



## Development Services Staff Report

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Report Title:	Draft Land Use Compatibility Guideline – Proposed Amendments – Environmental Registry of Ontario (ERO)
Report Number:	DS30-2021
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Final Review:	Senior Management Team

### **Recommendation:**

THAT the Council of the Township of Woolwich, in consideration of report DS30-2021 respond to the Environmental Registry of Ontario (ERO) posting in regard to the Draft Land Use Compatibility Guideline with the following comments and concerns:

1. That the implementation of the new guidelines will result in increased costs for development applications and significantly increase the number of applications that require submissions of compatibility studies which will:
  - a. Prevent or deter intensification that is to take place as per the PPS; and
  - b. Require municipalities to hire and train additional staff to process and review applications, and
  - c. Increase the timing to process Planning Applications.
2. That the guidelines be altered to allow municipalities to determine what studies are required or if studies can be scoped in situations where there are other intervening sensitive land uses between the industry and the proposed development.
3. That the new guidelines be based on science and accurate information than just complaints which is not reflect of all industry.
4. The guidelines clearly identify and define a sensitive use.
5. That Demonstration of Need Study should not be required to provide an evaluation of alternative sites.

6. That On-Farm Businesses in the rural area be exempt or reviewed in further detail to determine more appropriate AOIs and MSD and shall not apply to sensitive uses on the same parcel.
7. That the Province does not delegate any low risk enforcement issues looking to local municipality as the local municipalities do not have tools/powers or enforcement staff to deal with such issues.
8. That the proposed changes will contradict Provincial growth plan policies and the creation of complete communities, further segregates all developments, increasing transportation issues, preventing, and restricting infill and intensification.

### **Background:**

The Province has released the Draft Land Use Compatibility Guidelines on the Environmental Registry for review and comment by July 3, 2021. These proposed guidelines would replace or update the current guidelines, often referred to as the D-series guidelines. The registry posting notes:

- “The objectives of land use compatibility planning in the context of this Guideline are to:*
- *protect employment areas (including industrial employment areas) designated for future major facilities from incompatible uses and encroachment by sensitive land uses;*
  - *adverse protect existing or planned major facilities from potential impacts from new sensitive land uses; and*
  - *prevent effects to existing or planned sensitive land uses from new and/or expanding major facilities.*

*The Guideline would be applied when an approval under the Planning Act is needed where the decision to be made by the planning authority raises one of the following circumstances:*

- *a new or expanding sensitive land use (e.g. a residential subdivision or condominium) is proposed near an existing or planned major facility*
- *a new or expanding major facility is proposed near an existing or planned sensitive land use.*

*The proposed updated Guideline would inform and clarify to municipalities and other planning authorities when compatibility studies and (if applicable) mitigation measures are required as part of land use planning decisions under the Planning Act to prevent or reduce any adverse effects. To accomplish this, the Guideline proposes:*

- *area of influence (AOI) distances associated with specific types and classes of major facilities where adverse effects on sensitive land uses are moderately likely to occur (these distances have been revised from current guidelines based on newer Ministry compliance data)*
- *minimum separation distances (MSD) associated with specific types and classes of major facilities where adverse effects on sensitive land uses are highly likely to*

*occur (these distances have been revised from current guidelines based on newer Ministry compliance data)*

- *that a compatibility study is required for a new or expanding major facility or a new or expanding sensitive land use proposed in an AOI or MSD, to determine appropriate setbacks and mitigation measures*
- *that planning authorities should not allow sensitive uses within the MSD of a major facility except in rare circumstances*
- *that a demonstration of need assessment, as required under the Provincial Policy Statement, 2020 (PPS) to assess whether alternate preferred locations exist in the municipality for that proposed land use, is required for a sensitive land use proposed within the AOI of a major facility where mitigation measures are required and where a sensitive land use is proposed within the MSD of a major facility*
- *contents of compatibility studies and demonstrations of need, and additional direction and links to technical guidance to assist with the compatibility studies and demonstrations of need*
- *guidance on how to incorporate land use compatibility policies and concepts into official plans and as part of approvals under the Planning Act*
- *examples of mitigation measures that may help to reduce impacts, as demonstrated in a compatibility study, and discussion on integrating these mitigation measures as legal requirements*
- *guidance on planning for land use compatibility in areas of infill and intensification*
- *helpful links and information on other guidance that may apply in relation to specific types of facilities*
- *guidance specifically related to land use on or near landfills and dumps, and on assessing methane hazards from landfill sites*

