying degrees of significance based on detailed studies. The following is a recommended revision to Section 5.5.4 (third paragraph):</p> <p><i>“Detailed studies such as environmental impact assessments may be used to identify and evaluate the significance of woodlands and interpret the boundaries of these features in accordance with the policies of this Plan and applicable Provincial policies.”</i></p> <p>Related to our woodland concern is the formulation of Schedule C (Mineral Aggregate Areas). While the policies intend to permit consideration of some woodlands in certain situations, the exclusion of significant woodlands from Schedule C means that an Official Plan Amendment is required and the aggregate resources are not going to receive the benefit of protection from incompatible uses. This shortcoming reduces notice to stakeholders and could lead to greater potential for land use conflicts in the future.</p> <p><u>Section 5.5.5 Environmentally Sensitive Areas</u> Environmentally Sensitive Areas will be protected from development which would negatively impact these areas or their ecological functions. It is unclear which features are included Environmentally Sensitive Areas. It would be relevant to know the degree of overlap with other components of the Greenlands System (e.g. significant wetlands, woodlands, etc.).</p> <p><u>Section 5.6.2 Development Impacts</u> The environmental impact assessment policies in Section 5.6.2b) incorporate a requirement to demonstrate no negative impacts. However, this should only</p>	<p>Manual.</p> <p>Suggested change is too broad. A plantation created under a forest management plan may not have the objective of removal at rotation which is the intent of the exception.</p> <p>Recommend that intent of suggested change be incorporated into proposed wording.</p> <p>An Official Plan amendment would provide the basis to verify the woodland significance and boundary. The woodlands are much smaller than the surrounding aggregate overlay so the potential resource conflict in the area will be apparent.</p>
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	<p>James Parkin, MHBC Planning for James Dick Construction (continued...)</p>	<p>apply to portions of the Greenlands System where there are provincially significant features. We recommend that the no negative impacts test in this subsection be replaced with <i>“meet the requirements of this Plan”</i>.</p> <p><u>Section 5.6.6 Mineral Aggregate Areas</u> In combination with the proposed 4ha minimum size for woodlands, we have concerns with the proposed policy in Section 5.6.6 not permitting extraction within significant woodlands unless the woodland consists of young plantations or early successional woodlands, and the area of woodland removed is replaced with woodland of equal or greater area and quality. Defining significant woodlands solely based on size means that lower quality woodlands will be captured. It is our understanding that the County continues to take a pragmatic approach to considering limited extraction within portions of significant woodlands by taking into account significance, feature quality and other forms of mitigation. The proposed changes to Section 5.6.6 may contradict this understanding and other Policies in the Plan.</p> <p>Provision should also be made within this context for below water operations that will not be able to rehabilitate back to woodlands. Lake and wetland habitat could be considered to be of equal or greater significance in some situations and hence, represent an overall enhancement of the biological diversity of the area.</p> <p>Accordingly, we recommend that the first paragraph of this section be replaced with the following: <i>“In addition to the policies of Section 5.6.1 and 5.6.2, new mineral aggregate operations may be permitted within significant woodlands where the woodland consists of habitats that can be effectively replaced or restored. Where aggregate extraction takes place below the water table and rehabilitation back to woodlands is not possible, the area of created lake and wetland habitat may be considered an alternative to replacement or restoration of significant woodlands.”</i></p> <p><u>Section 5.7 Restoration and Enhancement</u> This section should consider positive, interim land stewardship. In the aggregate resources industry, it is important to manage lands for long periods of time. The planting of single rotation crop forests as an interim land stewardship activity has been past practice on licensed aggregate operations and reserve lands within the County. In combination with the recommended revisions to the plantation exceptions discussed in this letter, provision should be made for encouraging interim land stewardship for aggregate sites.</p> <p><u>Section 13.15 Complete Application and Preconsultation</u></p>	<p>Recommend change as suggested.</p> <p>An Official Plan amendment would provide the basis to verify the woodland significance and boundary.</p> <p>No change recommended.</p> <p>No change recommended. Current proposed wording is broad enough to include the concept of interim stewardship.</p>
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	James Parkin, MHBC Planning for James Dick Construction (continued...)	<p>The County proposes to add a new section addressing complete application and preconsultation requirements for development applications. One of the studies that may be required is a “subwatershed scale hydrogeological study where aggregate extraction below the water table is proposed.”</p> <p>Subwatershed scale studies are normally public sector studies. We understand that the County wishes to assure that potential cumulative impacts are addressed. Standard application reports assess potential cumulative impacts. As a result we request that the subwatershed scale hydrogeological study be removed from this section. We would not be concerned if other policies specified that hydrogeological studies take into account potential cumulative impacts (if the appropriate level of detail and analysis is discussed through a preconsultation meeting with the County and other applicable agencies).</p>	Recommend change to: “hydrogeological cumulative effects assessment where aggregate extraction is proposed below the water table. The appropriate boundaries, level of detail, and baseline data to be used will be determined by the County, local municipalities and Conservation Authority as part of preconsultation.”
August 26, 2013	Helen Purdy	<p><i>Note: Detailed submission consisting of 56 pages, was provided to staff and Planning Committee members. Comments include significant concerns with aggregates and advocates for: Official Plan Amendments to be required for mineral aggregate operations even where proposed within the Mineral Aggregate Area; major changes to agricultural policies, including removal of the Prime Agricultural Area designation from the Rural System. Staff would not support such changes; however, there are a number of minor revisions that staff would recommend, set out below.</i></p> <p><u>Subsection 2.4 THE PROVINCE</u> The word “will” to be replaced with the more definite word “shall” throughout Section 2.4.</p> <p><u>Subsection 3.3 GUIDING GROWTH</u> Objective One shall be revised to read: “to encourage cost-effective and efficient development.” (“Efficient” appears in Section 1.1.1 (a) of the PPS.)</p> <p><u>SECTION 4.1 CULTURAL HERITAGE RESOURCES</u> Revise the title of Section 4.1 to read: “CULTURAL HERITAGE AND ARCHAEOLOGICAL RESOURCES” to be consistent with Section 2.6 of the Provincial Policy Statement, and Paragraph 1 shall be revised to add the words “and archaeological” before the word “resources” in the first sentence.</p> <p>4.1.1 Identifying Cultural Heritage Resources - Paragraph One shall be revised to read: “Cultural heritage resources include, but are not necessarily restricted to the following criteria in Ontario Regulation 9/06 issued under the Ontario Heritage Act.”</p>	<p>Recommend change as suggested.</p>

