

**Ontario**  
Home Builders' Association

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20 Upjohn Rd., Suite 101 (416) 443-1545  
North York, Ontario Toll Free 1-800-387-0109  
M3B 2V9 Fax: (416) 443-9982  
[www.ohba.ca](http://www.ohba.ca) [info@ohba.ca](mailto:info@ohba.ca)

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Protecting Water  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay Street, Floor 13  
Toronto, ON M5G 2E5

**RE: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring Notice #013-1661**

**Background**

The Ontario Home Builders' Association (OHBA) supports the principle of protecting our most valuable environmental resources while building complete communities that are the foundation of the Growth Plan and Greenbelt Plan. The Greater Golden Horseshoe (GGH) is one of Canada's economic engines and hosts some of Canada's best farmland and natural features. It is also one of the fastest growing regions in the country, which is why it is so critical to ensure that our policy framework to implement a long-term vision for growth is clear, balanced, transparent and effective. In October 2016, OHBA submitted our recommendations regarding the Greenbelt as part of the Coordinated Review process, which outlined concerns with mapping errors and implementation challenges. In February 2017, OHBA made a submission with respect to proposed amendments to the Greenbelt area mapping and the Greenbelt Boundary Regulation (EBR 012-9247 & 012-9241). OHBA's key recommendation to the province at the time with respect to boundary adjustments was for the province to establish clearly defined criteria for any adjustments in order to ensure a transparent process that is accountable to all stakeholders.

The Greenbelt Plan was established in 2005, under the *Greenbelt Act, 2005*, to protect environmentally sensitive and agricultural land. The current Growing the Greenbelt proposal potentially adds another layer on top of an already robust and complicated regulatory and planning framework government by the PPS and the recently completed Coordinated Land Use Planning Review which resulted in updates to the Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan. The Advisory Panel for the Review, chaired by David Crombie recommended that the province lead a process to grow Ontario's Greenbelt to protect areas of ecological and hydrological significance where urbanization should not occur. At the time of launching the updated Greenbelt Plan, the government committed to undertake a process, including public consultation, to expand the Greenbelt on its outer edge.

In December 2017, the Ministry of Municipal Affairs requested input on a study area for potential Greenbelt expansion to protect water resources in the outer ring of the GGH. The study area released by the province (EBR 013-1661) is based on locations with high concentrations of water features that the province has stated as being under pressure from current or forecasted urban development.

## **Process to for Growing the Greenbelt in the Outer Ring:**

The province has stated clearly that the study area is not a proposed Greenbelt boundary and that it is not consulting on a proposed Greenbelt boundary at this time. The province specifically stated in the Environmental Registry posting that:

“The study area is conceptual and incorporates additional land around the identified water features. The study area is not a proposed boundary. Input received through this consultation will help inform decisions on how to move from a study area to a proposed Greenbelt boundary.”

Therefore, comments through this Environmental Registry posting should be specific to these seven study areas and the province should not at the next stage of consultation, propose greenbelt expansion outside of these seven study areas. As the province moves from a study area to a proposed Greenbelt Boundary, extensive additional due diligence in terms of scientific data, detailed technical mapping and “ground truthing” will be required within the seven study areas currently being consulted on.

Regarding next steps, the province has stated, “in keeping with the requirements of the *Greenbelt Act, 2005*, the province would consult with the public, municipalities, Conservation Authorities, stakeholders and Indigenous communities and organizations on a proposed amendment to the Greenbelt Plan and boundary prior to any changes being made.” OHBA is supportive of additional consultation to ensure accountability and transparency regarding growing the greenbelt in the Outer Ring as well as an opportunity for further feedback and ability to “ground truth” actual delineation of the proposed boundaries.

OHBA is however very concerned by the timing of the current and potential second round of consultation on a proposed greenbelt boundary. The province just completed the Coordinated Review of the four updated land-use plans, which came into effect on July 1, 2017. Municipalities are now just getting underway with their Municipal Comprehensive Review (MCR) to bring their Official Plans into conformity with the updated provincial plans and the province is finalizing a standard Land Needs Assessment (LNA) methodology for calculating the amount of land that they will need for development to accommodate forecasted population and employment growth to 2041. This “Growing the Greenbelt” consultation is occurring right in the middle of the MCR process and OHBA very strongly believes that our municipal partners should be respected and should complete their MCR and LNA processes to plan for and accommodate growth to 2041 prior to any permanent greenbelt boundary lines being established in the Outer Ring. OHBA is very concerned that a separate mapping exercise occurring simultaneously with MCR could frustrate and compromise the municipal process that is already underway to bring their Official Plans into conformity with the updated provincial plans. Furthermore, while the focus of the proposed study areas is on environmental protection, the province should balance and analyze social and economic considerations for any major public policy initiative such as this. OHBA recommends that the province respect their municipal partners and allow municipalities to complete MCR processes already underway to conform to the updated Growth Plan and Greenbelt Plans prior to proposing greenbelt boundary expansions in the Outer Ring.