*The primary goal of this proposed Guideline is to reduce land use compatibility issues resulting from new development proposals under the Planning Act that involve sensitive land uses in proximity to major facilities.”*

In order to support implementation of the Provincial Policy Statement (PPS), a guiding hierarchy for land use compatibility is provided as a decision-making framework for planning authorities where avoidance of incompatible land uses through adequate separation should be achieved, or if avoidance is not possible, minimizing and mitigating adverse effects.

The Province has introduced new definitions as part of proposed key concepts including: Major Facilities, Sensitive Land Uses, Adverse Effects, Areas of Influence (AOI), Minimum Separation Distance (MSD), Compatibility study, Avoidance, Demonstration of Need, and Minimize and Mitigate (see Appendix A).

These new guidelines will apply to Planning Act applications including:

- *Official Plans (OP) and OP amendments (OPAs);*

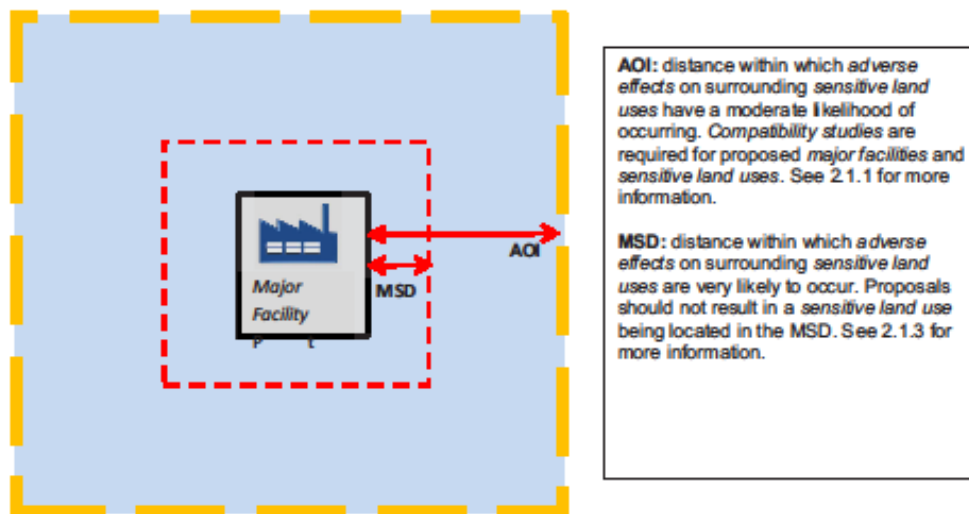
- *Secondary plans;*
- *Community planning permit systems;*
- *Zoning by-laws and zoning by-law amendments;*
- *Plans of subdivision or condominium;*
- *Consents;*
- *Minor variances; and*
- *Site plan control and other planning approvals.*

*The Guideline also applies in situations where the use of the land is not changing, but the nature and/or intensity of the land use is, and an application under the Planning Act is required.*

Within the new guidelines, a table is provided on the type of facility, its AOI and MSD which are used to determine if compatibility studies are required (Appendix B). Generally, the land uses in this table fall into 5 different classifications.

### How it works

When a proposal is made by either the expanding industry or a sensitive use in proximity to the industry the applicant will review if there are any impacts within the AOI and MSD based on the classification of the industry. If not, no studies are required. If so, then compatibility studies are required to assess the impact, determine mitigation measures etc.



