

THE CORPORATION OF THE TOWN OF MISSISSIPPI MILLS

BUILDING and PLANNING REPORT

MEETING DATE: May 12th, 2015

TO: Committee of the Whole

FROM: Stephen Stirling - Planner MCIP, RPP

SUBJECT: **MISSISSIPPI MILLS RURAL LOT CREATION POLICIES
COMMUNITY OFFICIAL PLAN REVIEW**

RECOMMENDATION:

“THAT the Committee of the Whole recommends Council maintain the current rural lot creation policies of the Community Official Plan.”

BACKGROUND:

In 2010, the Town of Mississippi Mills began its five-year review of the Community Official Plan and its land use planning policies until 2025. Staff consulted with Council, senior managers and local sub-committees in an effort to review current policies and identify any issues. In 2011, there was a change in the members of Council which resulted in a request to review the current rural lot creation policies, including severances and plans of subdivision.

On April 22, 2013, JL Richards completed a review of the current severance policies in the Community Official Plan (attached). The review included a review of the previous severances and a GIS calculation/simulation of the current severance policies. Using a number of filtering criteria, including the agricultural designation, municipal road access, lots under 2 ha and the aggregate buffer, but not including minimum distance separation, hydrogeological, wetlands or ANSI's because these factors are site-specific and rarely result in the elimination of a potential lot. The results of the analysis determined the number of potential lots and where they might be located. In the end, the study concluded that current lot creation policies would potentially create a total of 748 building lots, with the majority of them being located in Ramsay Ward. The intent of this study was to review the rural lot creation policies in the Community Official Plan and determine if there was a need to revise the local policy.

While the background study indicated that there is sufficient land available in the rural area to accommodate limited rural development, Council has directed staff to assess two rural lot creation policy options (severances) to create a more flexible severance policy that would allow for the creation of lots in more desired locations in an effort to meet the growth strategy objectives.

On June 10th, 2014, a public meeting was held to discuss the issues of rural development in Mississippi Mills, including rural subdivisions, cluster lot development and rural severances. The policy review included a survey of the public to gauge feedback on the current Community Official Plan Policies regarding rural development and any potential change in policy. The Town received a total of 189 responses to the request for public feedback, which included completed surveys, letters or e-mail

responses. The public survey reflected many of the feelings being discussed around the Council table. The data concluded that the community was not interested in permitting estate lot subdivisions and supported maintaining cluster lot development. At the same time the majority wanted to retain current severance policies. Of those who responded to the survey, 55% (104) wanted no change, while 45% (85) of the public wanted some change to the severance policies.

Community Official Plan – Severance Policies

The Provincial Policy Statement directs that the majority of growth occur within settlement areas, while allowing a limited amount of growth in the rural area. The current land severance policies in the COP reflect this directive mandated by the Province of Ontario. The Growth Strategy Plan for the Town of Mississippi Mills directs that 50% of the growth occur in the urban area, 30% in the rural area (i.e. severance) and 20% in the rural settlement area on communal systems.

The current Community Official Plan (also known as COP) policy limits the number of non-farm residential lots created by severance per land holding to two plus the remnant lot. The Community Official Plan defined a land holding as “a parcel of land held in conveyable ownership as of July 1st, 1973 or an original Township Lot”. The COP also permits an intensified form of rural development by way of consent, called Cluster development. Depending on the number of previous severances from the original Township lot, this form of development could permit up to a maximum of five lots clustered together being accessed by a private road. The intent of this policy was to allow rural development in a manner that was more sympathetic to the rural character.

SEVERANCES

The current severance policy has been in place since the adoption of the Community Official Plan in late 2005, and approved by the Ministry of Municipal Affairs and Housing in 2006. Over the last five years the Town as averaged 16.4 new severance lots per year and is ranked second in the County, only behind Drummond North Elmsley, who has no subdivision development. The table below summarizes severance activity in the Town over the last five years:

SEVERANCE ACTIVITY SUMMARY							
Municipality	Type	2010	2011	2012	2013	2014	Total
Mississippi Mills	Severance	15	18	12	14	23	82
5 Year Average							16.4

RURAL DEVELOPMENT ACTIVITY

When reviewing the severance policies it is also important to note the building permit activity. While lots can be created they would remain vacant if there is no desire to develop them. The table below summarized the new dwelling building activity in the rural community only:

RURAL BUILDING PERMIT ACTIVITY-NEW DWELLINGS												
TYPE	2010		2011		2012		2013		2014		TOTAL	
	RAM	PAK	RAM	PAK								
New Dwelling	12	12	16	6	19	8	22	6	23	2	92	34
5 Year Rural Average (25.2)											18.4	6.8

METHODOLOGY

The process to determine which properties would have the ability to be subdivided went through a two-step process by determining which lots could be severed based on current policy and then refining the lots by filtering out the lots with development constraints.

Town staff reviewed the severances that occurred within the Town of Mississippi Mills (Pakenham and Ramsay Wards) over the last 41 years and created a database to itemize the severance details. JL Richards then filtered all parcels within the rural community of the municipality to determine the pool of land available for future severances with five main filters. These filters included prior severances, agriculturally designated lands, lots less than 2 hectares of area, lands with no frontage on a municipal maintained road, properties within the 500 buffer of a quarry and 300m of a pit.