## **Key Recommendations**

- )] OHBA recommends that the province recognize the need to balance Growth Plan Schedule 3 population and employment growth targets with the need to protect water.
- )] OHBA recommends that throughout the Study Area that the province consider recognizing features that are already protected through existing robust provincial or local planning policies. The Study Area should be refined and scoped, rather than be expanded upon.
- )] OHBA recommends that the province respect their municipal partners and allow municipalities to complete MCR processes already underway to conform to the updated Growth Plan and Greenbelt Plans prior to proposing greenbelt boundary expansions in the Outer Ring. Any potential Greenbelt expansion should only occur after MCR processes are completed.

- J OHBA recommends the province establish and designate “long-term urban-reserves” or “white-belts” surrounding major urban settlement areas in the Outer-Ring (duplicating existing urban structure established in the Inner Ring) based on an analysis of a potential long-term urban structure in consultation with municipalities. The province must ensure long-term flexibility to accommodate population and employment growth beyond the 2041 Growth Plan schedule 3 forecast horizons.
- J OHBA recommends that the province should consider Greenbelt amendments, greater partnership programs and strategic investments to enhance recreational opportunities throughout the existing (and potentially expanded) Greenbelt plan.
- J OHBA recommends that there should not be any new proposals for a Greenbelt Boundary expansion outside of the seven study areas. Should the province determine that the areas studied were insufficient and choose to consider Greenbelt boundary expansion beyond the study areas currently being consulted on; there must be an additional Environmental Registry posting and public consultation studying any additional areas prior to proposing any specific Greenbelt Boundary expansions.
- J OHBA recommends that should the province propose adding rivers that flow through urban centres in the Outer-Ring as URVs to the Greenbelt, the current URV designation and definitions (publicly-owned lands) should not be amended.
- J OHBA recommends that following this consultation and prior to finalizing any new land-use designations, the province must establish a process where the municipality or landowner can appeal a Greenbelt expansion designation weighed against expansion criteria that should be required to be transparently established by the province.
- J OHBA recommends that larger settlements of each municipality could be identified as a ‘town/village’ as part of any potential Greenbelt expansion. This would ensure that existing settlements in potential greenbelt expansion areas can still direct and manage their growth that meet this criteria. OHBA further recommends that MCRs currently underway to ensure conformity with the Growth Plan could assist in determining which settlement areas become Town/Villages and Hamlets.
- J OHBA recommends that prior to finalizing any new land-use designations, the province and municipalities work together to refine and “ground truth” proposed Greenbelt boundary lines.

### Discussion Questions:

#### 1. Are there additional “building blocks” features that should also be considered for addition to the Greenbelt to protect water?

OHBA does not believe there are any additional “building blocks” that need to be added, but rather, the Province should not duplicate or impose another layer of policies for areas that are already protected from development. However, in the absence of a clearly defined methodology, it is difficult to assess what other data sets might be of assistance and what additional analysis should occur. OHBA is concerned by redundancy, duplication and potential conflicts with additional layers of regulation and policy on top of an existing robust set of policies to protect resources in the PPS and Growth Plan. For example, the Innisfil staff report (DSR-025-18) notes that the majority of the areas identified within Innisfil as part of the “Study Area for Potential Greenbelt Expansion” are already protected or restricted from development in various other provincial policies through their designation as either provincially significant wetlands or prime agricultural areas.

In a staff report (DSR-025-18 February 21, 2018), The Town of Innisfil states that, “Overall, the Town supports planning efforts to protect our water resources, but staff feel that a potential Greenbelt expansion could result in an unnecessary duplication of both provincial and local level planning policies that are already in place to protect our water resources – both directly and indirectly.” Innisfil staff further note that, “the source water protection planning efforts led by the Province, combined with the designation of *Key Natural Heritage Features* and *Key Natural Hydrologic Features* in the Town’s newly adopted Official Plan, indicate that an expansion to the Greenbelt would not be required to protect surface water recharge and discharge areas from development in the Town of Innisfil. This is further reinforced by recent Provincial mapping that implements natural heritage and agricultural policies limiting development outside settlement areas.” OHBA notes that Source Protection Mapping provided insights into the vulnerability of aquifers with protection policies varying based on the interpretation of

