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February 28, 2019

Charles O'Hara, Director  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
c/o Business Management Division 17th floor  
Toronto Ontario  
M5G 2E5

**SUBJECT: TOWNSHIP OF AMARANTH COMMENTS ON THE PROPOSED  
AMENDMENT 1 TO THE GROWTH PLAN FOR THE GREATER GOLDEN  
HORSESHOE, 2017  
ERO 013-4504**

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The Township of Amaranth provides the following comments:

1. We agree with the replacement of the term “undelineated built up areas” by “rural settlements” and with its related new definition which recognizes the character of these long-time established areas and servicing capacity.
2. That it is recognized that rural settlement areas can only offer limited growth and do not need to meet the minimum targets.
3. The term “minor rounding-out” should be defined based on the fact that it can be a remnant parcel to be developed within the rural settlement area or it would be for the extension of an existing development within the rural settlement area.
4. Private and partial services should be permitted within Rural Settlement Areas as those municipalities that have any are generally rural communities that cannot offer full municipal services and communal services are not financially feasible because of the limited acreage of land available to develop.
5. Maintaining the character of rural settlement areas is challenging as it is a broad term. Rural character should be based on the existing developments, the historical aspects of the settlement, the natural environment and the services that can be accommodated.
6. We agree with the revised intensification target and DGA density target for the County of Dufferin.
7. Alternative targets approval should be allowed beyond the 2022 target with the Minister's endorsement.

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8. We agree with encouraging intensification within delineated built-up areas (urban settlement areas). This would have the effect of reducing the potential of settlement area expansion beyond the boundaries of a municipality onto an adjacent municipality. Such expansions create conflicts between municipalities that make difficult cross-municipal boundary relations complicated and challenging. Should Settlement Area boundary expansions be allowed, it should only be within the subject municipality's boundary.
9. We agree that the new policies for the Agricultural System and Natural Heritage System mapping would only take effect once the upper-tier in consultation with the lower-tier municipalities will have the opportunity to review and refine the mapping as necessary, as part of the municipal comprehensive review in 2022. After the municipal comprehensive review is done, then municipalities should be allowed to propose further refinements as part of an upper-tier official plan amendment without waiting for the next municipal comprehensive review.
10. Rural municipalities should be allowed to do conversions of employment to non-employment or vice-versa within Rural Settlement Areas without having to wait for a municipal comprehensive review since they are not required to meet minimum targets.
11. Employment Areas outside Rural Settlement Areas are to be protected in the upper-tier and lower-tier municipalities' Official Plans and should be factored into the employment minimum target to be achieved.
12. We question why most of the Rural designation has disappeared within the Township of Amaranth as part of the Agricultural System mapping. Rural Areas and Rural Lands are still recognized in the PPS which "may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas and other resources and amenities". This is what the rural lands in Amaranth consist of with a minimum acreage of 25 ac./10ha. which allows agricultural uses and is proper to various scale of normal farm uses, agricultural-related uses and/or on-farm diversified uses. Therefore, there is no need to replace this designation as prime agricultural.

A lot of changes occurred in the past few years and it appears that more is to come to undo what has been put in place by the last government. These changes cost a lot of money to all levels of government which is funded by the tax payers which we all contribute to, are time consuming to municipalities and frustrating and difficult to understand for decision makers and the general public.

Yours truly,



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Christine Gervais, MCIP, RPP  
Director of Planning

c. Susan Stone, CAO, Clerk & Treasurer, Township of Amaranth