

November 30, 2022

**The Honorable Mr. Steve Clark**

Minister of Municipal Affairs and Housing  
777 Bay Street, Toronto Ontario  
M5G 2E5

**[greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)**

Re: Greenbelt Consultation

More Homes Built Faster

Lands Proposed for Inclusion into the Greenbelt

Ms. Nanxi Pang

5285 Trafalgar Road, Town of Erin, County of Wellington

**Dear Minister Clark:**

We act on behalf of Ms. Nanxi Pang, who is the owner of 80.14 acres of land with the municipal address of 5285 Trafalgar Road, Town of Erin, County of Wellington.

The subject property is now proposed to be included in the Greenbelt and our Client wishes to advise that they are opposed to this inclusion. From a technical standpoint, we could find nothing in the Greenbelt Inclusions that would support the province's decision.

To assist in describing our clients request we have prepared 4 illustrations as follows:

Attachment 1: Aerial View of Subject Site.

Attachment 2: Site Context Air Photo.

Attachment 3: Erin Land Use Map, County of Wellington.

Attachment 4: Proposed Amendment to the Greenbelt Boundary.

The subject property, consisting of 80.14 acres, is situated on the east side of Trafalgar Road and south of Sideroad 10. More precisely, it is located at the southeast corner of Trafalgar Road and Sideroad 10. The property contains an environmental feature to the west and a woodland feature to the southeast. See *Attachment 1: Aerial View of Subject Property* for reference.

The property is surrounded by similar type properties to the north, south, east and the west, which primarily consist of agricultural uses. See *Attachment 2: Context Air Photo* for reference.

The subject property and the majority of the surrounding lands are designated as “Secondary Agricultural” areas under Schedule A2 of the County of Wellington Official Plan. This designation is intended for lands that have certain agricultural capabilities but are not considered prime agricultural areas as they do not contain Class 1,2 or 3 soils or specialty crop lands. As such, the subject property is non-prime agricultural land. See *Attachment 3: Erin Land Use Map, County of Wellington* for reference.

While prime agricultural lands are rigorously protected for farming operations, secondary agricultural areas like the subject property are permitted to operate a broader range of residential, commercial, industrial, and institutional uses as long as these do not hinder existing agricultural operations and are in keeping with the rural character of the area. Secondary Agricultural areas also permit limited lot creation for the above noted non-agricultural uses in order to contribute to growth within the rural portions of the Wellington County. These are policies stipulated by the Wellington County Official Plan.

It is also important to note that the environmental features existing on site are limited in size and are already protected by the “Greenlands” and “Core Greenlands” land use designations. See *Attachment 3: Erin Land Use Map, County of Wellington* for reference. As such, it is our opinion that the proposed inclusion of the subject property into the Greenbelt boundary is inappropriate and would prevent the efficient utilization of the site to its highest and best use.

Based on this contextual and planning policy review of the subject property we are of the opinion that the proposed inclusion of the property within the Greenbelt Plan would not accurately capture the true area of the Greenbelt. Most of the subject property does not contain Greenbelt-like environmental features. *See Attachment 4: Proposed Amendment to the Greenbelt Boundary* for reference.

Our client would like to express their objection of the Greenbelt Inclusion in their property as this needs to be more carefully scrutinized as part of this process. Our client is confident that a reassessment of the Greenbelt expansion would result in excluding their property from the boundary expansion.

We look forward to our continued involvement in this important undertaking. If you have any questions regarding this submission, please do reach out to us.

