

PLANNING RATIONALE REPORT

**6615 CONCESSION 1
PUSLINCH, ON**

Prepared for:
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1 Introduction

Walker, Nott, Dragicevic Associates Limited (WND Associates) has been retained by Pamela and Philip O'Dell to assist in the land use planning approval process for a proposed development of a stand-alone warehouse facility and potential future expansion area to support the two legally-existing businesses operated at 6615 Concession 1, Rural Route #2 in the Township of Puslinch in Wellington County (the 'Subject Site'). The Subject Site is generally located in the southwestern area of the Town of Puslinch, south of Puslinch Lake and north of the Galt Sportsman's Club.

The existing businesses are Federally and Provincially regulated firearms businesses, operating under licenses from the Royal Canadian Mounted Police, the Chief Firearms Office of Ontario, and Natural Resources Canada. These businesses are known as O'Dell Engineering (established 1995, located on the Subject Site in 2003) and the Canadian Historical Arms Museum (established on the Subject Site in 2010).

1.1 Purpose

This report has been prepared to evaluate the Proposed Development against good land use planning principles and its consistency and/or conformity with all relevant Provincial and Municipal land use planning policies, regulations and guidelines. This report reviews and analyzes the following documents:

- The Provincial Policy Statement, 2014;
- The Growth Plan for the Greater Golden Horseshoe, 2017;
- The Draft Agricultural Land Base for the Greater Golden Horseshoe;
- The Draft Natural Heritage System for the Greater Golden Horseshoe;
- The County of Wellington Official Plan, as amended; and
- The Town of Puslinch Zoning By-law No. 19/85

This report specifically addresses the requirements provided within Section 4.6.2 of the County of Wellington Official Plan, which states that *Planning Reports* may be required to evaluate:

- (a) The need for the proposed use other than for aggregate operations, taking into account other available lands or buildings in the area;
- (b) The appropriateness of the proposed site for the use proposed taking into the consideration the size and shape of the land and its ability to accommodate the intensity of the use proposed;
- (c) The adequacy of the proposed method of servicing the site;
- (d) The compatibility of the proposed use with consideration given to the height, location, proximity, and spacing of buildings; the separation between various land uses; impacts from noise, odour, dust or other emissions from the proposed use and from the adjacent land uses; loss of privacy, shadowing or impact on cultural heritage resources and landscapes;
- (e) The impact on natural resources such as agricultural land and mineral aggregate deposits;
- (f) The impact on biodiversity and connectivity of natural features and areas;
- (g) The exterior design in terms of bulk, scale and layout of the buildings and other design elements;
- (h) The possibility that site contamination has occurred or the site may contain historic petroleum wells or associated works, and if so, demonstrate compliance with provincial regulations;
- (i) Methods of reducing or eliminating negative impacts; and
- (j) Other planning matters considered important by a Council.

This report has regard for and addresses the above noted items throughout within each relevant section.

2 Summary of Findings

The Proposed Development of a small scale commercial building and potential future expansion area represents an appropriate and desirable use of the Subject Site that will contribute to the overall achievement of Provincial and Municipal Policies. More specifically, the Proposed Development:

- Is consistent with the Provincial Policy Statement 2014, as it represents appropriate development within the *rural area* while appropriately protecting natural heritage features;
- Conforms to the Rural Areas and Natural Heritage policies of the Growth Plan for the Greater Golden Horseshoe, 2017 and will not be impacted by the Draft Agricultural Land Base mapping;
- Conforms to the Official Plan's policies relative to development within the Secondary Agricultural Area designation, the preservation of natural and environmental lands, and the promotion of local economic competitiveness and growth;
- Supports local economic development within an area designated for agriculture and small-scale commercial uses;
- Provides an appropriate scale of building within the surrounding rural context;
- Will not impact any Provincially Significant Wetlands or other key natural heritage features;
- Will not impact the agricultural capability of the Subject Site or any surrounding properties;
- Can be accommodated through the existing transportation and roadway infrastructure;
- Will not impact the on-going conservation efforts and management plans on the Subject Site; and
- Can be accommodated through appropriate rural water and septic servicing systems.

In order to implement the Proposed Development, a Zoning By-law Amendment is required. A Zoning By-law Amendment application has been submitted to the Township of Puslinch and is currently under review (Township File No. D14/ODE).

3 Background & Physical Context

3.1 Subject Site

6615 Concession Road 1 is a municipal address applied to two discrete parcels of land under the same ownership (Figure 1), separated by an unopened road allowance (known as *Road Allowance Between Lots 5 & 6*). These two parcels are under separate ownerships and combined are a total of 68.8 hectares (170 acres) in size, and will be referred to in this report as the 'eastern' and 'western' parcels for clarity. Collectively, this report will refer to the two parcels collectively as the Subject Property.

The parcel subject to the Zoning By-law Amendment application is legally described as *Part of the North Half of Lot 5, Gore Concession, Township of Puslinch, County of Wellington*, and comprises the western half of the lands municipally known as 6615 Concession 1, R.R. #2. For the purposes of this report, the Subject Site will refer to this parcel.

Table 1 Summary of Subject Property Information

	Subject Property	
	Eastern Parcel	Western Parcel (Subject Site)
Legal Description	Part of the North Half of Lot 6, Gore Concession, Township of Puslinch, County of Wellington	Part of the North Half of Lot 5, Gore Concession, Township of Puslinch, County of Wellington
Assessment Roll Number	2301000004040000000	2301000004038000000
Municipal Address	Not Municipally Addressed	6615 Concession Road 1
Total Area	33.2 ha (82 ac)	35.6 ha (88 ac)
Existing Use(s)	Residential	Office/Storage/Managed Wetlands
Existing Building(s)	Single Detached Dwelling	Single Detached Dwelling Detached Garage

Table 2 below summarizes the existing uses of the two buildings on the Subject Site:

Table 2 Summary of Existing Uses on the Western Parcel

	Existing Use
Single Detached Dwelling	Office space for O'Dell Engineering and the Canadian Historical Arms Museum. The building is also used for safe and secure storage of products and equipment, and provides private meeting space for hosting business meetings.
Detached Garage	The existing detached garage is currently used for business-related storage of goods and equipment.

3.2 Environmental Features

The Subject Property was heavily reforested prior to the Owner's purchase in 2003 and a Forest Management Plan was put in place in conjunction with Ducks Unlimited Canada. The Subject Property also contains three evaluated Provincially Significant Wetlands, two located on the Western Parcel and one located on the eastern parcel (Figure 2). These wetlands are separated and significantly buffered from the Proposed Development.

The Owner is committed to protecting, enhancing and preserving these wetlands and has worked with Grand River Conservation Authority to identify the best location for the Proposed Development to mitigate and minimize impacts to the wetland features and forested areas.

3.3 Adjacent Land Uses

The following provides a brief overview of the adjacent land uses abutting the Subject Site:

- North: Residential, recreational, environmental and agricultural uses. Pioneer Grove Road intersects with Concession Road 1 immediately north of the Subject Site and is a north-south right-of-way that provides access to residential uses surrounding the south side of Puslinch Lake.
- East: Residential, agricultural and environmental uses. Farther east is an outdoor automotive storage and repair service located at 6693 Concession Road 1 known as 'Advance Auto'.
- South: Residential, commercial, and agricultural uses. Adjoining the southwest boundary of the Subject Site is the Galt Sportsman's Club. This 101 hectare (250 acre) private club is a large outdoor recreation facility that focuses on hunting, fishing and sport shooting. The club has been in continuous operation since 1954 and is considered one of the premier shooting sports centres in North America.
- West: Residential, agricultural and open space areas. Farther west, beyond Townline Road is the urban neighbourhood known as 'Fiddlesticks' in the southeast area of the City of Cambridge.

