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February 27, 2018

Protecting Water  
Ministry of Municipal Affairs  
Provincial Planning Policy Branch  
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Toronto, ON M5G 2E5

To whom it may concern,

At its meeting held on February 22, 2018 Wellington County Council approved the following recommendation from the Planning Committee:

**That the report titled Comments on the Proposed Greenbelt Expansion Study Area be forwarded to the Minister of Municipal Affairs, member municipalities in Wellington County, neighbouring municipalities in the Greater Golden Horseshoe and the Grand River Conservation Authority.**

Please see the attached report and if you have any questions, please contact Mark Paoli, Manager of Policy Planning at 519.837.2600 ext. 2120 or [markp@wellington.ca](mailto:markp@wellington.ca).

Respectfully,

A handwritten signature in cursive script that reads "Kim Courts".

Kim Courts  
Deputy Clerk



## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Mark Paoli, Manager of Policy Planning  
**Date:** January 31, 2018  
**Subject:** COMMENTS ON THE PROPOSED GREENBELT EXPANSION STUDY AREA

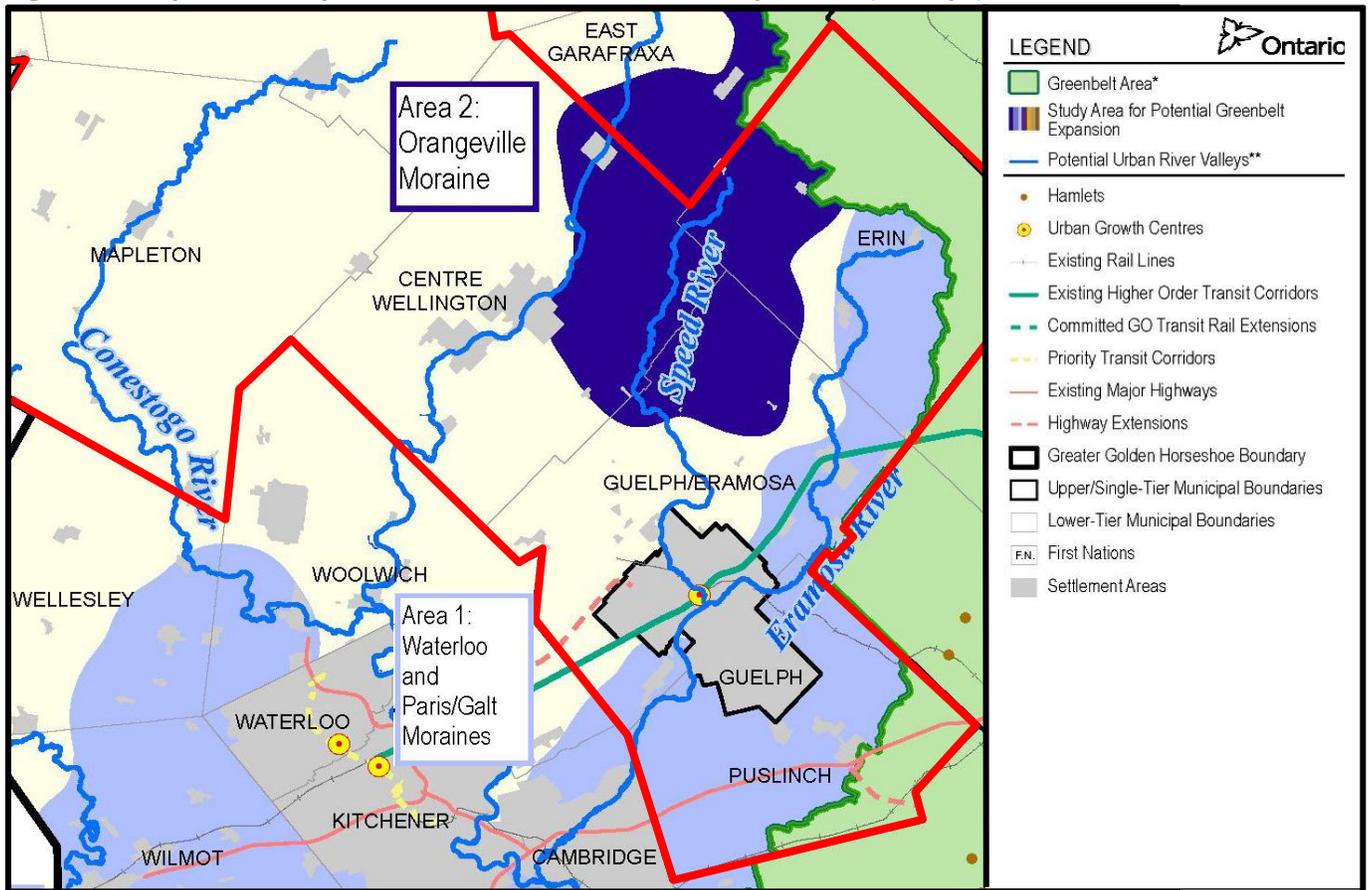
### 1.0 Background:

