



COUNTY OF WELLINGTON

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March 26, 2021

Sent via email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

Hon. Minister Steve Clark  
Minister of Municipal Affairs and Housing  
College Park 17th Flr, 777 Bay St,  
Toronto, ON M7A 2J3

Dear Minister Clark,

At its meeting held on March 26, 2021 Wellington County Council approved the following recommendation from the Planning Committee:

That the Comments on Government's Proposal to Grow the Greenbelt Report be forwarded to the Minister of Municipal Affairs and Housing and member municipalities in Wellington County.

Please find enclosed the Comments on Government's Proposal to Grow the Greenbelt Report.

Should you have any questions, please contact Sarah Wilhelm, Manager of Policy Planning at [sarahw@wellington.ca](mailto:sarahw@wellington.ca).

Sincerely,

A handwritten signature in black ink that reads "Kim Courts".

Kim Courts  
Deputy Clerk



# COUNTY OF WELLINGTON

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## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Sarah Wilhelm, Manager of Policy Planning  
Aldo Salis, Director of Planning and Development  
**Date:** Thursday, March 11, 2021  
**Subject:** **Comments the Government's Proposal to Grow the Greenbelt**

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### 1.0 Purpose

This report is in response to the Provincial Government's recent posting of a new proposal to expand the Greenbelt. The study area includes lands in Puslinch, Guelph/Eramosa and Erin. The deadline for comments is April 19, 2021 (see Environmental Registry of Ontario posting ERO 019-3136 for details).

### 2.0 Background

Since the Province established the Greenbelt Plan Area in 2005, planning staff has reported to Council on a number of Provincial consultations on expanding the Greenbelt and/or protecting the Paris Galt Moraine (which is part of the current Study Area):

#### **Growing the Greenbelt (2008)**

- consultation resulted in development of criteria to evaluate municipal requests to expand the Greenbelt Plan

#### **Paris and Galt Moraines Legislative Review (2009)**

- Inter-Ministry Committee concluded that "New Provincial policy or legislation is not required to protect the functions of the Paris and Galt Moraines at this time."<sup>1</sup>

#### **Protecting Water by Growing the Greenbelt (2018)**

- at the time of launching the updated Greenbelt Plan, 2017, the Government committed to undertake a process to expand the Greenbelt on its outer edge
- in Wellington, the study area included Paris/Galt Moraines and Orangeville Moraine and potential Urban River Valleys associated with the Conestogo, Grand, Speed and Eramosa Rivers.
- commenting phase concluded March 7, 2018

#### **Paris Galt Moraine Conservation Act (2019)**

- Proposed legislation to establish a "Paris Galt Moraine Conservation Plan" (Bill 71)

In 2015, County Council addressed the question of whether the expansion of the Greenbelt was necessary and concluded that there was "no rationale for extending beyond the current boundary". The basis for that position was that adequate Provincial legislation and regulatory measures are in place to protect the natural heritage features and functions, including moraines, within and beyond the Greenbelt.

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<sup>1</sup> Ministry of the Environment, EBR Review Response: Paris and Galt Moraines, April 2009