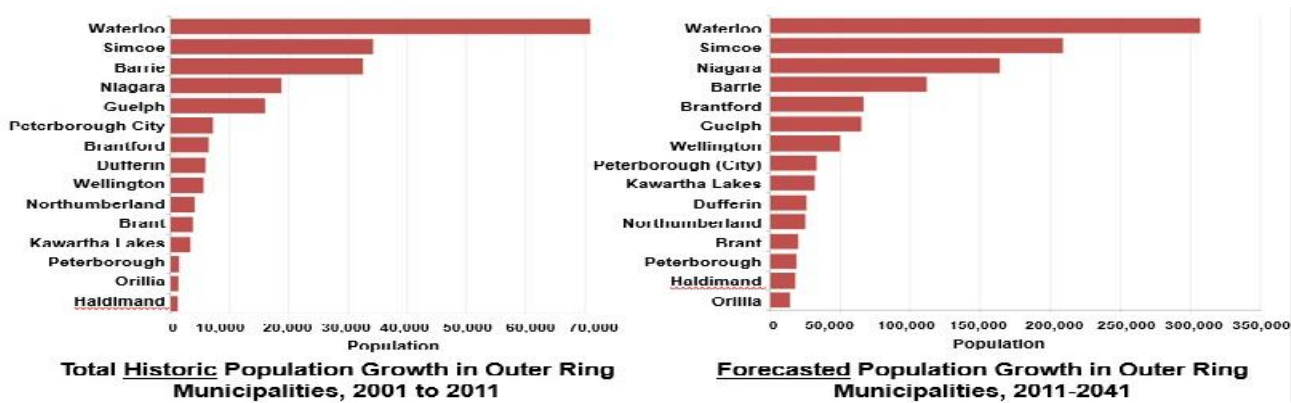
risk contamination. This risk-based approach provides adequate protection and another added layer of regulation would be redundant or could conflict with the existing framework.

The County of Wellington’s staff report (Comment on the Proposed Greenbelt Expansion Area) hold a similar view that, “It is our view that those water resource matters that are subject to the *Planning Act* are adequately addressed by the overlap of the Provincial Policy Statement, Growth Plan, Official Plans, Source Protection Plans, and Conservation Authority Regulations.” OHBA further notes that recently released Provincial mapping with respect to Natural Heritage Systems and Agricultural Systems further implement Provincial Growth Plan policies that seek to avoid development in the study area, thus resulting in enhanced protection of water resources.

**2. Are there additional data sets or types of analysis that should be considered?**

OHBA recommends that the province recognize the need to balance appropriate population and employment growth (Schedule 3 Growth Plan targets) with need to protect water. The Greenbelt Plan works with the Growth Plan to create an integrated framework for accommodating growth and providing permanent long-term protection. OHBA notes that the existing policies within the PPS provide extensive protections for Natural Heritage Systems, water resources and environmental features. Furthermore, the province has additional mapping for NHS and agricultural systems throughout the GGH outside of the greenbelt. These policies already provide extensive protections from urban growth. Through the Growth Plan, a municipality, through its MCR, must justify settlement boundary expansions, including proving that the growth cannot be accommodated within the upper- or single-tier municipality, and within the applicable lower-tier municipality through *intensification* and in the *designated greenfield area*. Similarly, there are requirements to demonstrate consideration for life cycle costs of infrastructure, future water supply and preservation of natural heritage and agricultural systems among many other requirements. So even without an expanded Greenbelt, settlement area boundary expansions are a rigorous exercise.

For outer ring municipalities, population is forecasted to grow from 2.29 million people in 2016 to 3.35 million in 2041. Schedule 3 of the Growth Plan distributes a population of 2.95 million to the Outer Ring municipalities by 2031 and 3.35 million by 2041. Despite the Growth Plan density and intensification targets, not all of this growth will be accommodated through intensification and the designated greenfield area. Potential greenbelt expansion must recognize that additional land will be needed to accommodate growth over the long-term and where growth will be directed. Provincial policy requires the growth must optimize infrastructure and create complete communities for the 2041 conformity exercise and with greenbelt expansion being considered “permanent”, the province must consider where growth will be permitted to occur beyond 2041 in determining how to move from a study area to a proposed Greenbelt boundary. Long-term urban growth beyond the 2041 Schedule 3 horizon must be considered within the provincial analysis. OHBA therefore recommends that the province establish “white-belt” long-term urban reserves surrounding major urban settlement areas in the Outer-Ring based on an analysis of a potential long-term urban structure in consultation with municipalities. Establishing a permanent Greenbelt boundary requires a degree of flexibility for long-term multi-generational growth for all major urban settlements, which can be provided through new white-belts.



