



COUNTY OF WELLINGTON

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November 22, 2022

Honorable Steve Clark, Minister
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

email: Steve.Clark@pc.ola.org

Dear Minister Clark,

**Re: Comments on Proposed Amendments to the Greenbelt Boundary
Town of Erin, County of Wellington**

Please accept our comments in response to the proposed addition of land in the Town of Erin to the Greenbelt under ERO postings 019-6216 and 019-6217. Approximately 7,000 acres of land in Erin are to be added to the Greenbelt, in large part to offset the removal of 7,400 acres of land from the Greenbelt in 10 other municipalities in the Province.

Wellington County has been consistent in its submissions to the Government that expanding the Greenbelt to protect the Paris Galt Moraines is unnecessary given existing Provincial legislation, plans and regulations, and similar local plans, policies and measures currently in place. This includes special policies incorporated into the Wellington County Official Plan in 2014.

If, however, the Province intends to proceed with this proposed expansion, the County of Wellington and Town of Erin request the removal of approximately 395 acres of land abutting the Village of Erin boundary from the Greenbelt (see Figure 1 in Appendix A). While establishing this 'whitebelt' is significant for the economic future of Erin, we would note that this type of Greenbelt Plan exclusion was not previously offered by the Ministry for any of the urban settlements of Wellington currently within the Greenbelt.

The removal of this land from the Greenbelt Plan for Erin would support the County's ongoing municipal comprehensive review (MCR) which has identified the need for additional urban employment area lands in Erin for employment growth. It would also support Erin's future employment needs to accommodate the growth plan horizon of 2051 and beyond. Information supporting the need for additional urban employment area lands for Erin is provided in Appendix B.

While the focus of our letter is to recognize the importance of a small 'whitebelt' expansion into the existing Greenbelt to accommodate necessary employment growth, we would also recommend a closer look at the proposed Greenbelt expansion into Erin to better align the northwest boundary of this new area with the Provincial mapping of the Paris Galt Moraine from 2021. That mapping is provided (excerpt for Wellington) as part of Appendix C. Our planning offices would be pleased to assist in this examination.

Thank you for considering these comments to allow Erin to meet its 2051 growth needs.

Respectfully submitted,



Aldo L. Salis, MCIP, RPP
Director of Planning and Development
County of Wellington