Factors, such as provincially significant wetlands, environmentally sensitive areas and Minimum Distance Separation were considered, but were not ruled out because these issues are addressed through site specific review and supporting studies. Furthermore, provincial planning policies and local polices allow development to occur, such as lot creation, provided that it has no negative impact on the feature.

SEVERANCE OPTIONS

1. No Change

The current rural lot creation policy permits two severances per land holding held in a conveyable ownership as of July 1st, 1973. For parcels of land that fall within the Natural Heritage Plan, the lot creation policy would limit the potential number of severances to one.

2. Permit an additional severance on a lot where the retained parcel is greater than 20ha (49.4ac)

This option maintains the existing land holding standard date of July 1, 1973. Where a lot is being held in a conveyable ownership as of July 1, 1973, consideration can be given for the subdivision of the land to a maximum of two lots. If after the two severances, the subject property retains a parcel area of 20 ha (49.4ac) or greater, consideration may be given for a third severance, provided it can satisfy all other policies of the COP.

3. Move the Land Holding Date from July 1st, 1973 to January 1st, 1985

This option proposes a maximum number of severances to two, plus a retained with a land holding creation date being moved from July 1, 1973 to January 1st, 1985. For parcels of land that fall within the Natural Heritage Plan, the lot creation policy would limit the potential number of severances to one. A land holding would be a parcel of land held in conveyable ownership as of January 1st, 1985.

4. Land Holding Date of January 1st, 1985 with Natural Heritage Area (Lots with a min 20ha)

This option proposes a maximum number of severances of two, plus a retained with a land holding creation date being moved from July 1, 1973 to January 1st, 1985 with the subject lot having a minimum lot area of 20ha. For parcels of land that fall within the Natural Heritage Plan, the lot creation policy would limit the potential number of severances to one. A land holding would be a parcel of land held in conveyable ownership as of January 1st, 1985.

The table below summarizes the impacts of the severance options identified above:

SEVERANCE POLICY SUMMARY			
Options	Lot Potential		
	NHA-No Lots	1 Lot in NHA	2 Lots in NHA
Current Policy (2 Plus retained)	370	447	522
3 rd Severance with 20ha retained lot	687	764	839
1985 Land Holding Date	1129	1301	1464
1985 Land Holding Date (20ha retained)	612	690	768
NOTES Totals do not include vacant retained lots. All options include NHA as a filter. Total of 77 lots (447-370) in the NHA that potentially could be severed based on 1973 date. Total of 95 lots (88 lots + 7 lots from Option 3) in the NHA that potentially could be severed based on 1985 date. NHA refers to the Natural Heritage Area.			

DISCUSSION:

Both Provincial and local planning policies currently direct the majority of the Town's growth to occur within the established settlement areas while allowing limited rural development to occur in an effort to achieve municipal sustainability. Through the growth strategy policies outlined in the Community Official Plan, the Town is striving to find that balance. A review of the current severance policies have projected a total of 469 building lots between the two rural wards (excluding the Natural Heritage Area), including 370 severance potential lots and 99 retained vacant lots. Based on current lot severance rates, the Town has a potential 32 year supply (approx.), which exceeds the life span of the Community Official Plan. Furthermore, based on the average current rate of new home construction in the rural wards, the available supply of lots would exceed 18 years. If the Town permits limited lot creation within the Natural Heritage Area, the number of severances and building lots will only increase depending on the number allowed. The table above looks at three options that could see an increase in severances from 370 to 522. Current development trends do not suggest that there is a need to change the current policy.

It is important to note that the Town can only create lots/building lot opportunities through policy, where the decision to sever a lot or not ultimately rests with the property owner. If property owners chose not sever their lot, or to sever and hold the lot, the desired effect of rural growth may not ultimately be achieved. It is staff's opinion that the current policy creates a sufficient supply of lots.

The previous Council raised concerns regarding growth pressures in Almonte Ward, significant rural growth in Ramsay Ward impacting the rural character, and future expansion of Almonte Ward and sustainability of Pakenham Ward due to such limited growth. It is important to remember that the Town has invested significant capital into local infrastructure, including the new sewage treatment plant, and as such the Town needs to grow in these settlement areas to pay for these investments. When growth is encouraged in under-developed rural areas, this will require future municipal improvements including road upgrades, widening, surfacing, storm ditch improvements, lighting, traffic lights and other upgrades.

Recognizing that the owners of some of the potential lots that can be severed may not sever the lots, the previous Town Council requested that staff look at two options that would not significantly deviate from the current policy but would allow for an easing up on the severance policy and the possibility of

creating some additional lots while addressing some of their concerns. The two options that were reviewed included allowing a third severance on a land holding that existed as of July 1, 1973, where the retained lot would maintain a minimum lot size of 20 ha (50ac) and the second would permit two severances on a lot that existed as of January 1st, 1985.

