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Re: Proposed Oak Ridges Moraine Conservation Plan (2016), (part of the Coordinated Land Use Planning Review), EBR Registry Number: 0127197; Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (part of the Coordinated Land Use Planning Review), EBR Registry Number: 0127194; Proposed Greenbelt Plan (2016), (part of the Coordinated Land Use Planning Review), EBR Registry Number: 0127195; and Proposed amendment to the Greenbelt Area boundary regulation (part of the Coordinated Land Use Planning Review), EBR Registry Number: 0127198

Amended Niagara Escarpment Plan, 2016 (part of the Co-ordinated Land Use Planning Review), EBR Registry Number: 012-7228

October 31, 2016

Dear Ms. Tan and Ms. Peters,

RE: EBR 012-7195 -- Proposed Greenbelt Plan (2016); 012-7197 -- Proposed Oak Ridges Moraine Conservation Plan (2016); 012-7194 -- Proposed Growth Plan for the Greater Golden Horseshoe, 2016; 012-7228 -- Amended Niagara Escarpment Plan, 2016

Ontario Greenbelt Alliance Coordinated Review Submission

The Ontario Greenbelt Alliance (OGA) respectfully submits the following 125 recommendations in response to the government's proposed plan amendments to the Greenbelt Plan, 2016 (GP); Proposed Oak Ridges Moraine Conservation Plan, 2016 (ORMCP); Proposed Niagara Escarpment Plan, 2016 (NEP) and the Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (Growth Plan). This document is a follow up submission to our original 2015 submission made in May of 2015 to the Government (included as Appendix A).



The 120 members of the Ontario Greenbelt Alliance feel strongly that progressive leadership is needed to ensure the updated plans guide the Greater Golden Horseshoe (GGH) toward a sustainable future. We are pleased to see that many of the proposed amendments reflect the recommendations we put forward as well as those from the Crombie Panel report in December of 2015. In particular it is important that final amendments move us closer to communities defined by smart compact urban form, efficient land use and a connected high order transit system. Improvements are needed in all the plans to guide growth, while protecting productive agricultural land and farming communities as well as important natural heritage systems for generations to come.

Submission format and Style

This submission format is organized by issue theme and will speak to aspects of the four plan areas within each theme. Each section includes a main theme heading, statement, rationale and recommendations.

In various sections of the document, you will notice quoted policy with lines struck through sections as well as underlined sections. The wording that has been struck through indicates policy language that should be removed from the proposed amendments. The underlined text is new recommended text.

An appendix is provided at the end of the document for supporting and relevant documentation referred to in the body of this submission.

A Collaborative Document

The OGA is happy to inform you that this document has been prepared in collaboration with OGA members as well as other groups in the ENGO community including Green Communities Canada. We acknowledge the work and expertise all groups have brought to the final version of this submission. As collaboration, this submission may have common text and recommendations found in the other groups submissions as we have done our best to be inclusive of the many policy recommendations our members wish to convey to the government through a comprehensive submission.

We thank the government for the opportunity to provide meaningful input into this process and look forward participating in next steps. If you should have any questions or would like to discuss our recommendations in more detail, please contact Erin Shapero, OGA coordinator at eshapero@environmentaldefence.ca or 416-323-9521 x 224.

Sincerely,

Erin Shapero

On behalf of the Ontario Greenbelt Alliance



OGA October 2016 Coordinated Review Submission

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Executive Summary

It's vital that the Ontario Government plan for a strongly protected Greenbelt with supportive rural communities while encouraging Smart Growth policies in urban areas

Our submission contains 128 recommendations, focused on the 10 key priority areas of concern to our members. The 10 key areas include:

- Grow the Greenbelt
- Strengthen Natural Heritage Protection
- Keep Greenbelt Boundaries Strong
- Deal with Infrastructure and Aggregates
- Support Ontario's Agricultural Sector
- Stop Sprawl & Build Smart and Complete Communities
- Protect The GGH's Water Sources
- Address Climate Change
- Improve Plan Policy Definitions & Related Provincial Policies
- Overhaul Plan Implementation

Greenbelt Threats

With serious threats on the horizon, the Greenbelt's protection is more important than ever. The Greenbelt is an anchor of sustainable land and future generations are counting on it for their survival. The boundaries of the Greenbelt need to remain strong and inflexible to alteration. The Greenbelt Plan "identifies where urban development should not occur". The goals of the plan provide for "permanent protection to the agricultural land base" and the natural environment while "providing for a diverse range of economic and social activities associated with rural communities." The removal of land for urban development should not be permitted as it is clearly inconsistent with the goals of the Greenbelt Plan.