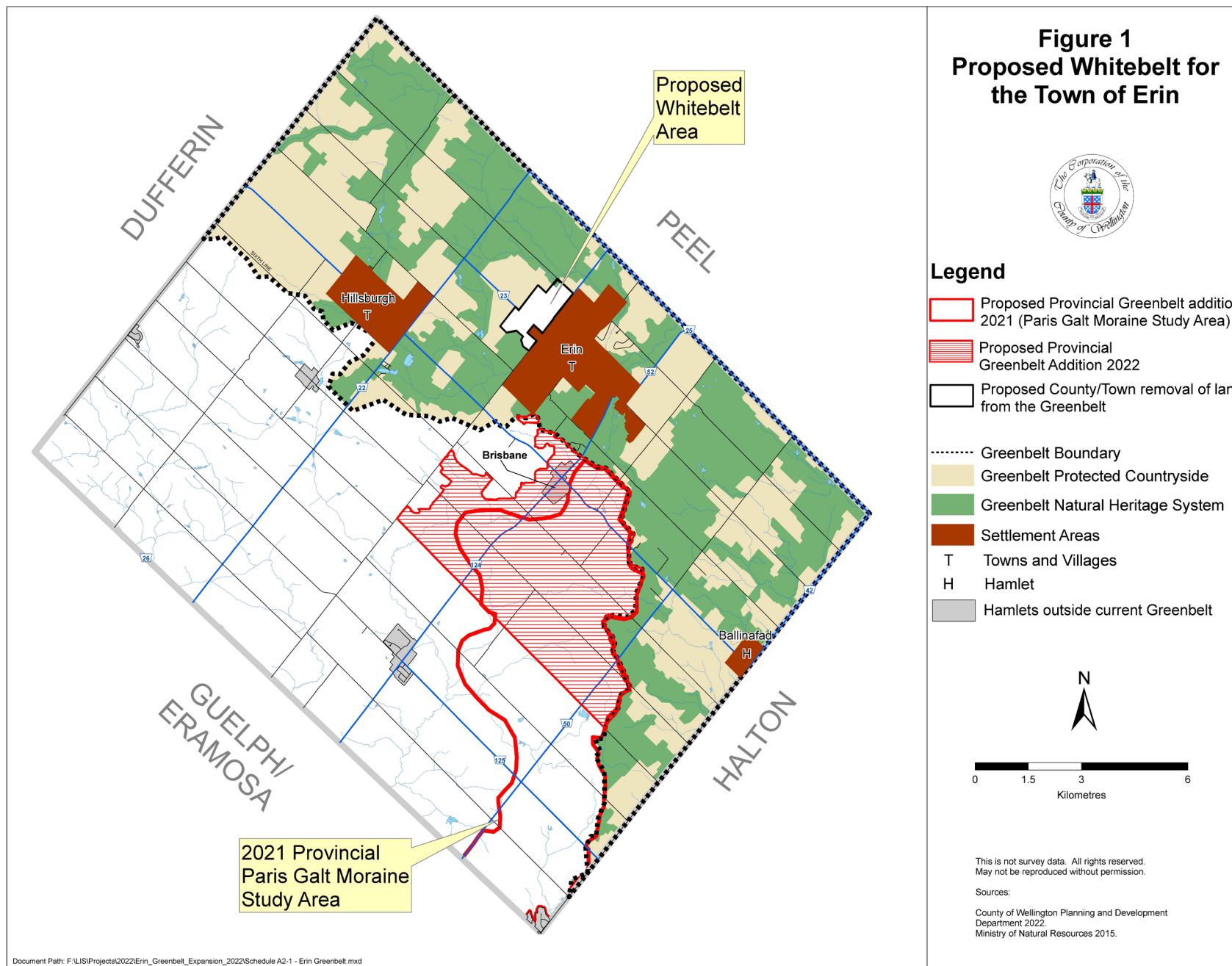


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Town of Erin

Appendix A Proposed Whitebelt for the Town of Erin
Appendix B Employment Area Land Need to 2051 for the Town Erin
Appendix C 2021 Growing the Greenbelt Study Area – Paris Galt Moraine (excerpt)

c. Office of the Premier Premier@ontario.ca
Honorable Ted Arnott, MPP ted.arnottco@pc.ola.org

Appendix A Proposed Whitebelt for the Town of Erin

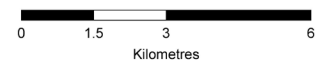


**Figure 1
Proposed Whitebelt for
the Town of Erin**



Legend

- Proposed Provincial Greenbelt addition 2021 (Paris Galt Moraine Study Area)
- Proposed Provincial Greenbelt Addition 2022
- Proposed County/Town removal of land from the Greenbelt
- Greenbelt Boundary
- Greenbelt Protected Countryside
- Greenbelt Natural Heritage System
- Settlement Areas
- T Towns and Villages
- H Hamlet
- Hamlets outside current Greenbelt



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Sources:
County of Wellington Planning and Development
Department 2022.
Ministry of Natural Resources 2015.

Appendix B Employment Area Land Need for the Town of Erin to 2051

The following table is an excerpt from the “Phase 2 MCR Report: Urban Land Needs Assessment” for the County of Wellington prepared by Watson & Associates Economists Ltd. (August 29, 2022). The Report has been approved in principle by County Council.

The Town of Erin needs an urban settlement area boundary expansion of approximately 23 hectares (60 acres) to meet its need for urban employment area lands to 2051.

Figure 6-1
County of Wellington
Summary of Land Needs, Adjusted for Recommended Employment Area Conversions

Area Municipality	Redesignation of Future Development Lands to Community Area	Community Area S.A.B.E., ha	Community Area Excess, ha	Urban Employment Area S.A.B.E., ha	Rural Employment Area Needs, ha	Urban Employment Area Excess, ha
Centre Wellington	-	238	-	160	-	-
Mapleton	15	34	-	9	-	-
Minto	61	18	-	-	-	-
Wellington North	81	-	89	-	-	40
Puslinch	-	-	-	-	30	-
Guelph-Eramosa	-	-	-	-	-	-
Erin	38	-	-	23	-	-
County of Wellington	195	290	89	192	30	40