3.4 Business Background & Operations

As previously discussed in Section 3.1, two legally-established businesses currently operate on the Subject Site. These are known as O'Dell Engineering (previously Phantom Forge) and the Canadian Historical Arms Museum.

O'Dell Engineering

O'Dell Engineering (previously Phantom Forge) was established in 1995 and located on the Subject Site in 2003. The business is involved in the firearms industry and possesses a Firearms Businesses License issued under the authority of the Royal Canadian Mounted Police (RCMP) and the Chief Firearms Officer (CFO) of Ontario, in accordance with the *Firearms Act, S.C. 1995*. These licenses provide a high degree of regulations to the businesses and are only granted after a lengthy application and review process whereby applicants must demonstrate their compliance with the applicable regulations and provide a business plan to the RCMP outlining the proposed business activities. Strict storage, transport and transfer requirements and conditions are placed on all inventory associated with the business, and inspections of licensed facilities are also conducted regularly in order to ensure compliance.

O'Dell Engineering is a leading importer and distributor of firearms, firearms parts, ammunition and shooting-sports accessories within the Canadian market. The business has been successful and has grown steadily with an industry reputation as a reliable, honest, and safe distributor of these heavily regulated goods. The business also provides warranty service and support for the various lines of products they distribute.

Currently, deliveries to the business are staged and off-loaded within the Concession 1 roadway, with a fork-lift required to enter and exit the roadway to transfer goods from the delivery vehicle to the existing buildings on the Western Parcel.

The growth and success of the business has resulted in the need for additional secure storage space to adequately and safely support the various products distributed.

The Canadian Historical Arms Museum (CHAM)

The CHAM is a private institution founded in 2010 that is dedicated to the preservation of historical firearms and associated military equipment and artifacts with a focus on Canadian-made or used equipment. The CHAM is committed to education and conducts regular outreach programs to related organizations, organized sport-shooting competitions, charitable fundraisers, and industry trade shows. As a firearms business, the CHAM also possesses a Firearms Businesses License issued under the authority of the Royal Canadian Mounted Police (RCMP) and the Chief Firearms Officer (CFO) of Ontario.

The CHAM has been featured in the Smithsonian Television series 'Weapon Hunter' which profiles important historical firearms and war artifacts across the world. This has resulted in increased national and international exposure for the CHAM, along with increased donations of artifacts. Safe, secure and archival storage is essential for the preservation of these important historical artifacts.



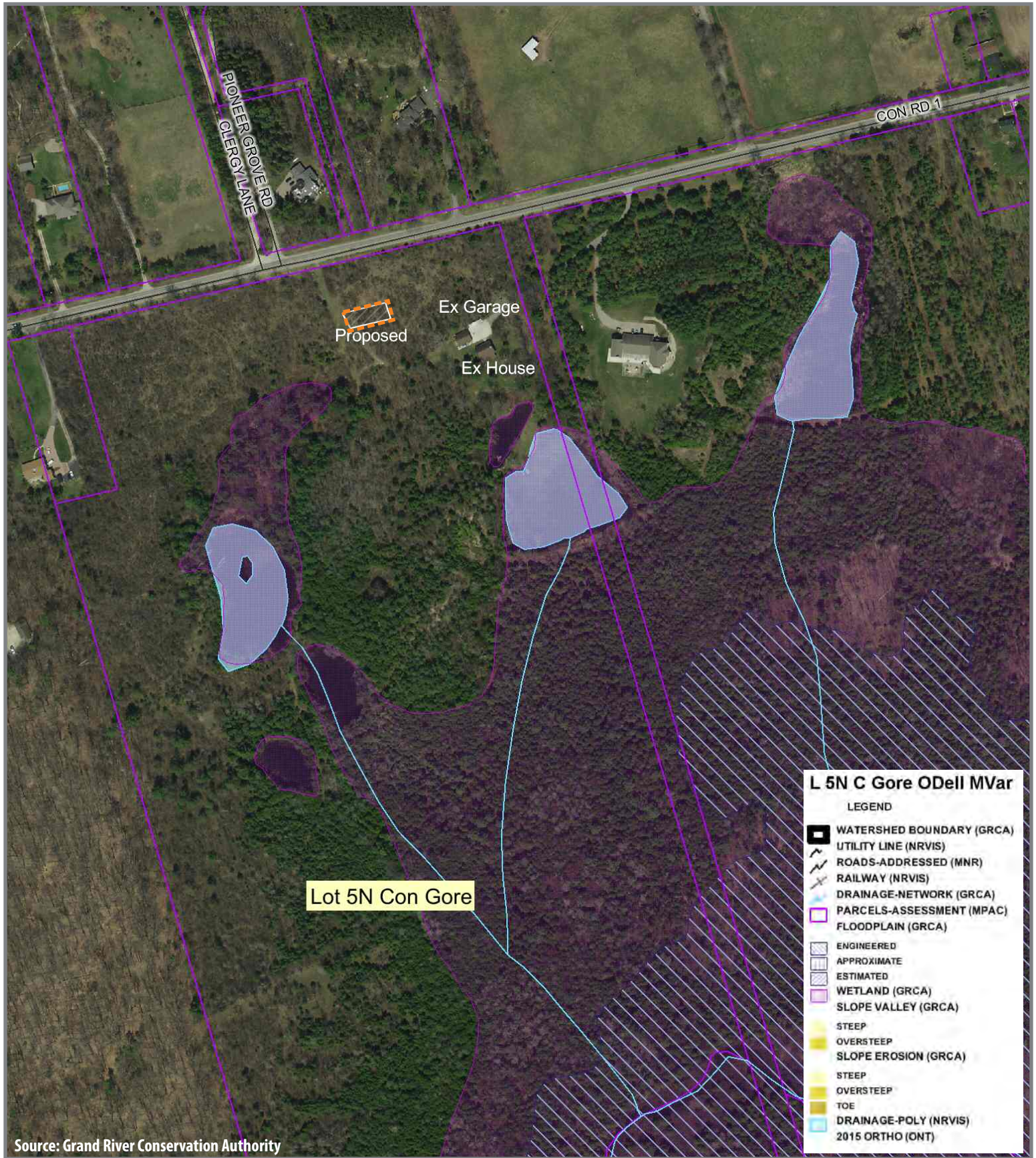
AERIAL PHOTOGRAPH

FIGURE 1
6615 Concession 1, Township of Puslinch ON

6615 Concession 1 

Proposed Building Location & Expansion Area 

Not to Scale | December 2017 | 17.684



GRCA WETLAND MAPPING

FIGURE 2

6615 Concession 1, Township of Puslinch ON

Proposed Building Location & Expansion Area 
Not to Scale | December 2017 | 17.684

4 Proposed Development

The Proposed Development on the Western Parcel involves the maintenance of the two existing structures along with the construction of a new Class 3 industrial storage building for the safe and secure storage, assembly, modification and repair of firearms and ammunition for wholesale distribution, and the historically-significant collection of the Canadian Historical Arms Museum (CHAM).

The existing detached dwelling and detached garage buildings will continue to be used for business purposes. The existing detached dwelling currently used as office space will continue to function as such, providing offices for business operations, security and accounting for the two businesses. The existing garage will continue to operate as storage space for business goods and equipment. Table 3 below provides a summary of the existing and proposed buildings:

Table 3 Summary of post-development uses of existing and proposed structures on the Subject Site

Building	Proposed Use
Single Detached Dwelling (existing)	<ul style="list-style-type: none">• Office space for O'Dell Engineering and the Canadian Historical Arms Museum; and• Archival storage of historical museum documents and artifacts;
Detached Garage (existing)	<ul style="list-style-type: none">• Storage space for business related equipment
Proposed Building	<ul style="list-style-type: none">• Safe and secure storage of business inventory;• Photographic studio for catalogue production and historical archival and documentation purposes;• Historical artifact display and storage;• Warranty and repair operations; and• Training/meeting room

4.1 Built Form Design & Massing

The proposed two-storey building will be approximately 16 metres square (16 metres by 16 metres) and a maximum of 10 metres in height. The new building will provide an approximate gross floor area (GFA) of 512 square metres.