Allowing a third severance on a land holding that existed as of July 1, 1973, where the retained lot would maintain a minimum lot size of 20 ha (50ac) would increase the potential number of severed lots from 370 to 687 and building lots from 469 to 786. The overall change in development potential within the rural wards in Mississippi Mills is 317 severances or new building lots. It is important to note that the lot distribution would be slightly higher in Ramsay Ward than in Pakenham Ward. Some have suggested that the Town should create different severance policies for different wards. The creation of policies that treat wards differently would be difficult to maintain while creating a perception of being treated differently depending on which ward the subject lands would fall within.

Moving the land holding date from July 1st, 1973 to January 1st, 1985, would create the most significant change between the two options. Once again the majority of the severances would be within Ramsay Ward, but there would be an increase in development potential in Pakenham Ward as well. The main benefit to the Town by moving the date forward, other than the development potential, is associated the Land Division records. The file details are much more complete and detailed than the older files, which would be beneficial to the Town with respect to processing these applications.

The final option moved the date forward to January 1, 1985 and allows a maximum of two severances on a land holding that was 20ha in size or greater. While this option maintained a limited growth in the rural area, it would take away severance rights from 109 properties that currently can be severed, which will likely create opposition within the community. If the municipality achieves a similar rural development rate in the rural area without taking away current owners' severance rights, that approach should be the preferred one.

CONCLUSION:

In regards to the current rural lot creation polices, Council requested staff to review the current severance polices along with two other options, being permitting allowing a third severance on a land holding that existed as of July 1, 1973, where the retained lot would maintain a minimum lot size of 20 ha (50ac); and, permitting two severances on a lot that existed as of January 1st, 1985. Keeping in mind the number of existing potential severances and rural building lots, the existing municipal infrastructure investment and distribution of lots resulting of the change in policy, it is staff's recommendation to maintain the current rural lot creation policies.

All of which is respectfully submitted.

Stephen Stirling, MCIP, RPP
Planner

Reviewed by CAO
Diane Smithson

OPTION 1 – CURRENT SEVERANCE POLICY



POTENTIAL FUTURE SEVERANCES - Option 1 Existing Policy (January 1, 1973 Cut-Off Date) Corporation of the Town of Mississippi Mills



Legend

Roads

- Maintained
- Not Maintained

Natural Heritage Area (MVFN, MVCA)

Aggregate Site

- Pit (300m Buffer)
- Quarry (500m Buffer)

Existing Official Plan Agriculture

(28969 ac)

Number of Potential Lots Inside Natural Heritage Area

- Area 2ha to 3ha - 2 Existing Lots (1 Existing dwelling, 1 Vacant retained)
- Area > 3ha - 75 Existing Lots (28 Existing dwellings, 47 Vacant retained)

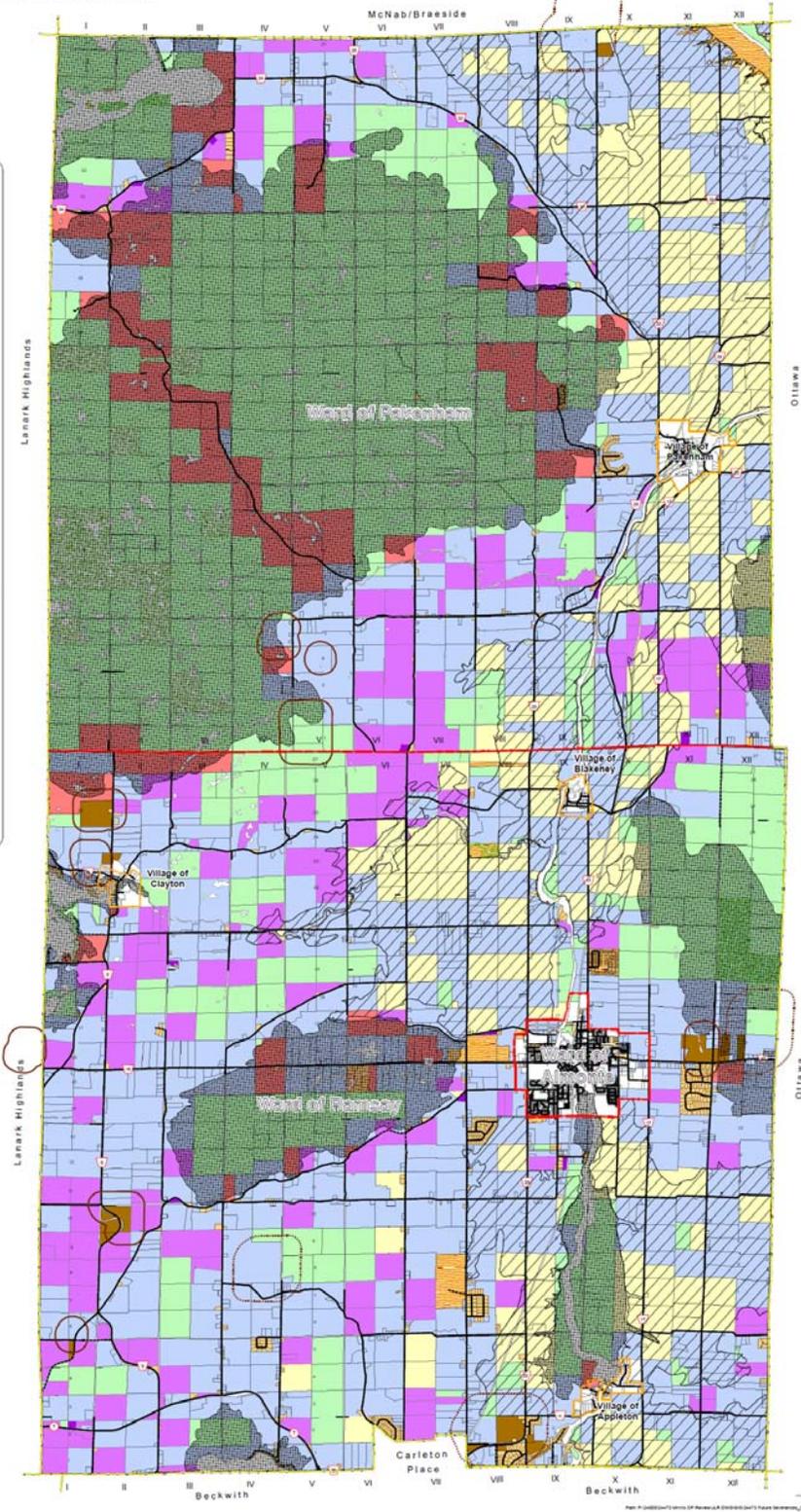
Potential Future Severances (370 Lots)