The province should carefully consider PPS and Growth Plan policies for growth to “optimize” infrastructure. OHBA notes that many municipalities have invested significantly in and are also planning for further water, wastewater and stormwater infrastructure investments to support future growth within the seven study areas identified by the Ministry of Municipal Affairs. Simcoe County (Report CO-18-001 January 23, 2018) asks, “how will the Province balance accommodating planned future urban growth based on the Growth Plan forecasts for 2031/41 with protecting water resources?” The Innisfil staff report (DSR-025-18) notes that through extensive source water protection planning and mapping that has already occurred, the Province should consider whether an additional layer of protection through an expansion to the Greenbelt is even required, or whether policy changes to other provincial plans can help achieve this same purpose.

### **3. Of the seven areas, are there some that are more or less important?**

OHBA recommends that throughout the Study Area review that the province consider recognizing features that are already protected in provincial or local planning documents. The Study Area should be refined and scoped, based on existing policies and a rigorous scientific and technical analysis of underlying geology and hydrology rather than being expanded upon.

OHBA notes that the City of Brantford does not support the inclusion of any City of Brantford lands within the Study Area, or any future extension of the Greenbelt into the City’s municipal boundary. The Study Area includes much of the northern Boundary Expansion Lands that were transferred from the County of Brant to the City of Brantford to enable the City to plan for and achieve the population and employment targets set by the Province in the Growth Plan. The Municipal Boundary Adjustment Agreement between the City of Brantford and the County of Brant was approved by the respective Councils on June 28, 2016. The Minister of Municipal Affairs signed the Restructuring Order on December 13, 2016, approving the annexation effective January 1, 2017.

The City of Brantford (Report No CD2018-033 February 13, 2018) notes that the approved Municipal Boundary Adjustment Agreement anticipates a future expansion of the City’s current Settlement Area. The limits of the expanded Settlement Area are to be determined through the MCR/LNA now underway as part of the City’s ongoing Official Plan Review, conducted in accordance with the requirements of the Growth Plan. If the Greenbelt was to be expanded as illustrated in the Study Area, any future expansion of the City’s current Settlement Area into the Boundary Expansion Lands on the north side of the City would be prohibited. As part of the Coordinated Review, in a letter dated May 21, 2015, the City of Brantford stated: “As the Greenbelt Plan is being reviewed, the Province must keep in mind the ongoing discussions surrounding the proposed boundary expansion between the City and the County of Brant. The land being discussed must not be brought into the Greenbelt Plan as this would certainly hinder future opportunities for the City to meet Provincial population and employment targets beyond its current [i.e. pre-2017] municipal boundary.”

The City of Brantford does not support the inclusion of any City of Brantford lands within a future Greenbelt expansion through a future amendment to the Greenbelt Plan as it would conflict with the Provincially Approved Municipal Boundary Adjustment that was recently approved to enable the City to meet Provincial growth targets. The Brantford City Staff Report (CD2018-033) notes that the City currently has an approximate two-year supply of designated greenfield lands and cannot meet the growth targets established by the Province without the ability to develop new areas within the Boundary Expansion Lands. In addition, the City will not meet the Growth Plan requirement to maintain land with servicing capacity sufficient to provide at least a three-year supply of residential units. Furthermore, the staff report notes that Greenbelt expansion into the Northern Boundary Expansion Lands may impact the City’s requirement to compensate Brant County as per the approved Municipal Boundary Adjustment Agreement. The City is required to pay the County of Brant compensation including \$1,163,350 per year for ten years commencing January 1, 2018, in accordance with Section 14.02 of the Boundary Adjustment Agreement.

The County of Simcoe (Report CO-18-001 January 23, 2018) notes that “the potential expansion of the Greenbelt will have significant effects on the long-term planning for the County of Simcoe. If implemented it will fundamentally change certain directions on where and how growth will occur in the Country... Depending on the timing and exact location of the Greenbelt boundary expansion the results of the County’s MCR could potentially be in conflict with it.” The County report goes on to state, “this potential expansion could significantly limit the County’s opportunity to meet the County planned growth forecasts to accommodate residential and employment growth as required by the Growth Plan.”

The Region of Waterloo (Report PDL-CPL-1807) notes that with the approval of the Regional Official Plan in 2015, a policy framework was established to refine boundaries of respective settlement areas and the Countryside Line. Waterloo Regional staff have stated, “accordingly, the Countryside Line, the rationalization exercises and the resolution of the Southwest Kitchener Policy Area should be respected in any future Greenbelt expansion work completed by the Province.”