The Province is consulting on a proposed Study Area for potential expansion of the Greenbelt Plan to protect water resources from urbanization. The Public Consultation Document states that:

**“We are not consulting on a proposed Greenbelt boundary at this time. Input received through this consultation will help inform decisions on how to move from a study area to a proposed Greenbelt boundary. We would consult further on a proposed boundary before any boundary changes are made.”**

The Study Area includes lands labeled on Figure 1 below as Area 1: Waterloo and Paris/Galt Moraines and Area 2: Orangeville Moraine, both of which extend into Wellington County along with Potential Urban River Valleys associated with the Conestogo, Grand, Speed and Eramosa Rivers.

**Figure 1: Proposed Study Area for Potential Greenbelt Expansion (excerpt)**

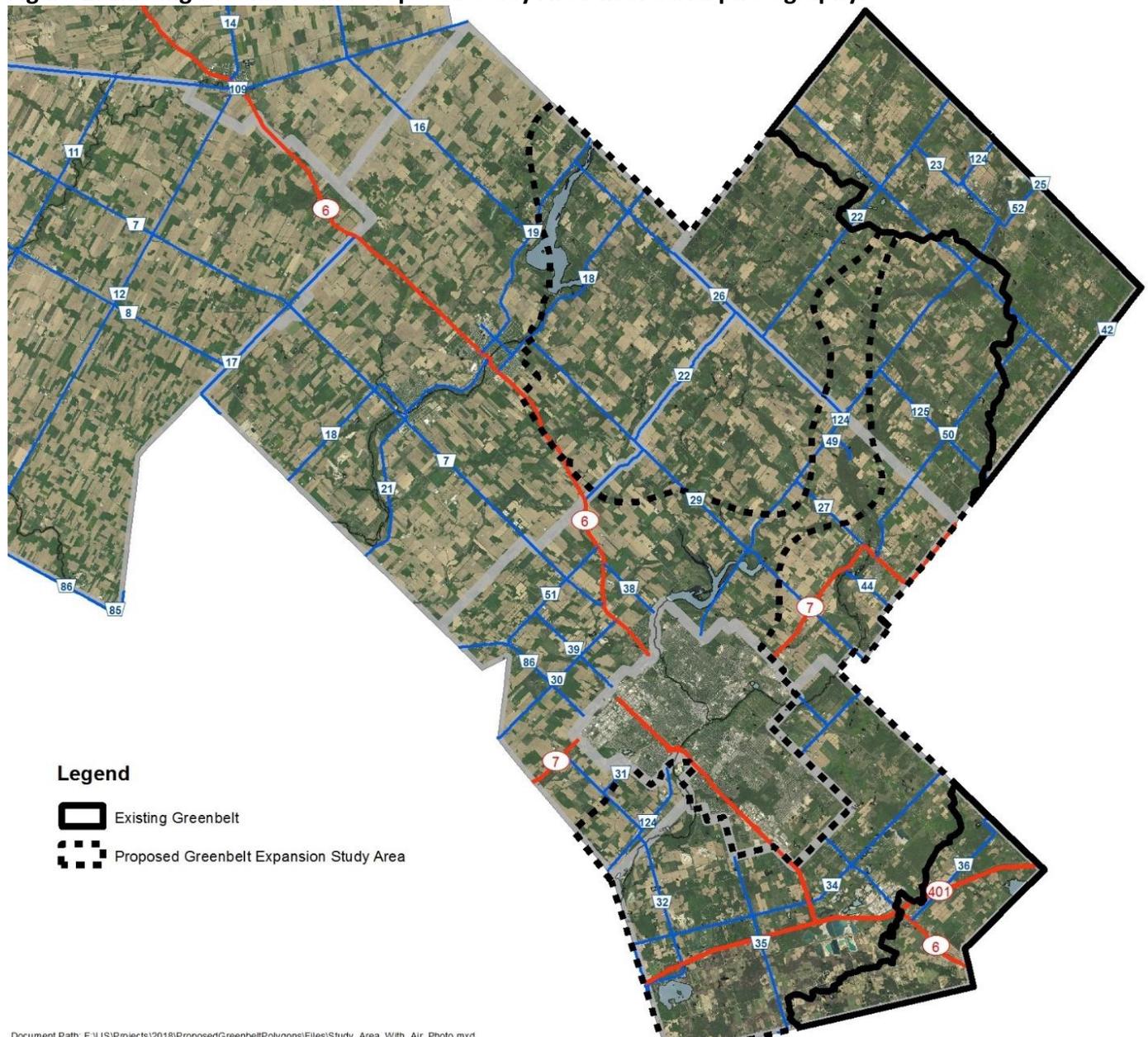


The deadline for comments is March 7, 2018. We are bringing this report forward at this point in the process to give member municipalities in the County time to review and consider should they also wish to submit comments.

## 2.0 Proposed Study Area General Description

As shown in Figure 2 below, the study area is mostly farmland dotted with small towns and hamlets. As a headwaters area, several rivers and their tributaries cross the landscape, which has varying amounts of natural cover. The Study Area has several lakes/reservoirs and adjacent recreational areas and contains one of the largest mineral aggregate resource areas in Ontario. The Study Area is approximately: 11,500 ha in Centre Wellington; 13,700 ha in Guelph/Eramosa; 14,200 ha in Erin; and 16,900 ha in Puslinch, for a total area in Wellington County of 56,300 ha.