- Area 2ha to 3ha - 1 Retained & 1 Future (14 Lots: 8 Existing dwellings, 6 Vacant retained) = 14 Potential Future Severances
- Area > 3ha - 1 Retained & 2 Future (178 Lots: 85 Existing dwellings, 93 Vacant retained) = 356 Potential Future Severances

Crown Land

Removed from Potential Future Severances

- Already Severed
- AG Land Option 3
- No Road Frontage
- Urban
- Parcel Area < 2ha
- Aggregate Buffer
- OTHER

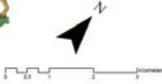


Map # 20080207 Series 01 Revised 20080207 01/11/08 Planning, Development, & Engineering

OPTION 2 - THIRD SEVERANCE LAND HOLDING JULY 1, 1973 WITH RETAINED LOT OF 20HA



POTENTIAL FUTURE SEVERANCES - Option 2 One additional Severance for lots > 20ha Corporation of the Town of Mississippi Mills



Legend

Roads

- Maintained
- Not Maintained

Natural Heritage Area (MVFN, MVCA)

Aggregate Site

- Pit (300m Buffer)
- Quarry (500m Buffer)

Existing Official Plan Agriculture

(28909 ac)

Number of Potential Lots Inside Natural Heritage Area

- Area 2ha to 3ha - 2 Existing Lots (1 Existing dwelling, 1 Vacant retained)
- Area > 3ha - 75 Existing Lots (28 Existing dwellings, 47 Vacant retained)
- Area > 20ha - 1 Future = 75 Existing Lots

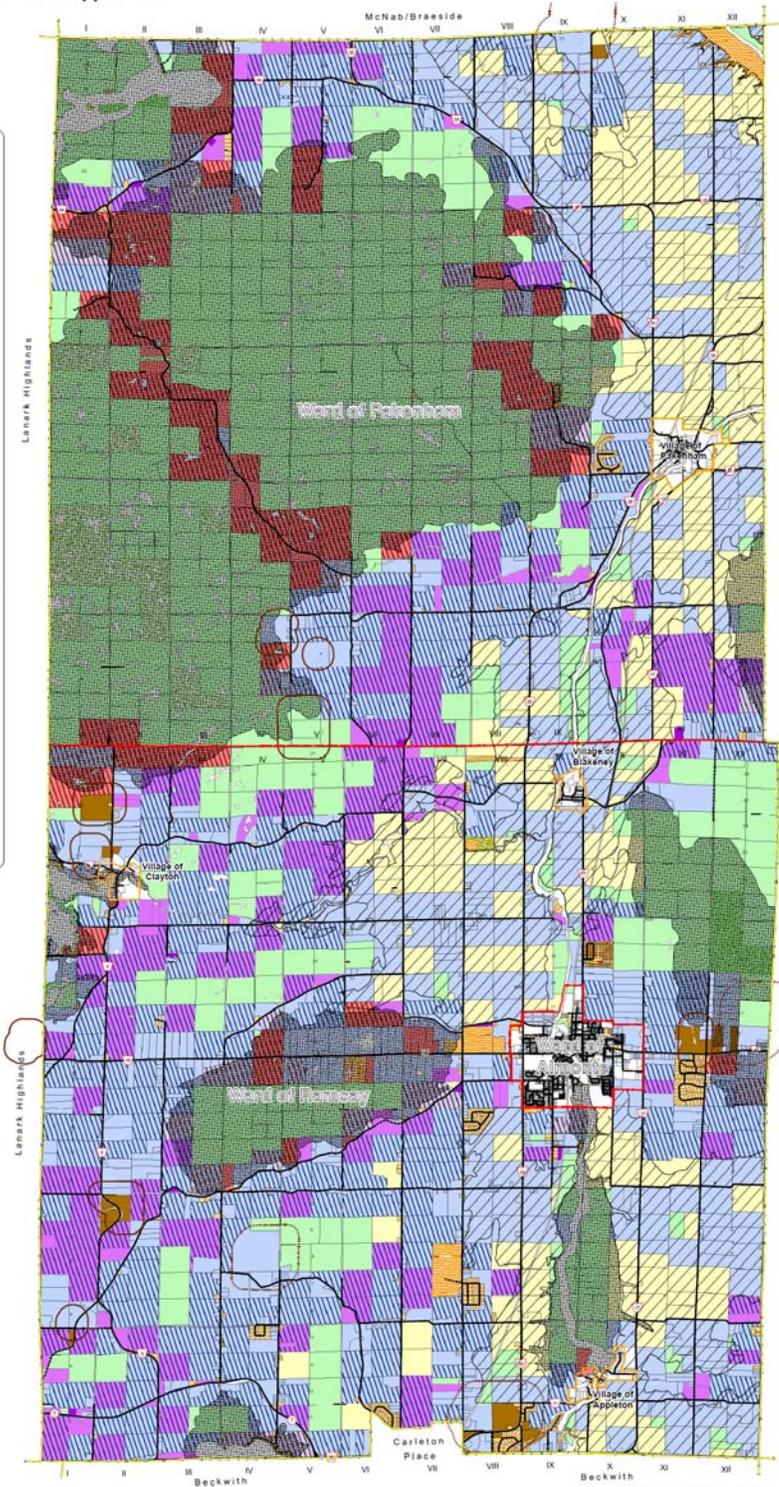
Potential Future Severances (687 Lots)