O'Dell Engineering takes great pride in their stewardship of the Subject Site and their dedication to the sporting community at-large. To this end, they are committed to developing a high-quality and architecturally-attractive building that will sensitively integrate with and positively contribute to the overall rural character of the surrounding area.

The proposed maximum building height of 10 metres is appropriate for the Subject Site and will not create negative impacts to any surrounding properties. Exterior lighting fixtures will be shielded and internally-directed so as not to negatively impact the night-sky views within the area.

4.2 Building Siting & Location

The proposed building location has been carefully selected in order to minimize the need for tree removal, utilize the existing access driveway (upgraded to current County standards), and accommodate buffers to the Provincially Significant Wetlands. The existing vegetation along the south side of Concession Road 1 will be maintained and enhanced with new planting that will further screen the proposed building from the public roadway.

4.3 Vehicular Access & Loading

Vehicular access to the proposed building will be accommodated by way of an upgrade to the existing 'farm access' from Concession Road 1. This access has been in place for more than 50 years and has been used in the past for trucks during previous logging operations and reforestation efforts.

The upgraded access has been selected to minimize tree removal or damage to existing vegetation, and not require substantial alterations to the grade of the Subject Site.

The upgrading of this access to Municipal standards will be reviewed as part of the Building Permit Application process.

A total of three loading spaces are proposed for the new building, comprised of two loading and unloading spaces to the building and one open-air loading space. The proposed loading configuration is a significant improvement over the current process as described in Section 3.4 of this report and are appropriate for the proposed use and likely frequency of users.

4.4 Servicing

The proposed building will be serviced by an appropriately sized private septic system and well. The existing buildings will continue to be serviced by the existing septic system and well. Detailed design and approval of these proposed systems will be reviewed during the Building Permit Application process.

4.5 Potential for Future Expansion

As part of the Zoning By-law Amendment Application, O'Dell Engineering has identified an area that could potentially house a future expansion of the proposed building, should the business require additional inventory capacity in the future. This area has been reviewed by the Grand River Conservation Authority who found the location appropriate for the Subject Site and proposed land use.

Any further expansion of the proposed building would be subject to a separate Site Plan Control and Building Permit Applications along with the GRCA review and permit process.

5 Planning Framework

The subject site is subject to Provincial and local municipal planning policies contained in the following statutory planning documents:

- Provincial Policy Statement;
- Places to Grow: Growth Plan for the Greater Golden Horseshoe;
- Wellington County Official Plan; and
- Town of Puslinch Zoning By-law 19/85

The following sections review and analyze the Proposed Development in the context of the above noted policy and guideline documents.

5.1 Provincial Policy Statement

The Provincial Policy Statement, 2014, (“PPS”) came into effect April 30, 2014, and is meant to provide direction on matters of Provincial interest related to land use planning and development. The document, through the Planning Act, directs that decisions affecting planning matters “shall be consistent with” the policy statement.

Section 1.1.4 of the PPS provides policies for *rural areas* in municipalities, recognizing that rural areas are “important to the economic success of the Province and our quality of life”. *Rural Areas* are defined within the PPS as “means a system of lands within municipalities that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas”.

1.1.4.1 Healthy, integrated and viable *rural areas* should be supported by:

- (a) Building upon rural character, and leveraging rural amenities and assets;
- (b) Promoting regeneration, including the redevelopment of *brownfield* sites;
- (c) Accommodating the conservation and *redevelopment* of existing rural housing stock on *rural lands*;
- (d) Encouraging the conservation and *redevelopment* of existing rural housing stock on *rural lands*;
- (e) Using rural infrastructure and public service facilities efficiently;
- (f) Promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;
- (g) Providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural and natural assets;
- (h) Conserving biodiversity and considering the ecological benefits provided by nature; and
- (i) Providing opportunities for economic activities in prime agricultural areas, in accordance with policy 2.3

The Proposed Development is consistent with the Rural Areas policies of the PPS by promoting the diversification of the rural economy, ensuring protection of natural heritage areas and biodiversity, taking efficient use of rural transportation resources; and building on the overall rural character of the area.

Section 1.1.5 provides policies relating *rural lands* within Municipalities. *Rural Lands* are defined within the PPS as “means lands which are located outside settlement areas and which are outside prime agricultural areas”. The Proposed Development is consistent with the type of permitted uses identified for the *rural lands*.

Section 2.1 of the PPS provides policies relating to natural heritage and natural features.

2.1.1 Natural features and areas shall be protected for the long term.

The Proposed Development will not impact any natural areas or features on the Subject Site. The Owner will continue to maintain their committed stewardship of the lands, including enhancing biodiversity and wetlands through agreements with the GRCA and Ducks Unlimited Canada.

In summary, the Proposed Development conforms to the policies of the Provincial Policy Statement, 2014.

5.2 Places to Grow: Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Golden Horseshoe, 2017 (the Growth Plan) took effect on July 1, 2017, and was established under the Places to Grow Act, 2005, for municipalities within the Greater Golden Horseshoe. All decisions made on or after July 1, 2017 in respect of the exercise of any authority that affects a planning matter must conform with the Growth Plan, 2017.

The cornerstone of the Growth Plan relates to its vision for the region for 2041. Broadly, the Growth Plan envisages the Greater Golden Horseshoe as continuing to be “a great place to live”, offering “a wide variety of choices for living” in “thriving, livable, vibrant and productive urban and rural areas”. These goals are contingent upon the implementation of, and adherence to, a set of core guiding principles.

The Growth Plan recognizes the importance of rural communities as being “vital to the economic success of the GGH and contribute[ing] to our quality of life”. The Growth Plan supports economic development within rural communities stating that: “opportunities to support a diversified rural economy should be promoted by protecting farmland and the viability of the agri-food sector in rural areas”.

Rural Areas (Figure 3)

Section 2.2.9 provides policies for Rural Areas, which are defined as “lands which are located outside of settlement areas and which are outside of prime agricultural areas”. The Subject Site is located within the Secondary Agricultural, Greenlands and Core Greenlands land use designations within the County of Wellington Official Plan. Accordingly, the Proposed Development is subject to the Rural Area’s policies of the Growth Plan.

The Growth Plan permits development within rural lands outside of settlement areas provided they are compatible with the rural landscape and surrounding uses, will be sustained by rural service levels, and will not adversely affect the protection of agricultural uses and other resource based uses such as mineral aggregate operations.

The Proposed Development includes a built-form and use which is compatible with the rural character of the area. The continuation of the existing commercial uses on the Subject Site will continue to be sustained with typical rural service levels. The Proposed Development will not adversely affect any agricultural, environmental protection or mineral aggregate uses.

In summary, the Proposed Development is consistent with the policies for the Rural Areas within the Growth Plan.

Natural Heritage System (Figure 4)

In June 2017, the Province released the Draft Proposed Regional Natural Heritage System mapping for public comment and review. The Subject Site is identified as being located within this draft proposed Regional Natural Heritage System. Section 4.2.2 of the Growth Plan provides policies relating to the *Natural Heritage System* within the Greater Golden Horseshoe. Section 4.2.2 (1) states that the Province will map an overall *Natural Heritage System* and that municipalities will incorporate this system as an overlay within their Official Plans.