The separation distance is generally measured from property line to property line, although where appropriate it can be measured from the major facilities building or source.

In the case where a development proposal is either:

- *a new sensitive land use is proposed within a major facility's AOI and mitigation measures would be needed to ensure no adverse effects or potential impacts; or*

- *a new sensitive land use is proposed within a major facility's MSD (regardless of whether mitigation measures are assessed to be needed or not), development may be permitted based on the demonstration of need.*

This need study would address the following:

1. *Demonstrate that there is a need for the proposed use in that particular location. This includes answering the following questions:*
  - a. *Do policies and objectives in the planning authority's applicable planning documents (such as OPs) and relevant provincial policies and plans (e.g. PPS, A Place to Grow) support locating the use in the proposed location? For example, consider policies/objectives related to complete communities, housing diversification, and community amenities.*
  - b. *Are there demographic considerations, such as expected land supply, housing strategy, and forecasted growth or growth targets in population or employment, that would support the use in the proposed location?*
  - c. *How will the proposed use, in its proposed location, support the community or other existing uses in the area? For example, does it provide necessities for daily living, including an appropriate mix of jobs, 35 local stores, and services, a full range of housing and transportation options and public service facilities?*
  - d. *Are there community amenities and infrastructure (i.e. transportation, servicing) available to support the use? e. Is the proposed use to be located within a designated strategic growth area which by nature should include multiple types of uses, such as an MTSA (within the Greater Golden Horseshoe growth plan area) or nodes and corridors generally?*
2. *Identify other locations in the municipality that have been designated and zoned specifically for this use and explain why they have not been chosen for the proposed use.*
3. *Provide a list of at least two alternative locations that have been considered outside of the major facility's AOI and for each, discuss whether they would be appropriate for this use as compared to the preferred location. This discussion should address the same questions presented in #1a-e.*
4. *Identify other potential uses for this particular site that would not be considered incompatible and explain why they have not been chosen for the proposed location.*
5. *The conclusion of the demonstration of the need should discuss why the proposed use in the proposed location is the best option, having considered the answers to the questions presented in #1a-e.*

Note – text in italics are direct quotes from the draft guideline information.

### **Comments:**

The classification of industry has changed from the current D-series guidelines which was more focussed on the operations of the industry (truck traffic, hours of operation, outdoor storage etc.) to establish separation criteria. This is consistent with the policies in the Provincial Policy Statement.

The new guidelines:

- (Section 4.2.3) still account for infill and intensification, providing direction on how to best respond to such scenarios.
- Still allow for the Class 4 designation in regard to the Noise guidelines.
- Creates 5 classifications of facilities instead of three classes.
- Breakdown operations based on the type of use.
- Require the studies for any development within an Area of Interest (AOI).

The new classification is industry focused and based on 10 years of historical information to produce the table as proposed in Appendix B hereto. Overall, the guidelines should be an improvement over the existing guidelines, providing better classification of uses as the new guidelines are based on better information and technical studies. The same overarching concept of attempting to separate incompatible uses will continue and using methods to reduce or mitigate any concerns where appropriate.

It is stated in the proposed guideline lines that they are not intended to increase the costs for any of the required compatibility studies in terms of noise, dust or odour; however, it will likely require more properties to undergo these studies. A new study that will be necessary is Demonstration of Need, which is a report that is required when a new use is proposed within the AOI and/or MSD. This study can support allowing the use within the AOI and MSD if there is sound rationale and there are no reasonable alternative locations or areas. Adding studies and subsequent reviews increases the development costs and generally increases the time to process an application. It will also trigger the need for peer reviews, which generally increases the costs.

Additional studies and associated costs may then be a deterrent to seeing intensification. This could impact achieving intensification targets, especially within areas like Elmira that have a number of major industries.

