

## Denise Holmes, AMCT

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**From:** Garry Hunter [ghunter@hunter-gis.com]  
**Sent:** Tuesday, March 16, 2010 7:06 PM  
**To:** Denise Holmes, Melancthon Township; Debbie Fawcett  
**Cc:** NDACT; Dale Rutledge; Karren Wallace; Rob Uffen; Nanci Malek; Dennis Sanford; Carl Cosack  
**Subject:** Preliminary Comments Melancthon Rough Draft Official Plan (no Schedules)

I understand that the Township asked for comments before Mar 12 on the Draft Master Plan which became available on about Mar 5 on the Township web site.

However on closer examination it is apparent that although comprehensive, this document is a 'cut and paste version' assembled from diverse sources and has not been tightly edited to remove conflicts between individual policies or fully adapted to specific Melancthon conditions. Most significantly the all important Schedules have not been included for review. This incomplete plan appears to have been prematurely released.

It is difficult to provide provide detailed comments without access to the full document. However I do provide the following preliminary overview comments to try to constructively advance the policy debate. Individual members of NDACT may have different concerns which they no doubt will express.

Melancthon has World Biosphere resources and provincially significant heritage, water, wind, agriculture and aggregate resources. The Draft Official Plan must find an appropriate balance between potentially conflicting land uses.

### AGGREGATE FRIENDLY DRAFT

The vision of this plan may be described as 'aggregate friendly' and mainly focussed on processing of Aggregate Licences. For example **S 2.4(c) permits the extraction of mineral aggregates as an interim use in all prime agricultural areas (Land Capability Classes 1, 2 and 3) throughout all of the Township.**

**The notion that Aggregate extraction up to 300 ft or more below the ground surface is an interim use that will not cause irreversible impacts on Agriculture and Water Resources is far fetched and far from proven.**

**Sec 2.5 (a) lists as an objective the protection as much as realistically possible of the Townships known or potential existing mineral aggregate resources to supply mineral aggregate resource needs.**

The Province of Ontario has requested that specific bedrock aggregate potential areas be designated in the Township of Melancthon. The province has also mapped Amabel formation bedrock resources in adjacent Grey and Simcoe Counties to the north and in Mulmur Township to the east. There are literally billions of tonnes of resource with less than 25 ft of overburden designated in the Provincial ARIP mapping in the County Road 124 corridor from Hornings Mills to Duntroon.

There are more billions of tonnes of accessible Amabel resource designated adjacent to the proposed rail corridor from Shelburne to Owen Sound and in Halton Region.

The Provincial ARIP mapping did not designate Guelph bedrock potential in Grey County because the Guelph resource potential in Melancthon Township was considered sufficient. The designated Guelph bedrock resource areas in Melancthon Township are also underlain by the Amabel bedrock at shallow depths in the east with depth increasing to the west.

**Why would Council want to encourage even more aggregate applications in deeper**

overburden outside the provincially designated areas?

**Have adjacent municipalities incorporated the provincial bedrock aggregate designations into their own Official Plans as Melancthon is proposing ? If not, why not?**

Notice for quarry applications, considering the depth of the resource and the extent of unmitigated groundwater interference should be increased to 4,000 m from 400 m.

A minimum 500 m 'nuisance' buffer of applicant owned land or negotiated easement should be required around quarry cells in excess of 60 ft deep and 100 acres in extent.

## AGRICULTURE UNFRIENDLY DRAFT

**This draft plan treats agriculture as second or third class. Despite NDACT's prior efforts, there is no recognition of the special status of the Potato and Vegetable growing lands and major agriculture infrastructure and technology investments within the Township and the importance of this industry. This draft does not represent good planning and does not provide an appropriate balance.**

**This draft plan is oblivious to the fact that the Honeywood Foodbelt centered in Melancthon produced and delivered in 2008 the equivalent of 25 lbs of fresh potatoes to each of the 6,000,000 residents of the Greater Toronto Area.** In addition, this Foodbelt area is producing increasing quantities of other specialty crops including rhubarb, broccoli, brussels sprouts, cabbage, peas, beans and strawberries. Not all specialty vegetable crops may be grown on organic soils.

Agricultural and AgriFood Canada (2007) reported that on average each 12 acres of potatoes grown in Canada generates one employment position. Therefore it may be estimated that **the Honeywood Foodbelt creates overall employment for about 500 persons**, many of these in Melancthon and adjacent municipalities. Food production is a significant local industry with many economic spinoffs.