- Area 2ha to 3ha - 1 Retained & 1 Future (14 Lots: 8 Existing dwellings, 6 Vacant retained) = 14 Potential Future Severances
- Area > 3ha - 1 Retained & 2 Future (178 Lots: 85 Existing dwellings, 93 Vacant retained) = 356 Potential Future Severances
- Area > 20ha - 1 Future = 317 Potential Lots

Crown Land

Removed from Potential Future Severances

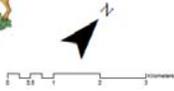
- Already Severed
- AG Land Option 3
- No Road Frontage
- Urban
- Parcel Area < 2ha
- Aggregate Buffer
- OTHER



OPTION 3 – 1985 LAND HOLDING DATE



POTENTIAL FUTURE SEVERANCES - Option 3 1985 Cut-Off Year Corporation of the Town of Mississippi Mills



Legend

Roads
 Maintained
 Not Maintained

Natural Heritage Area (MVFN, MVCA)
 Natural Heritage Area (MVFN, MVCA)

Aggregate Site
 Pit (300m Buffer)
 Quarry (500m Buffer)

Existing Official Plan Agriculture
 (26969 ac)

Number of Potential Lots Inside Natural Heritage Area

1973 cut-off year
 Area 2ha to 3ha - 2 Existing Lots
 (1 Existing dwelling, 1 Vacant retained)
 Area > 3ha - 75 Existing Lots
 (28 Existing dwellings, 47 Vacant retained)

1985 cut-off year
 Lot Area 2ha to 3ha - 7 Existing Lots
 (4 Existing dwelling, 3 Vacant retained)
 Lot Area > 3ha - 88 Existing Lots
 (62 Existing dwellings, 26 Vacant retained)

Potential Future Severances (1129 Lots)