End Urban sprawl

The economics of sprawl are clear. We cannot keep building subdivisions farther away from public services and expect governments to pay to extend those services. To better utilize the efficiencies of existing infrastructure; more new growth must be focused within our existing serviced urban areas. By directing growth within the built-up boundary of our cities and towns we also support investment in urban renewal to support the development of walkable cities with regular public transit, pedestrian and bicycle path infrastructure. We also need to be cognizant that not all urban centres are the same. Small towns surrounded by the Greenbelt should not be the focus on intensification. It is also unlikely that most greenfield sites will ever



support higher orders of transit such as Light Rail Transit (LRT) but we commend the province for increasing density targets as an important step in creating greenfield communities that can support at least basic transit.

An Effective Greenbelt and Growth Plan

Ideally, the Greenbelt and the Growth Plan will work together to build walkable communities connected by both transit and greenways, with access to clean water resources and fresh local food. But both natural systems and agricultural lands throughout the Greater Golden Horseshoe are under threat by inappropriate development. Careful mapping of the agricultural and natural systems and their connections beyond the Greenbelt and within the Whitebelt is critical to the long term protection of our environment, local food, rural economic development, water quality and quantity.

It's Time to Freeze Urban Boundaries and Get the Growth Plan Right

How much land is enough? Based on research by Neptis Foundation we know that too much land has been already been designated for urban expansion. The province needs to better rationalize where growth should occur and freeze urban boundaries to stop municipalities from continuing the inefficient and unaffordable sprawl onto important agricultural lands. Strong provincially-led growth management oversight is critical to the success of the Growth Plan and the long term success of maintaining a healthy Greenbelt throughout the entire Greater Golden Horseshoe. It's time to freeze municipal urban boundaries and do all that is necessary to enforce and implement the plans fully and not allow another round of sprawl to pave over agricultural and natural landscapes.

Action In An Age of Climate Change

To date the province has taken a strong stand on climate change through its new Climate Action Plan. We are pleased with the proposed amendments that bring climate change into land use planning. Further we support even stronger wording in the amendments to require climate change action.

Implementation Is the Key

However, with all of the improvements contained in the proposed plans, a protected greenbelt and effective growth plan will only be fully realized if the proposed plans are fully implemented through monitoring, compliance, adaptive management, complementary policy reforms, and provision of sufficient funding. Together these will be key to ensuring sustainability for the GGH for the coming decades.



The Ontario Greenbelt Alliance

The Ontario Greenbelt Alliance is a defender of Ontario's innovative Greenbelt and proponent of Smart Growth in Ontario. The Alliance brings together more than 125 environmental and public health organizations, community groups and local environmental organizations from across the Greenbelt's landscape and throughout the GGH. Founded in 2004, The Ontario Greenbelt Alliance believes that a strong economy and a beautiful well-protected Greenbelt go hand in hand. Our groups know first-hand the impacts bad planning decisions have had in Ontario, impacts that affect the quality of our water, our health, and our economy. The Greenbelt and Growth Plan must be strengthened if we want to have a healthy environment, a successful and robust rural economy and vibrant natural areas that connect and support Ontario's rich biodiversity.