	<p>Helen Purdy (cont...)</p>	<p><u>Subsection 4.3.2 Secondary Agricultural Areas</u>  ...suggest adding a new paragraph to Section 4.3.2 to read:  “In Secondary Agricultural Areas, all types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with provincial standards.”</p> <p><u>Subsection 6.6.1 Mineral Aggregate Areas</u>  Revise Subsection 6.6.1 to read:  “Mineral aggregate areas contain lands which may have potential natural deposits of mineral aggregate material of a quantity and quality that may prove to be economically viable for extraction at some time in the future.</p> <p>The County of Wellington has identified Mineral Aggregate Areas in the County of Wellington, mainly based on information in the Aggregate Resources Inventory Paper reports (ARIP). Lands in Mineral aggregate Areas most likely have aggregate deposits identified as Primary Significance or Secondary Significance by the Province.</p> <p>Licensed and currently operating pits and quarries have been established in some Mineral Aggregate Areas while other lands within Mineral Aggregate Areas are not at this time designated as a use of land for a licensed pit or quarry. There is no presumption that lands within Mineral Aggregate Areas shall be designated for use as a licensed pit or quarry. Mineral Aggregate Areas are shown on Schedule “C” of the County of Wellington’s Official Plan.</p>	<p>Recommend suggested wording be added to Section 6.5.3 Secondary Agricultural Area - Permitted Uses</p> <p>Recommend incorporating some of this wording that is intended to better describe the basis for the Mineral Aggregate Area overlay mapping.</p>
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## Public Meeting and Formal Circulation - Agency Comments and Staff Responses

(note: does not include letters that are supportive or have no concerns)

Date	Agency	Main Comments, Requests or Recommended Changes ( <i>excerpts taken verbatim are in "quotes"</i> )	Staff Response
May 8, 2013	Town of Minto	<p>passed the following Motion:            "THAT ... the following four recommendations be forwarded to Wellington County as comments from the Town of Minto;</p> <p>THAT rural lot creation policies in the updated County plan eliminate the maximum lot size with policies included that ensure severed and retained lots are sized based on intended use, topography, grading, road access, environmental sensitivity and natural lands, proximity to more intensive agricultural uses and similar, and further;</p> <p>THAT County staff consider as part of the 5 year review, enhancing Section 4.12 to demonstrate an upper tier commitment to consider participating in partnership with local municipalities in incentive programs that enhance the core of urban areas including but not limited to matching façade and structural improvement grants provided by local municipalities, participating in tax increment financing arrangements approved by local municipalities, and encouraging similar support by the Province, and further;</p> <p>THAT Council supports the County 5 year review proceeding under the current approved Provincial Policy framework, and further;</p> <p>THAT Council requests the County consider the following changes to the land use schedules:</p> <ol style="list-style-type: none"> <li>1. Apply the Residential designation from OP#84 to the former ball field in Clifford.</li> <li>2. Adjust the Core Greenlands designation on the edge of Rotary Park to Greenlands.</li> <li>3. Remove the rail line in Clifford for the Town owned Ann Street Lots in Clifford in favour of a 10 metre strip of Greenlands to allow trail development.</li> <li>4. Remove expanded Core Greenlands from the Industrial Designation in the Harriston and Palmerston Industrial Parks.</li> <li>5. Change new PA5-9 respecting location of propane uses to PA5-10 given overlap in number with the Clarke Heinmiller Subdivision at Noble Road in Palmerston." </li></ol>	<p>see Report Discussion.</p> <p>Staff would be interested in pursuing this topic, but feel that it should begin as a budget discussion that could then lead to a separate, focused amendment.</p> <p>Change shown in recent (May, 2013) consolidation</p> <p>No change recommended as area is floodplain</p> <p>Recommend change as suggested.</p> <p>Discussed on site, recommend minor adjustment to north woodland in Harriston for future road access.</p> <p>Recommend change as suggested.</p>

Date	Agency	Main Comments, Requests or Recommended Changes ( <i>excerpts taken verbatim are in "quotes"</i> )	Staff Response
June 4, 2013	Town of Erin Planning Staff Information Report received at Council	<p>“The County and Local Official Plan are intended to be a “reference manual” and “bible” on how development and socioeconomic activities are undertaken in the physical form. The goal or objective needs to be defined and include measures that are measurable and defensible. When the measures and procedures are to achieve the “objectives” are vague or non-existent and without a time frame then there is little value in an Official Plan policy other than to recognize the “subjective values” of a community at a specific time. As an example I am providing a comment on the designating of “cultural heritage landscapes”.</p> <p><u>Cultural Heritage Landscapes</u> I have concerns regarding the inclusion of ‘Cultural Heritage Landscapes’ as the ultimate purpose is to restrict development and redevelopment. The policy would allow the Municipality to look at designating a specific feature or area as a “Cultural Heritage Landscape” (Sections 4.1.4, 4.1.5, &amp; 4.6.7) ...Cultural values are subjective and subject to wide variation between residents in a municipality. It is difficult to create a set of cultural landscape values that define the wide variation between residents in a municipality. Also taking in consideration that these cultural values that are “formalized” for the community radically change over time.</p> <p><u>Greenlands System</u> The Official Plan must also conform with Provincial Policy. The province has provided the Natural Heritage Reference Manual, as a standalone document to assess development potential in or near wetland areas and adjacent woodlands to an extent of 30 – 120m, essentially the larger the wetland, the larger the setback area. The distances are set through the Conservation Authorities Act and are being formally included in the County Official Plan policies.</p> <p><u>Mineral Aggregate Areas</u> Aggregate extraction areas will be designated within the Official Plan. This policy directive of the Province provides the public and municipalities with information as to where significant aggregate deposits are located and acknowledges the likelihood that the aggregate will be extracted in the future. Applicants will no longer require a County Official Plan amendment when seeking an aggregate extraction license from the Ministry of Natural Resources.</p>	<p>Policies on <i>significant</i> cultural heritage landscapes were added under OPA 53 in 2007 to be consistent with the ‘shall be conserved’ standard in the PPS. OPA 81 proposes to add wording to clarify their definition and identify means of mitigation of development impacts. Local municipalities may develop measures and procedures to further specify how the goals and objectives can be addressed over time.</p> <p>No change needed.</p> <p>No change needed. County Official Plan amendments have normally not been needed except to expand aggregate areas or where a significant natural feature is to be removed.</p>

