



# COUNTY OF WELLINGTON

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## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Mark Paoli, Manager of Policy Planning  
**Date:** June 9, 2016  
**Subject:** COMMENTS ON PROPOSED CHANGES TO PROVINCIAL PLANS

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### 1.0 Background:

The province started a Co-ordinated Land Use Planning Review of the Growth Plan for the Greater Golden Horseshoe (the Growth Plan); the Greenbelt Plan; the Oak Ridges Moraine Conservation Plan; and the Niagara Escarpment Plan, in 2015. The Growth Plan and Greenbelt apply within Wellington County.

The first phase of the review was focused on a discussion paper that was released for comment and concluded with a report prepared for the province by David Crombie with 87 recommendations. The County provided input to this part of the process through Planning Committee reports that were endorsed by Council, forwarded to the province and circulated to local municipalities.

A new phase of the review is underway as the province has released proposed changes to the Plans and is seeking input. While the deadline for comments is September 30th, County staff are bringing forward this report now so that local municipalities have time to use it as a base for their comments if they wish to do so.

### 2.0 Comments:

#### Overall Comment

The province is intruding too far into municipal planning, leaving little room for citizens to have meaningful input into the future of their own communities.

Also, the province's review is an opportunity for the Plans to reduce overlap with the PPS and focus more on growth management; instead, the scope of the Plans has broadened to include a number of topics that are already adequately addressed in the PPS, or should be added to the PPS. These include:

- Agriculture;
- Natural heritage;
- Cultural heritage; and
- Climate change.

The province needs to clarify the hierarchy and minimize duplication between the Growth Plan, Greenbelt Plan, and the Provincial Policy Statement.

A more detailed summary of comments is set out below:

Comments on Both Plans	Growth Plan Comments	Greenbelt Plan Comments
<p>The County of Wellington:</p> <ol style="list-style-type: none"> <li>1. Supports Greenbelt policy changes that defer to the Growth Plan for certain growth management and infrastructure policies as this reduces overlap and improves coordination.</li> <li>2. Views the establishment of Agricultural System mapping as being redundant given that the PPS already directs us to designate these lands.</li> <li>3. Recommends that Agricultural Support Network policies be added to the PPS instead of these Plans.</li> <li>4. Recommends that the requirement for an agricultural impact assessment for mineral aggregate applications be added to the PPS instead of these Plans.</li> <li>5. Notes that the PPS was broadened to include climate change policies and recommends that, if the province feels that the PPS climate change policies are not sufficient, then it should address this through changes to the PPS instead of these Plans.</li> </ol>	<p>The County of Wellington:</p> <ol style="list-style-type: none"> <li>1. Supports the continued ability of the County to establish alternative targets; however, we are concerned about the upward pressure on targets as the main factors on which the targets were justified remain, and major density increases are not accepted by the public in small town Ontario.</li> <li>2. Notes that some designated greenfield is made up of subdivision plans historically approved or supported by the province at lower densities. Making up for these lower densities in the remaining area is not realistic so the application of the target needs to exclude the build out of these plans.</li> <li>3. Supports the change to the 2041 time horizon and a consistent methodology to assess land needs; however, we are concerned that the 5-Year Review requirement for a municipal comprehensive review may prevent important projects that cannot wait for the next 5-Year Review (example: to expand to accommodate a school).</li> <li>4. Does not support the mandatory identification of, and prohibition of development on, excess lands. This should be optional.</li> <li>5. Supports the ability to establish 'prime employment areas'; however, discussion with our local municipalities is required and we are concerned that the definition excludes unserviced lands outside of settlement areas which are some of our best employment lands.</li> <li>6. Does not support the provincial imposition of a natural heritage system. Current PPS policies should govern the development of natural heritage systems in official plans.</li> </ol>	<p>The County of Wellington:</p> <ol style="list-style-type: none"> <li>1. Maintains the position stated in previous reports that the Greenbelt Plan is doing its intended job reasonably well, and we see no rationale for expanding beyond its current boundary in Wellington County.</li> <li>2. Does not support the proposed policy that would impose Greenbelt expansion on the County. Municipal support should be a requirement.</li> <li>3. Supports natural heritage policy changes that provide less onerous requirements for agricultural development than in the current Greenbelt Plan.</li> <li>4. Does not support the inclusion of buildings for agricultural, agriculture-related and on-farm diversified uses in the definition of 'major development'.</li> </ol>



### 3.0 Changes in Both Plans:

#### 3.1 Agricultural System and Agricultural Support Network

The province proposes to lead the establishment of an Agricultural System across the Greater Golden Horseshoe. It would consist of Specialty Crop areas, Prime Agricultural Areas and Rural Lands.

