

# WESTON CONSULTING

planning + urban design

Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON  
M7A 2J3

December 4, 2022  
File 10655

**RE: Planning Opinion Letter – Greenbelt Removal  
The Ministry of Municipal Affairs and Housing  
474446 Dufferin County Rd 11, Township of Amaranth**

Weston Consulting has been retained by the owners of the property municipally addressed as 474446 Dufferin County Rd 11, Amaranth (herein referred to as the “subject lands”). We have been monitoring the proposed changes to the Greenbelt Removal (*Ontario Regulation 140/02*). We understand that the Ministry of Municipal Affairs and Housing (MMAH) is seeking feedback on the proposed removal and redesignation of 15 select areas from the Greenbelt Area (ERO 019-6216, ERO 019-6217 ERO 019-6218). We are in agreement with this proposal and the ultimate objective of removing the regulatory burden from lands that could be suitable for residential development in the near term. In addition to the lands the province is currently considering, this letter provides comments as it relates to the subject properties and why they warrant consideration from the MMAH for residential development in the near future.

## **Description of the Subject Property**

The subject lands are municipally known as 474446 Dufferin County Road 11 and is comprised of two parcels of land. The parcel fronting Dufferin County Road 11 has an approximate area of 10.74 hectares (26.54 acres) with an approximate frontage of 265.56 metres on Dufferin County Road 11. The second parcel fronts the Dufferin County CP Rail Trail with an approximate frontage of 606.63 metres and has an approximate area of 29.49 hectares (72.89 acres).

The subject lands have split land use designations, with a portion of land designated *Environmental Protection* and the other portion designated *Rural* by The Township of Amaranth Official Plan. The *Environmental Protection* designation permits existing agricultural operations and expansions to existing agricultural buildings, legally existing uses, passive recreation uses, forest and wildlife management, and more. The *Rural* designation permits: agricultural uses that include the use of lands, buildings or structures for growing crops; single-detached residential dwellings; small-scale public uses such as schools, churches, and cemeteries; and more. The County is currently reviewing the designation of “Woodlands” and these boundaries are subject to updates.

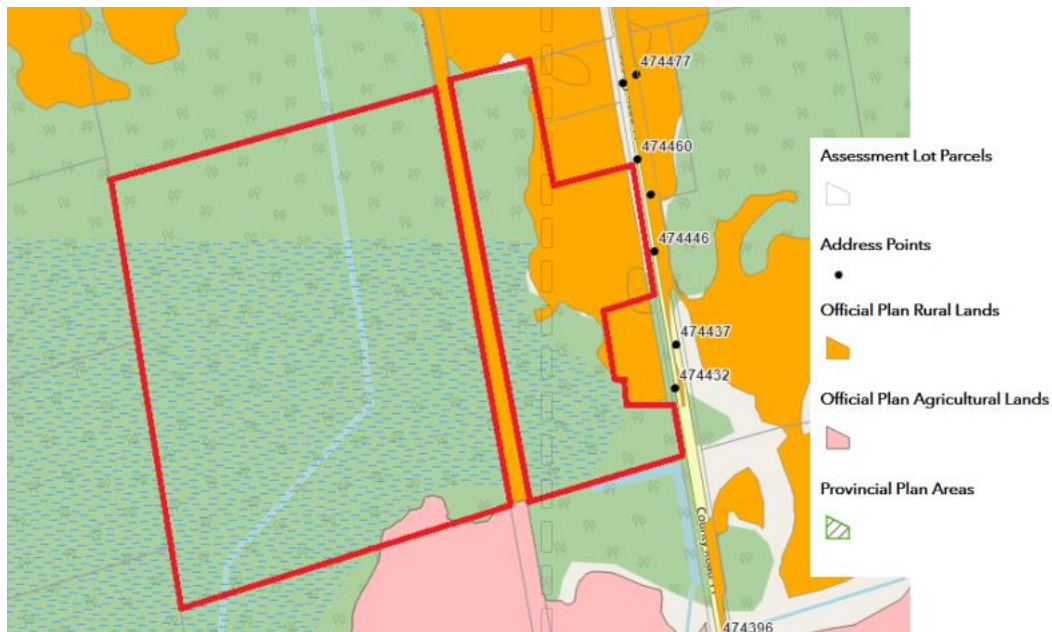


Figure 1: Dufferin County Official Plan – Schedule C – Agricultural and Rural Areas

The Township of Amaranth Zoning By-law 2-2009 designates a portion of the subject lands as *Environmental Protection* and the other portion *Rural*. The *Environmental Protection* Zone permits: existing agricultural use; conservation; passive recreation; resource management and existing buildings and structures. The *Rural* Zone permits rural and residential uses including: agricultural use; a greenhouse; home industry; a single-detached dwelling; and more.

In addition, the subject lands are within the Grand River Conservation Authority (GRCA) regulated area as shown in the mapping below.