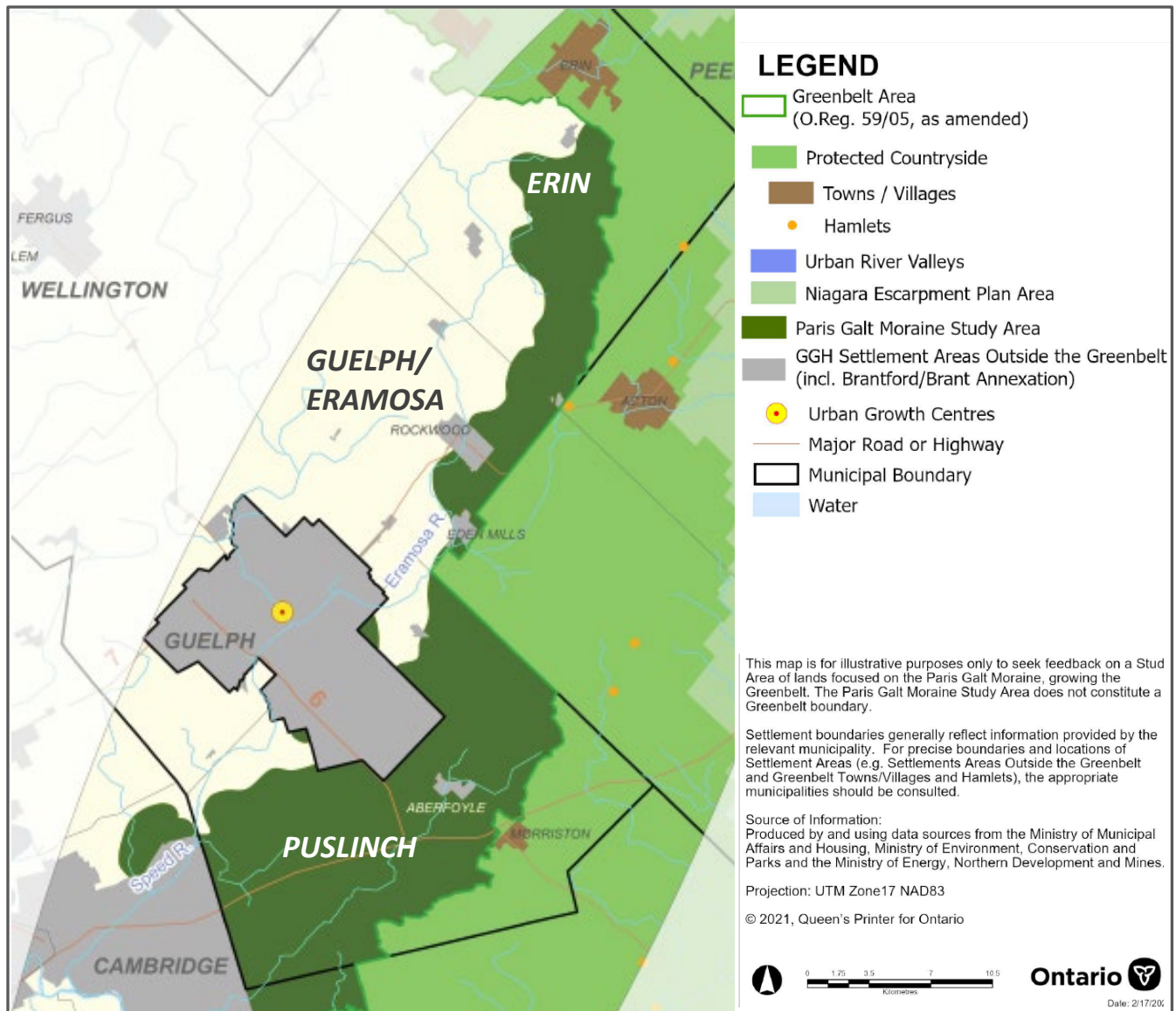
## 2.1 Details of Current Proposal

The Province states that the priority of the consultation is:

- a study area of lands focused on the Paris Galt Moraine (Appendix A); and
- ideas for adding, expanding and further protecting Urban River Valleys (Appendix B), including consideration of adding connections to the Paris Galt Moraine through the Speed and Eramosa Rivers in the urban areas of Guelph and Cambridge.

An excerpt of the Study Area for growing the Greenbelt in Wellington is shown below.

**Figure 1 2021 Growing the Greenbelt Study Area – Paris Galt Moraine (excerpt)**



The Province indicates that the maps are for discussion purposes and do not represent a proposed boundary at this time.

The Province has laid out the following principles for Greenbelt expansions:

1. Will not consider removal requests or land exchanges
2. Will not change existing Greenbelt policies
3. Lands to be considered for expansion must:
  - Support the objectives, vision and goals of the Greenbelt Plan
  - Follow the amendment process laid out in the Greenbelt Act, 2005
  - Connect physically and/or functionally to the current Greenbelt
  - Consider impacts on existing Provincial priorities in Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe

Staff addresses the discussion questions laid out in the proposal in section 6.0 of this report.

### **3.0 Wellington Context**

The Paris Galt Moraine Study Area is approximately 15,000 ha (37,000 ac) in Puslinch, 2,200 ha (5,500 ac) in Guelph/Eramosa and 4,100 ha (10,000 ac) in Erin, for a total area in Wellington County of about 21,400 ha (52,000 ac)<sup>2</sup>. The Study Area is mostly farmland with scattered small villages and hamlets. As a headwaters area, several rivers and their tributaries cross the landscape, which has varying amounts of natural cover. It also contains one of the largest mineral aggregate resource areas in Ontario.

Over half of the Study Area is designated for Agricultural uses and almost 40% is in the protected Greenlands System in the County Official Plan. Within the Urban System, the Study Area contains two designated Urban Centres: Aberfoyle in Puslinch, and part of Rockwood in Guelph/Eramosa. There are also three Hamlets: Crewson's Corners in Erin and Guelph/Eramosa, Eden Mills in Guelph/Eramosa, and Arkell in Puslinch. The Urban Centres and Hamlets only account for approximately 3% of the Study Area.

The City of Guelph and Cambridge are adjacent to Wellington and the Study Area. Under the Growth Plan for the Greater Golden Horseshoe (Growth Plan), Wellington County, Waterloo Region, and the City of Guelph are 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 (MCR) which is subject to approval by the Province. We note that the City of Guelph's growth management strategy indicates that they have enough land to meet population and employment forecasts to 2051<sup>3</sup>.

The Provincial planning system in the Greater Golden Horseshoe is a complex array of legislation, regulations, policy and plans that often overlap, particularly with respect to water resources where Source Protection Plans and Conservation Authority Regulations also apply. In addition, Appendix C

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<sup>2</sup> Total does not add up due to rounding.

<sup>3</sup> Shaping Guelph – Employment Lands Strategy (January 7, 2021 email notice) & Housing Analysis and Strategy (February 22, 2021 email notice)

lists the groundwater measures put in place through decades of work by the Townships of Puslinch and Guelph/Eramosa and the County. In summary, these include the following:

- Groundwater monitoring
- Rural Water Quality Programme
- Groundwater studies
- Groundwater protection measures in Official Plan
- Risk Management Office
- Participation in Guelph / Guelph/Eramosa Tier 3 Study
- Protection of Paris and Galt Moraines in Official Plan
- Source Protection Plans in Official Plan
- Source Protection Plans in Zoning By-laws
- Expert advice on development applications

The strength in the above local protection is in the complementary nature of the various initiatives.