**Figure 2: Existing Greenbelt and Proposed Study Area with aerial photography.**



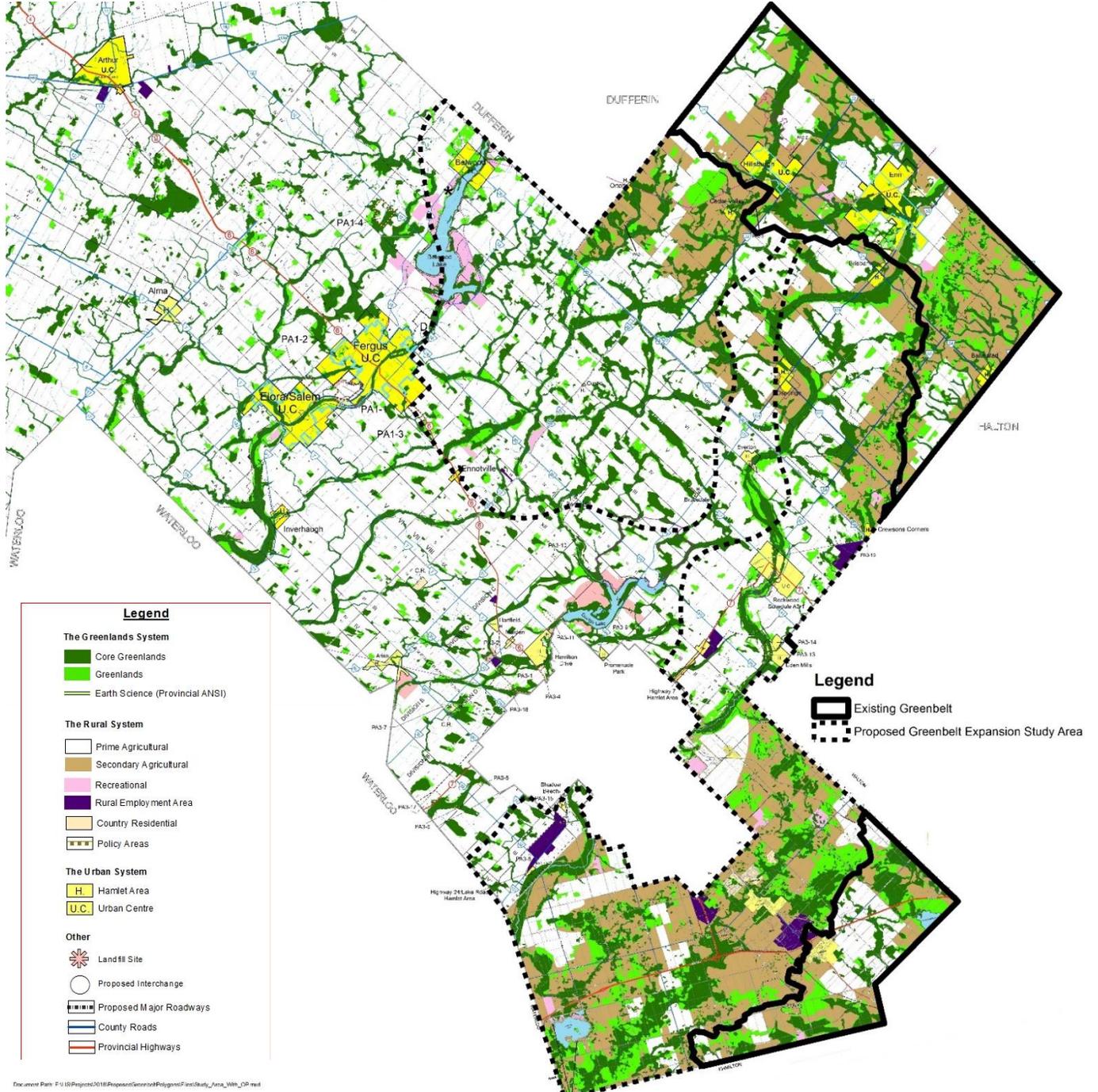
Document Path: F:\US\Projects\2018\ProposedGreenbelt\Polygons\Files\Study\_Area\_With\_Air\_Photo.mxd

### 3.0 County Official Plan

The Official Plan land use designations in the Study Area are shown on Figure 3 and summarized in Table 2 below.

About 62% of the Study Area is designated for agricultural uses and about 1/3 is protected in the Greenlands System.

**Figure 3: Existing Greenbelt and Proposed Study Area with County Official Plan Land use Schedule**



**Table 2: Proposed Study Area Land Use Designations**

Designation	Prime or Secondary Agricultural Area	Core Greenlands or Greenlands	Urban Centre or Hamlet	Recreational	Rural Employment Area	Country Residential or Lifestyle Community	TOTAL
Area (ha)	34,680	18,800	1,190	840	650	140	56,300
% of Study Area	62	33.3	2	1.5	1	0.2	100

### 3.1 Settlement Areas

The Study Area contains two Urban Centres and 16 Hamlets (see Table 2 below).