The Dufferin County EBR 013-1661 submission notes that, “the County is concern with the large geographic area that is proposed as a potential Greenbelt Expansion Study Area, which encompasses such a large portion of Dufferin County. As the Greenbelt Pan established strict limits on growth and development within its boundary, the potential expansion would significantly impact the ability of settlement areas within the Study Areas to expand and ability of the County to meet the Growth Plan forecasts for population and employment growth.” Furthermore Dufferin County notes that, “the potential Greenbelt Expansion Study Area 3, would entirely surround the designated settlement area of the Town of Shelburne resulting in significant implications on the future expansion of the settlement area in accordance with the Growth Plan policies.”

**4. Are there areas beyond the study area that you think should be considered for potential future Greenbelt expansion?**

OHBA continues to encourage the provincial government, Conservation Authorities and municipalities to consider additional appropriate publicly-owned lands that could be included in the Greenbelt. Furthermore, within urban areas, OHBA believes there are opportunities to add existing parkland that is connected to the Greenbelt to the Greenbelt. This would enhance recreational opportunities and urban access to the Greenbelt.

OHBA reiterates our recommendation from October 31, 2016, that the province should consider Greenbelt amendments, greater partnership programs and strategic investments to enhance recreational opportunities throughout the existing Greenbelt plan. The province should also consider creating new designations in the Greenbelt that would support specific provincial goals and objectives (i.e. recreational designation).

OHBA recommends that there should not be any new proposals for a Greenbelt Boundary expansion outside of the seven study areas. Should the province determine that the areas studied were insufficient and choose to consider Greenbelt boundary expansion beyond the seven study areas currently being consulted on, there must be an additional Environmental Registry posting and public consultation studying any additional areas prior to proposing any specific Greenbelt Boundary expansions.

**5. Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?**

In 2013, OHBA welcomed the new Greenbelt URV designation that gave municipalities the opportunity to connect publicly-owned and protected URVs to the Greenbelt through a public Official Plan process. On January 10, 2013 in a joint OHBA Press Release with Environmental Defence spokesperson Gillian McEachern, OHBA CEO Joe Vaccaro stated, “The new Greenbelt designation gives municipalities the opportunity to connect publicly-owned and protected urban river valleys to the Greenbelt through a public official plan process. This is the appropriate way to grow the Greenbelt for future generations to enjoy.”

OHBA continues to support the URV designation on publicly-owned lands and encourages the Provincial government, Conservation Authorities and municipalities to consider additional appropriate publicly-owned lands that could be included in the Greenbelt. The amendments to the Greenbelt Plan and Boundary Regulation in 2016 in conjunction with the addition of 21 urban river valleys (URV) and associated coastal wetlands were supported by OHBA. The EBR posting noted that the 21 river valleys and associated coastal wetlands added in May 2016 equal approximately 9,000 hectares.

OHBA however notes that greenbelt expansion into URVs may duplicate existing policies that already provide robust protection. The Grand River Conservation Authority (GRCA) states in its February 23, 2018 staff report (GM-02-1809) that, “it is important to note that river valleys are also subject to a number of municipal and conservation authority policies and regulations which already protect them. For example, Ontario Regulation 150/06 (Development Interference with Wetlands and Alterations to Shorelines and Watercourses regulation) and the Provincial Policy Statement both offer protective instruments.” The GRCA in fact recommends that, “GRCA lands along the rivers noted above should not be included within the URV designation.”

OHBA recommends that should the province propose adding rivers that flow through urban centres in the Outer-Ring as URVs to the Greenbelt, the current URV designation and definitions (publicly-owned lands) should not be amended.

## **6. With the range of settlement areas in the GGH, how should the province balance accommodating future urban growth with protecting water resources?**

The 2017 Growth Plan, along with the PPS contain policy requirements designed to ensure a fair balance between growth and the protection of water resource systems. OHBA notes that the province needs to ensure that settlement areas that are identified in other provincial plans as being a focus for population and employment growth (e.g. Primary Settlement Areas, Strategic Settlement Employment Areas, Major Transit Station Areas, Urban Growth Centres etc.), are not unnecessarily restricted by a potential Greenbelt boundary. For example, in the Innisfil staff report (DSR-025-18), the Town notes that provincial plans identify Alcona as a Primary Settlement Area, while Innisfil Heights is a Strategic Settlement Employment Area. Provincial plans are also directing the Town to focus growth and development and plan for substantially higher transit-supportive densities around the future Innisfil GO Station. However, if the conceptual ‘Study Area’ became the Greenbelt boundary, development in Alcona around the future GO station would be restricted and the Town would be unable to achieve the direction of these provincial planning policies.