If there are more studies to be reviewed it will also place greater demand on the Region, to complete the reviews. To provide some context, the draft guidelines have a 2000 metre AOI and a 500 metre MSD for a chemical plant where previously the distances were the 1000 metre and 300 metre respectively. In Appendix C the map shows the impacts of a 500m MSD and 2000m AOI. These requirements would trigger almost all applications in Elmira to complete the compatibility studies. The Township could, as per the proposed guidelines, undergo a process to reduce the AOI's which would reduce the number of applications that would need to complete the studies. Staff are recommending that the Province to provide flexibility in the new guidelines to allow municipalities to review, if and what, studies are required if there are already other intervening sensitive land uses between the industry and the proposed development.

With the increase in applications requiring studies, Township staff have concerns that the Region as the approval authority may not have the staff resources to handle the additional work load at this time.

The previous guidelines applied to most Planning Applications; however, site plan approval was generally used to implement the requirements (i.e., warning clauses) but not to request studies and approve the same. The new guidelines have the potential to trigger studies during the site plan approval process if the site is intensifying, thereby making the site plan approval process more complicated, taking longer to process, and require the Region to be involved where they currently are not.

As the implementation and approval of the studies is by the Region, Township staff will need to continue to work with the Regional Staff in regard to the implementation and review of such studies. Working together to determine when studies are required and then the desired methodology and format of the same will help in reviewing these reports.

Some other concerns that staff note:

- The new guidelines are based on complaints over the last 10 years. Is this truly reflective of industry as the data is based on issues or concerns, not the average or those industries that operate well.
- The document refers to a sensitive use, but unclear what that means – does that include parks, forests, open spaces?
- Demonstration of Need Study – they will need to evaluate alternative sites, which increases developer costs, but also is very challenging if they lands they do not own or if the other lands are even available.
- Province is wanting municipalities to create mapping of major facilities. Challenge is that as a Township we do not have a list of that nature to generate such mapping
- It is likely to impact in the On-Farm Businesses in the rural area – to the point of asking for studies to the house on the same farm.
- Province looking to delegate lower risk issues to the local municipality. As a municipality we do not have tools/powers or enforcement staff to deal with such issues.

As the new guidelines are clearer, it may result in them being more rigid with less subjectivity than the current guidelines. However, the Province still allows flexibility to consider matters related to infill/intensification issues, approving alternative AOI's, continuing with the Class 4 noise, and consideration through the demand study. This gives some opportunity to review applications without being bound to an overly rigid structure that cannot account for every scenario.

If the new guidelines are approved, the Township would need to implement them into the Official Plan, Zoning Bylaw and site plan control bylaw. This implementation will include mapping the industry and the MSD and AOI's for known facilities. Overall, this

will come at a cost financially and in terms of staff time to implement such changes.

Although the concept of the guidelines remains the same, the changes will be an improvement to the existing guidelines attempting to balance the needs of both industry and development. Although staff have concerns on the implications to the work load, review times and costs to applicants, the draft guidelines also appear reasonable.

The proposed changes will have significant impact to all forms of development applications. As such, Township staff have concerns with the proposed changes as the recommendations will significantly impact development of our communities.

**Interdepartmental Impacts:** None

**Financial Impacts:** Costs for staff resources.

**Strategic Plan Impacts:**

- *Planning for Growth and Exploring Economic Development Opportunities*
  - *Ensuring managed and sustainable community growth and development*

**Conclusion:**

This report be received for information purposes, for Council to be aware of the proposed changes to the Compatibility Guidelines as proposed by the Province.

It is recommended that Council respond to the Province the following comments in regards to the proposed changes as they:

- Will require municipalities to hire and train additional staff to process and review applications.
- Will increase the timing to process Planning Applications.
- That the guidelines be altered to allow municipalities to determine what studies are required or if studies can be scoped in situations where there are other intervening sensitive land uses between the industry and the proposed development.
- That the new guidelines be based on science.
- The guidelines clearly identify and define a sensitive use.
- That Demonstration of Need Study should not be required to provide an evaluation of alternative sites.
- That On-Farm Businesses in the rural area be exempt or reviewed in further detail to determine more appropriate AOs and MSD and shall not apply to sensitive uses on the same parcel.
- That the Province does not delegate any low-risk enforcement issues looking to local municipality.
- That the proposed changes will contradict Provincial growth plan policies and the creation of complete communities, further segregates all developments,



increasing transportation issues, preventing, and restricting infill and intensification.