- 4.2.2 (1) The Province will map a *Natural Heritage System* for the GGH to support a comprehensive, integrated and long-term approach to planning for the protection of the region's natural heritage and biodiversity. The *Natural Heritage System* mapping will exclude lands within *settlement area* boundaries that were approved or in effect as of July 1, 2017.
- 4.2.2 (2) Municipalities will incorporate the *Natural Heritage System* as an overlay in Official Plans, and will apply appropriate policies to maintain, restore or enhance the diversity and connectivity of the system and the long-term ecological or *hydrologic functions* of the features and areas as set out in the policies of this subsection and the policies in subsections 4.2.3 and 4.2.4

Section 4.2.2 (3) provides criteria for new development within the identified *natural heritage system*.

- 4.2.2 (3)(a) new development or site alteration will demonstrate that:
- i. There are no *negative impacts* on *key natural heritage features* or *key hydrologic features* or their functions;
 - ii. Connectivity along the system and between *key natural heritage features* and *key hydrologic features* located within 240 metres of each other will be maintained, or where possible, enhanced for the movement of native plants and animals across the landscape;
 - iii. The removal of other natural features not identified as *key natural heritage features* and *key hydrologic features* is avoided, where possible. Such features should be incorporated into the planning and design of the proposed use wherever possible;
 - iv. Except for uses described in and governed by the policies in subsection 4.2.8, the disturbed area, including any buildings and structures, will not exceed 25 per cent of the *total developable area*, and the impervious surface will not exceed 10 per cent of the *total developable area*;
 - v. With respect to golf courses, the disturbed area will not exceed 40 per cent of the *total developable area*; and
 - vi. At least 30 per cent of the *total developable area* will remain or be returned to *natural self-sustaining vegetation*, except where specified in accordance with the policies of subsection 4.2.8

Table 4 below provides an analysis of the Proposed Development's conformity the development policies of Section 4.2.2 (3)(a):

Table 4 Analysis of the Proposed Development and Section 4.2.2 (3)(a) of the Growth Plan)

	Section 4.2.2 (3)(a) Criteria	Proposed Development
i	There are no <i>negative impacts</i> on <i>key natural heritage features</i> or <i>key hydrologic features</i> or their functions;	As previously discussed, the Proposed Development is setback from the <i>key natural heritage</i> and <i>key hydrologic features</i> on the Subject Site. The wetlands on the property are subject to an agreement with Ducks Unlimited Canada to preserve and maintain the wetlands as part of their Wood Duck Growth program. The program has 6 monitored nesting sites within the wetlands that are monitored by the landowners and supervised by Ducks Unlimited.
ii	Connectivity along the system and between <i>key natural heritage features</i> and <i>key hydrologic features</i> located within 240 metres of each other will be maintained, or where possible, enhanced for the	The Proposed Development will not impact the connectivity or linkages of these important wetland systems. The wetlands are subject to a continuous monitoring program that will be maintained through, and after the construction process.

	movement of native plants and animals across the landscape;	
iii	The removal of other natural features not identified as <i>key natural heritage features</i> and <i>key hydrologic features</i> is avoided, where possible. Such features should be incorporated into the planning and design of the proposed use wherever possible;	The Proposed Development will not remove any natural features not identified within the Growth Plan or otherwise. Specifically, the access to the proposed building has been designed to make use of an upgraded existing farm access to minimize tree removal and grading associated with constructing a new driveway.
iv	Except for uses described in and governed by the policies in subsection 4.2.8, the disturbed area, including any buildings and structures, will not exceed 25 per cent of the <i>total developable area</i> , and the impervious surface will not exceed 10 per cent of the <i>total developable area</i> ;	The total area subject to the proposed Zoning By-law Amendment area is 7,664.5 square metres. The Proposed Building footprint is approximately 256 square metres, representing 3.3% of the total amendment area. The proposed by-law amendment includes a 'Potential Future Expansion Area' for the proposed building of approximately 512 square metres in size. This area represents an additional 6.7% of the total amendment area. The proposed impervious surface area will be further reviewed during the Site Plan control and Building Permit application review process, however as no surface parking is proposed, the impervious surface area will be minor, and consistent with (iv).
v	With respect to golf courses, the disturbed area will not exceed 40 per cent of the <i>total developable area</i> ; and	The Proposed Development does not involve the development of a golf course facility and therefore policy (v) does not apply.
vi	At least 30 per cent of the <i>total developable area</i> will remain or be returned to <i>natural self-sustaining vegetation</i> , except where specified in accordance with the policies of subsection 4.2.8	The Proposed Development (including the potential future expansion area) accounts for 10% of the total amendment area. The total amendment area represents 2.1% of the overall Western Parcel. Therefore, at least 30% of the amendment area will remain as natural self-sustaining vegetation, which will positively contribute to the overall conservation efforts of the Owner on the Subject Site.

Natural Heritage System is a defined term within the Growth Plan which refers to “the system mapped and issued by the Province in accordance with this Plan...”. The Province has not yet adopted the draft mapping for the Regional Natural Heritage System and therefore the Subject Site is not subject to the policies of Section 4.2.2 at this time. While not yet in-force-and-effect, the Proposed Development conforms to the Natural Heritage System policies for development and will not negatively impact any *key hydrologic* or *key natural heritage features*. The Proposed Development will require a permit from the GRCA, and the Owner will continue to work closely with the GRCA and Ducks Unlimited Canada on their conservation efforts to protect and enhance the wetlands and create important Wood Duck habitats.

Agricultural System (Figure 5)

The Growth Plan, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan recognize that the Province will undertake a study to identify and map an *Agricultural Land Base* within the GGH. In June 2017 the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) released a draft consultation document titled *Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe* along with a web-based mapping system and portal to identify potential lands to become part of the *agricultural system* within the Greater Golden Horseshoe (GGH). The Province has also released Draft Agricultural Land Base mapping, which will ultimately form a Schedule to the Growth Plan.

The draft Agricultural Land Base mapping prepared by The Province includes existing *prime agricultural areas* identified within Municipal Official Plans, *specialty crop areas*, and additional *prime agricultural lands* identified by OMAFRA but not yet designated within local Official Plans. The draft Agricultural Land Base also identifies areas within active agricultural areas which may have agricultural potential.

As shown on Figure X, the Subject Site is not located within any of the identified *prime agricultural areas*, *specialty crop areas*, or areas identified as “active agriculture plus areas identified by OMAFRA as having agricultural potential”.

In summary, the Proposed Development conforms to and supports the achievement of the policies of the Growth Plan for the Greater Golden Horseshoe.

5.3 County of Wellington Official Plan

The Proposed Development is subject to the policies of the Wellington County Official Plan, as amended (the ‘Official Plan’). The Official Plan was adopted by Wellington County council on September 24, 1999 and subsequently approved by the Ministry of Municipal Affairs and Housing on April 13, 1999. The Official Plan ultimately came in to force on May 6, 1999, and has been amended as required to conform with Provincial Policy. The Official Plan provides overall guiding principles and land use policy for all lands within Wellington County.

The Subject Site is designated ‘Secondary Agriculture’, ‘Greenlands’ and ‘Core Greenlands’ (Figures 6 & 7). The Proposed Development will be located within a portion of the Subject Site that is designated ‘Secondary Agriculture’, as confirmed with County Staff. The Official Plan also provides policies that apply to the County as a whole, which have been reviewed as part of this Planning Rationale Report.

2.1 Fundamental Beliefs

Section 2.1 outlines the County’s ‘Fundamental Beliefs’, which are relevant to the all land use planning decisions made by County Council. The following sections review and analyze the Proposed Developments support for, and consistency with, the overall planning vision for the County.