Figure 2 provides an example of existing mapped Official Plan and Growth Plan policy protection for natural heritage resources and areas, water resources and prime agricultural areas. Each map contains a different layer(s):

**MAP 1 County Official Plan Greenlands System and Paris and Galt Moraine Policy Area**

The County Official Plan Greenlands System identifies and protects areas including wetlands, environmentally sensitive areas, streams and valley lands, ponds, lakes and reservoirs, areas of natural and scientific interest, woodlands, fish and wildlife habitat, flood plains and hazardous lands, and threatened or endangered species.

Also pictured is the Paris and Galt Moraine Policy Area. The policies:

- Protect moraine processes and features in order to maintain and where possible restore and enhance groundwater and surface water resources; and
- Promote stewardship activities on the moraines that maintain, restore or enhance groundwater and surface water resources.

**MAP 2 Provincial Natural Heritage System**

This map identifies the Provincial Natural Heritage System for the Growth Plan and for the Greenbelt Plan.

**MAP 3 Key Water Resources Policies**

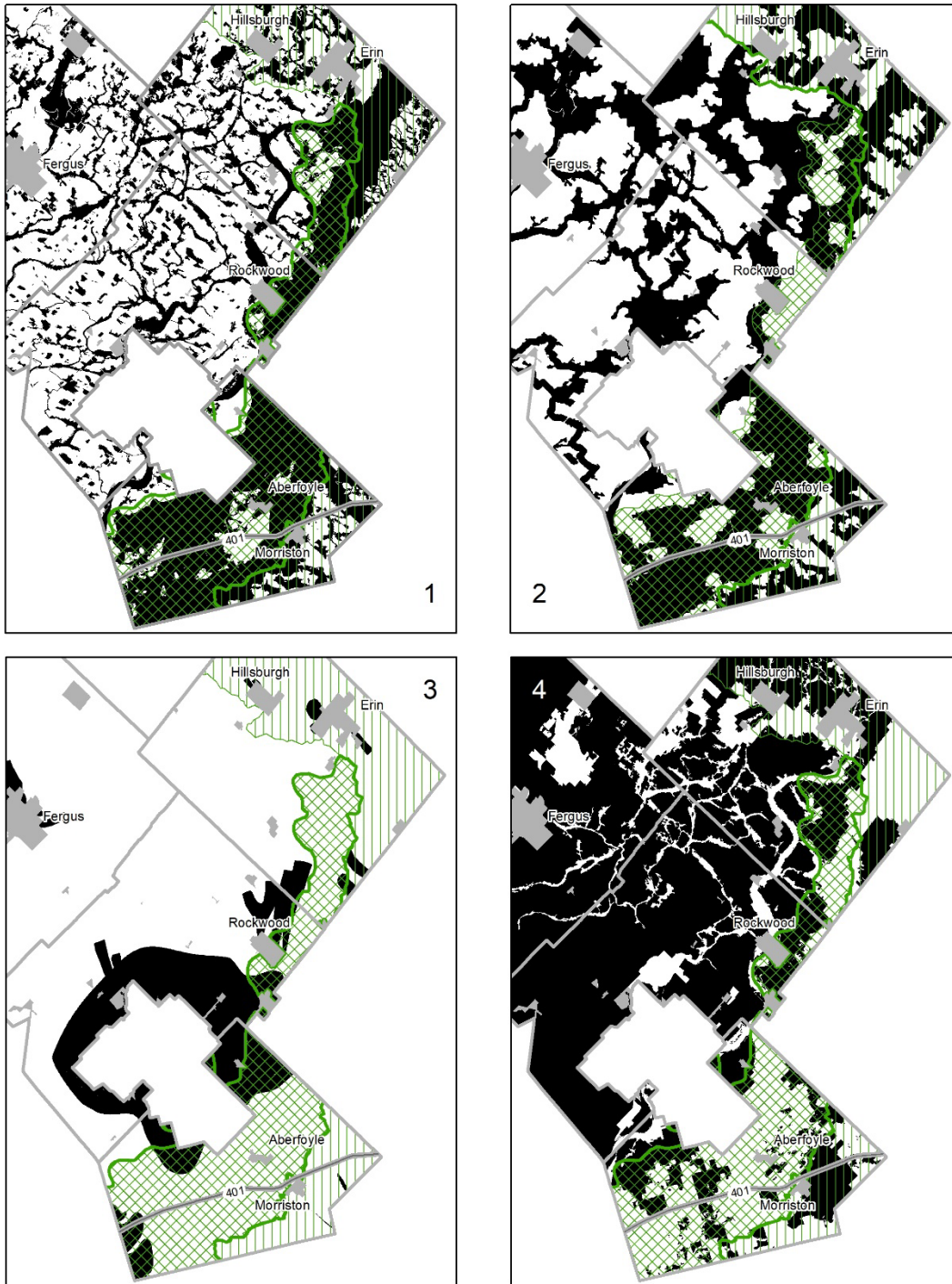
Policies have been added to the County Official Plan to conform with the five Source Protection Plans in Wellington. Map 3 identifies the water quality wellhead protection areas.

**MAP 4 Provincial Agricultural Land Base**



This map identifies the Prime Agricultural Areas of the Agricultural Land Base issued by the Province. It does not reflect the Candidate Areas.