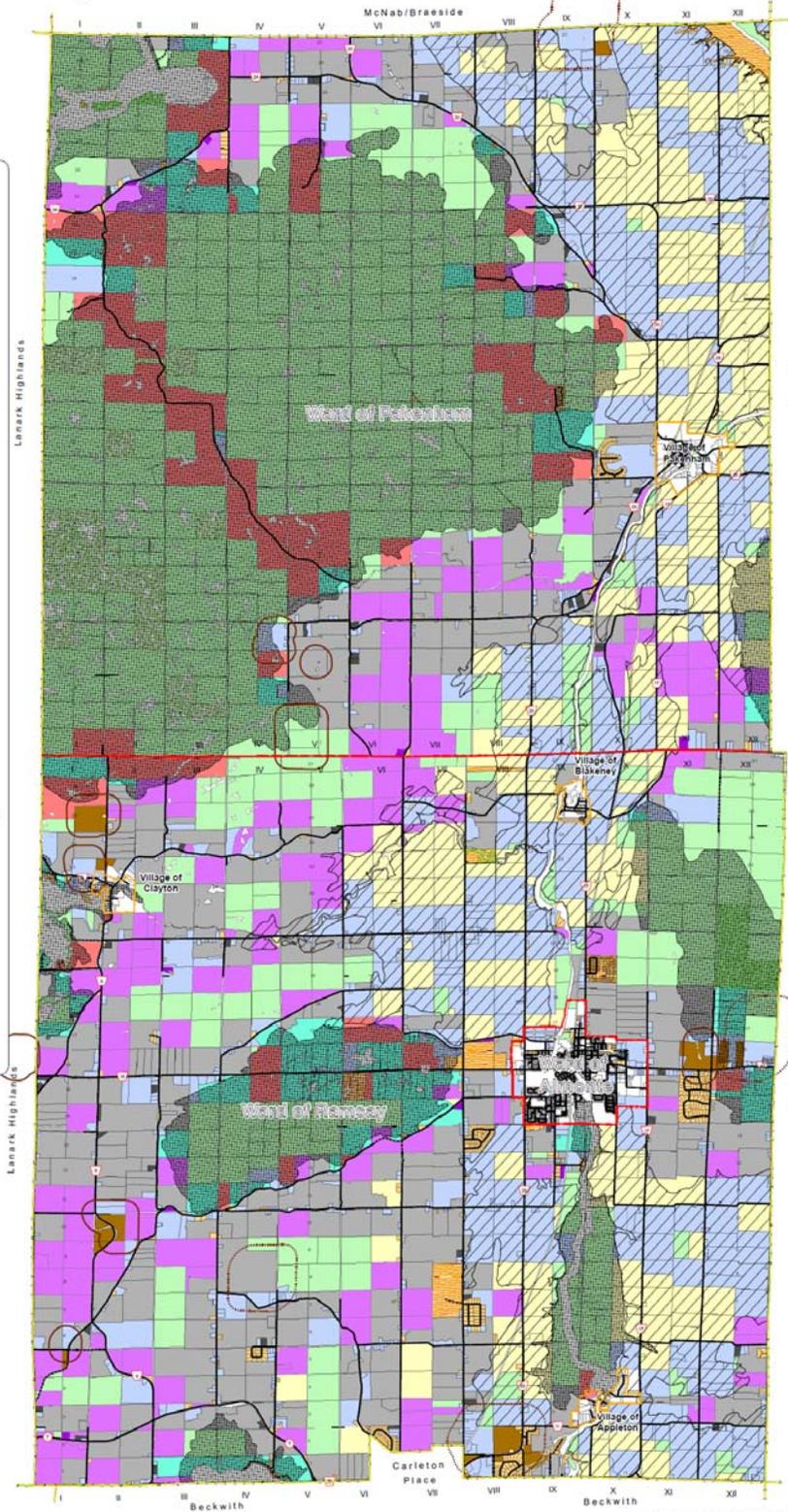
1973 cut-off year
 Area 2ha to 3ha - 1 Retained & 1 Future
 (14 Lots: 8 Existing dwellings, 6 Vacant retained)
 = 14 Potential Future Severances
 Area > 3ha - 1 Retained & 2 Future
 (178 Lots: 85 Existing dwellings, 93 Vacant retained)
 = 356 Potential Future Severances

1985 cut-off year
 Area 2ha to 3ha - 1 Retained & 1 Future
 (47 Lots: 41 Existing dwellings, 6 Vacant retained)
 = 47 Potential Future Severances
 Area > 3ha - 1 Retained & 2 Future
 (356 Lots: 182 Existing dwellings, 174 Vacant retained)
 = 712 Potential Future Severances

Crown Land
 Crown Land

Removed from Potential Future Severances

- Already Severed
- AG Land Option 3
- No Road Frontage
- Urban
- Parcel Area < 2ha
- Aggregate Buffer
- OTHER

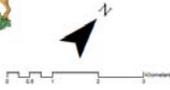


OPTION 4 – 1985 LAND HOLDING DATE (Lots with a minimum area of 20ha)





POTENTIAL FUTURE SEVERANCES - Option 4 1985 Cut-Off Year and Lots > 20ha
 Corporation of the Town of Mississippi Mills



Legend

Roads
 ~ Maintained
 ~ Not Maintained

Natural Heritage Area (MVFN, MVCA)
 [Pattern]

Aggregate Site
 Pit (300m Buffer)
 Quarry (500m Buffer)

Existing Official Plan Agriculture
 (28009 ac)

Number of Potential Lots Inside Natural Heritage Area

1973 cut-off year
 Area > 20ha - 46 Existing Lots
 (18 Existing dwellings, 28 Vacant retained)

1985 cut-off year
 Area > 20ha - 32 Existing Lots
 (17 Existing dwellings, 15 Vacant retained)

Potential Future Severances (612 Lots)