It is also recommended that the guidelines be altered to allow municipalities flexibility to review what and if any studies are required where there are already other intervening sensitive land uses between the industry and the proposed development.

**Attachments:**

Appendix 'A' – Proposed Definitions

Appendix 'B' – Proposed Classification Table

Appendix 'C' – Example of 500m and 2000m impacts

## APPENDIX A

## APPENDIX G – GLOSSARY

**Adverse effect(s):** means one or more of:

- a) impairment of the quality of the natural environment for any use that can be made of it;
- b) injury or damage to property or plant or animal life;
- c) harm or material discomfort to any person;
- d) an *adverse effect* on the health of any person;
- e) impairment of the safety of any person;
- f) rendering any property or plant or animal life unfit for human use;
- g) loss of enjoyment of normal use of property; and
- h) interference with normal conduct of business

(EPA)

**Amenity Area:** an outdoor space or facility that is used for the enjoyment of persons residing in or utilizing any building(s) on the property/premises.

**Area of Influence:** an area surrounding the property boundary of an existing or planned *major facility* where *adverse effects* on surrounding *sensitive land uses* have a moderate likelihood of occurring. An alternate AOI may be determined by the planning authority based on a technical and scientific process similar to a *compatibility study*.

**Buffer:** A method of control used to prevent or minimize the *adverse effects* of incompatible land uses and may be in the form of:

1. a land area or intervening space sufficient to provide the necessary distance separation; or
2. a natural or human-made feature such as a berm, wall, barrier, planting, topography, trench, fence or other structure or technical control (e.g. solid brick walls, triple-glazed windows to lessen the effect of noise); or
3. a land use different from the 2 conflicting ones but compatible with each; or
4. any combination of the above, interposed between conflicting land uses.

**Compatibility Study(ies):** a study that assesses potential *adverse effects* and recommends *separation distances* and mitigation measures, if needed, to limit impacts to surrounding land uses.

**Contaminant:** means any solid, liquid, gas, odour, heat, sound, vibration, radiation or combination of any of them resulting directly or indirectly from human activities that causes or may cause an *adverse effect* (EPA).

**Demonstration of Need:** a study that determines whether there is an identified need for the proposed use in the proposed location, and if alternative locations for the use have been evaluated and there are no reasonable alternative locations.

**Discharge:** when used as a verb, includes add, deposit, leak or emit and, when used as a noun, includes addition, deposit, emission or leak (EPA).

**Employment Area:** areas designated in an official plan for clusters of business and economic activities including, but not limited to industrial uses, manufacturing, warehousing, offices, and associated retail and ancillary facilities (PPS).

**Environmental Assessment:** a study which assesses the potential environmental effects (positive or negative) of an individual proposal. Key components of an EA include consultation with government agencies and the public; consideration and evaluation of alternatives; and, the management of potential environmental effects. Conducting an EA promotes good environmental planning before decisions are made about proceeding with a proposal.

**Environmental Compliance Approval:** an approval issued under Part II.1 of the EPA.

**Fill Area:** the area of a *waste disposal site* set aside for *landfilling* or dumping.

**Fugitive Dust:** dust or suspended particulate matter that is generated due to mechanical disturbance of granular material (e.g. dirt, soil). Fugitive dust sources may be separated into two broad categories: process sources (e.g. rock crushing) and open dust sources (e.g. material handling/storage).

**Infilling:** development on vacant lots or underdeveloped lots within a built-up area.

**Intensification:** means the development of a property, site or area at a higher density than currently exists through:

- a) redevelopment, including the reuse of brownfield sites;
- b) the development of vacant and/or underutilized lots within previously developed areas;
- c) infill development; and
- d) the expansion or conversion of existing buildings (PPS).