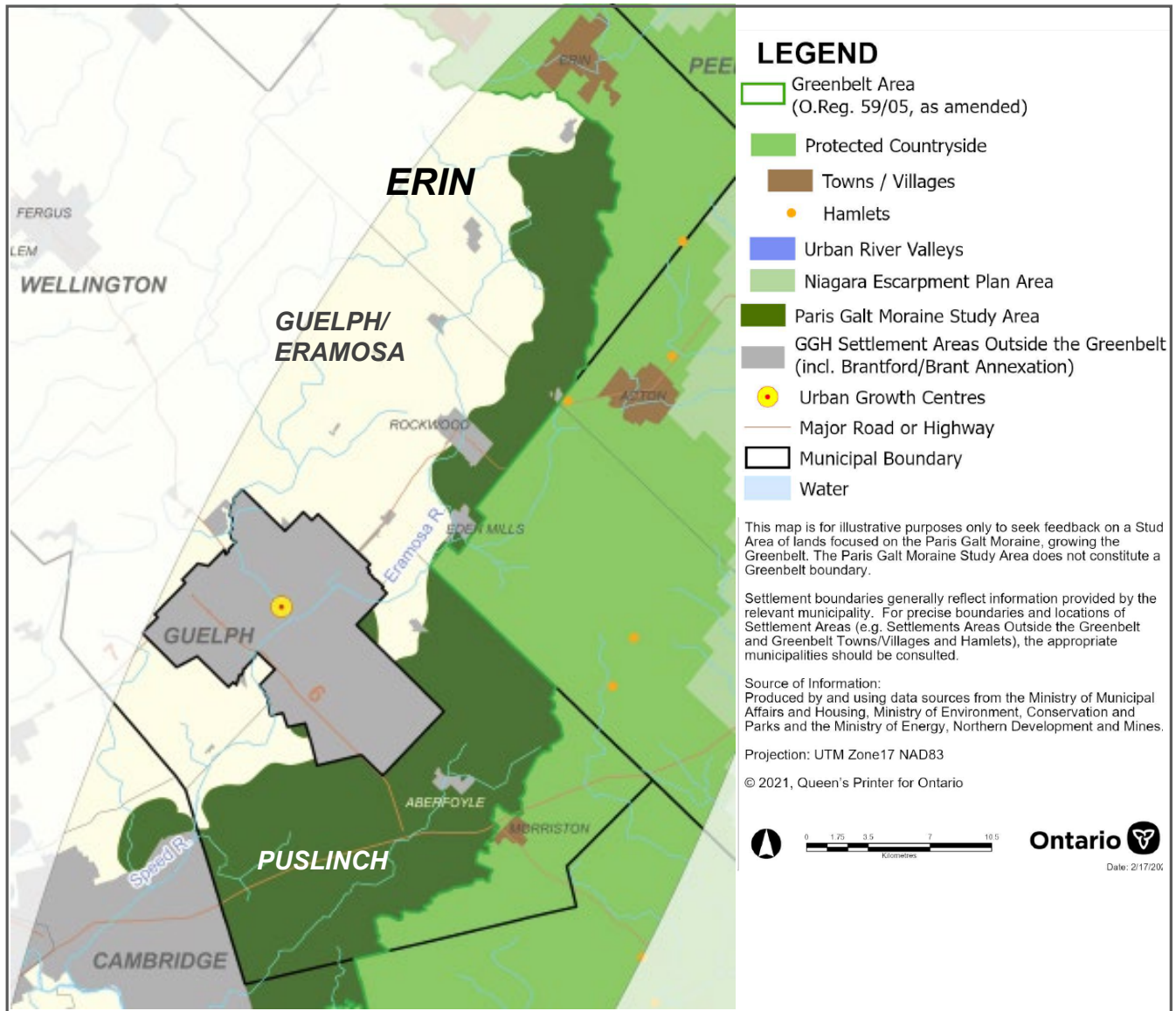
Note: Adjusted for recommended Employment Area to Community Area conversions in the Township of Wellington North (2 ha) and the Township of Centre Wellington (14 ha). Conversion of sites in the Township of Centre Wellington includes 5 ha in the B.U.A. and 9 ha in D.G.A. Lands in the B.U.A. provide intensification opportunities and do not reduce Community Area land needs.
Source: Watson & Associates Economists Ltd.

The employment area lands are needed for Erin Village, but not for Hillsburgh (the Town’s other urban centre). The Growth Plan for the Greater Golden Horseshoe allows for consideration of settlement area boundary expansions subject to criteria. One such criteria (s. 2.2.8.3(k)(ii)) would limit the expansion to a maximum of 10 hectares (25 acres) of employment area land.

The creation of a whitebelt would support the Town’s need for more designated employment area land to 2051 and provide the opportunity to delineate more land for the future.

Appendix C

2021 Growing the Greenbelt Study Area – Paris Galt Moraine Wellington County Excerpt



LEGEND

- Greenbelt Area (O.Reg. 59/05, as amended)
- Protected Countryside
- Towns / Villages
- Hamlets
- Urban River Valleys
- Niagara Escarpment Plan Area
- Paris Galt Moraine Study Area
- GGH Settlement Areas Outside the Greenbelt (incl. Brantford/Brant Annexation)
- Urban Growth Centres
- Major Road or Highway
- Municipal Boundary
- Water

This map is for illustrative purposes only to seek feedback on a Study Area of lands focused on the Paris Galt Moraine, growing the Greenbelt. The Paris Galt Moraine Study Area does not constitute a Greenbelt boundary.

Settlement boundaries generally reflect information provided by the relevant municipality. For precise boundaries and locations of Settlement Areas (e.g. Settlements Areas Outside the Greenbelt and Greenbelt Towns/Villages and Hamlets), the appropriate municipalities should be consulted.

Source of Information:
Produced by and using data sources from the Ministry of Municipal Affairs and Housing, Ministry of Environment, Conservation and Parks and the Ministry of Energy, Northern Development and Mines.

Projection: UTM Zone17 NAD83

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Date: 2/17/2021