**Given that the land base for the system is already designated in official plans, we see this as a redundant exercise.**

Also added is a new policy for an “Agricultural Support Network”, defined below:

“a network that includes elements Important to the viability of the Agri-food sector such as: regional agricultural infrastructure and transportation networks, on-farm buildings and infrastructure, agricultural services, farm markets, distributors and first level processing and vibrant agricultural-supportive communities. “

New policies which have been introduced into the Plan include planning for the “Agricultural Support Network”. This would require planning decisions to consider the connections, both financial and physical of the Agricultural food Sector. It is unclear at this time what criteria would be applied to a land use decision in this regard.

**We recommend that Agricultural Support Network policies be added to the PPS instead of these Plans.**

#### 3.2 Agricultural Impact Assessment for new mineral aggregate operations

Both Plans would require an Agricultural Impact Assessment to be completed for new mineral aggregate operations in the Prime Agricultural Area, which is not a requirement in the current Provincial Policy Statement.

**We recommend that the requirement for an agricultural impact assessment for mineral aggregate applications be added to the PPS instead of these Plans.**

#### 3.3 Climate change

The scope of both Plans has widened to include climate change. The Growth Plan would require the County to “develop policies in the official plan to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with the Ontario Climate Change Strategy, 2015 and Action Plan.”

**We note that the PPS was broadened to include climate change policies and recommend that, if the province feels that the PPS climate change policies are not sufficient, then it should address this in the PPS instead of these Plans.**

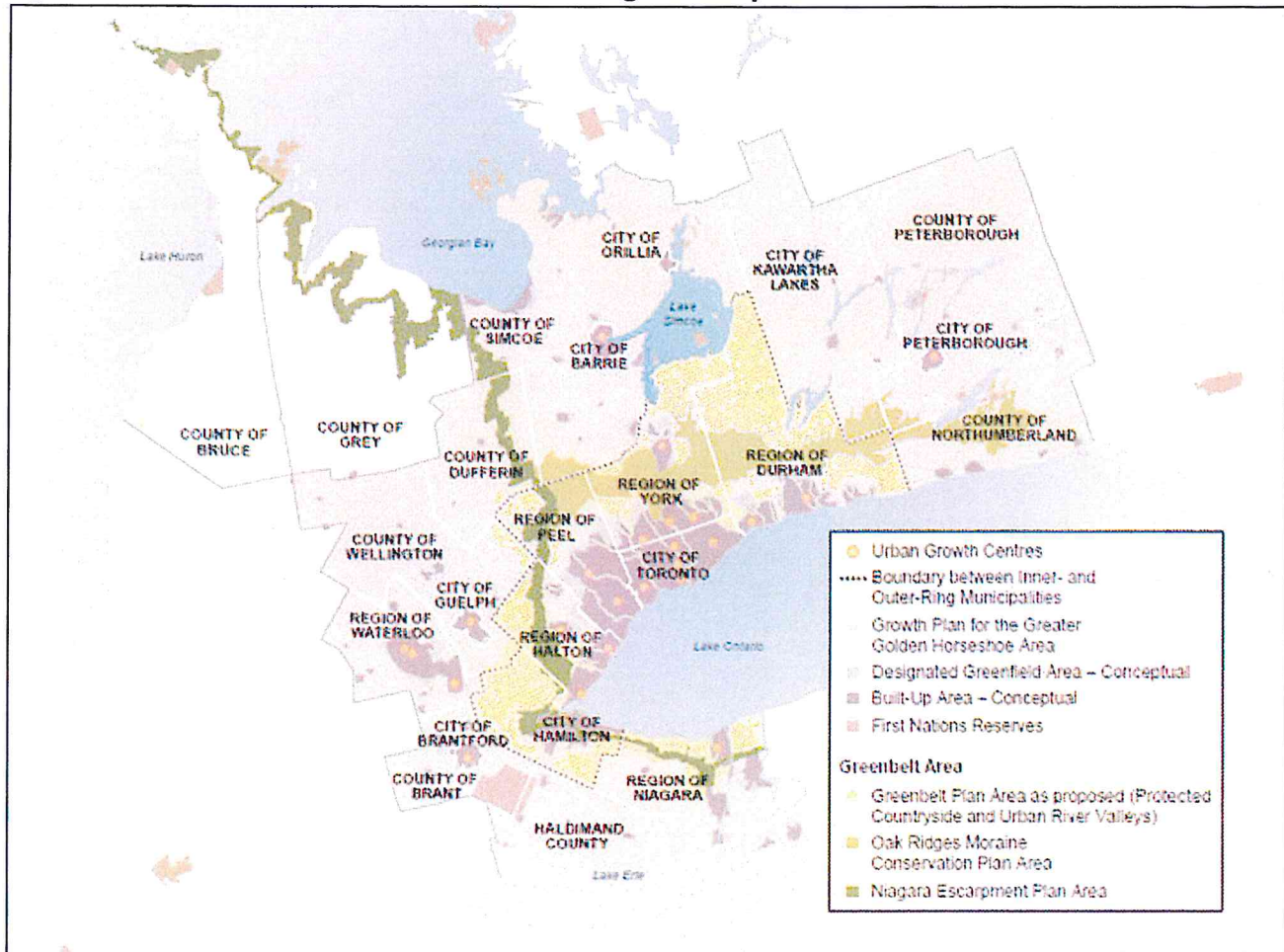
## 4.0 Main Growth Plan Changes:

### 4.1 Targets

#### Current Targets

The Growth Plan contains two areas that are referred to as the “inner ring” and “outer ring” and Wellington County is in the outer ring (see Figure 1 below).

**Figure 1: The Greater Golden Horseshoe and Niagara Escarpment Area**



Source: Ministry of Municipal Affairs and Housing

The current minimum targets that apply to the inner ring municipalities, as well as those municipalities in the outer ring that have an urban growth centre such as Waterloo Region and the City of Guelph are:

- Intensification - 40 % of residential development within the built boundary; and
- Greenfield Density - 50 persons and jobs per hectare.

In the outer ring, the Growth Plan provided Counties with the ability to request an alternative target that would be appropriate given the size, location and capacity of the built up area, and the characteristics of the municipality and adjacent communities.



In 2009, County Council submitted a request for alternative targets that was based on a staff report that set out the planning analysis for the minimum targets for Wellington County:

- Intensification - 20 % of residential development within the built boundary; and
- Greenfield Density - 40 persons and jobs per hectare.

The province approved Council's request, and the alternative targets were included in the Official Plan Amendment to conform with Places to Grow (OPA 65) that was adopted in 2009.

### **Proposed Changes**

The proposed minimum targets that apply to the inner ring municipalities, as well as those municipalities in the outer ring that have an urban growth centre such as Waterloo Region and the City of Guelph are:

- Intensification - 60 % of residential development within the built boundary; and
- Greenfield Density - 80 persons and jobs per hectare.

The proposed Intensification target is 50% higher than in the current Growth Plan and the proposed Greenfield Density target is 60% higher. Although the effect of the Greenfield Density increase will be offset somewhat by the fact that more land can be excluded from the calculation, it is also worth noting that these higher targets will need to be met on a smaller land area because the built boundary is to remain unchanged.

In the outer ring, Council may request alternative targets at the time of the next 5-Year Review of the Official Plan. At that point, we will be required to revisit the targets and resubmit justifications. There will be pressure to increase the targets based on the significant mandatory increases described above.

**We support the continued ability of the County to establish alternative targets; however, we are concerned about the upward pressure on targets as the main factors on which the targets were justified remain, and major density increases are not accepted by the public in small town Ontario.**

**We note that some designated greenfield area is made up of subdivision plans historically approved or supported by the province at lower densities. Making up for these lower densities in the remaining area is not realistic so the application of the target needs to exclude the build out of these plans.**

## **4.2 Land Needs Assessment**

In the current Growth Plan, the assessment of land needs to justify a settlement expansion is: based on 20 years of growth as set out in the forecasts; carried out as part of a municipal comprehensive review that can be done as part of a 5-Year Review, or on an as needed basis; and is calculated using different methods.

In the proposed Growth Plan, the assessment of land needs to justify a settlement expansion is: based on the horizon of the Plan (2041); carried out as part of a municipal comprehensive review that can only be done as part of a 5-Year Review; and calculated using a standardized provincial methodology.

A related change is that, as an outer ring upper-tier, we would be required to identify any 'excess lands', (lands that exceed forecasted needs to 2041). If we have excess lands, we would be required to prohibit development on those lands. Although we would then be in a position to justify settlement expansions, notwithstanding the identified "excess", the prohibition of development on designated land is likely to result in objections.

**We support the change to the 2041 time horizon and a consistent methodology to assess land needs; however, we are concerned that the 5-Year Review requirement for a municipal comprehensive review may prevent important projects that cannot wait for the next 5-Year Review (example: to expand to accommodate a school).**

**We do not support the mandatory identification of, and prohibition of development on, excess lands. This should be optional.**

## **4.3 Employment Lands**

The proposed Growth Plan would establish a new category of employment lands referred to as "Prime Employment Areas" and defined as:

"Areas of employment within settlement areas that are designated in an official plan and protected over the long-term for uses that are land-extensive or have low employment densities and require these locations, including manufacturing, warehousing and logistics and appropriate associated uses and ancillary facilities."