**Land Used for Waste Disposal Purposes:** the land comprising the *fill area*, where *landfilling* or dumping has occurred, and the land which is being used or is to be used for the leachate *buffer area* and/or the gas *buffer area*; the land may be on- or off-site.

**Landfilling:** the disposal of waste by deposit, under controlled conditions on land or on land covered by water and includes compaction of the waste into a cell and covering the waste with cover materials at regular intervals (Regulation 347).

**Major Facilities(y):** facilities which may require separation from *sensitive land uses*, including but not limited to airports, manufacturing uses, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, *waste management systems*, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities (PPS).

**Major Transit Station Area:** the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk (A Place to Grow).

**Minimum Distance Separation:** means formulae and guidelines developed by the Province, as amended from time to time, to separate uses so as to reduce incompatibility concerns about odour from livestock facilities (PPS).

**Minimum Separation Distance:** a recommended minimum distance within which *adverse effects* are highly likely to occur and incompatible development should not normally take place.

**Municipal Comprehensive Review:** means new official plan, or an official plan amendment, initiated by an upper- or single-tier municipality under section 26 of the *Planning Act* that comprehensively applies the policies and schedules of A Place to Grow.

**Planning Authorities:** means the various agencies that make decisions on land use planning. This includes the entity or body with planning approval authority under the *Planning Act* (e.g. The Minister of Municipal Affairs and Housing, the council of a municipality, a local board, and a planning board). Note that decisions of the Local Planning Appeal Tribunal when determining appeals of decisions made by a planning authority under the *Planning Act* must also be consistent with that Act and the PPS.

**Point of Reception:** means any location on a noise *sensitive land use* where noise from a stationary source is received. Noise *sensitive land uses* may have one or more points of reception (NPC-300).

**Proponent:** means any person who makes an application under the *Planning Act*. For the purpose of this Guideline, this includes developers of *sensitive land uses* and developers of *major facilities*. Proponent can also mean a person who makes an application for approvals under other legislation, such as the *Environmental Assessment Act*.

**Sensitive Land Uses:** buildings, *amenity areas* or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more *adverse effects* from *contaminant discharges* generated by a nearby *major facility*. *Sensitive land uses* may be a part of the natural or built environment. Examples may

include, but are not limited to: residences, day care centres, and educational and health facilities (PPS).

**Separation Distance:** the distance between a *sensitive land use* and a *major facility*. This distance is usually measured from property line to property line, except as described in **Section 2.4**.

**Settlement Area:** means urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets) that are:

- a) built-up areas where development is concentrated and which have a mix of land uses; and
- b) lands which have been designated in an official plan for development over the long-term planning horizon (A Place to Grow).

**Vectors and Vermin:** disease-carrying organisms, insects, rodents, birds (especially gulls) and other harmful creatures (e.g., bears).

**Warning Clause:** Means a notification of or obligation to notify a potential purchaser or tenant of a potential annoyance due to an existing source of environmental noise. When circumstances warrant, agreements that are registered on title to the lands in question should incorporate provisions for using *warning clauses*. *Warning clauses* would be included in agreements of Offers of Purchase and Sale, lease/rental agreements and condominium declarations (NPC-300, with modifications).

**Waste Disposal Site:** means,

- a) any land upon, into, in or through which, or building or structure in which, waste is deposited, disposed of, handled, stored, transferred, treated or processed, and
- b) any operation carried out or machinery or equipment used in connection with the depositing, disposal, handling, storage, transfer, treatment or processing referred to in clause (a) (EPA).

**Waste Management Systems:** means sites and facilities to accommodate solid waste from one or more municipalities and includes recycling facilities, transfer stations, processing sites and disposal sites (PPS).