**Figure 2**

**Sample of Provincial and Local Planning Policy Protections**  
 Natural Heritage, Water Resource and Prime Agricultural Areas



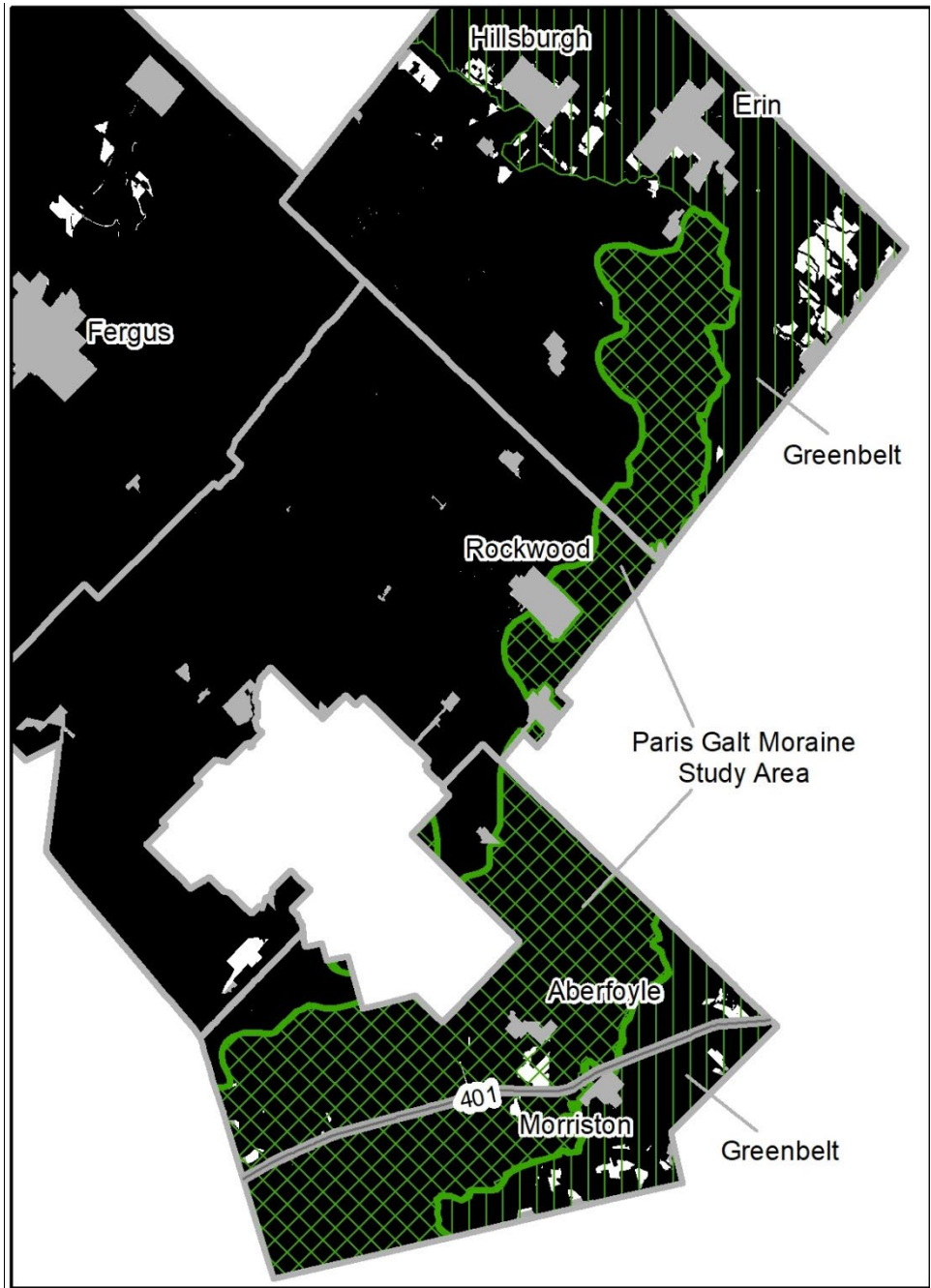
**Legend**

-  Paris Galt Moraine Study Area
-  Current Greenbelt Plan Area



- 1 County Official Plan Greenlands System and Paris Galt Moraine Policy Area
- 2 Provincial Natural Heritage System
- 3 County Official Plan Wellhead Protection Areas
- 4 Provincial Agricultural Land Base (Candidate Areas not shown)

Figure 3 provides an example of the type of overlap that occurs when we overlay the natural heritage resources and areas, water resources and prime agricultural areas contained in Figure 2.

**Figure 3**      **Layering Effect of Provincial and Local Planning Policy Protections**  
Natural Heritage, Water Resource and Agricultural Areas



**Legend**

-  Paris Galt Moraine Study Area
-  Current Greenbelt Plan Area

## 4.0 Implications of Greenbelt Expansion for Wellington County

The policies of the Greenbelt Plan and Growth Plan overlap, 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 Province expanded the Greenbelt. The summary table below highlights some of the policies that are unique to the Greenbelt.