OHBA notes that the Ministry of Municipal Affairs five-year review of the Growth Plan stated in 2011, “Because of the magnitude of growth that is forecast, it will be necessary to bring new lands into the urban envelope. The Growth Plan outlines a series of tests and criteria to ensure that expansions occur when necessary and where most appropriate, and in a way that ensures that infrastructure is in place and the natural environment is protected.” OHBA therefore recommends that major settlement areas, including settlement areas that have an Urban Growth Centre accommodate for future growth beyond the 2041 Growth Plan Schedule 3 horizon by designating a “white-belt” / “long-term urban reserve” (duplicating the existing urban structure in the Inner Ring). While the inner-ring municipalities have a long-term urban reserve in an area commonly referred to as the “white-belt”, OHBA recommends that the Ministry of Municipal Affairs designate “long-term urban reserves” or “whitebelts” outside of existing designated greenfield areas that should not be included in any Greenbelt boundary expansion.

The GRCA (report GM-02-18-09), makes a very important observation that, “based on the current policy framework, development should not have an impact on hydrologic features and areas and their function. The Growth Plan requires several studies be completed prior to expansion of urban boundaries. For example, the Plan requires watershed planning, water, waste water, and storm water planning, implementation of subwatershed planning and other technical studies aimed to ensure that the quality and quantity of water

resources remain the same.” OHBA shares the perspective that the current policy framework sufficiently protects important water resources from urban expansion.

## **7. What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?**

Similar to question #6, OHBA believes that the key for drawing potential greenbelt boundaries around settlement areas is “balance”. The province should recognize the robust regulatory and policy framework already protecting key hydrological features and the robust series of “tests” through the MCR and LNA process to even consider settlement boundary expansions. That being said, OHBA continues to recommend the province establish “long-term urban-reserves” or “white-belts” (duplicating the existing Inner Ring urban structure) to ensure long-term flexibility to accommodate population and employment growth beyond the 2041 Growth Plan schedule 3 forecast horizons.

The Growth Plan is designed to plan for and accommodate growth in specific locations where infrastructure is optimized, while constraining growth where other features and resources are to be protected. The amendments to the Growth Plan in 2017 enhance the Growth Plan’s ability to direct growth in specific locations and OHBA believes that it is not the Greenbelt that is the appropriate policy tool to constrain growth from areas to be protected, but rather the existing robust policies within the updated Growth Plan. As noted by the Town of Innisfil, “An expanded Greenbelt boundary into Innisfil would also challenge the Town’s ability to plan to achieve the Provincial vision for the future growth of Innisfil’s Primary Settlement Area (Alcona) and the Innisfil Heights Strategic Settlement Employment Area.” The Town of New Tecumseth (Report #PD-2018-08) similarly expressed concern that, “should be boundary of the expanded Greenbelt be proposed as shown in the study area, it could have significant impacts on the ability to expand the boundaries of Alliston should future growth be allocated through the MCR.”

OHBA notes that many Outer Ring municipalities have a robust policy framework in place to protect Natural Heritage Features, ground water resources and agricultural areas while providing strong direction regarding the location of future urban growth. The Region of Waterloo’s February 27, 2018 report (PDL-CPL-18-07) notes, “direction for the location of future growth is provided through the Countryside Line designation such that future urban boundary expansions can only occur on lands located between the current urban area boundaries and the Countryside Line. Furthermore, the ROP restricts future urban boundary expansions into areas designated Protected Countryside, Environmentally Sensitive Landscape and/or Regional Recharge Area. This policy framework ensures that future growth can continue to be accommodated in Waterloo Region while continuing to protect prime agricultural areas, groundwater resources and significant natural heritage systems.” Through an existing policy framework, the Region of Waterloo believes that it already strikes an appropriate balance between accommodating future urban growth and protecting water resources.

The County of Wellington (Comments on the Proposed Greenbelt Expansion Study Area) makes a similar point to the Region of Waterloo that, “under the Growth Plan for the Greater Golden Horsehoe, Wellington County, Waterloo Region, and the City of Guelph will be required to use a standard methodology to assess the quantity of land needed to accommodate forecasted growth. The location of any expansion, if needed, will be determined based on a series of criteria and studies that require the natural heritage system, key hydrological areas and prime agricultural areas to be avoided where possible.” Furthermore, the County of Wellington recommends, “Consideration of Greenbelt boundary changes should not occur until after the Province has approved Growth Plan municipal comprehensive reviews at which point the community will have a clear understanding of the need for, size and direction of urban expansion in Wellington County and in its neighbouring municipalities.”