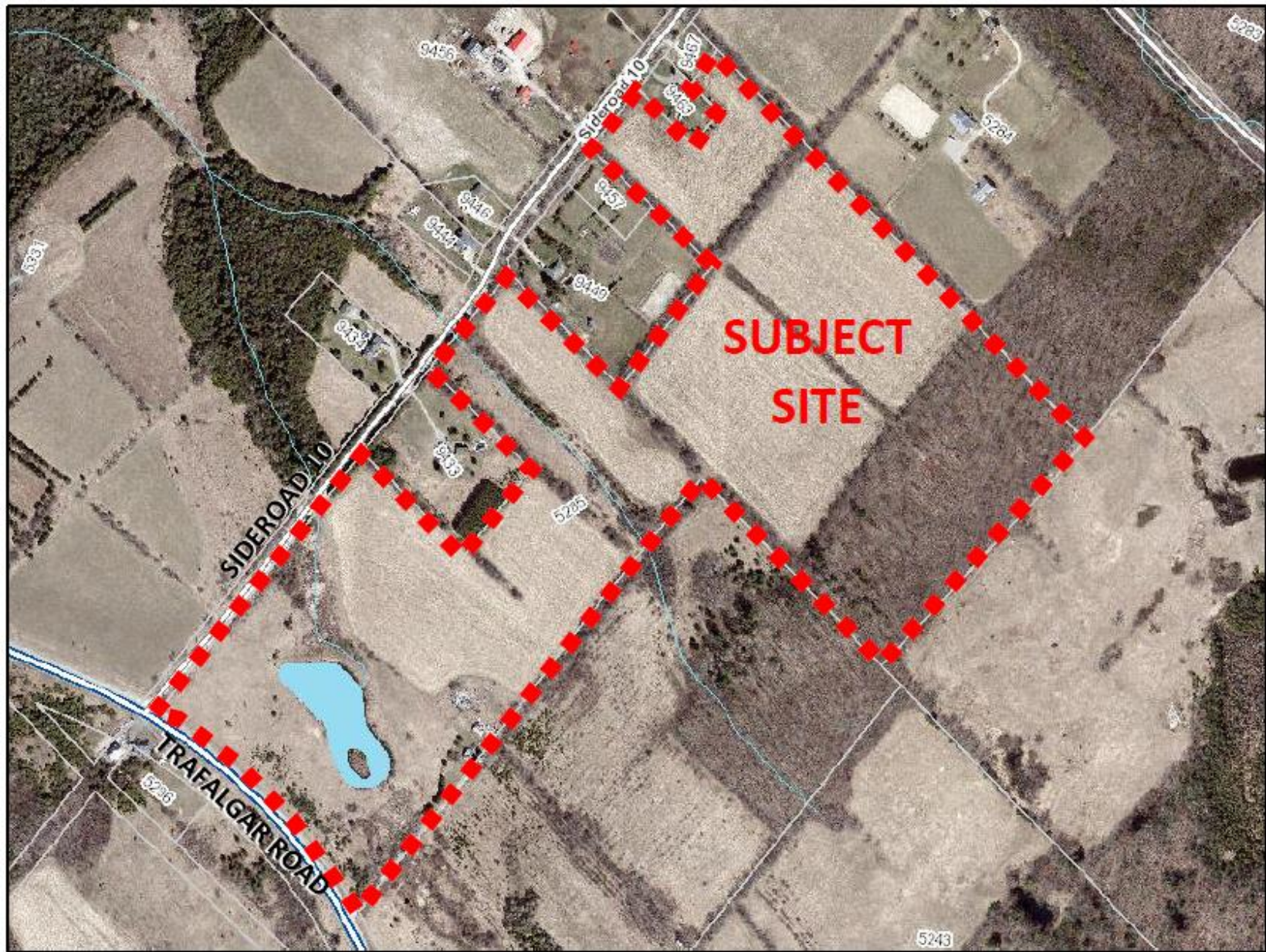
Yours truly,



**Claudio Brutto, MCIP, RPP**  
President, Brutto Planning Consultant Ltd.