**Table 2: Settlement Areas inside the Study Area**

Type	Centre Wellington	Guelph/ Eramosa	Erin	Puslinch	TOTAL
Urban Centre	0	1 Rockwood	0	1 Aberfoyle	2
Hamlet	2 Belwood, Ennotville	8 Barrie Hill, Brucedale, Crewson's Corner, Eden Mills, Hwy 7, Lake Road, Oustic, Shadow Beech	5 Brisbane, Cedar Valley, Crewson's Corner, Orton, Ospringe	1 Arkell	16
TOTAL	2	9	5	2	18

The City of Guelph, City of Cambridge and the Urban Centre of Fergus are adjacent to the Study Area. The study area adjacent to Fergus includes land that may need to be considered for future urban expansion. None of the Wellington County settlements inside the Study Area need to expand to meet the Official Plan growth forecasts to 2041, based on current long-term land supply estimates. More importantly, under the Growth Plan for the Greater Golden Horsehoe (Growth Plan), Wellington County, Waterloo Region, and the City of Guelph will be required to use a standard methodology to assess the quantity of land needed to accommodate forecasted growth. The location of any expansion, if needed, will be determined based on a series of criteria and studies that require the natural heritage system, key hydrological areas and prime agricultural areas to be avoided where possible. This analysis will form part of the larger municipal comprehensive review that will be required by 2022 and subject to approval by the Province.

### 3.2 Key Water Resources Policy Updates to the Official Plan since the Greenbelt was established

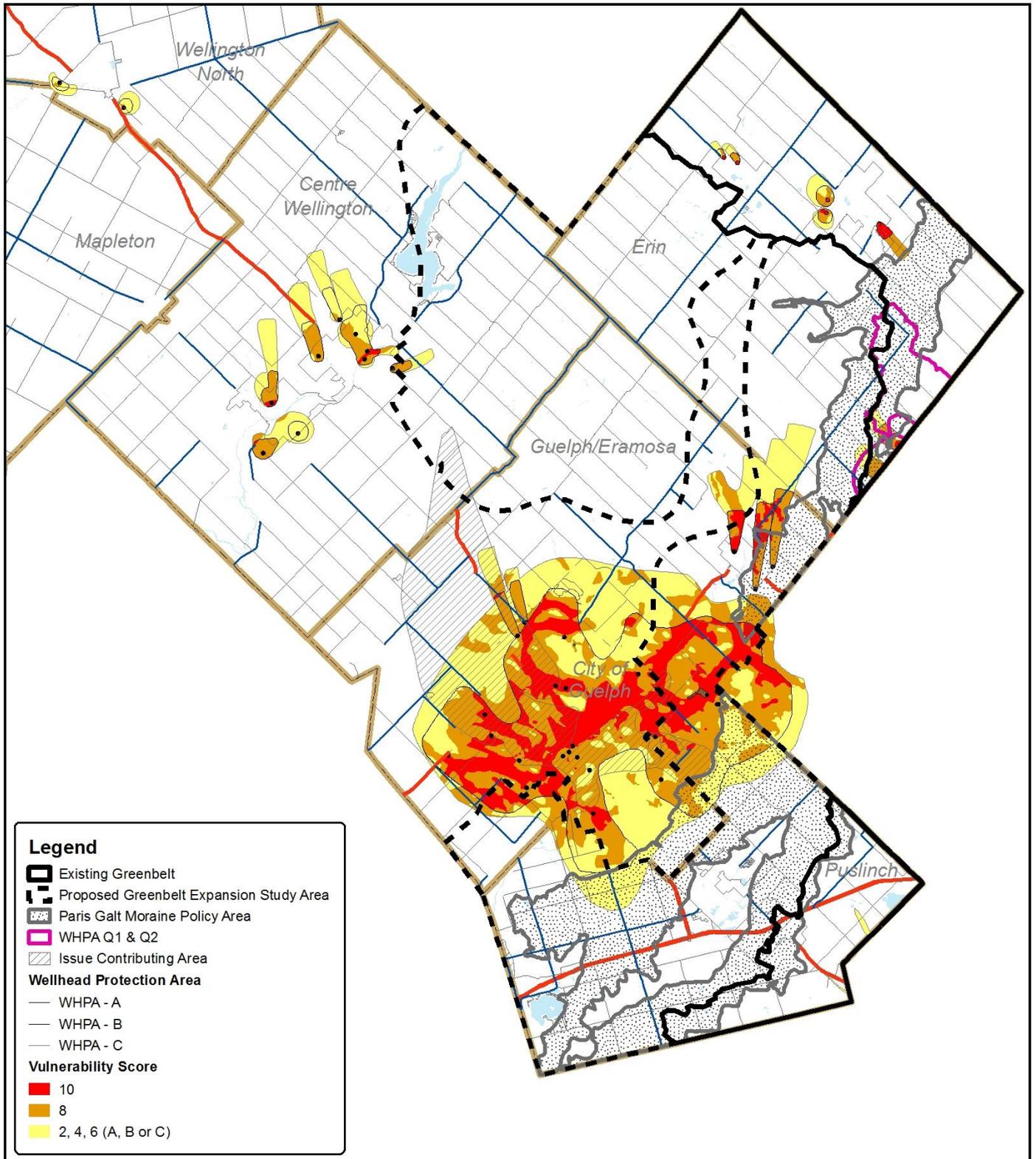
Policies were added to the County Official Plan (OPA 98) to conform with the 5 Source Protection Plans. Areas for which policies are approved in the Source Protection Plans (water quality and quantity Well Head Protection Areas, Issue Contributing Areas and Intake Protection Zone) are on Schedule 'B'. The policies work in combination with *Clean Water Act* tools and Provincial instruments under a variety of other Acts in a multi-barrier approach to protect municipal drinking water supplies.

