



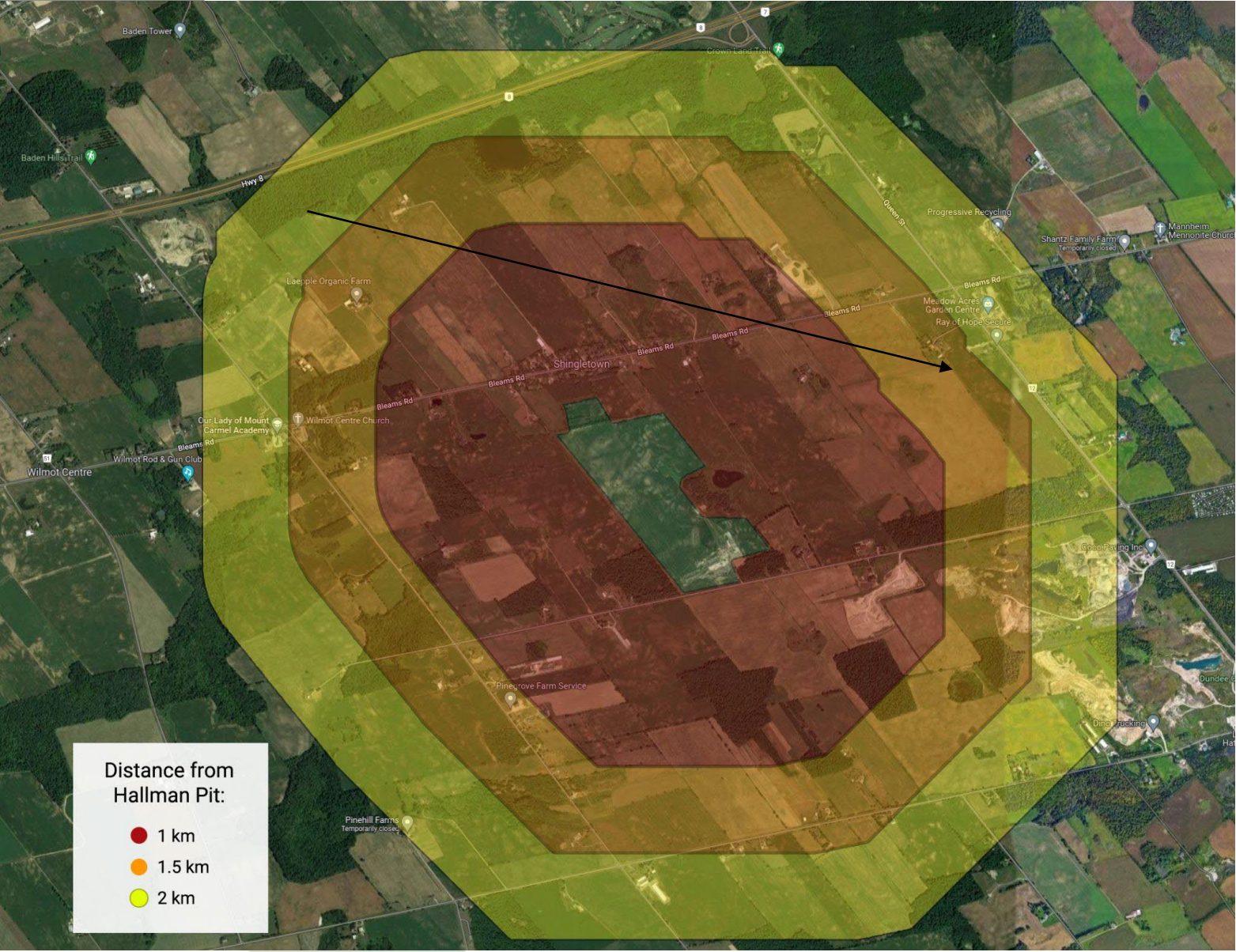
Zoning Amendment 11/19

Jackson Harvest Farms Ltd.