cc. Client: Ms. Nanxi Pang



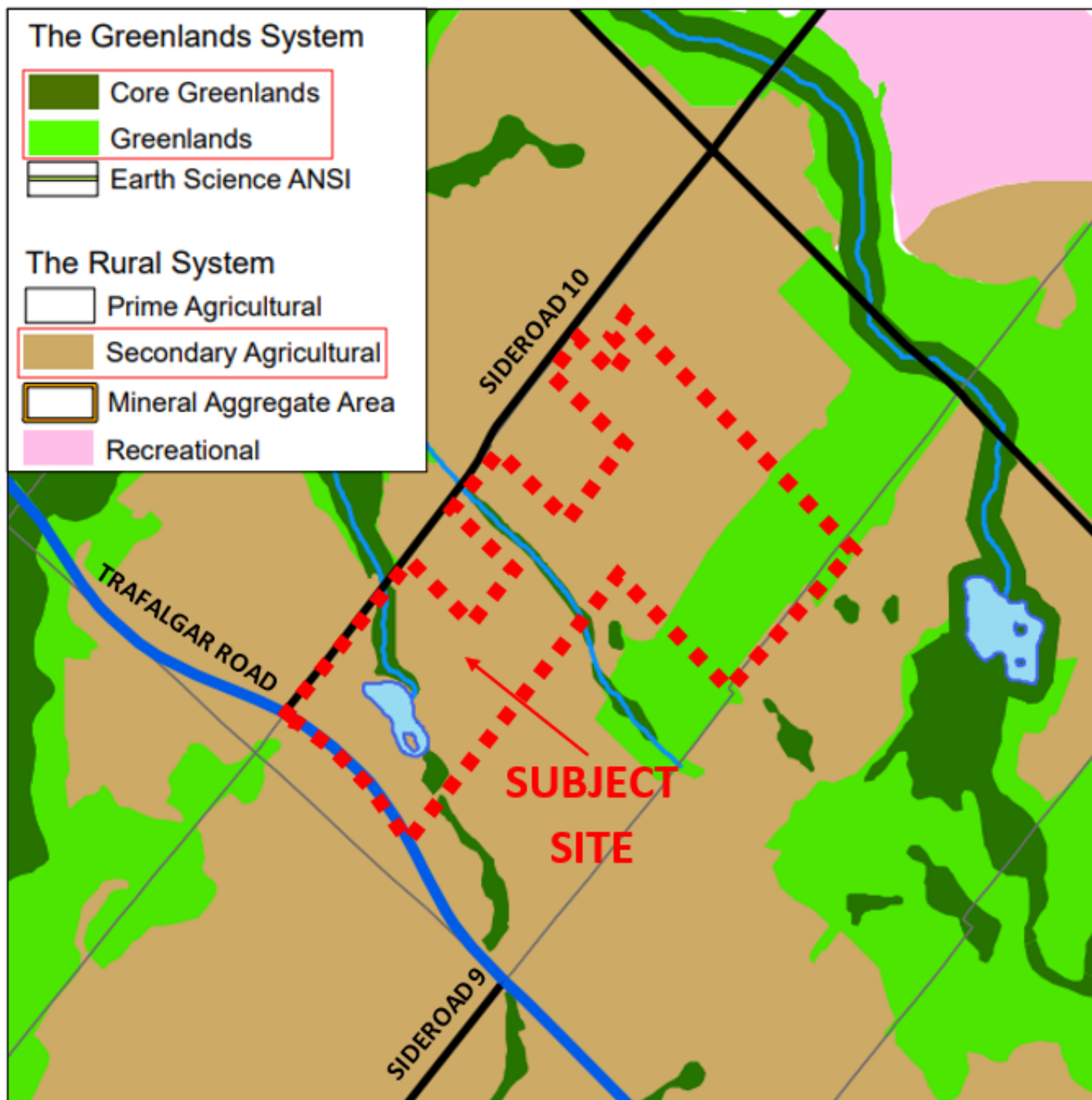


Attachment 1: Aerial View of Subject Site.