OHBA notes that the Growth Plan requires that water functions are protected from large scale development. The GRCA in fact expresses concerns that the expansion of the Greenbelt could potentially reduce protection to some sensitive features and that existing protections are sufficient. The GRCA report (GM-02-18-09) states that, “many of the policies included in the Greenbelt Plan are similar in the level of protection offered by the Growth Plan



and some watershed municipalities in their official plans. In some cases, the Greenbelt Plan policies may be less restrictive. Many of the actions required under the Greenbelt Plan are already being implemented by local watershed municipalities (e.g. natural heritage systems studies, subwatershed planning and master plans for storm water, water and wastewater).” OHBA is concerned that the province is potentially adding a new layer or possibly redundant or conflicting policies onto an already complex array of legislation, regulation, policies and plans.

**8. How should the province determine which settlement areas become Towns/Villages or Hamlets, if included in a potential Greenbelt?**

The Greenbelt Plan outlines that “Towns/Villages have the largest concentrations of population and employment within the Protected Countryside and tend to be the central settlement areas for *development* for their respective municipalities. “Towns/Villages are subject to the policies of the Growth Plan and continue to be governed by official plans and related programs or initiatives and are not subject to the policies of this Plan” (Greenbelt Plan 3.4.3.1).

To promote the continued viability and growth of communities that may not have a provincially identified growth area, should the Greenbelt be expanded in the Outer-Ring, OHBA recommends that larger settlements of each municipality could be identified as a ‘town/village’ as part of any potential Greenbelt expansion. This would ensure that existing settlements in potential greenbelt expansion areas can still direct and manage their growth to existing settlement areas that meet these criteria. The County of Wellington (Committee Report Comments on the Proposed Greenbelt Expansion Study Area) raises concerns with respect to small-scale development, “The permanent protection of Prime Agricultural Areas and prohibition of large settlement expansions typically receive the most attention in discussions of Greenbelt expansion. It is worth noting from the above; however, that there are policies unique to the Greenbelt Plan that either prohibit or make it more difficult to get approval for small-scale developments. OHBA recommends that MCRs currently underway to ensure conformity with the Growth Plan could assist in determining which settlement areas become Town/Villages and Hamlets.

**9. Once the Agricultural System and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt Expansion?**

Now that the provincial Agricultural System and Natural Heritage System mapping is in place to protect high quality agricultural land, NHS and water resources, the Province should consider what (if any) the added benefit for potentially expanding the Greenbelt would be. The Innisfil staff report (DSR-025-18) suggests that the Town thinks that the finalization of this mapping, in combination with other recent provincial planning policy updates such as to the Growth Plan, already provide the necessary protection for our water resources without the need for an expansion to the Greenbelt.

The GRCA staff report (GM-02-18-09) notes that, “given that the criteria used to develop the mapping for these systems was based on those used for the existing Greenbelt, these systems should be substantially protected through the applicable Growth Plan policies. The mapping for these systems, however, should be further refined where possible as more comprehensive information becomes available (e.g. subwatershed plans, environmental assessments, municipal natural heritage studies and plans, etc.) to ensure accuracy and appropriate application of the Growth Plan policies.” OHBA is in agreement with the GRCA assessment of the strength of existing policies to protect these systems.

**10. How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt expansion?**

The Province needs to ensure that the Greenbelt expansion would include flexibility that would allow for mineral aggregate extraction to occur as well as the construction of necessary community infrastructure such as roads,

trails and service utilities. Simcoe County (Report CO-18-001 January 23, 2018) notes that “the potential expansion of the Greenbelt would affect planning for things such as mineral aggregate extraction and making the resources available as close to market as possible.”

## **11. What other priorities or initiatives do you think the province should consider?**

The goal of the Province should be a clear provincial planning framework that avoids duplication and conflicts between various provincial plans while achieving provincial goals to protect water. An expanded Greenbelt Plan adding to an already complex policy regime will have a potential negative impact on development required to accommodate residential and employment growth targets in Schedule 3 of the Growth Plan. Adjustments to existing provincial policies (e.g. the PPS in 2014 and the Growth Plan in 2017) achieve similar outcomes without additional complexity and duplication.

OHBA reiterates our concern that an expanded greenbelt may be redundant, duplicate or even conflict with existing policies. The Region of Waterloo precisely raised this concern (Feb 27, 2018 staff report PDL-CPL-18-07), that, “There is also a need for the Province to consider whether the restriction on stronger municipal official plan policies with respect to agricultural uses and mineral aggregate resources is appropriate where Greenbelt expansion and any subsequent municipal official plan conformity exercise would “lower the bar” with respect to the protection of certain features. Strong, local protections should not be weakened as a result of inclusion in the Greenbelt.”