1894-1922 Witmer Road

LOCATION

APPENDIX B



APPLICATION & TECHNICAL STUDIES

APPENDIX B



Zoning Application submitted in December 2019 (Class A, Category 3 gravel pit to include concrete & asphalt recycling use).

- Transportation (PR) (*)
- Noise (PR) (*)
- Dust/Air Quality (PR) (*)
- Water (PR) (*)
- Agriculture Impact Assessment (PR) (*)
- Cumulative Impacts
- Natural Environment (CA) (*)
- Dust (PR) (*)

(PR) – peer review

(*) CSGW peer review

PLANNING REGIME

APPENDIX B



Zoning Application submitted in December 2019

Application must be reviewed against the following applicable planning documents:

- ❖ 2020 PPS – Must be reviewed against this document regardless of the approval date of an Official Plan and submission of application.
- ❖ Growth Plan for the Greater Golden Horseshoe - 2020.
- ❖ Region of Waterloo Official Plan – 2013 (Approved in 2015).
- ❖ Township of Wilmot Official Plan (Consolidated 2019).

(Aggregate Resources Act) & (Conservation Authority)

APPENDIX B PLANNING REVIEW – TOP DOWN



2020 PPS – Has not been appropriately reviewed by the applicant and staff.

MY PROFESSIONAL OPINION – Key PPS policies not addressed:

1.2.6 Land Use Compatibility

- 1.2.6.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

- 2.5.2.2 Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts.

2.5.3 Rehabilitation

- 2.5.3.1 Progressive and final rehabilitation shall be required to accommodate subsequent land uses, to promote land use compatibility, to recognize the interim nature of extraction, and to mitigate negative impacts to the extent possible. Final rehabilitation shall take surrounding land use and approved land use designations into consideration.

2.5.4 Extraction in Prime Agricultural Areas

- 2.5.4.1 In prime agricultural areas, on prime agricultural land, extraction of mineral aggregate resources is permitted as an interim use provided that the site will be rehabilitated back to an agricultural condition.

PLANNING REVIEW (con't) – Waterloo & Wilmot OPs

MY PROFESSIONAL OPINION – Key OP policies not properly addressed:

- Policies that permit aggregate extraction on Prime Agricultural Areas – subject to meeting several important tests.
 - 7.2.4.1 “....will only be permitted where the studies have been submitted to the satisfaction of the Township, Region and or any other public agency.”
 - 6.1.1 – compatibility & protection of natural features/functions, noise, dust, traffic, water, etc.
- Acknowledge new agg. uses are generally permitted in existing designations provided a specific number of significant tests are reviewed and evaluated.

TECHNICAL STUDIES

- Applicant's studies do not reference current policies, schedules
 - AIA references former Wilmot OP (2006).
 - No 2020 PPS review.
 - No 2020 Growth Plan review.
- CSGW – conducted several peer reviews of the supporting technical studies AND commissioned their own Environmental & Noise studies.
- Peer review and stand-alone studies contain questions that have not been addressed and provide additional technical data that must be considered within the applicant's supporting review – regardless of the peer reviews conducted by the Region/Township.

MAJOR POLICY GAPS

- Rehabilitation – AIA, Peer Reviews & staff acknowledge a significant issue with meeting the applicable policies of PPS.
- Compatibility between existing sensitive and agricultural uses and new pit operation. Very little technical information related to the recycling operation.
- Cumulative Impacts.
- Technical Reports have not been appropriately commissioned.

CONCLUSIONS

- The proposed **significant** and **long-term** land use has not been properly assessed in accordance with the PPS, Growth Plan, Regional & Local OPs.
 - Council does not have the appropriate information in front of them to make an informed decision.
 - Gaps in the policy analysis.
 - Application is **PREMATURE**.
- OPA? Remove Recycling Use?

FINAL THOUGHTS

PLANSCAPE INC.

Stefan Szczerbak, M.Sc, MCIP RPP
Partner

sszczerbak@planscape.ca

(705) 645-1556