- 2.1.1 Wellington County supports certain planning concepts recognized in Ontario and in many other parts of the world. These concepts include:
 - Sustainable development;
 - Land stewardship; and
 - Healthy communities
- 2.1.2 Sustainable development is a concept that supports development which “meets the need of the present without compromising the ability of future generations to meet their own need”. Wellington County will make planning decisions which properly balance:
 - Protecting and enhancing the natural environment;
 - Enhancing economic competitiveness;
 - Fostering a healthy, safe and socially responsible society
- 2.1.3 Land Stewardship recognizes that preserving natural features and protecting the environment is a shared value between government, community groups, and landowners. County Council believes that all landowners are entitled to reasonable use and enjoyment of their land but they are also stewards of the land with responsibility to the community for the long term environmental health of their land.
- 2.1.5 Wellington County will promote land use decisions which provide an economically strong, healthy and socially responsible community and which protect our natural and cultural heritage for this and future generations.

The Proposed Development has appropriate regard for, and reinforces the above noted 'Fundamental Beliefs'. The Owner (and previous owners) have taken significant action to evaluate, enhance, and protect the environmental resources on the Subject Site. Extensive reforestation and wetland preservation efforts have taken place on the Subject Site and a Managed Forest Plan created to guide and manage protection of these important assets. No development is proposed within any environmental lands and significant features such as wetlands and woodlands will not be affected by the Proposed Development.

Therefore, the Proposed Development is consistent with the Fundamental Beliefs from the perspective of "protecting and enhancing the natural environment" (Section 2.1.2) and Land Stewardship.

The Proposed Development will allow for the expansion of the existing business (O'Dell Engineering and the Canadian Historical Arms Museum) currently operating on the Subject Site. Both businesses have been highly successful, and dedicated facilities for warehousing and storage of goods are now required for the long-term success and viability of the businesses. The Proposed Development is essential to the further growth of this local business and therefore will contribute to the achievement of County Council's Fundamental Beliefs, as noted in Section 2.1.5 above, which directs Council to support land use decisions that support an economically strong community.

The Canadian Historical Arms Museum has steadily increased their capacity for public outreach and provides travelling displays for educational and community fundraising events. The museum resources are important cultural artifacts that provide tangible and educational links to Canada's rich military history, and contributes to the preservation of cultural heritage for future generations, consistent with Section 2.1.5 noted above.

Overall, the Proposed Development will support the achievement of County Council's Fundamental beliefs with respect to protecting the natural environment, enhancing economic competitiveness, and protecting our shared cultural heritage.

Section 4.0 provides general policies that apply to all lands within the County. The following sections of this report provide a review and analysis of the Proposed Development's consistency with these general policies.

4.2 Economic Development

Section 4.2 provides policies for guiding and supporting economic development within Wellington County. Policies (1), (3), and (5) are relevant to the Proposed Development.

- 4.2.3 The County will encourage a variety of employment opportunities in a variety of locations. Opportunities for industrial, commercial and recreation activities will be supported in appropriate locations. The majority of opportunities will occur in urban areas where full municipal services are available. Other locations, including lands in the Rural System, will be considered where they offer advantages to businesses such as larger sites, compatibility or proximity to resources or major transportation facilities. Land shall be set aside in the Urban System to provide employment opportunities which will at least keep pace with residential growth.
- 4.2.5 The Rural System will also provide opportunities for employment. The main employment generator in the rural system will be resource based industries such as agriculture, aggregate operations and forestry. Businesses required to serve agriculture will be allowed where they are needed in close proximity to farms. The Rural System can also contribute sites for employment based on the availability to provide larger lots, larger buffers for compatibility, proximity to rural resources or access to major roads. The Rural System may also contribute employment opportunities through the development of tourism and recreation opportunities. The applicable policies of this plan will be used in locating employment lands to minimize the impacts on prime agricultural areas or mineral aggregate areas.

As the Proposed Development is an expansion of a legally-established business, there are no negative impacts to the overall supply of employment land within the broader County-wide context that the Official Plan considers.

The Official Plan recognizes the importance of the Rural System in providing employment opportunities. The expansion of the two legally-established businesses within an area designed within the Rural System is consistent with the policy directions of Sections 4.2.3 and 4.2.5. The Subject Site provides a discrete, accessible and convenient location for the businesses and is an appropriate and desirable location from a business viability and policy context.

There will be no impact to any Prime-Agriculturally-designated lands, environmental features or mineral aggregate areas as a result of the Proposed Development.

The policies within Part 5 of the Official Plan provide guidance and policy direction on development within or near the 'Greenlands' and 'Core Greenlands' designations. While the Proposed Development is located within the 'Secondary Agricultural Areas' designation, we have evaluated the policies for development within proximity of the Greenlands and Core Greenlands designation in the context of the Proposed Development.

5.4 Core Greenlands

Section 5.4 provides policies relating to the Core Greenlands designation, of which (1) is relevant to the Proposed Development.

- 5.4.1 All wetlands in the County of Wellington are included in the Core Greenlands. Development and site alteration will not be permitted in wetlands which are considered provincially significant. Provincially significant wetlands are shown in Appendix 3 of this Plan. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted. The appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland.

Southern portions of the Subject Site, generally consistent with the Provincially significant wetlands and associated linkages, are designated 'Core Greenlands'. The Owners of the Subject are committed to protect, enhance and preserve the wetlands on the property and are committed to ensuring the wetlands are protected in perpetuity. A Forest Management Plan is in place on the Subject Site in conjunction with the Grand River Conservation Authority (the 'GRCA') to preserve and protect the extensive wooded areas.

GRCA has reviewed the Proposed Development location and it is our understanding that they are supportive of the proposed location. The proposed location will ensure that the Proposed Development will not negatively impact any of the environmental features, including wetlands, on the Subject Site.

The proposed access has also been carefully designed to utilize an existing 'farm entrance' in order to minimize any tree removals that would otherwise be required to create a new vehicular access point from Concession 1.

There will be no negative impacts on, or alteration to, any lands designated 'Core Greenlands' and 'Greenlands' as a result of the Proposed Development. Accordingly, the Proposed Development is consistent with the policies of the 'Core Greenlands' and 'Greenlands' land use designations.

6.5 Secondary Agricultural Areas

As previously discussed in this report, WND Associates Ltd. has consulted with County Staff who have confirmed that the policies of the 'Secondary Agriculture' designation apply to the Proposed Development. The following section evaluates the Proposed Development's consistency with the policies of the 'Secondary Agriculture' land use designation. Section 6.5.3 and 6.5.4 provide policies relating to the permitted uses within the 'Secondary Agriculture' designation:

- 6.5.3 Permitted uses and activities within the Secondary Agricultural Areas may include:
- (a) All uses allowed in the Prime Agricultural Area;
 - (b) Small scale commercial, industrial and institutional uses;
 - (c) Public service facilities.

In Secondary Agricultural Areas, all types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with Provincial standards.

- 6.5.4 Small scale commercial, industrial and institutional uses may be permitted provided that:
- (a) Appropriate sewage and water systems can be established;
 - (b) The proposed use is compatible with surrounding uses;
 - (c) The use requires a non-urban location due to:
 - a. Market requirements;
 - b. Land requirements;
 - c. Compatibility issues
 - (d) The use will not hinder or preclude the potential for agriculture or mineral aggregate operations;
 - (e) The use will be small scale and take place on one lot and large-scale proposals or proposals involving more than one lot will require an official plan amendment.

