



April 19, 2021

Project No. 20239

Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Attention: Honourable Steven Clark
Minister of Municipal Affairs and Housing

Dear Mr. Clark:

**Re: Request for Comments
Consultation on Growing the Size of the Greenbelt
Environmental Registry of Ontario posting ERO 019-3136
Concession Road 7 and Maltby Road West, Township of Puslinch
2751508 Ontario Ltd.**

GSP Group acts on behalf of 2751508 Ontario Ltd. The above-noted property is located at the corner of Concession Road 7 and Maltby Road West in the Township of Puslinch (the "Property"). The Property currently does not have an assigned municipal address.

The Property is approximately 11.9 hectares (29.4 acres) in size with frontage on both Concession Road 7 and Maltby Road West. The Property is visible from Highway 6 North (Hanlon Expressway) and lies east of this corridor.

We are submitting comments on behalf of our clients with respect to Growing the Size of the Greenbelt and the request of comments under the Environmental Registry of Ontario posting ERO 019-3136.

1. **BACKGROUND**

The Property is designated "Rural Employment Area", "Core Greenlands" and "Greenlands" as per Schedule A7 in County of Wellington Official Plan. The Property is part of a large employment area on either side of the Hanlon Expressway. The Rural Employment Area designation permits industrial and limited commercial uses that would benefit from a rural location due to needed large sites and need for access to major transportation routes.

The Property is also located within the Paris Galt Moraine Policy Area as per Schedule B7 of the County Official Plan. Section 4.9.7.2 of the County Official Plan states that large scale development proposal including rural employment area designations will be

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 will not normally be required to demonstrate protection of the moraines.

The Property is zoned “Industrial” subject to Site Specific Exemption #53 and “Natural Environment” according to Map A-8 of the Township Zoning By-law. The site specific industrial permits a range of employment uses.

A recent Township Housekeeping Amendment By-law 2021-003 was passed that amended Section 14.1(53) to specify that the permitted uses are only those contained in 14.1(53). Site Specific provisions also states that outdoor storages area shall only be located to the rear of a permitted main building and not be visible from a street or adjacent lot. The Natural Environment Zone limits the use of any lot and restricts any use of any buildings or structures expect in accordance with specific provisions.

2. COMMENTS

The Province has asked for comments prior to April 19, 2021 under the Environmental Registry of Ontario posting ERO 019-3136 with respect to the Proposal to Grow the Greenbelt”.

Under the “Proposal details” is stated:

The Ministry of Municipal Affairs and Housing is seeking feedback on ways to grow the size and further enhance the quality of the Greenbelt, with a priority of:

- i) A study area of lands focussed on the Paris Galt Moraine, which is home to critical groundwater resources*
- ii) Ideas for adding, expanding and further protecting Urban River Valleys*

The Province has posed several questions and we are specifically responding to Question 1 which states, “**What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**”

The Property is within a designated employment area in the County Official Plan which is intended to support job growth in the Township of Puslinch. Provincial policy must balance other stated public interest objectives including the delivery of jobs and housing. These long-standing objectives should in no way be compromised or impacted through any future decisions to expand the size of the Greenbelt.

Further current policies in the County Official Plan and regulations in the Township of Puslinch Zoning By-law are currently in place which provide protection to natural heritage features and functions, including the Paris Galt Moraine. In fact, 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 for this very purpose.

Request for Comments
Consultation on Growing the Size of the Greenbelt
Environmental Registry of Ontario posting ERO 019-3136
Concession Road 7 and Maltby Road West, Township of Puslinch
2751508 Ontario Ltd.
April 19, 2021

Accordingly, it is our opinion there is no need or technical rationale to extend the Greenbelt to this area of the Province. Policy and regulations are currently in place to adequate guide growth and development in the Paris Galt Moraine on the Property and within Puslinch.

We respectfully request consideration of our comments. Should you or MMAH staff like to discuss our comments, I can be reached in our Kitchener office at 519-569-8883 or by cell at 519-242-5351.

Yours truly,
GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Senior Associate

cc 2751508 Ontario Ltd.