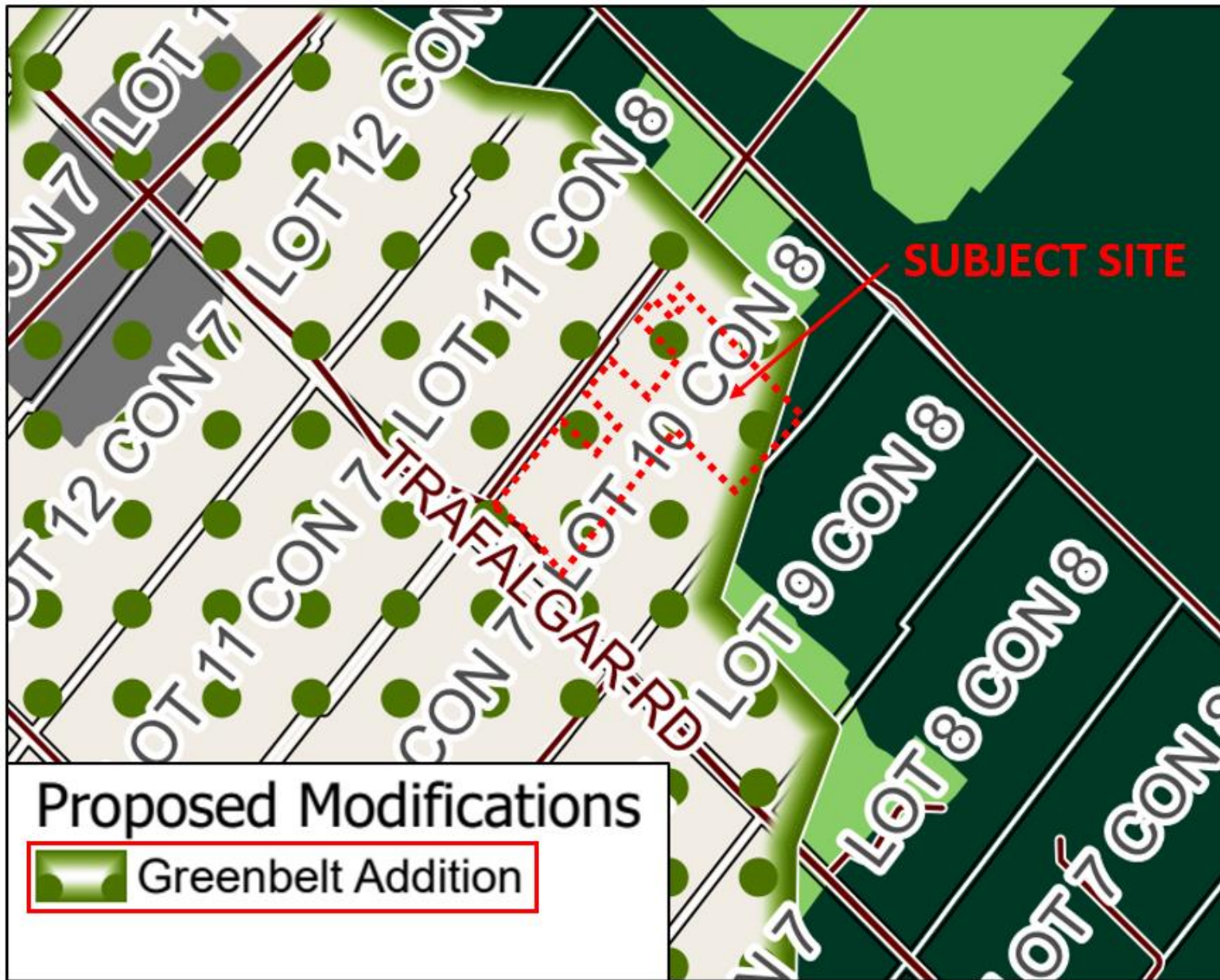


Attachment 2: Site Context Air Photo.



Attachment 3: Erin Land Use Map, County of Wellington.





Attachment 4: Proposed Amendment to the Greenbelt Boundary.