## PROVINCIAL POLICY STATEMENT NON CONFORMITY

**The Plan objectives do not conform to the Provincial Policy Statement (2005). The PPS (2005) contains clear provincial policy direction that aggregate extractive uses are to be preferentially directed to lower capability agricultural lands.** On this basis the Honeywood silt loam soils north of 15th Side road in the Old Survey would be one of the last lands on the Amabel Formation north of Highway 401 to Manitoulin Island to be developed for extraction.

The plan should recognize that **perpetual pumping, dewatering and perimeter recirculation and recharge is not a sustainable long term strategy for agriculture or even lake rehabilitation in areas with steep natural water table gradients.** Steep gradients will result in severe upgradient drawdown interference impacts on the inevitable abandonment of the quarry. These site selection tests should be undertaken prior to a site specific licence application being submitted.

## WIND RESOURCES

The plan does not articulate a Township position on development of wind resources. Melancthon farmers (but not necessarily rural residents) appear to have accepted that wind energy development is compatible with agriculture. The Province appears to be mandating potential wind energy development as a primary policy wherever there is a 500 m buffer from residential use areas with high wind energy potential such as Melancthon.

**This Plan does not address the compatibility of wind development and bedrock aggregate potential. Is wind development an interim use which protects the aggregate resource or is it sterilizing?**

**Are quarries a threat to nearby towers and wind flow stability?**

**Do wind development applications take priority?**

## **WATER**

**Melancthon's hydrogeological function is similar to that of the Oak Ridges Moraine with high recharge and aquifer storage potential to sustain aquifer flow and supply to groundwater fed streams.**

The Plan does not recognize that the Noisy and Pine River headwaters contribute about 30 % of the base or summer flow to the lower Nottawasaga River to Wasaga Beach. This base flow is essential for ecology, agricultural irrigation, fisheries, waste assimilation, recreation and other riparian uses.

Due to robust groundwater discharge and extensive forest cover, the Pine River arguably supports the highest quality coldwater fisheries habitats of the four major Nottawasaga Escarpment tributaries.

Salmonid recruitment from the Pine River not only supports the local angling events such as the Wasaga Beach Rainbow Derby but may also play a significant role in supporting the sport fishery in Georgian Bay.

Water from Melancthon also contributes recharge to the deep regional Alliston Aquifer in Simcoe County and to the provincially significant Guelph / Amabel Aquifer which extends far to the southwest to Lake Erie. **Most importantly the local Guelph / Amabel aquifers are the only high quality drinking source water supply for all Melancthon residents.**

The Plan does not appear to have incorporated the Town of Shelburne Production Well Source Water Protection Zone. This protection zone is mainly in Melancthon.

There are no policies in the plan for protection of sensitive brook trout habitats and existing fish hatchery uses.

There is no environmental recognition of karst including caves, sinkholes, collapse basins and trenches, sinking and underground streams and stream resurgence areas and the continuity of these features which often do not conform to traditional Conservation Authority water course definitions.

The words 'fish' and 'karst' seldom appear in the draft except when excerpted from other documents.

## **NIAGARA ESCARPMENT UNESCO WORLD BIOSPHERE RESERVE**

The Plan is silent on the Niagara Escarpment UNESCO World Biosphere Reserve and the important natural and cultural heritage resources of the Niagara Escarpment and the re-entrant valleys including the Noisy, Pine and the Boyne River headwaters and the historic significance of Hornings Mills and the River Road.

County Road No 124 is a linear cultural heritage corridor from Masonville to Maple Valley which together with side roads provides access to this world significant Niagara Escarpment resource.

The wall to wall quarries and aggregate processing areas contemplated by this draft plan on County Road 124 are not compatible with tourism and recreation uses.

## **TRANSPORTATION**

3/18/2010

The Plan anticipates reconstruction of the former Streetsville to Owen Sound Railway. However it does not anticipate the potential need for a related industrial area in continuation of the aggregate friendly theme of the current draft. A Highway 10 / Railway industrial area might include aggregate processing (with conveyor access from quarries) to avoid running aggregate trains across the Township. This would require establishment of a Highway 10 Bypass north of Shelburne. Quarry haul routes should be on provincial highways not County or Township Roads.

There may be a long term requirement for widening County Road 124 to about 50 m versus the existing right of way width of 30 m. The Plan should recognize the requirement for specific County land takings in future development applications.