Schedule 'B' also shows the Paris and Galt Moraine Policy Area that was added through the 5-Year Review (OPA 81) that the Province approved in 2014. The Paris and Galt Moraine policies state that:

- Large scale development proposals including intensive recreation, mineral aggregate operations, new rural employment area designations, and urban boundary expansions are required to demonstrate that ground and surface water functions will be maintained, and where possible, restored and enhanced;
- Small scale developments that do not rely on significant site alterations are not normally required to demonstrate protection of the moraines. Where planning approvals for small-scale developments are needed, best practices for alteration will be required to reduce or eliminate cut and fill activities that would fill in land surface depressions.
- Agriculture is a major activity on the moraines and is an accepted and supported use of land. The County will encourage best practices for agriculture by developing and supporting stewardship programs.

The Study Area is overlaid on Schedule 'B' in Figure 4 below.

**Figure 4: Existing Greenbelt and Proposed Study Area with County Official Plan Schedule 'B'**



## 4.0 The Greenbelt Plan and the Provincial Planning System

The following is an excerpt from the Greenbelt Plan, Section 1.4:

### **“Relationship with the Provincial Policy Statement**

**The PPS provides overall policy direction on matters of provincial interest related to land use and development in Ontario and applies to the Greenbelt, except where this Plan or another provincial plan provides otherwise.**

**Like other provincial plans, this Plan builds upon the policy foundation provided by the PPS and provides additional and more specific land use planning policies to address issues facing specific geographic areas in Ontario. This Plan is to be read in conjunction with the PPS. The policies of this Plan take precedence over the policies of the PPS to the extent of any conflict, except where the relevant legislation provides otherwise. Where the policies of this Plan address the same, similar, related or overlapping matters as policies in the PPS, applying the more specific policies of this Plan satisfies the requirements of the more general policies in the PPS. In contrast, where matters addressed in the PPS do not overlap with policies in this Plan, those PPS policies must be independently satisfied.**

### **Relationship with Other Provincial Plans, Legislation and Regulation**

**This Plan must also be read in conjunction with other provincial plans, related planning mechanisms, regulations and standards of conservation authorities, other agencies and the federal government. This includes the Growth Plan, the ORMCP and the NEP as well as the Parkway Belt West Plan and the Central Pickering Development Plan. Other plans, including the Lake Simcoe Protection Plan under the *Lake Simcoe Protection Act, 2008* and some source protection plans under the *Clean Water Act, 2006*; upper-, lower- and single-tier official plans; zoning by-laws; Minister’s zoning orders under the *Planning Act* as well as other pertinent legislation (e.g. the federal *Rouge Urban Park Act*) and regulations (e.g. those under the *Endangered Species Act, 2007* and *Conservation Authorities Act*) also apply within the Greenbelt.**