With respect to 6.5.3, the Proposed Development is the expansion of a legally established small-scale commercial use within the Secondary Agricultural Area designation. Accordingly, the proposed expansion must be evaluated against the requirements of Section 6.5.4 which provides specific criteria for small scale commercial, industrial and institutional uses within the Secondary Agriculture designation. Table 1 below reviews the Proposed Development and criteria of Policy 6.5.4:

Table 5 Analysis of Official Plan Section 6.5.3 and the Proposed Development

	Section 6.5.4 Criteria	Proposed Development
(a)	Appropriate sewage and water systems can be established	The existing businesses are served by a private well and septic system. The system has been professionally tested at the time of occupancy of the Subject Site. The system will be monitored through construction as well as post-construction to ensure it is functioning properly and within Ministerial guidelines.
(b)	The proposed use is compatible with surrounding uses	<p>The Proposed Development is an expansion of facilities for two legally established businesses which have operated on the Subject Site since 2003. Both businesses are also Federally and Provincially regulated as to their location, physical design and operation. The proposed warehouse facility for the two businesses is a scale that is compatible and consistent with a rural context, where large-scale agricultural barns, silos, hangers, and other accessory structures are commonly found.</p> <p>The proposed location along Rural Route #1 has been reviewed by the Grand River Conservation Authority (the 'GRCA') and deemed appropriate and acceptable to ensure that there will be no negative impacts to the wetlands and other natural environmental areas on the Subject Site.</p>
(c)	<p>The use requires a non-urban location due to:</p> <ul style="list-style-type: none"> a. Market requirements; b. Land requirements; c. Compatibility issues 	<p>The Proposed Development is an expansion of the legally-established businesses currently located on the Subject Site. The location is appropriate and desirable for a variety of reasons, including market requirements, land requirements and compatibility issues.</p> <p>From a 'market requirements' standpoint, the Proposed Development is a direct response to the success and growth of the two legally-established businesses on the Subject Site. Additional storage space is required to allow the businesses to continue this growth and support the local economy. The Subject Site represents an opportunity to expand the business in a</p>

		<p>convenient, safe and appropriate location without the capital burden of purchasing new urban-designated land and relocation of the business.</p> <p>With respect to 'land requirements', the Subject Site is adequately sized to accommodate the Proposed Development without causing negative impacts on any surrounding properties. As previously discussed in Section 3.3 of this report, the Subject Site is directly contiguous with the Galt Sportsmen's Club which provides facilities for the safe discharge and testing of new firearms and related equipment. This co-location aspect is an important aspect of the business and its daily operations.</p> <p>The Proposed Development, if hypothetically located within an Urban Area, would not create negative compatibility concerns. The Subject Site offers a safe, convenient and discrete location for the unloading and storage of firearms, supporting the goals of Section 2.1.5 which directs Council to promote land use decisions which support and provide a healthy and socially responsible community.</p>
(d)	The use will not hinder or preclude the potential for agriculture or mineral aggregate operations	<p>The Subject Site is heavily treed, the majority of which are subject to a Forest Management Plan. The Subject Site also contains several evaluated Provincially Significant Wetlands which are subject to Provincial and GRCA regulations. As such, the Subject Site is not considered to be an agriculturally viable parcel, as significant clearing of managed woodlands and removal of Provincially significant wetlands would be required. The Proposed Development would not hinder or preclude the agricultural potential of the Subject Site.</p> <p>Schedule 'C' of the Official Plan identifies areas of "sand and gravel resources or primary and secondary significance", which are areas to be preserved for mineral aggregate operations. The Proposed Development is not located within an area identified on Schedule C and therefore will not hinder or preclude the development of mineral aggregate resources within the County of Wellington.</p>
(e)	The use will be small scale and take place on one lot and large-scale proposals or proposals involving more than one lot will require an official plan amendment	<p>The Proposed Development involves the construction of a small-scale warehouse constructed on a single lot, consistent with the Policy direction of (e).</p>

The Proposed Development has been carefully designed to respond to the policies of the Official Plan for the 'Secondary Agricultural Areas' land use designation as well as ensure consistency with the policies of the 'Core Greenlands' and 'Greenlands' designations. The Proposed Development represents an appropriate and desirable expansion of a legally-existing use that in a form that is compatible with the character of the surrounding rural area and that will help achieve the overall 'Fundamental Beliefs' of Wellington County Council.

In summary, the Proposed Development conforms to the Official Plan's policies relative to development within the Secondary Agricultural Area designation, the preservation of natural and environmental lands, and the promotion of local economic competitiveness and growth, and no amendment to the Official Plan is required to implement the Proposed Development.

5.4 Township of Puslinch Zoning By-law 19/85

The Township of Puslinch Zoning By-law 19/85 (the 'By-law'), as amended, was adopted by Council in 1985 and provides regulations regarding land use location and scale, along with use-specific regulations for certain uses. The By-law zones the Subject Site *Agricultural* and *Natural Environment*, while the Proposed Development is located within a portion of the Subject Site zoned agricultural (Figure 8).

The Agricultural Zone permits agricultural uses, a single detached dwelling, home occupations, retail farm sales, existing institutional uses, wayside pits, forestry and woodlots, open space and conservation, fish and wildlife management, public uses, secondary dwellings and apartments (subject to qualifications) and bed and breakfast establishments. The proposed small-scale commercial use is not a permitted use within the applicable Zoning regulations.

The purpose of a Zoning By-law is to implement the policies of the Official Plan within a regulatory framework to ensure land use compatibility. The Proposed Development conforms to the policies of the Official Plan and is therefore appropriate to implement through an amendment to the Zoning By-law.

A Zoning By-law Amendment application has been submitted by the Owners and is currently under review by the Township.



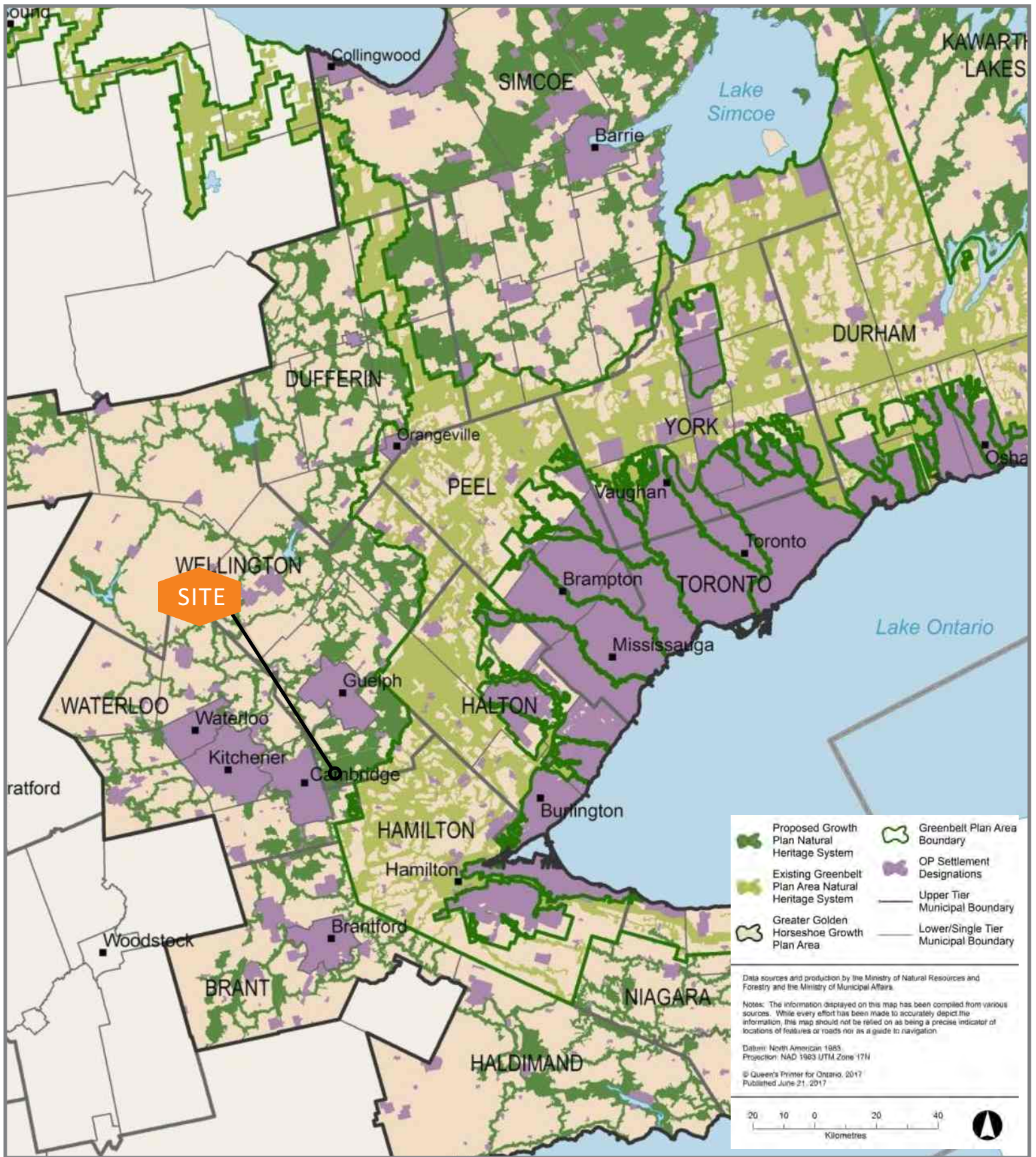
GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE

SCHEDULE 2 | PLACES TO GROW CONCEPT

FIGURE 3

6615 Concession 1, Township of Puslinch ON

Not to Scale | December 2017 | 17.684

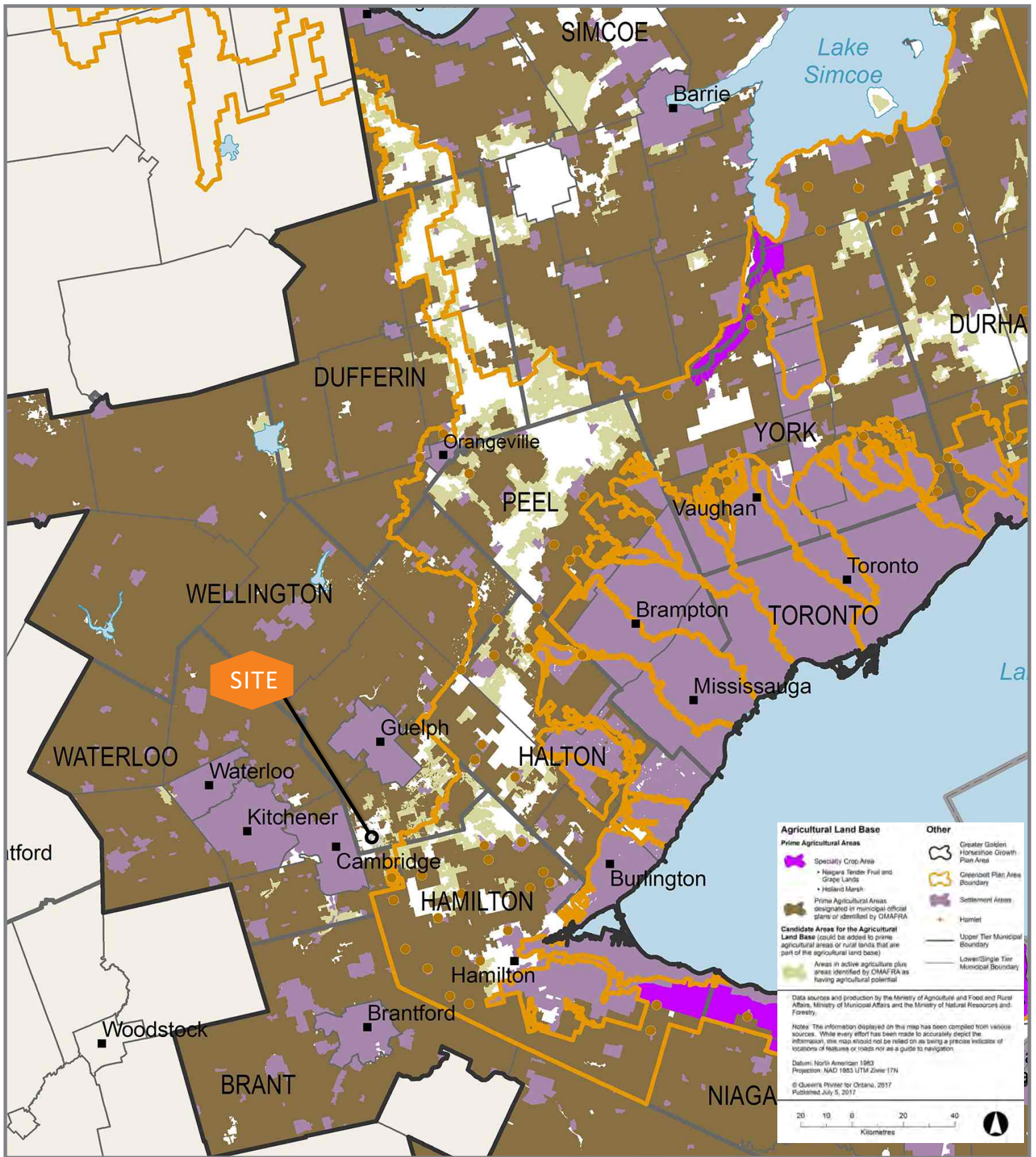


GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE

DRAFT SCHEDULE | DRAFT REGIONAL NATURAL HERITAGE SYSTEM

FIGURE 4
6615 Concession 1, Township of Puslinch ON

Not to Scale | December 2017 | 17.684



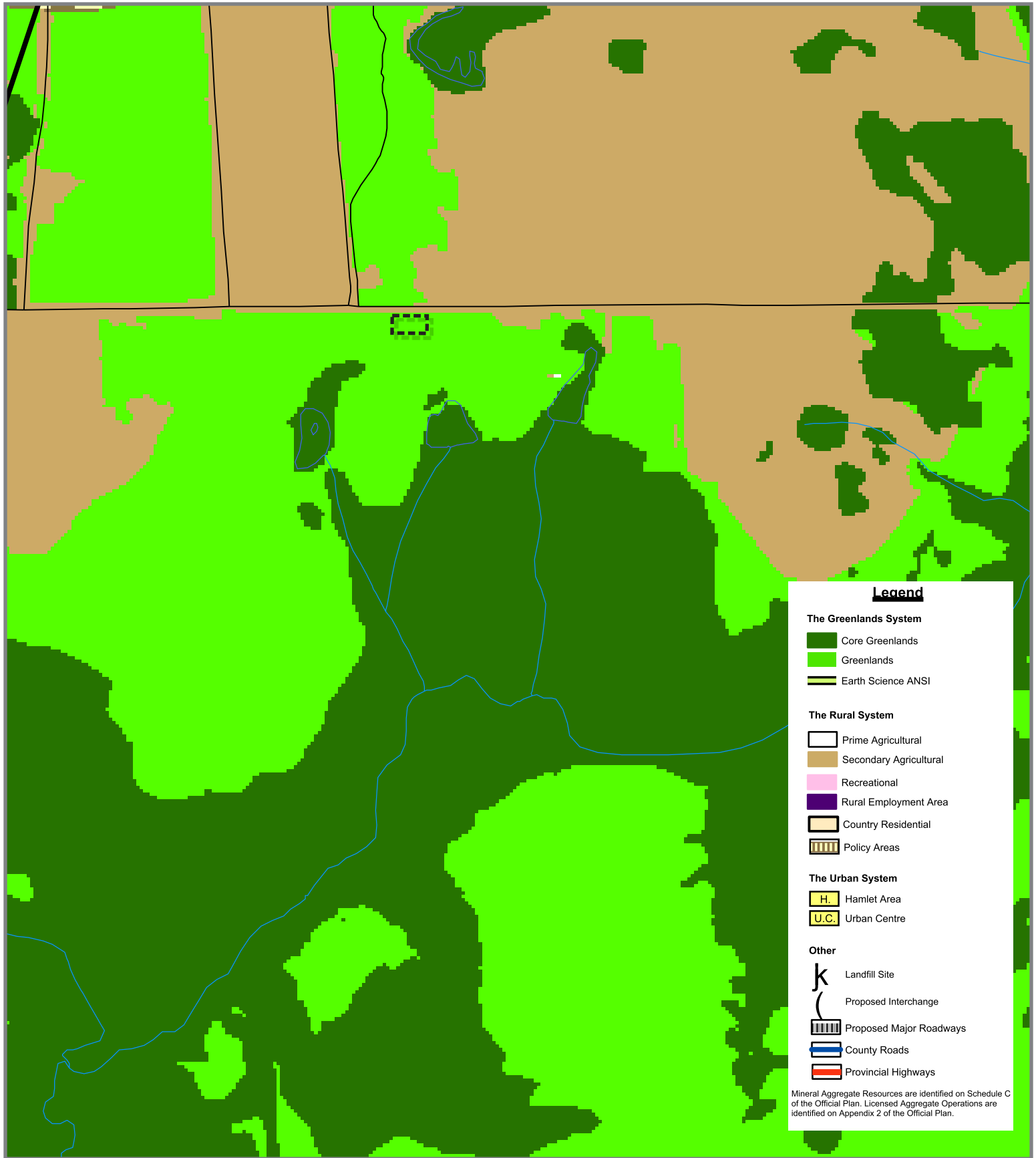
GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE

DRAFT SCHEDULE | DRAFT AGRICULTURAL LAND BASE

Not to Scale | December 2017 | 17.684

FIGURE 5

6615 Concession 1, Township of Puslinch ON



COUNTY OF WELLINGTON OFFICIAL PLAN

SCHEDULE A7: PUSLINCH

Approximate Location of Proposed Building & Expansion Area [Dashed Box]
 Not to Scale | December 2017 | 17.684

FIGURE 6

6615 Concession 1, Township of Puslinch ON



COUNTY OF WELLINGTON OFFICIAL PLAN

LAND USE MAPPING


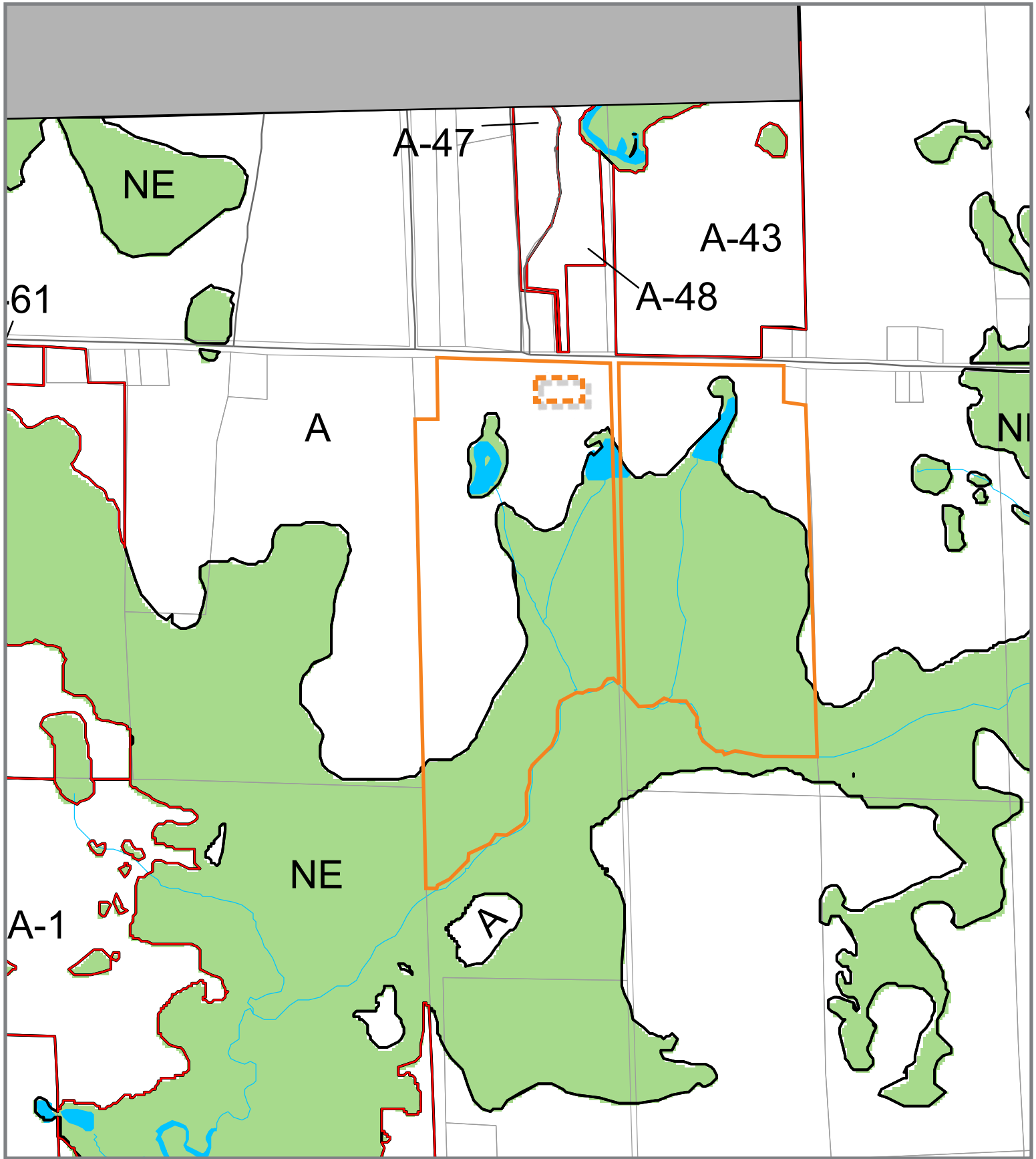
Approximate Location of Proposed Building & Expansion Area 
 Not to Scale | December 2017 | 17.684

FIGURE 7

6615 Concession 1, Township of Puslinch ON



TOWNSHIP OF PUSLINCH ZONING BY-LAW 19/85

SCHEDULE A

6615 Concession 1 

Proposed Building Location & Expansion Area 

Not to Scale | December 2017 | 17.684

FIGURE 8

6615 Concession 1, Township of Puslinch ON

6 Conclusion

The Proposed Development is appropriate for the Subject Site and will help to achieve land use policies of the Province and Municipality. Specifically, the Proposed Development:

- Is consistent with the Provincial Policy Statement 2014, as it represents appropriate development within the *rural area* while appropriately protecting natural heritage features;
- Conforms to the Rural Areas and Natural Heritage policies of the Growth Plan for the Greater Golden Horseshoe, 2017 and will not be impacted by the Draft Agricultural Land Base mapping;
- Conforms to the Official Plan's policies relative to development within the Secondary Agricultural Area designation, the preservation of natural and environmental lands, and the promotion of local economic competitiveness and growth;
- Supports local economic development within an area designated for agriculture and small-scale commercial uses;
- Provides an appropriate scale of building within the surrounding rural context;
- Will not impact any Provincially Significant Wetlands or other key natural heritage features;
- Will not impact the agricultural capability of the Subject Site or any surrounding properties;
- Can be accommodated through the existing transportation and roadway infrastructure;
- Will not impact the on-going conservation efforts and management plans on the Subject Site; and

Can be accommodated through appropriate rural water and septic servicing systems.

Having had regard to the many factors discussed in this report, the Proposed Development conforms to all relevant Provincial and Municipal policies, and will help implement the Provincial and Municipal land use planning vision for the Greater Golden Horseshoe and local Wellington County area.

The proposed development is reasonable, represents good planning and warrants the support of both staff and Council.

WND associates
planning + urban design



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