	<p>Town of Erin Planning Staff Information Report received at Council (continued...)</p>	<p><u>Urban Forest</u> Planning staff support the idea of an “urban tree canopy”, however in urban forestry practice, planter trees or private front yard ornamental trees are not long lived nor generally species that will contribute to a permanent tree canopy. Typically planter trees and street trees are fast growing short-lived hybrid species that are tolerant to salt and drought and bred to be dwarf “columnar “ or “lollipop” shapes. Such street trees are intended to be esthetically pleasing “street furniture” and cannot be maintained as “permanent” trees. Staff do not recommend inclusion of policies related to trees that are clearly not intended to reach a mature “urban tree canopy”. Tree “protection policies may have the unintended consequence of actually discouraging tree plantings on private lands as landowners are concerned that trees are an encumbrance to development.</p> <p><u>Greenbelt Policies</u> Staff has no comment or issue with the proposed inclusion of Provincial Greenbelt Policies in the County Official Plan.</p> <p><u>CONCLUSION:</u> Most of the proposed changes included in proposed OPA 81, the 5 year review, reflect the inclusion of policy imposed by the Province of Ontario. Municipalities and planning staff are required to comply with and provide Official Plans that conform to Provincial planning policies.</p>	<p>Proposed policy recognizes that street trees, among other trees, contribute to overall urban forest. Caution about the potential unintended consequence of tree protection policies is well taken; however, most urban landowners plant trees to add property value to existing development.</p>
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Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in "quotes")</i>	Staff Response
June 13, 2011	Grey County	<p>“Proposed changes that are of interest to the County of Grey include:</p> <p>Section 10.4.4, which states, One new lot for residential purposes may be allowed from a parcel of land existing on March 1, 2005 provided that: a) the lot generally meets a 0.4 ha minimum lot size, and is large enough to support water and sewage systems; f) the use is well removed from any settlement boundary;</p> <p>From a general planning perspective the County would raise the issue of a minimum lot size of 0.4 hectares. Is this proposed smaller size sufficient for services and leaving room for the potential relocation of those systems.</p> <p>In addition, the County is unclear how ‘well removed’ is defined. The term is vague and could result in interpretation issues.”</p>	<p>The change is not a proposed smaller size; it adds a minimum size policy that aligns with Zoning By-law minimums that are in place across the County.</p> <p>Some terms need to be addressed on a case by case basis.</p>
June 14, 2013	Credit Valley Conservation	<p>Section 8.9.5e) Rather than reading “subject to any Conservation Authority permits” the section should read “in consultation with the Conservation Authority” or “subject to approval of the conservation authority” as CA permits are not issued for lot creation applications. [related to Comment 36 from October 20, 2010]</p> <p>Section 13.15.2 CVC recommends that pre-consultation occur with agencies including the Conservation Authority for matters related to water, natural heritage and hazard lands management.</p>	<p>Recommend change to “in consultation with” wording.</p> <p>Recommend adding the following: “Applicants are also encouraged to preconsult with the applicable Conservation Authority on proposals involving lands within or in proximity to the Greenlands System or the Greenbelt Natural Heritage System.”</p>
June 14, 2013	Grand River Conservation Authority	<p>“Section 4.4.3 While the above noted section allows for some level of intensification, Section 8.9.5 would limit intensification in a floodplain area. Therefore appropriate zoning should be reflected in local documents to limit or prevent intensification in Hazard areas.”</p>	<p>No change recommended. The intensification policies do not imply that development should be allowed on hazardous lands which are governed by the PPS, the OP Core Greenlands designation and restrictions in local Zoning By-laws.</p>

Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in "quotes")</i>	Staff Response
June 14, 2013	Town of Halton Hills	<p>“- Planning staff do not support the pre-designation of non-licensed aggregate extraction areas, especially areas of Secondary Significance, as it is premature to determine if aggregate extraction is an appropriate land use in those locations without a comprehensive site specific review of the impacts to the environment and the surrounding area. It would be more appropriate to identify the resources on an overlay or accompanying appendix to the Official Plan...Staff are particularly concerned with the new designation of Aggregate Extraction Areas north of Acton in the Town of Erin which would have significant impacts on the Town of Halton Hills, and the environment. Planning staff note that the newly identified Aggregate Extraction Areas appear to be within the Wellhead Protection Areas for the Acton municipal wells.</p> <p>Secondly, staff do not support the approach of only requiring a rezoning application subject to criteria for a new or expanded aggregate extraction operation. It would be more appropriate to require an official plan amendment for a new or expanded aggregate extraction operation to provide for an opportunity for a comprehensive site specific review of the impacts of the use on the surrounding area including the Town of Halton Hills, and the environment. The preferred approach described is currently adopted by the Region of Halton.</p> <p>- Schedule B2 – The wellhead protection areas for the Acton area municipal wells should be shown on this schedule as they extend into the Town of Erin. The Risk Management Official in the Town of Erin will be responsible for implementing the requirements of the CTC Source Protection Plan in these well head protection areas.”</p>	<p>Refer to OP Section 6.6.1 “Mineral Aggregate Areas are areas of high potential for mineral aggregate extraction and are <b>shown as an overlay</b> on Schedule ‘C’.”</p> <p>In the Wellington County planning system, a rezoning application does provide an opportunity for a comprehensive site specific review of the impacts of the use on the surrounding area, including neighbouring municipalities.</p> <p>To be addressed in a separate, focused amendment once Source Protection Plans are approved by the province.</p>
June 14, 2013	Township of Puslinch	<p>The following resolution was adopted:</p> <p>“That the correspondence from the County of Wellington dated April 24, 2013, regarding the County Official Plan Review – Consideration of Changes to the Secondary Agricultural Lot Size Policies be received; and</p> <p>That the Township recommends that the maximum lot size policy be removed and the minimum size continues to be 0.4 ha with no upper limit.”</p>	<p>See Report Discussion.</p>

Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in "quotes")</i>	Staff Response
June 14, 2013	MHBC Planning Ltd. for Township of Guelph/Eramosa	<p>"We recommend that the Township of Guelph/Eramosa support the April 2013 draft of the County of Wellington Official Plan Amendment 81 subject to the additional amendments:</p> <ol style="list-style-type: none"> <li>1. Inclusion of the Eramosa Hamlet as a Hamlet Area on Schedule A3 and other applicable Schedule or references within the County Official Plan. The requested Hamlet Area boundary as shown on Map A which includes those lands identified within the Eramosa Hamlet in the Township's Zoning By-law 57/1999 and the existing residential dwellings on the north side of the Highway 124; and</li> <li>2. Update Table 13 to include Speedvale Avenue (from the City limits to Wellington Road 32) and Township Road 3 (from Highway 7 to Wellington Road 30) with a road width of 30m." </li></ol>	<p>Recommend change as suggested.</p> <p>Recommend change as suggested.</p>
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.6.6 Mineral Aggregate Areas</p> <p>"MNR notes consideration of mineral aggregate operations in natural heritage features has been limited to significant woodlands. The PPS provides for the consideration of development (including mineral aggregate extraction) in a number of significant natural heritage feature types where it can be demonstrated there will be no negative impacts to the features or their functions. Mineral aggregate extraction should also be permitted in locally significant (non-PPS) natural heritage features. The Ministry suggests this policy should be reviewed to provide for consideration of mineral aggregate operations in other Greenland features.</p> <p>It also appears that in Section 5.6.6.a), significant woodlands are limited to "young plantation or early successional woodlands". If this is the intent, MNR would like more clarification as to why. Beyond the Greenbelt Plan, significant woodlands are to be defined pursuant to the policies of the PPS. The Natural Heritage Reference Manual (NHRM) represents the provincial recommended technical criteria and approaches for being consistent with Section 2.1 of the PPS.</p> <p>The Ministry also notes the requirement to re-establish features of greater area or quality represents a higher standard than the no negative impact test required under the PPS. Further, the policy requirement/test should not necessarily be the same for all natural heritage feature types (i.e. provincial vs. local features). The matter of mineral aggregate extraction in natural heritage features is addressed to some extent in the NHRM (e.g. Section 2.3.3), which the County may wish to review."</p>	<p>Refer to Section 5.6.1 Permitted Uses in the Draft Revised Amendment.</p> <p>No change recommended. Policy states 'areas of equal or greater area and quality' and clearly only applies to the 'significant woodlands' feature type.</p>

Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in "quotes")</i>	Staff Response
June 26, 2013	Ministry of Natural Resources	re: Section 13.9 Site Plan Control "MNR suggests that mineral aggregate operations should be added to the list of uses to be excluded from site plan control."	No change recommended. Site Plan control under the <i>Planning Act</i> does not apply to aggregate operations, so no need to state in policy.
June 26, 2013	Ministry of Natural Resources	re: Section 13.15 Complete Application and Preconsultation "MNR notes that a subwatershed scale hydrogeological study requirement has been included for where aggregate extraction below the water table is proposed. MNR assumes this requirement has been included in this Section in relation to the review of the OP's mineral aggregate resource policies (Section 6.6) and/or new aggregate policies that are being developed, but which have not been provided for review and comment at this time.  MNR is of the opinion the proposed study requirement is unreasonable and should be deleted from the OP. Although municipalities may require applicants for mineral aggregate operations to complete studies and submit information necessary for assessing the potential impacts of a new operation in the local context, it is not reasonable to expect an applicant to conduct studies that requires data collection or analyses well beyond the zone of influence of the application. Broad-based, comprehensive studies, such as a subwatershed study, are most appropriately addressed by municipal (public) planning authorities. Further, as far as MNR staff is aware, the process or criteria by which the proposed study requirement would be evaluated has not been defined. Study requirements must be clearly defined and linked to recognized standards or guidelines. MNR notes the Aggregate Resources Act provides an established framework for the assessment of hydrogeological impacts.	The Draft Revised Amendment that was circulated for comment includes proposed changes to Section 6.6.  Recommend change to "hydrogeological cumulative effects assessment where aggregate extraction is proposed below the water table. The appropriate boundaries, level of detail, and baseline data to be used will be determined by the County, local municipalities and Conservation Authority as part of preconsultation."
June 26, 2013	Ministry of Natural Resources	re: Section 5.4 Core Greenlands Fish habitat is identified as a Core Greenlands feature under Section 5.4. This feature is identified and discussed in conjunction with the significant habitat of endangered and threatened species. The rationale for grouping these distinct feature types together is not clear, and it is suggested that they be addressed separately. Fish habitat would seem to be addressed in Section 5.5.1 as a Greenlands feature. The policy framework for fish habitat should be reviewed and clarified.	Rationale to combine is that both are habitats. Policies refer to fish habitat in Core Greenlands and Greenlands because fish habitat is not mapped as a feature on its own. Fish habitat may occur in conjunction with features identified as Core Greenlands or Greenlands, or may occur outside of these features. In either case, the policy framework is the same: that development is not permitted except in accordance with provincial and federal requirements.
June 26, 2013	Ministry of Natural Resources	re: Section 5.4.2 Habitat of Endangered or Threatened Species and Fish Habitat "The words 'in proximity' should be changed to 'adjacent' to better align the policy with the adjacent lands distances that are established in Section 5.6.3 of	Recommend change as suggested; also, add 'significant habitat of endangered and threatened species' to 5.6.3 a).

		the OP.”	
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Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in “quotes”)</i>	Staff Response
June 26, 2013	Ministry of Natural Resources	<p>Fish habitat, which is considered part of the Greenlands System, is not included in the table provided in Section 5.3.</p> <p>Fish habitat is identified as a Core Greenlands feature under Section 5.4. This feature is identified and discussed in conjunction with the significant habitat of endangered and threatened species. The rationale for grouping these distinct feature types together is not clear, and it is suggested that they be addressed separately. Fish habitat would seem to be addressed in Section 5.5.1 as a Greenlands feature. The policy framework for fish habitat should be reviewed and clarified.</p>	<p>The Revised Draft Amendment does not include a table within Section 5.3</p> <p>Policies refer to fish habitat in Core Greenlands and Greenlands because fish habitat is not mapped as a feature on its own. Fish habitat may occur in conjunction with features identified as Core Greenlands or Greenlands, or may occur outside of these features. In either case, the policy framework is the same - development is not permitted except in accordance with provincial and federal requirements.</p>
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.5.1 Habitat            “The feature type identified as ‘habitat’ should be changed to “significant wildlife habitat” to better reflect PPS terminology. If it is the County’s intent to protect other habitats, aside from those that may be identified as significant wildlife habitat, then this should be clearly described.</p> <p>If it is determined that fish habitat is to be considered as a Greenlands feature (as opposed to a Core Greenland), MNR suggests it be addressed as its own feature type, distinct from wildlife habitat. Further, the criteria by which the County identifies significant wildlife habitat have not been defined in the OP.”</p>	<p>Refer to Section 5.1 Greenlands System – Defined.</p> <p>See response re: fish habitat above.</p>
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.5.2 Areas of Natural and Scientific Interest            As a general comment, MNR identifies ANSIs, both life science and earth science, which may be evaluated as provincially, regionally or locally significant. ANSIs may also be “confirmed” or “candidate”. It is only confirmed provincially significant ANSIs that are considered under policies 2.1.4 and 2.1.6 of the PPS. Municipalities may also choose to protect regionally and locally significant ANSIs as well as candidate ANSIs. Based on the above, the first sentence could be simplified by revising it as follows: “Both provincially and regionally significant areas of natural and scientific interest (ANSI) are included in the Greenlands system.”</p>	<p>The Draft Revised Amendment was changed to address this comment.</p>