OHBA understands that the next round of consultation will consider potential amendments to the Greenbelt Plan and boundary. OHBA recommends that following that consultation and prior to finalizing any new land-use designations, the province establish a process where the municipality or landowner can appeal a Greenbelt expansion designation weighed against expansion criteria that should be established in a transparent manner by the province. Any expansion must include a policy in the Greenbelt Plan that allows for an appropriate appeal process to be established through the findings of scientific studies completed through the public process of official plan/secondary plan approvals. This will allow the confirmation and/or correction of the site-specific Greenbelt boundary to reflect real environmental and Natural Heritage System features on the ground. Furthermore, OHBA recommends that prior to finalizing any new land-use designations, the province and municipalities work together to refine and “ground truth” proposed Greenbelt boundary lines.

The underlying assumption in the *Protecting Water for Future Generations* document is that urban growth adversely affects water and the natural heritage features that groundwater and surface water support, and thus should be restricted. The vast majority of land in southern Ontario is naturally under recharge conditions. Discharge conditions typically are confined to the base of valleys, riparian wetlands and watercourses. The majority of wetlands are surface water fed (and are warm water features), and the groundwater fed wetlands that exhibit thick organic deposits are already protected by other legislation and policies. The cold groundwater discharge that feeds these features is usually site specific, may be locally recharged or alternately come from one geologic pathway that lies outside of the immediate area. The current principal of balancing pre-development recharge with post-development recharge is a proven technique in avoiding adverse impacts to the groundwater. This in itself ensures that groundwater storage is not impaired, as the underlying soils will always contain storage space that is not changed by urban development. Proper mitigation and design of water management facilities can protect, and also enhance in some cases, the recharge and discharge functions the Province seeks to protect in a more site specific manner than general land development restrictions described in the *Protecting Water* document.

OHBA believes that it is critical that if the province proceeds with potential greenbelt expansion, it must respond to submissions regarding the Greenbelt boundary where proposed mapping does not accurately represent what exists on the ground. The scientific basis for inclusion within the study areas is not well understood or explained with the mapping too coarse for technical analysis or technical interpretation. There continues to be many

examples that can be provided by our members, farmers and municipalities, where the existing Greenbelt boundary lines do not accurately correlate with and reflect actual features or lack of features on the ground.

Furthermore, OHBA would again like to reinforce the importance of transition as included in our October, 2016 submission. Transition is appropriate in all major land use planning policy changes and is an essential element of any policy legislation adopted in a democratic society. OHBA continues to support transition measures which should be consulted on separately with municipalities and all impacted stakeholders.

## **Conclusion**

OHBA continues to support the guiding principles of the Growth Plan and Greenbelt Plan and is concerned that potential greenbelt expansion may duplicate and in some cases conflict with the existing robust public policy framework that balances protection of important hydrological resources, natural heritage systems, agricultural system and the approximately 1 million additional people that will live in the Outer Ring by 2041. The provincial planning system in the GGH is a complex array of legislation, regulations, policy and plans that often overlap; this complexity is even greater with respect to water resources where Source Protection Plans and Conservation Authority Regulations apply. The province should also balance environmental considerations with social and economic impacts of major changes to public policy. OHBA strongly recommends that the province respect their municipal partners and allow municipalities to complete MCR processes already underway to conform to the updated Growth Plan and Greenbelt Plans prior to proposing greenbelt boundary expansions in the Outer Ring. While greenbelt boundary expansion may very well be appropriate in the seven study areas, a mapping exercise dropped into the middle of a Growth Plan conformity exercise will frustrate comprehensive municipal efforts to plan for infrastructure, employment and population growth.

OHBA continues to have concerns regarding the policy-based approach articulated by the province versus the science, data and mapping-based approach advocated by municipalities, Conservation Authorities and professional practitioners. OHBA notes that policies to restrict land use based on blanket restrictions to large areas will simply inhibit wise development principles that focus on the site-specific conditions. It is our recommendation that the focus be on careful development of lands to take advantage of the opportunities there, and base development on planning complete communities. Lastly OHBA reiterates our key recommendation that “white-belts” or “long-term urban reserves” be established surrounding existing settlement areas to provide long-term flexibility that recognize the both population and employment growth will continue beyond the 2041 Growth Plan planning horizon. Going forward, it is important that the Greenbelt review process continue in a transparent and accountable manner. OHBA appreciates the opportunity to be consulted and looks forward to continuing to work with the province.