INSIDE THE GREENBELT	OUTSIDE THE GREENBELT
<b>Farm Split Consents</b>	
<ul style="list-style-type: none"> <li>40 ha minimum lot size</li> </ul>	<ul style="list-style-type: none"> <li>35 ha minimum lot size in Official Plan</li> </ul>
<b>Surplus Farm Dwelling Consents</b>	
<ul style="list-style-type: none"> <li>Requires that the residence that is surplus to the farm operation existed before December 16, 2004</li> </ul>	<ul style="list-style-type: none"> <li>Official Plan has no date requirement for the existing surplus residence</li> </ul>
<b>Second Units (now referred to as Additional Residential Units)</b>	
<ul style="list-style-type: none"> <li>Second units are not permitted in the Greenbelt Natural Heritage System</li> </ul>	<ul style="list-style-type: none"> <li>Second units may be permitted in existing residences and ancillary buildings</li> </ul>
<b>Secondary Agricultural Area Consents</b>	
<ul style="list-style-type: none"> <li>Application of Provincial Agricultural Land Base and Natural Heritage System will constrain rural residential lot creation potential in Secondary Agricultural Areas</li> <li>Generally, to date, rural residential consent activity has occurred to a slightly lower degree</li> </ul>	<ul style="list-style-type: none"> <li>Current Secondary Agricultural Areas in Official Plan apply until Provincial mapping is implemented in Official Plan</li> </ul>
<b>Official Plan Amendment to Re-designate Prime Agricultural Area for Non-Agricultural Uses</b> (i.e. Official Plan Amendment to expand Rural Employment or Recreational Areas)	
<ul style="list-style-type: none"> <li>This type of Official Plan Amendment is not permitted</li> </ul>	<ul style="list-style-type: none"> <li>May be considered but must meet Provincial Policy Statement, Growth Plan and Official Plan policies</li> </ul>
<b>Urban Centre Expansion</b> (if justified as a result of Growth Plan Municipal Comprehensive Review)	
<ul style="list-style-type: none"> <li>Expansion required to be serviced by <i>existing</i> municipal water and wastewater systems</li> <li>Expansion into the Natural Heritage System is prohibited</li> <li>Expansions would also be limited, among other matters, to a 5% increase up to a maximum size of 10 ha, only 50% of which can be residential development</li> </ul>	<ul style="list-style-type: none"> <li>Urban Centres outside the Greenbelt cannot expand into the Greenbelt</li> <li>Also applicable to neighbouring cities of Guelph and Cambridge</li> </ul>
<b>Hamlet Expansion</b>	
<ul style="list-style-type: none"> <li>Hamlet expansions are not permitted</li> </ul>	<ul style="list-style-type: none"> <li>Hamlet expansions are limited, but may be considered in the Municipal Comprehensive Review</li> </ul>
<b>Mineral Aggregate Extraction</b>	
<ul style="list-style-type: none"> <li>Additional requirements for rehabilitation and maximum disturbed area</li> <li>Requires municipalities to apply Source Protection Plan and Subwatershed Plan policies</li> </ul>	



The permanent protection of Prime Agricultural Areas and prohibition of large urban 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.

#### **4.1 Agricultural Land Base**

The Province established the Agricultural Land Base for the Greater Golden Horseshoe and Natural Heritage System for the Growth Plan in 2017. In the Growth Plan outside of the Greenbelt, Prime Agricultural Areas in Official Plans as of July 1, 2017 apply until Provincial mapping is implemented in Official Plans. As is required, Wellington will be refining Provincial mapping through the municipal comprehensive review. In the Greenbelt, however, the Provincial mapping of the Agricultural Land Base would be in effect prior to refinements.

#### **4.2 Natural Heritage System**

There are currently two Provincial Natural Heritage Systems (NHS): one for the Greenbelt and another for the Growth Plan. Wellington will be refining Provincial mapping outside of the Greenbelt through the municipal comprehensive review. The Greenbelt NHS has been incorporated into the County Official Plan. It is unclear at this time, what the implications of growing the Greenbelt might have for implementing the Growth Plan NHS.

### **5.0 Criteria for Growing the Greenbelt**

As noted earlier in this report, over ten years ago the Province consulted on and published criteria to use to evaluate municipal requests to grow the Greenbelt (*Growing the Greenbelt*, August 2008, Ministry of Municipal Affairs and Housing). In our view, these criteria should apply to the Provincial proposal. In particular, we note criterion #5 requires that the request “complements the Growth Plan for the Greater Golden Horseshoe” including that the proposed area for expansion:

“cannot impede the implementation of the Growth Plan. The municipality must demonstrate how the expansion area supports the goals, objectives and targets of both the Greenbelt Plan and the Growth Plan...”

One of the guiding principles of the Growth Plan is to “Provide for different approaches to manage growth that recognize the diversity of communities in the GGH.” The designated Urban Centres and Hamlets in Wellington vary in size, diversity and intensity of uses. This is evident between the three municipalities impacted by the expansion proposal, but particularly in Puslinch. As proposed, almost the entire Township Puslinch would be covered by the current Greenbelt Area and the expanded Greenbelt Study Area. The settlement hierarchy consists of two small Urban Centres and one Hamlet. The population of Aberfoyle is just over 300 people and Arkell is much smaller. Puslinch is the only Township in Wellington County without a municipal water and/or wastewater system. Adding (or surrounding) the Urban Centre of Aberfoyle and the Hamlet of Arkell would eliminate the potential for limited expansion or minor rounding out (if justified by the MCR land needs assessment).

Puslinch is a small but stable community and the Greenbelt will not support its long-term viability by creating fixed, permanent boundaries for all of its settlement areas.