Date	Agency	Main Comments, Requests or Recommended Changes <i>(excerpts taken verbatim are in "quotes")</i>	Staff Response
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.5.3 Valleylands</p> <p>"While not part of OPA 81, MNR recommends that the County consider clarifying the terminology used to indicate 'significant valleylands' are included. MNR notes the criteria by which the County identified (significant) valleylands have not been identified in the OP."</p>	<p>The policy as currently written states that all valleylands are included.</p>
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.6.2 Development Impacts</p> <p>This subsection of the OP regarding Development Impacts contains a section titled "Natural Heritage Systems". Natural Heritage Systems are not defined, their relationship to the "Greenlands System" is not described and the whole section seems out of place. If this section is meant to deal with the greenbelt policies then it should be moved to section 9.9.</p> <p>The distinction between "negative impacts" and "significant negative impacts" is not clear as "significant negative impacts" does not appear to be defined in the OP.</p>	<p>Recommend adding PPS definition of 'natural heritage system' to Definitions section.</p> <p>Some terms need to be interpreted on a case by case basis.</p>
June 26, 2013	Ministry of Natural Resources	<p>re: Section 5.6.2 Development Impacts (continued)</p> <p>In part a), MNR suggests that the "natural heritage resource(s)" be replaced "natural heritage features" or "Core Greenlands/Greenlands features" to be more consistent with terminology used elsewhere in the OP.</p> <p>In addition to the considerations/requirements for development proposals identified in a) through e), MNR suggests an evaluation of the ecological functions of the adjacent lands should also be required. This could be identified in Section 5.6.3 or included in the Environmental Impact Assessment policies of the OP in Section 4.6.3.</p> <p>MNR suggests that Section 5.6.3 would benefit from the addition of policy that requires development applicants to undertake a site specific inventory and assessment in support of their applications. The purpose of site assessment is to ensure that all natural heritage features and functions have been identified and evaluated. Site assessment is required recognizing that our information about natural heritage features and function is incomplete; not all features are necessarily presently known or identified on the landscape.</p> <p>Policy should also be included to indicate that where features are newly identified that their significance will be evaluated, and that such features will be recognized in the development application review process and the incorporated into the OP more generally.</p>	<p>The Draft Revised Amendment was changed to address this comment.</p> <p>The policy as currently written states "Where development is proposed in the Greenland system or on adjacent lands..."</p> <p>The Draft Revised Amendment was changed to refer to Section 4.6.3 Impact Environmental Assessment, which addresses site specific requirements.</p> <p>No change recommended. Current wording of Section 4.6.3 Environmental Impact Assessment has this effect. Incorporating new or more detailed mapping of features from EIS through OPAs occurs as a matter of course.</p>

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June 26, 2013	Ministry of Natural Resources	MNR notes a deposit (pool) of natural gas is found within the County, outside of Arthur. A number of wells also occur in the County. MNR suggests the County should consider developing policy to include in the OP to address petroleum resources and wells.	Would introduce a new topic not included in the public notices. Recommend addressing in a future amendment subject to confirming published sources and policy implications.
June 26, 2013	Ministry of Natural Resources	re: Section 9.9.6 - Key Natural Heritage Features and Key Hydrologic Features. The identification of features here is generally consistent with how KNHF and Key Hydrologic Features (KHF) are defined in the Greenbelt Plan, with the exception of sand barrens, savannahs, tallgrass prairies and alvars, which are not identified. The Ministry suggests the County consider adding policy to address the policies of Section 3.3 of the Greenbelt Plan related to parkland and open space. In considering how to address this, it may be appropriate to make reference to the OP's existing parks and open space policies in Section 4.11.	No change recommended. Based on mapping supplied by the province, these features do not occur in the Wellington portion of the Greenbelt, so they were not identified in the Official Plan.  Recommend change as suggested.
June 26, 2013	Ministry of Natural Resources	re: Section 9.9.10.2 Non-renewable Resources  MNR suggests a policy or statement should be added to reflect Section 4.3.2.2 of the Greenbelt Plan, which acknowledges the importance of mineral aggregate resources and making them available close to market.  Under Section 9.9.10.2(a)(iii) and (b)(ii), it is required that the "specific provisions of the rehabilitation policies have been addressed". MNR recognizes all rehabilitation policies would have to be addressed by applicants for a mineral aggregate operation, but suggests the County may wish to consider making specific reference to policies 9.9.10.2(e)(iii), (iv) and 9.9.10.2(f)(iii) to be consistent with Section 4.3.2.3(a)(iii) and (b)(ii). Alternatively, or in addition, the County may wish to consider clarifying that the rehabilitation policies are outlined in subsections (e) and (f).  The Ministry suggests relevant definitions in support of Greenbelt Plan policies should be added to the OP.	Recommend change as suggested.  The Draft Revised Amendment includes a wording change in a)iii) to address this comment. Recommend a similar change in bullet b)ii).  See terms added to Definitions Section in the Draft Revised Amendment
June 26, 2013	Ministry Northern Development and Mines	The colour used to show Proposed Mineral Aggregate Resource Areas in Schedule C corresponds with sand and gravel resources of secondary significance in the ARIP report. Some of the areas outlined in Schedule C, originally shown as a thick line (Current Mineral Aggregate Resource Area which is shown as an overlay on Schedule "A") are of primary significance, shown in red in the ARIP report. A suggestion would be to change colour of this layer.	Recommend revision to a different colour, to avoid confusion with ARIP report.
June 26, 2013	Ministry of	Please provide further explanation of what is meant by the term "limited non-	Term added from PPS 2.3.5.1c) at request of