**Within the Greenbelt Area, there may be other provincial, federal or agency plans, regulations or standards that also apply. An application, matter or proceeding related to these plans, regulations or standards shall conform with the Greenbelt Plan. However, where the plans, regulations or standards are more restrictive than this Plan, the more restrictive provision shall prevail.**

**With respect to the Growth Plan specifically, the policies of that Plan that address the same, similar, related or overlapping matters as this Plan do not apply within the Greenbelt Area, except where the policies of this Plan provide otherwise. In contrast, where matters addressed in the Growth Plan do not overlap with policies in this Plan, those Growth Plan policies must be independently satisfied.”**

To summarize the above, the Provincial planning system in the Greater Golden Horseshoe is a complex array of legislation, regulations, policy and plans that often overlap; this complexity is even greater with respect to water resources where Source Protection Plans and Conservation Authority Regulations also apply.

## 5.0 Implications for Development Proposals

The updated Growth Plan and Greenbelt Plan have more overlap than their predecessors did, particularly with respect to natural heritage and water resources. At the same time, there are specific policy differences that would affect a range of development proposals if the Greenbelt were expanded. The summary in Table 3 below is intended to highlight policies that are unique to the Greenbelt Plan.

**Table 3: Development Implications of Policies that are Unique to the Greenbelt Plan**

Type of Proposal	Effect of being added to the Greenbelt
Farm Splits in Prime Agricultural Areas	In the Greenbelt, the minimum lot size is 40 ha. Outside the Greenbelt per the County Official Plan the minimum lot size is 35 ha.
Surplus Farm Dwelling Consents in Prime Agricultural Areas	The Greenbelt Plan requires that the residence that is surplus to the farm operation existed before December 16, 2004. Outside the Greenbelt, the County Official Plan has no date requirement for the existing surplus residence.
Rural residential consents in Secondary Agricultural Areas	Generally, to date, rural residential consent activity in the Greenbelt portion of the Secondary Agricultural Area in the County has occurred to a slightly lower degree than in the Secondary Agricultural Area outside the Greenbelt.
Second Units	In the Greenbelt, second units are not permitted in the Natural Heritage System. This restriction does not exist outside the Greenbelt where the Natural Heritage System includes existing residences and ancillary buildings where the creation of second units may be considered.
Official Plan Amendment to redesignate Prime Agricultural Area for non-agricultural uses	Examples: applications to expand Rural Employment or Recreational Areas. <ul style="list-style-type: none"> <li>- Not permitted in the Greenbelt.</li> <li>- May be considered outside the Greenbelt but must meet Provincial Policy Statement, Growth Plan and Official Plan policies.</li> </ul>
Urban Centre Expansion	Urban Centres outside the Greenbelt cannot expand into the Greenbelt.  In the Greenbelt, if expansion of a Town/Village (Urban Centre in the Official Plan) is justified as a result of the Growth Plan municipal comprehensive review, the expansion will be subject to the following (among other matters): <ul style="list-style-type: none"> <li>- Not more than a 5% increase in the size of the settlement area;</li> <li>- A maximum size of 10 ha;</li> <li>- Residential development not permitted on more than 50% of the area;</li> <li>- Expansion into the Natural Heritage System is prohibited.</li> </ul>
Hamlet Expansion	In the Greenbelt, Hamlet expansions are not permitted. Outside the Greenbelt, Hamlet expansions are limited but may be considered in the municipal comprehensive review.
Mineral Aggregate Extraction	The Greenbelt Plan has additional requirements on rehabilitation and maximum disturbed area and requires municipalities to apply Source Protection Plan and Subwatershed Plan policies.

The permanent protection of Prime Agricultural Areas and prohibition of large settlement expansions typically receive the most attention in discussions of Greenbelt expansion. It is worth noting from the above; however, that there are policies unique to the Greenbelt Plan that either prohibit or make it more difficult to get approval for small-scale developments.