## 6.0 Consultation Question Responses

Question	Response
<p><b>1. What are your thoughts on the initial focus of the Study Area of the Paris Galt Moraine?</b></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>In 2015, County Council addressed the question of whether the expansion of the Greenbelt was necessary and concluded that there was “no rationale for extending beyond the current boundary”.</p>
<p><b>2. What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?</b></p>	<p>It is our view that adequate provincial legislation and regulatory measures are in place in Wellington to protect the natural heritage features and functions, including moraines, within and beyond the Greenbelt.</p>
<p><b>3. What are your thoughts on the initial focus of adding, expanding and further protecting Urban River Valleys?</b></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>
<p><b>4. Do you have suggestions for other potential areas to grow the Greenbelt?</b></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><b>5. How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned?</b></p>	<p>The Province should defer to the Official Plan as amended through the Growth Plan municipal comprehensive review, which includes completion of land needs assessment using Provincial methodology, urban structure, and refinements to the Natural Heritage System and Agricultural Land Base.</p>
<p><b>6. Are there other priorities that should be considered?</b></p>	<p>The Province should consider the potential for Greenbelt expansion to have unintended outcomes related to:</p> <p>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 additional residential units; and/or</p> <p>The potential to limit minor rounding out of Hamlets and limited expansions to Urban Centres (if justified through land needs assessment) which will help sustain our stable rural communities.</p>

## 7.0 Impact on County Official Plan Review

The Government’s proposal states that the Study Area does not represent a proposed boundary at this time, but later indicates that “Greenbelt expansion needs to be considered in the context of these growth management exercises by municipalities.”

The County and its consultants have invested considerable time and effort in the growth management work required as part of the municipal comprehensive review. We have experienced delays to respond to a new Growth Plan (2019) and Amendment 1 (2020), Provincial Policy Statement (2020) and guidance documents. While the Province has shown flexibility by supporting phased approaches to MCR conformity, they have not adjusted a conformity deadline that was set five years ago. We cannot afford further delays.

## 8.0 Conclusion

The County of Wellington agrees that the Paris Galt Moraines are unique landforms worthy of protection, which is why we used existing *Planning Act* provisions to incorporate special policies in our Official Plan in 2014.

The proposal to expand the Greenbelt does not include any technical rationale to contradict the Ministry of the Environment’s 2009 position that no new Provincial policy or legislation is required to protect the functions of the Paris Galt Moraine.

There is no major growth anticipated in the Study Area that warrants Greenbelt Plan protection and there are undesirable outcomes that would limit options for agricultural areas and impact the stability of rural communities in Wellington.

The County has been, and continues to be, consistent in its position that there is no rationale for expanding the Greenbelt. There are adequate Provincial legislation, regulations, plans and policies; and local plans, policies and measures in place.

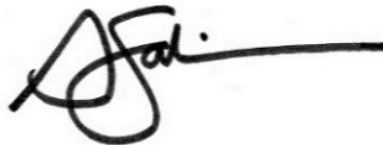
## Recommendations

That the report “Comments on Government’s Proposal to Grow the Greenbelt” be forwarded to the Minister of Municipal Affairs and Housing and member municipalities in Wellington County.

Respectfully submitted,



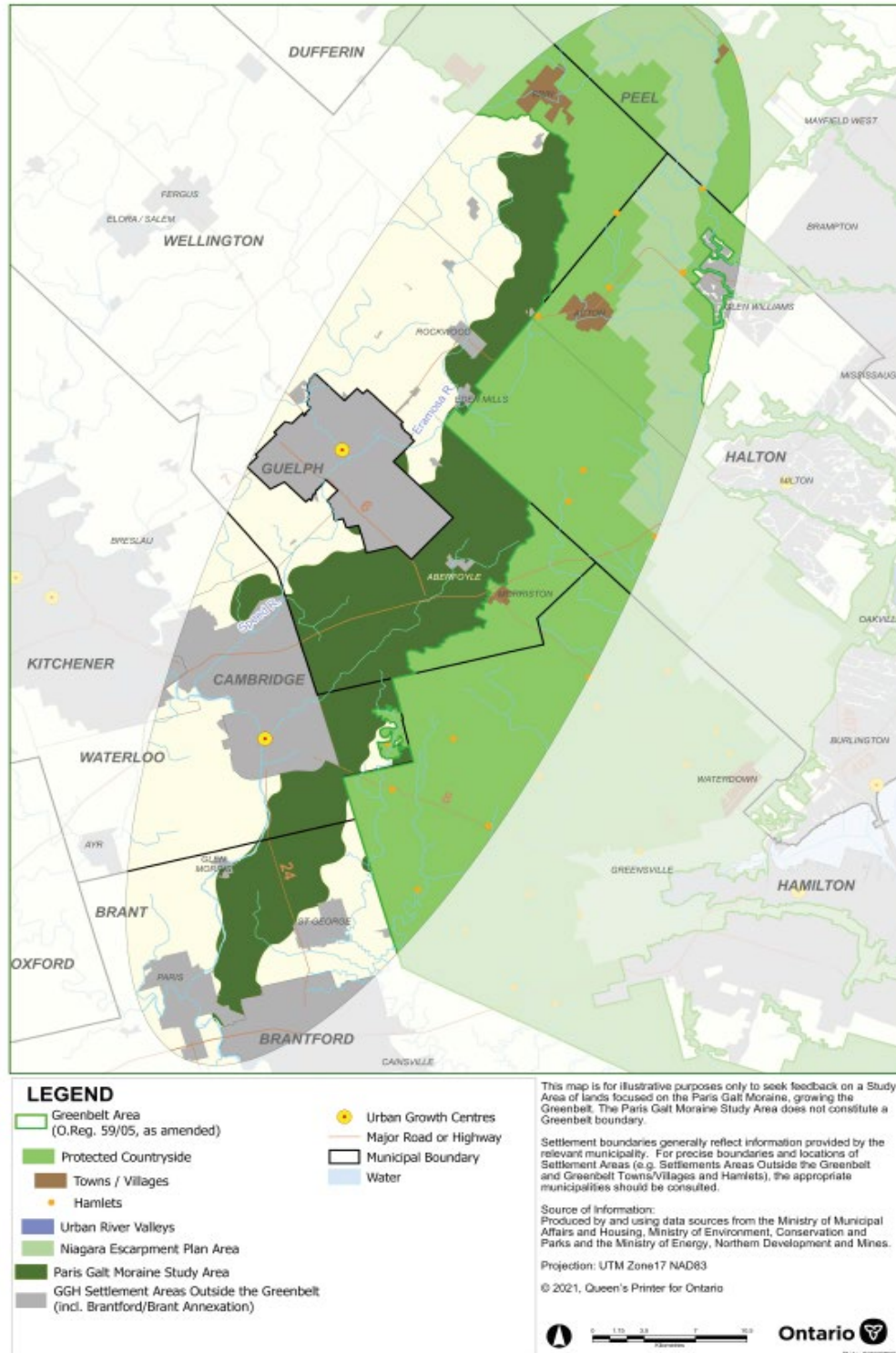
Sarah Wilhelm, MCIP, RPP  
Manager of Policy Planning