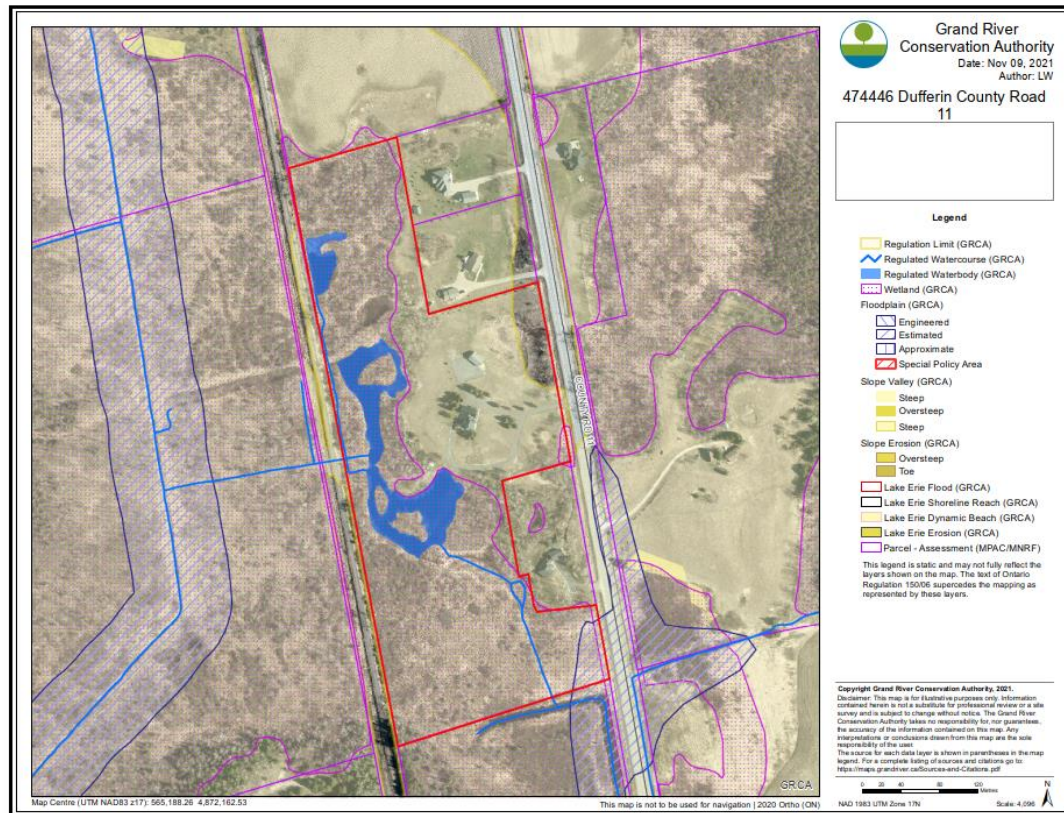


Figure 2: Grand River Conservation Authority

## Background

Weston Consulting and the registered owners of the subject properties understand that the Ministry of Municipal Affairs and Housing is seeking feedback on proposed changes to remove lands from the Greenbelt (Ontario Regulation 140/02) and the Oak Ridges Moraine Conservation Plan (O. Reg.140/02) that would:

- Remove lands from the Greenbelt Area that could be suitable for residential development in the near term
- Add lands in the Paris Galt Moraine to the Greenbelt Area, designated as Protected Countryside with a Natural Heritage System
- Redesignate lands in the Oak Ridges Moraine Conservation Plan Area that could be suitable for residential development in the near term

We understand that landowners will be expected to develop detailed plans to build housing and move forward with the project quickly. It is the government's expectation that construction of new homes will begin on these lands by no later than 2025, and that significant progress on approvals and implementation be achieved by the end of 2023. This letter is to provide comments requesting that the lands be removed from the Greenbelt to support residential development in the near future, as the character of the area would be suitable and can provide adequate access to services. We have noted that landowners will be expected to develop detailed plans to build housing and move forward with the project quickly.

### **Removal of Subject Lands from the Greenbelt**

We understand that the lands are not included within the Greenbelt, however, they are within the Grand River Conservation Authority regulated area and are located east of wetland areas. The land owners are prepared to submit an Ecological Site Assessment conducted by a qualified professional to ensure that there are no negative impacts on heritage features upon development.

It is our opinion that the subject lands are suitable for residential development. The current Official Plan designation, as mentioned above, only approximately 10-20% of the subject lands are designated *Rural*. We request that the rest of the subject lands be redesignated to permit residential uses to make efficient use of the underutilized area.

### **Summary**

Based on the planning analysis conducted and comments provided above, we ask that the following summarized points be considered:

- Subject lands are located within the Grand River Conservation Authority regulated area with wetlands located west of the subject lands.
- The land owners are prepared to submit an Ecological Site Assessment conducted by a qualified professional to ensure that there are no negative impacts on heritage features.
- The current Official Plan designation, as mentioned above, only approximately 10-20% of the subject lands are designated *Rural*. We request that the rest of the subject lands be redesignated to permit residential uses to make efficient use of the underutilized area.

In conclusion, it is our opinion that for the reasons mentioned above, the best use will be residential which will be consistent to the surrounding residential lands.

Thank you for the opportunity to share our comments. We are open to future discussions regarding this matter. If you have any questions, please contact Katie Pandey at ext. 335.

Yours truly,

**Weston Consulting**

Per:

A handwritten signature in black ink that reads "K. Pandey". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Katie Pandey, MAES, MCIP, RPP  
Associate