	Infrastructure	residential uses.”	OMAF in preconsultation, not defined in PPS.
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Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in "quotes")	Staff Response
June 26, 2013	Ministry of Infrastructure	re: Section 4.8 Urban Expansion It appears that the County is proposing to implement Section 2.2.8.2 of the GP. If so, Section 2.2.8.2 of the GP would apply not only to proposed expansions to urban centres, but to all urban and rural settlement areas in the County as defined in the GP, including hamlets. In order to ensure the wording is in accordance with GP policy 2.2.8.2, the term "settlement area" should be used, regardless of whether it is an urban centre or a hamlet. Please ensure that the wording in Policy 4.8.2 a) to i) is in accordance with GP policy 2.2.8.2 a) to i).	Our growth management policies approved through the OPA 65 Conformity Amendment state that we expect Hamlets to build out and not expand by more than 5 lots, where justified through comprehensive review. So our policies on Hamlet expansions are more restrictive than for Urban Centres in this regard. That is one reason for retaining the distinct Urban Centre wording and not blending Urban Centres and Hamlets into 'settlement areas' in this section. Recommend adding reference to Section 4.8.2 to clarify that where a Hamlet Expansion is considered, that the comprehensive review requirements of 4.8.3 would apply.
June 26, 2013	Ministry of Infrastructure and Ministry of Municipal Affairs	re: 4.8.2 Urban Centre Expansion Criteria Urban centres and hamlets in OPA 81 would appear to meet the definition of settlement areas in the Growth Plan (GP) and any policy related to the expansions of these settlement areas must meet the requirements of Section 2.2.8.2 of the GP. For clarity, the use of the term "settlement area" is suggested, regardless of whether it is an urban centre or a hamlet.	
June 26, 2013	Ministry of Infrastructure	re: 4.8.2 Urban Centre Expansion Criteria a) to c) Clarification is needed that the intensification and density targets referenced as defined in OPA 81 are the same as those issued by MOI in August 21, 2009. In order to be in conformity with the GP, the wording of these subsections needs to reflect the exact wording of Section 2.2.8.2.	Recommend adding "in Section 3.3.1 Targets" after the phrase "using the intensification target and greenfield target, as approved by the Province".
June 26, 2013	Ministry of Infrastructure	re: 4.8.2 Urban Centre Expansion Criteria a i) The wording of this policy must be in keeping with the GP policy 2.2.8.2 on settlement area boundary expansions, specifically 2.2.8.2 a) i). The addition of the full definition of regional market area in OPA 81 as defined in the GP is recommended.	Refer to Current OP. Regional Market Area definition was added to the Definitions through the OPA65 Growth Plan Conformity Amendment.
June 26, 2013	Ministry of Infrastructure	re: 4.8.2 Urban Centre Expansion Criteria a) ii) The wording of this policy must be in keeping with the GP policy 2.2.8.2 on settlement area boundary expansions, specifically 2.2.8.2 a) i). The phrase "pursuant to Places to Grow in Part 3 of this Plan" should be deleted.	Recommend change as suggested.
June 26, 2013	Ministry of Infrastructure	re: 4.8.2 Urban Centre Expansion Criteria g) The wording of this policy should be in keeping with the GP policy on settlement area boundary expansions. In order to ensure conformity with GP policies, the term "settlement area" must be used in place of the term "urban centre".	See recommended change at top of this page.
June 26, 2013	Ministry of Infrastructure	This policy proposes that "new rural employment areas shall only be established by amendment to this Plan" with the considerations listed in subsections a) through i). Further explanation is required as to how the establishment of new rural employment areas and their permitted uses would meet the rural area	Proposals for new locations would need to meet Growth Plan policies.

		policies of Section 2.2.2.1 i) and 2.2.9 of the GP.	
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Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in “quotes”)	Staff Response
June 26, 2013	Ministry of Infrastructure	re: Section 10.4.4 Lot Creation Policies for Secondary Agricultural Areas The proposed revision to Policy 10.4.4 proposes that, with respect to Secondary Agricultural Areas, “one new lot for residential purposes may be allowed from a parcel of land existing on March 1, 2005”. The GP 2.2.2.1 i) requires that growth should be accommodated by directing development to settlement areas. Please clarify why any potential residential development materializing from the implementation of Policy 10.4.4, if approved, cannot be directed to settlement areas as per GP policy 2.2.2.1 i) and how it would conform to GP policy 2.2.9.	Policy mainly affects Puslinch Township, in which the potential residential development, which is in line with the Township growth forecast, cannot be directed to the settlements of Aberfoyle, Morriston (Urban Centres) and Arkell (Hamlet) are unable to accommodate significant increases in growth due to environmental and servicing constraints. Morriston, the largest, is unable to expand its boundary due to the Greenbelt Plan.
June 26, 2013	Ministry Northern Development and Mines	In the first bullet point of item 13 in Part A – Preamble, there are some words missing in the phrase “site plan control policies to allow local the site plan control process”.	Recommend change to “site plan control policies to allow the local site plan control process...”
June 26, 2013	Ministry Agriculture and Food	Re: 3.3 Guiding Growth Regarding the sixth bullet and as noted in previous comments, the words “non-prime agricultural areas” need to be replaced with “secondary agricultural areas” since this is the terminology used in the OP (“non-prime agricultural areas” is not defined in the OP).	Secondary Agricultural Area is one of several designations (Recreation, Rural Employment Area, Country Residential, etc.) in the Rural System that are outside of the Prime Agricultural Area. Recommend rewording: “to identify areas outside of prime agricultural areas as locations for rural growth opportunities”.
June 26, 2013	Ministry Agriculture and Food	The sentence in text box following 4.3.2 that “Prime agricultural land will be protected and normal farming operations should not be hindered” should be replaced with the actual PPS 2.3.3.2 wording (“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”) and added as a second stand-alone paragraph in 4.3.1.	No change recommended. Text box provides a plain language statement that does not weaken the PPS policy cited in 6.4.2 under the Prime Agricultural Area designation.
June 26, 2013	Ministry Agriculture and Food	re: 4.3.2 Secondary Agricultural Areas “...these areas are defined in this section of the OP as ‘areas with agricultural capability but determined not to be prime agricultural soils’. Since prime agricultural areas may also contain associated CLI Class 4-7 soils this definition does not work. The word ‘soils’ in 4.3.2 should be replaced with the word ‘areas’, or the PPS definition should be used (i.e. lands in the rural area which are outside settlement areas and which are outside prime agricultural areas).  As noted above, in the text box below 4.3.2, the word “land” should be replaced with the word “area” since the PPS requires that prime agricultural areas be protected. In addition, as per the PPS, Secondary Agricultural Areas should be determined in consultation with the Ministry of Agriculture and Food and the	Recommend change suggested from “lands” to “areas” in 4.3.2.  See response re: text box above.  Recommend adding complete “prime agricultural area” definition to Definitions section, which