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

- Appendix A Growing the Greenbelt Study Area – Paris Galt Moraine
- Appendix B Greenbelt Area – Urban River Valleys
- Appendix C Local Groundwater Protection Measures

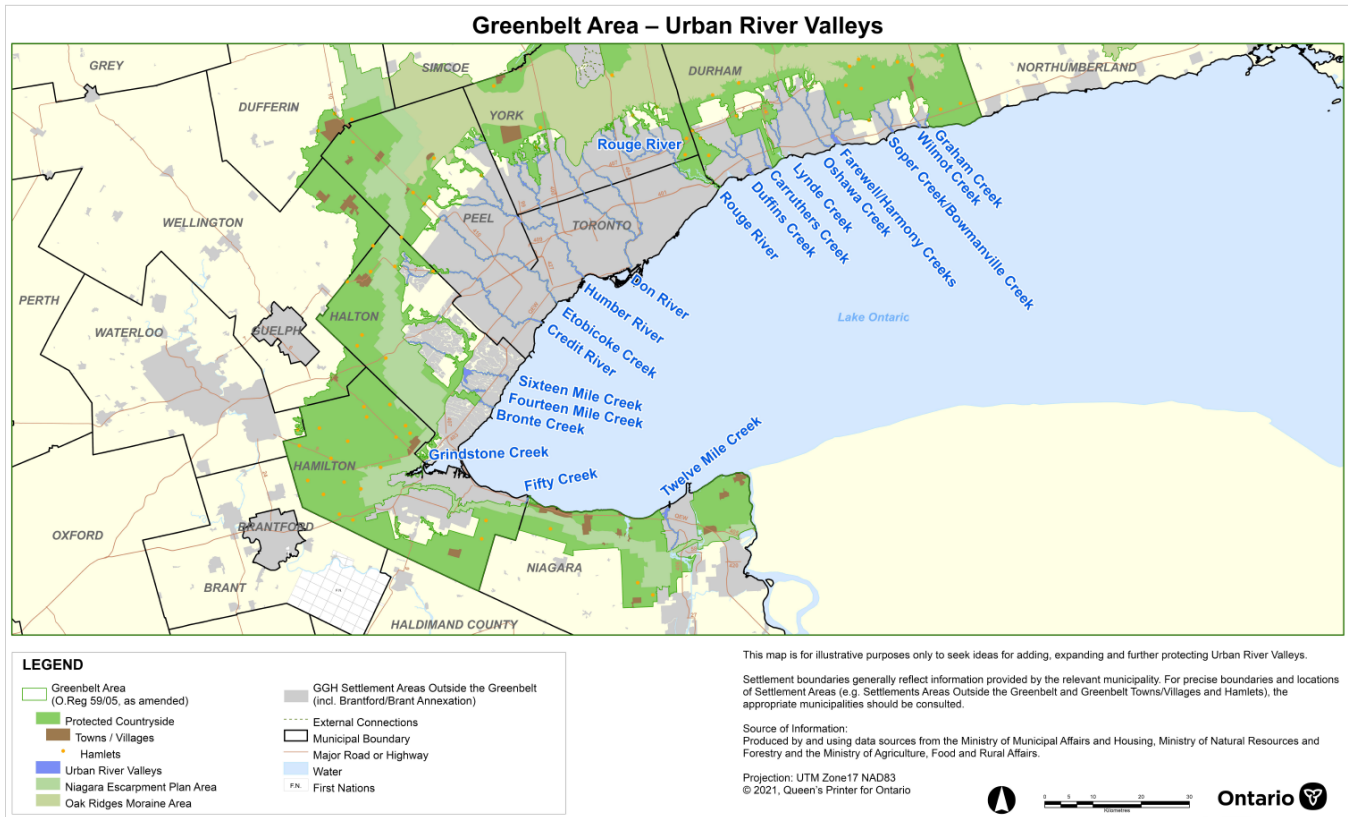
Growing the Greenbelt Study Area – Paris Galt Moraine



# APPENDIX B

# Greenbelt Area – Urban River Valleys

ERO Posting 019-3136



## **APPENDIX C**

## **Groundwater Protection Measures**

Guelph/Eramosa Township, Township of Puslinch, County of Wellington

The following is a list of groundwater protection measures put in place by Guelph/Eramosa Township, Township of Puslinch and the County of Wellington.