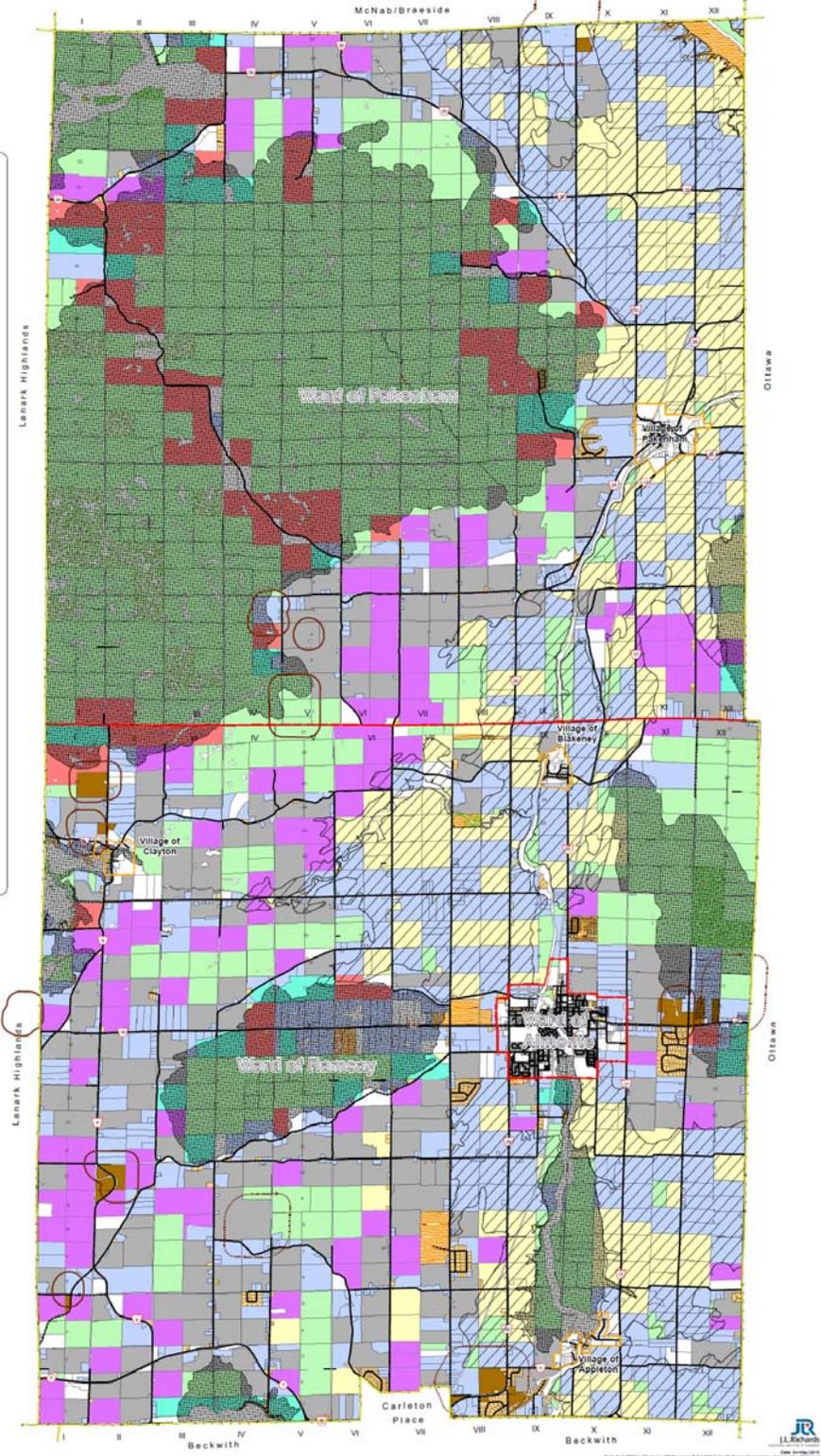
1973 cut-off year
 Area > 20ha - 1 Retained & 2 Future
 (114 Lots: 52 Existing dwellings, 62 Vacant retained)
 = 228 Potential future severances

1985 cut-off year
 Area > 20ha - 1 Retained & 2 Future
 (192 Lots: 67 Existing dwellings, 125 Vacant retained)
 = 384 Potential future severances

Crown Land
 [Pattern]

Removed from Potential Future Severances

- Already Severed
- AG Land Option 3
- No Road Frontage
- Urban
- Parcel Area < 2ha
- Aggregate Buffer
- OTHER



MEMORANDUM

PAGE 1 OF 4

TO: Stephen Stirling, MCIP, RPP
Town Planner
Town of Mississippi Mills

DATE: April 22, 2013

FROM: Marc Rivet, MCIP, RPP

JOB NO.: 24473-02

RE: Mississippi Mills Potential Future Severances

CC:

Supplemental Report to the Comprehensive Review

Section 1.1.4.1 a) of the Provincial Policy Statement (2005), stipulates that within the Rural areas, permitted uses and activities shall relate to the management or use of resources, resource-based recreational activities, limited residential development and other rural land uses.

The current Community Official Plan has established a 50/30/20 Settlement Strategy. The Plan is designed to direct 50% of future growth to Almonte on full municipal services, 30% to rural areas and villages with large lots (private services), and 20% to existing villages or new rural settlement areas with a form of servicing that can support 1,000 to 2,000 square metres.

According to the Comprehensive Review report prepared as part of the Official Plan Review, it was projected that 2,493 new lots/units would be required to meet the 20 year growth projection. Based on the Settlement Strategy, this would translate into some 748 new lots/units in the Rural area and Village on large lots.

The Community Official Plan prohibits new rural estate lot subdivisions.

Section 2.5.3.2.3.9 of the Community Official Plan permits:

"The creation of new residential lots outside of identified settlement areas shall take place by consent to sever. Generally, non-farm rural residential lots shall be 1 ha (2.4 acres) in size. The number of lots created by consent per land holding shall be a maximum of two plus the remnant lot, except as otherwise provided for in this Plan. A holding is defined as either a parcel of land held in a conveyable ownership as of July 1, 1973 or an **original township lot**. Consents for a boundary adjustment, partial discharge of mortgage, easement or right-of-way shall not be considered toward the maximum consents per holding. Notwithstanding the above, consideration may be given to "cluster lot" development proposals in compliance with the policies contained in Section 3.3.7 of this Plan."