		Ministry of Rural Affairs.”	describes the provincial role in identification.
Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in “quotes”)	Staff Response
June 26, 2013	Ministry Agriculture and Food	<p>re: 4.3.3 Policy Direction</p> <p>bullet a) In order to avoid site specific re-designation proposals from a prime agricultural area to secondary agricultural area, there should be a requirement here to undertake a comprehensive review of the prime agricultural area, in consultation with OMAF, in order to “demonstrate that the land would be more appropriately placed in a Greenlands or secondary agricultural designation”.</p> <p>Change “non-farm” to “limited non-residential” and add “in accordance with 4.3.3 b) and c)”.</p> <p>bullet b) This section attempts to incorporate the policies of the PPS (1.1.3.9 settlement expansion into prime agricultural areas and 2.3.5 removal of land from prime agricultural areas) but some key policies are missing. The PPS policy 2.3.5.2 also needs to be added to 4.3.3. These policies deal with settlement area expansions into prime agricultural areas so in the first paragraph change “land” to “areas”. Urban centres and hamlets in OPA 81 would appear to meet the definition of settlement areas in the Growth Plan (GP) and any policy related to the expansions of these settlement areas must meet the requirements of Section 2.2.8.2 of the GP. For clarity, the use of the term “settlement area” is suggested, regardless of whether it is an urban centre or a hamlet.</p> <p>bullet c) The terminology is misleading and not consistent with the PPS. Therefore, replace “areas of prime agricultural land” with “prime agricultural areas” and the rest of the paragraph should read “if the need for the use can be demonstrated and provided that there are no reasonable alternative locations which avoid prime agricultural areas and there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands”.</p> <p>Regarding “Alternative Locations”, change the first bullet point to “impacts on agricultural land and operations” and add a 5th bullet point “Canada Land Inventory classification”.</p> <p>Also, it is noted that consistency with PPS 2.3.5.1 c) (i.e. “need”) will be</p>	<p>Need to avoid confusion with “comprehensive review” phrase which is a key policy trigger in PPS and Places to Grow for settlement expansions and employment land conversions. Recommend adding “municipal scale” in front of “studies”.</p> <p>Recommend change to ‘limited non-residential’.</p> <p>The policy framework for expansions is set out in accordance with Places to Grow in Section 4.8. Therefore, recommend deleting bullet b) and replacing with “Urban Centre or Hamlet expansions are subject to the comprehensive review policies of Section 4.8 Urban Expansion.”</p> <p>Recommend changes as suggested.</p> <p>Recommend adding “Canada Land Inventory classification” bullet.</p>

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Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in “quotes”)	Staff Response
June 26, 2013	Ministry Agriculture and Food	<p>re: 4.4.3 Residential Intensification</p> <p>With respect to residential intensification, it should not be encouraged in the “rural areas” (not defined) in general since the Rural System also includes prime agricultural areas. Prime agricultural areas are required to be protected and only agricultural uses, secondary uses and agriculture-related uses are permitted. Clarify where the small scale intensification in the rural system will be encouraged by deleting “in rural areas” in the first paragraph of 4.4.3 and in 4.4.3 h), and inserting “in the secondary agricultural areas of the Rural System” or ‘outside of prime agricultural areas’.</p> <p>4.4.3 e) and h) speak to allowing severances and encouraging intensification in “stable residential areas” and in “rural areas”. Unless “rural areas” is clarified or defined in the first paragraph, it should be stated that these areas are designated urban areas or secondary agricultural areas.</p>	<p>No change recommended. The policy framework for second units in the rural system will be reviewed as part of a separate, focused amendment to address Bill 140.</p>
June 26, 2013	Ministry Agriculture and Food	<p>re: 4.7.1 Distinct Urban Boundary</p> <p>Regarding the Distinct Urban-Rural Boundary, item b) should be deleted as the restriction of agricultural uses is not permitted in prime agricultural areas and the MDS formulae are used to site livestock operations in accordance with provincial policy. In addition, PPS 2.3.3.2 states 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.</p>	<p>MDS effectively prohibits new intensive livestock facilities adjacent to urban boundaries, so this statement is consistent with PPS.</p>
June 26, 2013	Ministry Agriculture and Food	<p>re: 5.6.4 Zoning</p> <p>The last paragraph of this subsection regarding Zoning allows for zoning setbacks from Greenland areas which would prohibit buildings or structures. There is no criterion specified for the establishment of these setbacks. This is contrary to the PPS 2.3.3.2 since 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. This paragraph should be deleted or reasonable parameters outlined for the establishment of these setbacks (in accordance with provincial standards).</p>	<p>Local Zoning setbacks have been in place to address provincial natural heritage and hazardous lands policies for some time, and relief is provided through minor variances where appropriate.</p>
June 26, 2013	Ministry Agriculture and Food	<p>re: 5.6.5 Agriculture</p> <p>Further to the confusion regarding the “Natural Heritage System” and the “Greenlands System”, this policy states that “Natural heritage policies will not limit the ability of agricultural uses to continue”. In accordance with the PPS, this policy should state, “Nothing in Greenlands System policies is intended to limit the ability of existing agricultural uses to continue”.</p>	<p>No change recommended. Current wording is more consistent with PPS which specifically refers to natural heritage policies. Greenlands System is broader as it includes hazardous lands in addition to natural heritage features.</p>
June 26, 2013	Ministry Agriculture and Food	<p>re: Part 6 the Rural System</p> <p>It would be helpful to put the MDS policies (PPS 2.3.3.3) up front in this section as they apply throughout the Rural System.</p>	<p>Recommend adding “New land uses, including the creation of lots, and new or expanding livestock facilities shall comply with the Minimum Distance Separation formulae.” at end of 6.3 Planning</p>

Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in “quotes”)	Approach. Staff Response
June 26, 2013	Ministry Agriculture and Food	<p>re: 6.4 Prime Agricultural Areas Regarding Permitted Uses, as discussed with the County, the last three uses listed, j), k) and l), are not permitted as of right in prime agricultural areas. All limited non-residential uses, including community service facilities, group homes and kennels, must satisfy, among other PPS and OP policies, PPS 2.3.5 Removal of Land from Prime Agricultural Areas before the use can be considered in a prime agricultural area.</p> <p>Regarding Community Service Facilities, Group Homes and Kennels, as noted previously, planning authorities may only exclude land from prime agricultural areas for: expansions of settlement areas; extraction of minerals, petroleum resources and mineral aggregate resources; and limited non-residential uses. PPS 2.3.5 clearly outlines the policies that must be met for the establishment of these types of non-agricultural uses in prime agricultural areas.</p> <p>PPS 2.3.5 should be included in section 6.4 Prime Agricultural Areas of the OP so that all other uses, (e.g. 6.7 Recreational Areas, 6.8 Rural Industrial Areas, 6.9 Highway Commercial Areas, institutional uses that are required for local communities that rely on horse drawn vehicles as their sole means of transportation, etc.) may be considered in prime agricultural areas as warranted, and subject to the other policies of the OP and the PPS. Therefore, the text box in 6.4.10 should be a stand-alone policy to address all limited non-residential uses that are proposed in the prime agricultural area.</p>	<p>Comment re: Community Service Facilities led to proposed additional wording under Section 6.4.10 that rezoning is required to address need and alternative locations. This change would make the OP consistent with the desired outcomes of PPS Section 2.3.5.</p> <p>In terms of group homes and kennels, no change recommended.</p> <p>PPS 2.3.5 for other uses is addressed earlier in the General Policies – Farmland Protection (4.3.3).</p>
June 26, 2013	Ministry Agriculture and Food	<p>With respect to Accessory Residences, the PPS permits accommodation for full-time farm labour when the size and nature of the operation requires additional employment. This wording should be reflected in the first sentence of the first paragraph.</p>	<p>Recommend addressing this in a future separate amendment in the context of broader second unit policy changes to comply with Bill 140.</p>
June 26, 2013	Ministry Agriculture and Food	<p>re: 6.5 Secondary Agricultural Areas In subsection 6.5.1 Defined, the word “farmland” needs to be deleted and replaced with “agricultural areas”.</p>	<p>Recommend change as suggested.</p>
June 26, 2013	Ministry Agriculture and Food	<p>Regarding Recreational Areas, Rural Industrial Areas and Highway Commercial Areas, these uses and all other non-agricultural uses must first satisfy the requirement of PPS 2.3.5 (Removal of Land from Prime Agricultural Areas) and 2.3.3.3 (MDS) prior to being allowed to establish in prime agricultural areas. This should be clearly outlined up front in section the respective sections of the OP or these uses should be moved to Section 6.5 Secondary Agricultural Areas.</p>	<p>Proposed 6.8.4 Rural Employment Areas – New Locations, references Section 4.3.3c) which addresses PPS 2.3.5. Recommend adding reference to Section 4.3.3c) in the Recreational Areas policies.</p>

Date	Agency	Main Comments, Requests or Recommended Changes (excerpts taken verbatim are in "quotes")	Staff Response
June 26, 2013	Ministry Municipal Affairs and Housing	re: 9.9 Greenbelt Policies (Erin and Puslinch) The proposed Greenbelt Policies do not appear to include policies related to Cultural Heritage Resources (Section 4.4 – Greenbelt Plan).	Greenbelt Cultural Heritage Policies are redundant with Official Plan framework
June 26, 2013	Ministry Agriculture and Food	re: Greenbelt Policies (Erin and Puslinch) With respect to the Agricultural System, and the discussion of "Prime Agricultural Area", the first bullet point states that the "uses permitted shall be in accordance with section 6.4" which is acceptable subject to the revisions requested regarding Section 6.4.	Section 6.4 was partially revised to address earlier comments.
June 26, 2013	Ministry of Natural Resources and Ministry of Municipal Affairs	re: Schedules The OP notes the Greenbelt Plan boundary and geographic areas/systems are shown on Schedules A2-1 and A7-3. In reviewing these schedules, MNR notes the Settlement Area boundary of Erin appears to be inconsistent with the Greenbelt Plan schedules, extending too far south/west across Eighth Line and into lands identified in the Greenbelt Plan as Natural Heritage System. There are also differences in the boundary on the east side, extending into the Protected Countryside. Please verify that the settlement area boundaries shown on the schedules are accurate and reflective of the boundaries identified/approved in the County OP as of the date the Greenbelt Plan came into effect.	No change recommended. Boundary accurately reflects Erin Village boundary that was Adopted by Town and County Councils prior to December 16, 2004.
June 26, 2013	Ministry Agriculture and Food	re: Greenbelt Policies (Erin and Puslinch) With respect to the Agricultural System, and the discussion of "Prime Agricultural Area", the first bullet point states that the "uses permitted shall be in accordance with section 6.4" which is acceptable subject to the revisions requested regarding Section 6.4.	Section 6.4 was partially revised to address earlier comments.
June 26, 2013	Ministry Agriculture and Food	re: Land Use Schedules A review was undertaken of the 21 proposed settlement area boundary expansions. Basically no information was provided in terms of need, alternative locations and potential impacts, including MDS I and II implications. Based on OMAF's review, the Morriston and Rockwood north (OPP and fire station) proposed settlement boundary expansions still have outstanding MDS I issues. Of these MDS I issues noted, OMAF would have no concerns regarding the proposed settlement area boundary expansions if an urban zoning is currently in place on the subject lands.	Staff reviewed MDS for Morriston and determined that there would be no impact. Staff revised the boundary for Rockwood north to ensure that it lies outside of the MDS arc.



	<p>City of Guelph (continued...)</p>	<p><u>Urban Area Protection</u> ...The City is concerned that the cumulative impact of development within the fringe, particularly the creation of new rural residential lots immediately abutting the City’s boundary:</p> <ul style="list-style-type: none"> <li>• Impacts on the planned arterial function of the boundary roads, particularly Maltby Road and result in future compatibility issues, particularly in the south end of the City. A Secondary Plan for this area will determine future land uses.</li> <li>• Continued severance activity in the fringe is in effect a settlement boundary expansion without services that does not respect the policies of the Growth Plan.</li> </ul> <p>...We are unclear as to how residential lot creation abutting the City can meet the criterion that the use be ‘well removed from any settlement area boundary’ pursuant to policy 10.4.4f) and would appreciate some commentary in this regard. We are still reviewing the policies to determine if the City’s interests are adequately protected by the Urban Area Protection and Lot Creation policies and may provide further comment in this regard.</p> <p><u>Rural Employment</u> ...We confirm that based on our discussions with you that the policy as written suitably protects against the development of large format retail uses. We also suggest revising policy 6.8.4b) to clarify that new Rural employment designations will not be established within the City’s Urban Protection area.</p>	<p>This has already been established based on past practice and Ontario Municipal Board decisions.</p> <p>Recommend change, to apply to all Urban Centres.</p>
<p>August 26, 2013</p>	<p>Hamilton Conservation Authority</p>	<p><u>Section 5.6.3 Adjacent Lands</u> HCA notes the Natural Heritage Reference Manual recommends 120m for fish habitat and adjacent lands. HCA suggests the County incorporate this standard into the OP.</p> <p><u>Section 9.9.4 Greenbelt Agricultural System – Rural Area</u> ...HCA notes this GB policy also prohibits the creation of multiple lots under any circumstance, not only where it would facilitate strip development. HCA suggests the Rural Area policies in Section 9.9.4 be broadened to address this Greenbelt provision, or alternatively a cross-reference to Section 6.3 of the OP be included (which already includes a policy to prohibit new rural estate, multi-lot development).</p>	<p>Recommend change as suggested.</p> <p>Recommend adding cross-reference to Section 6.3 to the other sections cross-referenced in the first bullet.</p>