### **Groundwater Monitoring**

Since 1994, the Township of Puslinch operates an ambient groundwater monitoring network to collect data on water quality and quantity. This network of sixteen monitoring wells are installed at various depths including within the Paris and Galt Moraines, Aberfoyle Outwash Deposits, and the Guelph and Gasport Bedrock Formations. This program provides the Township with quarterly groundwater levels and annual groundwater quality and is used to evaluate impacts from major water takings in the Township including those from neighbouring municipal wells for Cambridge and Guelph.

### **Municipal Supply Systems in Guelph/Eramosa**

The Township of Guelph/Eramosa operates two groundwater municipal supply systems: Rockwood and Hamilton Drive. These systems are operated in accordance with their Municipal Drinking Water License and all applicable legislation including the *Safe Drinking Water Act*, *Clean Water Act*, *Environmental Assessment Act* and *Ontario Water Resources Act*. This includes operation, review, groundwater monitoring, sampling and oversight by licensed water operators, Professional Engineers and Professional Geoscientists. The Township's groundwater monitoring program provides water quality and quantity data to ensure compliance with the regulatory requirements including ensuring the protection of the groundwater resource.

### **Rural Water Quality Programme**

Since 1999, the County of Wellington funds the Rural Water Quality Programme that is administered by our local Conservation Authorities on the County's behalf. The Rural Water Quality Programme encourages farmers and rural residents to carry-out various projects that improve groundwater quality and since inception has completed over 1,650 projects including domestic well upgrades, manure, fuel, chemical and fertilizer storage, wash-water treatment and many more projects. The County's funding commitment is approximately \$400,000 per year.

### **Groundwater Studies**

In the early 2000's, both Townships completed groundwater studies as part of a provincial program designed to benchmark the understanding of the groundwater resource and to inform the creation of the source protection program and the *Clean Water Act*. This culminated in 2006 with the County groundwater study that incorporated the results of the Township level studies and proposed a new County of Wellington Official Plan framework for groundwater protection.

## **APPENDIX C          Groundwater Protection Measures (continued)**

### **Groundwater Protection Measures in Official Plan**

In 2008, the County of Wellington approved an Official Plan amendment that incorporated the groundwater protection measures recommended in the County groundwater study. These measures provided protection of the groundwater resource seven to eight years ahead of the approval of the Source Protection Plans. The measures include a risk based approach to reviewing development applications and spill response/chemical management plans and other requirements to ensure new developments did not impact the groundwater. Included in this amendment were wellhead protection areas for existing, non-municipal, residential communities in the Township of Puslinch. This protection that exceeds the current source protection or *Clean Water Act* requirements which is only focused on the protection of municipal water supplies.

### **Risk Management Office**

Beginning in 2013, the Townships, the County and the other Townships and Towns within Wellington established a shared Risk Management Office to deliver the source protection program and enforce the *Clean Water Act* for all the municipalities within Wellington County. Wellington Source Water Protection is a shared, municipal program that is funded by the County, Townships and Towns in Wellington. This program protects the 14 drinking water systems of the municipalities of the County as well as municipal drinking water systems for four neighbouring municipalities including protecting, approximately, 50% of the City of Guelph's water supply.

### **Participation in Guelph / Guelph/Eramosa Tier 3 Study**

Since 2014, the Townships and County have participated in the Guelph / Guelph/Eramosa Tier 3 Study. This project is still continuing and will result in the establishment of water quantity policies in the applicable Source Protection Plans to protect Guelph/Eramosa Township's and the City of Guelph's municipal supplies. This project has included technical and scientific studies, policy development and stakeholder consultation as well as collaboration between all the municipalities and agencies involved to protect the shared groundwater resource. Township and County staff are members on this project team along with City of Guelph staff.

### **Protection of Paris and Galt Moraines in Official Plan**

In 2014, the County of Wellington approved an Official Plan amendment to protect the Paris and Galt Moraines through policy area mapping and applicable policies. This is partly in recognition of the important role that the Paris - Galt Moraines in Guelph/Eramosa Township and the Township of Puslinch have on regional groundwater resources.

## **APPENDIX C      Groundwater Protection Measures (continued)**

### **Source Protection Plans in Official Plan**

In 2016, the County of Wellington approved an Official Plan amendment to incorporate the five Source Protection Plans within the County Official Plan. The County of Wellington Official Plan is the local Official Plan for both Townships. This conformity exercise is a legal requirement and the County was one of the first municipalities in the Province to complete this amendment. Included in this amendment was the establishment of additional protections that exceed the current source protection or *Clean Water Act* requirements.

### **Source Protection Plans in Zoning By-laws**

In 2017, both Townships approved amendments to their Zoning By-laws to incorporate the Source Protection Plans. These conformity exercises are also legal requirements and the Townships were among the first municipalities in the Province to complete these amendments.

### **Expert Advice on Development Applications**

Additionally, the Townships and the County routinely retain Professional Engineers and Professional Geoscientists to provide expert advice on development applications, proposed provincial approvals such as Permits to Take Water or *Aggregate Resources Act* approvals, Class Environmental Assessments and Water Supply Master Plans.