## 6.0 Consultation Question Responses

Responses to the questions in the Public Consultation Document are set out below:

Question	Response
<p>1. Are there additional “building blocks” features that should also be considered for addition to the Greenbelt to protect water?</p>	<p>It is our view that those water resource matters that are subject to the <i>Planning Act</i> are adequately addressed by the overlap of the Provincial Policy Statement, Growth Plan, Official Plans, Source Protection Plans, and Conservation Authority Regulations.</p>
<p>2. Are there additional data sets or types of analysis that should be considered?</p>	<p>Completion of land needs assessments as part of Growth Plan municipal comprehensive reviews.</p>
<p>3. Of the seven areas, are there some that are more or less important?</p>	<p>The Paris and Galt Moraine Policy Area was added to the County Official Plan through the 5-Year Review Amendment (OPA 81) and approved by the Province in 2014.</p>
<p>4. Are there areas beyond the study area that you think should be considered for potential future Greenbelt expansion?</p>	<p>It is our view that those water resource matters that are subject to the <i>Planning Act</i> are adequately addressed by the overlap of the Provincial Policy Statement, Growth Plan, Official Plans, Source Protection Plans, and Conservation Authority Regulations.</p>
<p>5. Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?</p>	<p>We note that the policy would only apply to publicly owned lands and that urban river valleys are already connected to the rural landscape by the existing overlap of the Provincial Policy Statement, Growth Plan, Official Plans, Zoning By-Laws and Conservation Authority Regulations.</p>

Question	Response
6. With the range of settlement areas in the GGH, how should the province balance accommodating future urban growth with protecting water resources?	For the purposes of water resource matters that are subject to the <i>Planning Act</i> , the policy framework for balancing the accommodation of future urban growth with protection of water resources is already set out in the Provincial Policy Statement and Growth Plan.
7. What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?	Consideration of Greenbelt boundary changes should not occur until after the Province has approved Growth Plan municipal comprehensive reviews at which point the community will have a clear understanding of the need for, size and direction of urban expansion in Wellington County and in its neighbouring municipalities.
8. How should the province determine which settlement areas become Towns/Villages or Hamlets, if included in a potential Greenbelt?	The Province should defer to the Official Plan as amended through the Growth Plan municipal comprehensive review, which includes a requirement to establish a settlement hierarchy.
9. Once the Agricultural System and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt Expansion?	These new systems, when approved, should not be drivers for expansion of the Greenbelt.
10. How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt expansion?	Provincial priorities in the areas of infrastructure and mineral aggregates are reflected in the Provincial Policy Statement and the Growth Plan.
11. What other priorities or initiatives do you think the province should consider?	<p>The province should consider the potential for Greenbelt Expansion to have unintended outcomes related to:</p> <ul style="list-style-type: none"> <li>- The potential to reduce the ability of farmers to get approval for small scale development proposals such as farm splits, surplus farm dwelling consents, or second units; and/or</li> <li>- The potential to cause development pressure to advance outwards from the Greater Toronto Area at a faster rate than forecast.</li> </ul>

## 7.0 Moving from Study Area to Greenbelt Boundary Change

According to the Public Consultation Document,

**“The process of moving from a study area to a proposed new Greenbelt boundary will include elements of both scientific and land use planning analysis. For example, refinements may be made to the study area to reflect additional information regarding the location of hydrological features or important land use planning considerations such as accommodating forecasted growth. Feedback received through public consultation will help inform this process.**

**In keeping with the requirements of the Greenbelt Act, 2005 the province would consult with the public, municipalities, conservation authorities, stakeholders and Indigenous communities and organizations on a proposed amendment to the Greenbelt Plan and boundary prior to any changes being made. This would provide an additional opportunity to comment on the province’s approach.”**

### **Recommendation:**

That the report “Comments on the Proposed Greenbelt Expansion Study Area” be forwarded to the Minister of Municipal Affairs, member municipalities in Wellington County, neighbouring municipalities in the Greater Golden Horseshoe and the Grand River Conservation Authority.

Respectfully submitted,



Mark Paoli  
Manager of Policy Planning