## SEVERANCES

Policies for granting multiple severances are not consistent with the proposed Aggregate Resource Protection Designations.

The Draft Official Plan document is Melancthon's submission to the Province. The Township should not presume what the Province may or may not approve but state its own position and those of the ratepayers.

Melancthon ratepayers should recognize that the regulations which will emanate from this proposed draft plan version are much more onerous than those of past Official Plans.

Yours truly,

**Garry T. Hunter M.A.Sc. P.Eng.**  
President

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**Denise Holmes, AMCT**

**From:** Margaret Walton [mwalton@planscape.ca]  
**Sent:** Sunday, March 14, 2010 2:47 PM  
**To:** Jerry Jorden  
**Subject:** Official Plan

Jerry

I was away for most of February but when I returned I noted that you had released the draft Official Plan for Melancthon. Congratulations! I just checked the web site and determined that I should have had comments in on the OP by last Friday March 12. I certainly do have comments. Can I submit them now or what process should we follow. I have not had a chance to confirm with my clients but we have been working towards a submission asking for a specialty crop designation on an area of Melancthon. What is the best way to get this in front of Council?

Margaret

Margaret Walton, M.PI, MCIP, RPP      mwalton@planscape.ca  
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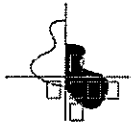
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PLANSCAPE

BUILDING COMMUNITY THROUGH PLANNING



MARGARET WALTON  
MPL MCIP RPP

RICHARD HUNTER  
MCIP RPP

March 12, 2010

Denise Holmes CAO, Clerk/Treasurer  
Township of Melancthon  
157101 Highway 10  
R. R. # 6  
Shelburne, ON L0N 1S9

Dear Ms Holmes:

Reference: Proposed Official Plan

As you are aware, I am the professional planner retained by the group Conserve Our Rural Environment (CORE) and the North Dufferin Agricultural and Community Taskforce (NDACT). I am writing regarding the draft Official Plan being considered at the Council meeting on March 18<sup>th</sup>, 2010.

My clients are interested in participating in the review of the draft plan and will be making submissions requesting the designation of a specialty crop area in the Township They will also be pursuing inclusion of policies addressing the designation of locally significant agricultural lands in the Official Plan. These submissions will be forthcoming shortly, once the Official Plan maps are available.

By this letter I am requesting notice of any and all meetings and decisions regarding the Official Plan.

Thank you for your consideration.

Yours truly,

PLANSCAPE

Margaret Walton, M.Pl. MCIP RPP  
Partner

c.c. Jerry Jorden  
Jane Pepino  
Robert Green  
Norm Wolfson  
David Vander Zaag

**Denise Holmes, AMCT**

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**From:** Karren Wallace [karrenwallace@sympatico.ca]  
**Sent:** Tuesday, March 16, 2010 8:38 PM  
**To:** Debbie Fawcett; Denise Holmes, Melancthon Township  
**Subject:** RE: COMMENTS OP

Mayor and Council;

I would like to be able to provide comments on the draft of the Official Plan, however there are no schedules to the draft which makes it impossible.

Please reserve my right to make comments when the schedules are released.

Thanks.

Karren Wallace  
R.R.#6  
Shelburne, ON  
L0N 1S9

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March 11, 2010

Ms. Denise Holmes, CAO/Clerk-Treasurer  
Township of Melancthon  
157101 Highway 10, RR # 6  
Shelburne, ON  
L0N 1S9

Dear Ms. Holmes:

**Re: Revised Draft of Official Plan  
Our File No. 3667**

We have downloaded the updated Draft Official Plan for the Township of Melancthon from the internet and are in the process of reviewing the document to provide comments to the Municipality on behalf of our client, The Highlands Companies. We note that Council has requested written comments on the Draft Official Plan by March 12, 2010 and is intending on hearing depositions related to the draft document on March 18, 2010. These dates are of some concern to us since the Draft Official Plan text has been prepared but there are no maps to review how the policies have been applied. In the absence of maps that enable ourselves and other members of the public to determine what policies apply to what lands, it is difficult to provide the Municipality with meaningful input into this new draft of the document.

Once the entire draft Official Plan is available for review we will prepare comments for consideration by Council.

Yours truly,  
**MERIDIAN PLANNING CONSULTANTS INC.**

A handwritten signature in black ink, appearing to read 'Jim Dymont', is written over a horizontal line.

