



April 19, 2021

Project No. 19025

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  
Part Lot 17, Concession 7, Township of Puslinch  
Donna Marie Daymond**

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GSP Group acts on behalf of Ms. Donna Daymond.

The above-noted property is located south of Maltby Road West on the east side of Concession Road 7 (the "Property"). The Property currently does not have an assigned municipal address.

The Property is approximately 41 hectares (102 acres) in size and is visible from Highway 6 (Hanlon Expressway) and lies east of this corridor.

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

## 1. **BACKGROUND**

The Property is designated a combination of "Rural Employment Area", Secondary Agricultural", "Greenlands" and "Core 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.

## **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.

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 adequately 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.

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Yours truly,  
**GSP Group Inc.**



Hugh Handy, MCIP, RPP  
Senior Associate

cc Ms. Donna Daymond  
Jennifer and Dan Arsenault