Based on records from the consent approval authority, an average of 21 lots per year are created through applications for consent to sever rural residential lots over the past five (5) years. Of these, 82.5% are outside Rural Settlement Areas. Assuming this constant, an additional 347 lots/units could be added to the rural land supply over the twenty-year planning horizon (excluding the retained parcel). Of these, 347 lots/units would be in the Rural area (20 year planning horizon).

This number is expected to decline in the future as the number of lots conforming to the rural residential consent policies diminishes.

The question then becomes: Are there sufficient rural lands that could (possibly) meet the rural residential consent policies to meet the 20 year projection and maintain the 50/30/20 Settlement Strategy?

Potential Future Rural Severances

The objective of this exercise was to evaluate how many rural lots in The Corporation of the Town of Mississippi Mills (Town) are available for future rural severances. A Geographic Information System (GIS) application was used to analyze different datasets and apply a series of filters to the lot fabric layer to display the lots that met certain requirements for future rural severances. Datasets for the exercise were supplied by the Ministry of Natural Resources and the Town itself.

The final output was a GIS layer showing all potential future rural severances. This is a very high level desktop analysis exercise using various qualities of datasets. Below is a description of the filters used to remove lots for potential future rural severances.

Urban Area Filter

This is a rural area study so any lands inside a settlement area, such as the Ward of Almonte or any of the smaller villages and certain estate lot subdivisions were removed from the potential rural severances layer.

Lands Already Severed

The Town undertook a study that looked at past lot severances going back to 1972. The Town tried to assess which parcels had already received consent approval to create a rural lot so they could be removed from the future potential rural severances layer. This was a very time consuming task especially when dealing with old severances with little background information and limited plans or drawings.

Agricultural Land (Ex Official Plan)

Any lots covered by 50% or more of agriculture were removed from the selection. The agricultural boundary from the Town's existing Official Plan was used to filter these lots. This screening criteria was used rather than evaluating Minimum Distance Separation (MDS I or MDS II) from livestock and manure facilities.

Less than 2 Hectares Lot Area

For a severance to occur a rural lot is required to have an area of at least two hectares (1 ha severed and 1 ha retained). Lots not meeting this requirement were removed.

No Frontage on a Municipally Maintained Road

Any land that did not have frontage (minimum 45 metres) on a year-round municipally maintained road was removed from the selection.

Aggregate 500 metre Buffer

Any lots within 500 metres of a licensed pit or quarry were removed as a potential future rural severance.

Others

This includes lots that were filtered out based on input from the Town as a result of previous screening methods that deemed certain lots not eligible for future severances.

Summary of Potential Future Rural Severances

Based on the potential future severances exercise, it was assumed that some 547 rural lots could be created by consent. In addition, there would be 152 retained lots (without structures) which also form part of the rural lot land supply. There is therefore a possibility for some 699 rural lots in the Rural areas.

Vacant Rural Lots and Large Village Lots

In addition to the potential future rural severances in the Rural areas, there are also some 42 vacant rural estate lots within previously approved rural plans of subdivision and a potential for some 42 rural lots through cluster lot policies.

According to the Settlement Strategy, the 30% can also include large lots within the Villages. A Land Use Survey was also completed as part of the Comprehensive Review, this survey identified some 178 hectares of vacant lands. Assuming a split of 65% residential and 35% non-residential, and the Community Official Plan policy for 0.4 hectare lots, there is a potential for 289 lots/units with the Rural Settlement Areas (Villages).

In summary, in addition to the potential lots created by rural consent, there are also some 373 potential lots/units in the Rural Area and Villages (existing estate lot subdivisions, cluster lots, large village lots).

Conclusion

The Potential Future Severances (rural) exercise has demonstrated that there are sufficient growth opportunities in the Rural Area to meet projections of 387 lots/units in the Rural Area (excluding large Village lots). Furthermore, this exercise and the land use inventory have demonstrated that there are sufficient opportunities in the Rural Area and Villages (large lots) to meet the growth strategy which could translate into 748 lots/units.

Regards,

J.L. RICHARDS & ASSOCIATES LIMITED



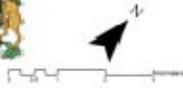
Marc Rivet, MCIP, RPP

MR:jd

Attach. - Potential Future Severances Figure



POTENTIAL FUTURE SEVERANCES
Corporation of the Town of Mississippi Mills



Legend

Roads

- Maintained
- Not Maintained

Crown Land



Potential Future Severances

- Area 2ha to 3ha - 1 Retained & 1 Future
(9 Existing, 8 Retained + 17 Future Severances
= 25 Potential Lots / Units)
- Area > 3ha - 1 Retained & 2 Future
(121 Existing, 144 Retained + 530 Future Severances
= 674 Potential Lots / Units)

Future Severances (Removed)

- All other values
- Already Severed (Remove from Selection)
- AG Land Option 3 (Remove from Selection)
- No Road Frontage (Remove from Selection)
- Urban (Remove from Selection)
- Parcel Area < 2ha (Remove from Selection)
- Aggregate 500m Buffer
- OTHER