As an upper-tier municipality, the County may identify existing employment areas in settlement areas as prime employment areas, where appropriate. Implications of this would include:

- A requirement to prohibit residential and other sensitive land uses, institutional uses, and retail, commercial and office uses that are not ancillary to the primary employment use.
- Conversion of 'prime employment areas' to 'employment areas' to allow retail, commercial and office uses that are not ancillary to the primary employment use would be permitted only through a municipal comprehensive review (a 5-Year review under Section 26 of the Planning Act) to justify the need and location of the change.
- Conversion of 'prime employment areas' to non-employment uses would be prohibited.

- The foregoing would be more restrictive than current policy. This may be desirable in some locations where the priority is long term protection of the land base for industrial development, and not desirable in other locations where the strategy is to provide for transition to more retail or office commercial uses.
- Prime employment areas would be excluded from the designated greenfield area density calculation which would mitigate some of the effect that the lower industrial employment densities have on the greenfield density target.

**We support the ability to establish 'prime employment areas'; however, discussion with our local municipalities is required and we are concerned that the definition excludes unserviced lands outside of settlement areas which are some of our best employment lands.**

#### **4.4 Natural Heritage System**

The province would establish a Natural Heritage System, similar to the current Greenbelt Plan, across the entire Greater Golden Horseshoe. The system in the Greenbelt Plan extends into working farm fields well beyond natural features and has been difficult to explain and justify to farmers, rural land owners and decision-making bodies. Although the 2014 PPS requires us to establish a Natural Heritage System in the County Official Plan, we intended to work with the language in the PPS to develop a system that would be appropriate for the agricultural area. Instead, with the changes proposed, we would be in the position of commenting on the province's system before it is imposed.

**We do not support the provincial imposition of a natural heritage system. Current PPS policies should govern the development of natural heritage systems in official plans.**



## **5.0 Main Greenbelt Plan Changes:**

### **5.1 Expansion**

There is a new section called “Growing the Greenbelt” in which the Province shall lead a process to identify areas to be added to the Protected Countryside. A specific focus shall be on areas of ecological and hydrogeological significance where urbanization should not occur.

The policy direction calls for consultation with municipalities, among other stakeholders. Municipal support is not required.

**We maintain the position stated in previous reports that the Greenbelt Plan is doing its intended job reasonably well, and we see no rationale for expanding beyond its current boundary in Wellington County.**

**We do not support the proposed policy that would impose Greenbelt expansion on the County. Municipal support should be a requirement.**

### **5.2 Siting of Agricultural Buildings and Structures**

The current Greenbelt Plan requires new development within 120 m of a Key Natural Heritage Feature in the Natural Heritage System or a Key Hydrologic Feature anywhere in the Protected Countryside to complete a natural heritage evaluation or a hydrologic evaluation to identify a vegetation protection zone.

In the Proposed Greenbelt Plan, development of Agricultural, Agricultural-related and On-farm diversified uses within 120 m of a Key Natural Heritage Feature or Key Hydrologic Feature will not be required to complete a natural heritage or hydrologic evaluation. Rather these types of developments will be sited in accordance with a number of criteria specified in the Plan which promote the enhancement and protection of the features.

**We support natural heritage policy changes that provide less onerous requirements for agricultural development than in the current Greenbelt Plan.**

### **5.3 Key Hydrologic Areas**

A section has been added to provide policy direction in significant groundwater recharge areas, highly vulnerable aquifers, and significant surface water contribution areas. In these areas, major development is required to do water studies or submit designs that demonstrate that the hydrologic functions of these areas will be protected and, where possible, improved or restored.

The definition of major development includes buildings that are 500 m<sup>2</sup> or larger, which could include many agricultural buildings. Agricultural buildings are typically sited on large lots which, combined with the required setbacks from natural and hydrologic features, provide ample space for water to infiltrate. This requirement is not reasonable for agricultural development.

**We do not support the inclusion of buildings for agricultural, agriculture-related and on-farm diversified uses in the definition of ‘major development’.**



## **6.0 Summary:**

The province has proposed extensive changes to the Growth Plan and Greenbelt Plan. While a number of the changes are supported, there are significant areas of concern.

This report summarized the main comments arising from our review to-date, and may provide a base for local municipality comments. Our review will continue over the summer as there are a number of areas, particularly related to infrastructure, where the changes will be felt more locally. Accordingly, we plan more analysis and discussions with local staff. This work may result in a Supplementary Report with additional comments in September.

## **Recommendation:**

That the report "Comments on Proposed Changes to Provincial Plans" be forwarded to the Minister of Municipal Affairs, and circulated to local municipalities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Paoli".

Mark Paoli  
Manager of Policy Planning