Jim Dymont, BES, MCIP, RPP

JD/jrw

C. Jerry Jorden  
John Lowndes, Highlands Companies  
Allan Libel, Goodmans

Questions for Mr. G.W. Jordan to answer in writing

1. Mr.G. W. Jordan, is the 2010 Official Plan for Melancthon the vision you have for Melancthon Township to the year 2029?
2. Who helped you create and modify both this draft and the 2004 Draft Official Melancthon Plan?
3. Why were OS2 areas removed in the Draft 2004 Official Plan, especially on the west side of highway 124, where the proposed Highlands Quarry is to be located?
4. Are there any differences between the Draft 2004 Official Plan and Draft 2010 Official Plan in regard to Open Space Conservation designated lands?
5. Mr. G.W. Jordan, have you coloured the maps for the Draft 2010 Official Plan?
6. Are you afraid the citizens will be upset to see 7,400 acres transformed from farming to a quarry?
7. When will the 2010 Official Plan maps be released for public viewing?
8. What changes have you made from the 2004 Draft Official Map to the 2010 Draft Official Map?
9. Do you consider it good planning to copy exactly the Bedrock Resources Map?
10. How many acres in total have you planned for mining on Layer F of the Draft Official 2010 map?
11. How much additional acreage is planned for future mining that is not shown on layer F?
12. Q. #8: In the 2010 Draft Official Plan, how are our water and agricultural lands protected?
13. What Mission Statement is stated in the Official Plan for Melancthon?
14. Why is mining rather than specialty crop the foundation for our Official Plan?
15. It is the recommendation by the Ontario Federation of Agriculture to protect Honeywood Soils under the Specialty Crop Designation. Why has the OFA recommendation been omitted from the Draft 2010 Official Melancthon plan?
16. Mayor Debbie Fawcett would you please ask our County Forester, Caroline Match why she refused to include a soil analysis for the forested areas of Melancthon, and yet she included an aggregate analysis?
17. Mr. G.W. Jordan, are you aware that clear cutting of our forests and fence-rows will result in a lack of wildlife corridors and soil erosion? What protection for clear-cutting is in our Draft Official Melancthon plan?
18. Mr. G.W. Jordan, is a LEAR study part of the new Draft Official 2010 plan?
19. Have you taken any actions to implement a LEAR study for Melancthon, and include it in the Draft Official Plan?
20. Without PPS specialty crop guidelines, isn't Highlands application premature?
21. Mr. Jordan, what protection does the Draft Official give to our Honeywood sandy loam soils?
22. Why were your letters removed from the Melancthon Township website?
23. When are the Draft 1010 Official Plan maps going to be released for public view?
24. What was your rationale for isolating "environmental features" and "mineral aggregate resource area" in the Draft Official Plan 2010, and giving them their own layers?

25. : What is the total acreage involved in “mineral aggregate resource area” on Layer F of the Draft Official Plan map?
26. One ANSI area was removed in Melancthon. Where was this area? Who removed it?
27. What independent environmental studies have been done, and by whom to determine there are no species at risk, and there are no significant wetlands, or woodlots?
28. Is Melancthon Council prepared to compile a SARO-Species at risk list?
29. Why don't we have a local Stewardship Officer for Melancthon?
30. Is monitoring of our areas biodiversity included in your Official 2010 plan?
31. Before any further development takes place in Melancthon, what independent studies are you undertaking, to monitor water levels, flow rates, etc. to protect our head-waters resource?
32. If and when Highlands submits their application for a 2,400 sq ft mine, what additional technical reports are you going to have independently investigated?
33. Have all the risk factors to drinking water been identified in our Official Plan?
34. How are they to be mitigated when :
  - area wells go dry,
  - sewage water starts feeding our wells,
  - dust and noise from blasting,
  - biodiversity of plants and animals in this eco-region are unable to sustain life,
  - traffic bottlenecks,
  - train volume and noise,
  - depopulation,
  - mass exodus of landowners, thereby reducing tax base
  - health problems from the ill sighting of wind turbines,
  - and lack of restraints on number of wind turbines.
35. As our Melancthon Council, if the wishes of residents in the Municipality is to “Stop the Quarry”, then why does the Official Plan streamline the approvals process for mining?
36. Has Melancthon Council officially supported a wind turbine moratorium?
37. What planning policies are in the Draft Official 2010, regarding wind turbine locations, setbacks, and quantity?
38. Does the Official 2010 Melancthon Plan give a cap on the number of turbines within Melancthon?
39. What is the Native American stance on this Draft 2010 Official Plan?