## APPENDIX B

### 2. Areas of Influence and Minimum Separation Distances (con't)

AOIs and MSDs for classes of major facilities

Class	Description of Major Facility	AOI	Examples of Major Facility	MSD
Class 1	Operations with known smaller adverse effects.	500 m	Food Manufacturing; Sewage Lagoons; Various EASR activities	200 m
Class 2	Operations with moderate effects. May include some outdoor operations.	750 m	Manufacturing Metal and Glass Parts	300 m
Class 3	Operations with moderate to significant adverse effects that may be difficult to mitigate. May include larger outdoor operations	1,000 m	Aggregate Operations (in relation to sensitive land use proposals only)	500 m
Class 4	Operations with significant adverse effects that may be difficult to mitigate. May include larger outdoor operations.	1,500 m	Meat and meat product processes (slaughterhouses and rendering)	500 m
Class 5	Operations with the most significant adverse effects that may be difficult to mitigate. May include larger outdoor operations	2,000 m	Chemical product manufacturing	500 m

**Table 1 – Area of influence and minimum separation distance for select major facilities.**

Select Major Facility	Description of Major Facility	AOI & Class	Minimum Separation Distance
Aggregate Operations	Aggregate extraction, Resource extraction, Other mineral quarries	1,000m Class 3*	500m*
Asphalt Manufacturing	Asphalt mixture and block manufacturing, Asphalt shingle and coating manufacturing	1,000m Class 3	300m
Cannabis production and processing facilities	Indoor cannabis production facilities that are located in a <i>settlement area</i> on lands that are zoned for industrial uses; and all cannabis processing facilities	2,000m Class 5	500m
Cement Manufacturing	Cement manufacturing and distribution	2,000m Class 5	500m
Chemical Product Manufacturing	Inorganic chemical manufacturing, Household cleaning and miscellaneous product manufacturing	2,000m Class 5	500m
Composting Facilities	Composting facilities	1,500m Class 4	500m
Concrete (Ready-mix)	Ready-mix and concrete product manufacturing facilities	250m Class 1	100m
Industrial Anaerobic Digesters	Anaerobic digesters that are not agricultural uses	1000 m Class 3	500m
Food Manufacturing	General industrial manufacturing of food products	500m Class 1	200m
Industrial Food Mills (non-agricultural)	Wet corn or flour mill	750m Class 2	300m
Landfills and Dumps (see <b>Section 7.2</b> of <b>Appendix E</b> )	Operating and non-operating sites	case-by-case Class 5	500m

Select Major Facility	Description of Major Facility	AOI & Class	Minimum Separation Distance
Meat and Meat Product Processes	Slaughterhouses and rendering facilities, Meat by-product processing, Production of foods using fats or oils, Cooking oil production	1,500m Class 4	500m
Metal and Glass Parts Manufacturing	Manufacturing steel parts, Foundries, Metal stamping, Manufacturing glass or fiber glass auto parts	600m Class 2	300m
Oil Refinery	Refinery for oil and oil products	2,000m Class 5	500m
Painting/Coating	Application of paint, solvent, lacquer or other coating/ Includes paint spray booths, electroplating, tanneries	400m Class 1	100m
Paper Manufacturing	Paper, newsprint and paperboard mills	1,000m Class 3	400m
Plastics Manufacturing	Manufacturing plastic or rubber products	500m Class 1	100m
Recycling Facilities – General	The sorting, processing, storage and transfer of recycled material (except auto parts)	900m Class 3	200m
Recycling Facilities – End-of-Life Vehicles	The sorting, processing, storage and transfer of motor vehicles	2,000m Class 5	300m
Scrap Yards	Scrap metal recyclers, auto recyclers, auto wreckers	1,500m Class 4	300m
Steel Mills	Iron and steel manufacturing	2,000m Class 5	500m
Waste Transfer Stations	The sorting, processing and transfer of waste	400m Class 1	100m
Sewage Lagoons	Sewage treatment lagoons	500m Class 1	200m



APPENDIX C