ontario greenbelt alliance

MEMBER LIST



ontario greenbelt alliance

- Altona Forest Stewardship Committee
- AWARE Simcoe
- A Rocha Canada
- Best Environment for Streetsville/Sierra Club Peel/NICO
- Blue Mountain Watershed Trust Foundation
- Bond Head/BWG Residents for Responsible Development
- Brampton Environmental Community Advisory Panel
- Bruce Peninsula Biosphere Association
- BurlingtonGreen
- Canadian Association of Physicians for the Environment
- Canadian Institute for Environmental Law and Policy
- Canadian Network for Respiratory Care
- Canadian Organic Growers
- Canadian Parks and Wilderness Society (CPAWS)-Wildlands League
- Canadian Society of Iranian Engineers and Architects
- Castle Glen Ratepayers' Association
- CELA
- Children of the Greenbelt
- Citizens Environment Alliance of Southwestern Ontario
- Clear the Air Coalition
- Coalition of Concerned Citizens of Caledon
- Coalition on the Niagara Escarpment
- Community Preservation Initiative
- Conservation Council of Ontario
- Conservation Development Alliance of Ontario
- Concerned Citizens of King Township
- CRAND
- Credit River Alliance
- David Suzuki Foundation
- Earthroots
- Ecological Farmers of Ontario
- EcoSpark
- Environment Hamilton
- Environmental Defence
- Couchiching Conservancy
- Rare Charitable Research Reserve
- Federation of Urban Neighbourhoods (Ontario) Inc.
- Food Forward
- Food & Water First
- Friends of Boyd Park
- Friends of East Lake, Prince Edward County.
- Friends of Fairy Lake
- Friends of Hope Conservation Group Inc.
- Friends of Pittock
- Friends of Rural Communities & the Environment (FORCE)
- Friends of the Farewell
- Friends of the Fraser Wetland
- Friends of the Rouge Watershed
- Friends of the Twelve (FOTT)
- German Mills Ratepayers Association
- Global Environmental Action Group
- Grand Erie Energy Quest
- Grand River Environmental Network
- Green Incorporated
- Greening Niagara
- Greenlands Centre Wellington
- Greenpeace Canada
- Halton Environmental Network
- Halton - Peel Woodlands and Wildlife Stewardship Council
- Heritage Speed River Working Group
- Innisfil District Association
- Kawartha Land Trust
- King Environmental Groups
- The Lakewatch Society
- Land Over Landings
- Langford Conservancy
- LincolnGreen
- Moraine Partnership
- North East Sutton Ratepayers Association
- Oak Ridges Moraine Land Trust
- Oakville Green
- Ontario Farmland Trust
- Ontario Land Trust Alliance
- Ontario Nature
- Ontario Smart Growth Network
- Paulgrave Residents Association
- Peel Environmental Network
- Pembina Institute/York U
- Personal Computer Geographic Education System/Software (PCGES)
- PitSense Niagara Escarpment Group
- Preston Lake Environmental Association (PLEA)
- Protecting Escarpment Rural Land (P.E.R.L.)
- Protect our Water and Environmental Resources (P.O.W.E.R)
- Public Spaces Appreciation Association of Ontario
- Registered Nurses Association of Ontario
- Preservation of Agricultural Lands Society
- Rescue Lake Simcoe Coalition
- Richmond Hill Naturalists
- Riversides
- Rural Burlington Greenbelt Coalition
- St.Catharine's CAN (Climate Action Now)
- Save the Maskinonge
- Save the North Gwillimbury Forest
- Save The Rouge
- Save the Oak Ridges Moraine - STORM Coalition
- Save Our Ravines - Halton Hills
- Sierra Club of Canada (Ontario Chapter)
- Simcoe County Greenbelt Coalition
- South Lake Simcoe Naturalists
- South Peel Naturalists Club
- Stop the Quarry - Save Luther Marsh
- Sunfish Lake Association
- Sustainable Cobourg
- Sustainable Brant
- Sustainable Urban Development Association
- Sustainable Vaughan
- Toronto Environmental Alliance
- The Humane Society of Canada
- The Lakewater Society
- Urban Green Environmental Organization
- Willow Park Ecology Centre
- Valley Voices Residents Association
- Wainfleet Ratepayers Association
- Wellington Water Watchers
- West Whitby Community Against 407 Link Location (WW-CALL)
- West Oro Ratepayers Association Inc.
- York Region Environmental



Policy Recommendations

1) Grow the Greenbelt

Vulnerable Water Supplies

Follow through on commitments to grow the Greenbelt to protect vulnerable water supply areas. These should include key headwater features, significant groundwater recharge areas, important surface water, and urban river valleys in areas of the GGH where growth and development pressures exist or are anticipated – including both the ‘Whitebelt’ and ‘outer ring’.

RATIONALE

The OGA was pleased to see the Province’s draft Greenbelt 2016 include additions to the Greenbelt in 21 urban river valleys, seven coastal wetlands, and parcels of land in Hamilton and along the Niagara Escarpment. However, OGA members strongly believe the government should go much further to protect water supplies in communities facing growth and development pressures. Extending Greenbelt designation should not require land swaps or trading of land. This review represents an important opportunity to include areas of high ecological and hydrological significance across the GGH in the Greenbelt. Local experts and community groups throughout the region have identified many areas where the Greenbelt should be expanded to provide necessary policy protection. Specifically these areas include:

- Simcoe County’s vulnerable surface and groundwater systems, including the globally significant Minesing Wetland, significant headwater contributors including the Oro Moraine, Horseshoe Moraine and south Georgian Bay region (west of the Niagara Escarpment) and the remainder of the Lake Simcoe basin, including the Carden Alvar.
- Moraines and groundwater recharge areas in the Grand River watershed that provide clean drinking water to 80% of local residents. These moraines include the Paris-Galt, Waterloo and Orangeville Moraines. Significant headwater features including the Luther Marsh, important headwater areas and source water protection areas in Brant and Wellington Counties, as well as the Grand River as a key river valley connection between these important and vulnerable water supplies.
- Headwaters of rivers that flow through Peel, York, Durham and Toronto and reduce flooding for millions of residents. This includes the Carruthers Creek,



Duffin's Creek, Harmony Creek, Farewell Creek and Black Creek in Durham Region, Rouge River (including the Rouge Park ecological corridor), Don River and Humber River.

- Lake Gibson in Niagara.
- The Lake Iroquois shoreline, which includes many features that provide important groundwater functions and help sustain groundwater base flow.

Urban River Valleys and Sensitive Headwater areas

Protect Urban River Valleys and Sensitive at risk headwater areas across the GGH.

RATIONALE

We support the proposed addition of “21 urban river valley areas which connect the Greenbelt to Lake Ontario and some associated coastal wetland areas” to the Greenbelt. The recent amendment to the Greenbelt Plan to include an Urban River Valley designation within the Greenbelt Plan was a welcome addition to ensure connectivity and riparian protections on an ecologically relevant scale. We are pleased to see this designation being used.

At the same time, we are concerned that headwater areas are not being considered for expanded protection. The following sensitive headwaters should be prioritized for immediate protection: Carruthers Creek, Duffin’s Creek Etobicoke Creek, Rouge River, Don River and Humber River. The Town of Ajax and the Toronto Region Conservation Authority have both passed resolutions regarding the urgent need to protect the Carruthers Creek headwaters in particular.

Niagara Escarpment Plan

The OGA supports the provincial proposal to add 45,000 hectares of land on the Niagara Escarpment to the Greenbelt. We also see a need to ensure that the proposed mapping of the NEP reflects the most recent and up to date area regional official plan mapping, including i.e. newly created ecological park areas.

At-Risk Agricultural System

Extend Permanent Greenbelt Protection to the GGH’s agricultural system: lands, infrastructure and resources by including policies within Greenbelt Plan legislation.

RATIONALE

The Greater Golden Horseshoe’s Agricultural System, lands and resources are at risk outside of the protected greenbelt, including lands located inside the Whitebelt



as well as in the Outer-Ring. Land speculation and leap-frog development pressures threaten the very foundation and long term viability of the agricultural sector in the province.

RECOMMENDATIONS

Recommendation #1: Increase the scope of the Ministry of Municipal Affairs' growing the Greenbelt exercise to include important headwater features (including but not limited to The Rouge, Don and Humber Rivers, Carruthers, Duffin's and Etobicoke Creeks) found in the 'white belt', or 'inner-ring' of the current Greenbelt

Recommendation #2: Amend the Greenbelt Plan boundary regulation, Schedule 1 and all other associated schedules to include the headwater of Carruthers Creek, Duffin's Creek, Etobicoke Creek, Farewell Creek and Black Creek in Durham Region, Don River, Humber and Rouge Rivers; including the Rouge National Park's ecological corridor and headwater lands in Markham's Whitebelt (Appendix B:Maps), the Grand River's moraines, groundwater recharge areas, headwaters and surface water features in Brant and Wellington Counties, and Waterloo Region, including the Paris-Galt Moraine, Waterloo Moraine, Orangeville Moraine, Luther Marsh, the Grand River Watershed; Simcoe County's significant surface water, source water and groundwater features and functions including the Minesing Wetland, Oro and Horseshoe Moraines, and the rest of the Lake Simcoe Basin including the Carden Alvar (See Appendix C:Map); and the Lake Iroquois Shoreline in Northumberland County, Lake Gibson in Niagara, south Georgian Bay (See Appendix D: Map) in the Greenbelt

Recommendation #3: Ensure that areas identified to grow the Greenbelt are also included in the consideration of the water resources systems, natural heritage system and agricultural systems.

Recommendation #4: Adhere to firm timelines in the process of identifying, mapping, consulting and finalizing areas to grow the Greenbelt. A draft map should be presented publicly for consultation on the Environmental Registry by January 2017, with final mapping completed and final amendments integrated by late spring 2017. Until the mapping is completed, place a moratorium on the Brantford/Brant annexation proposal.

Recommendation #5: Extend Greenbelt Policies to the GGH's agricultural system within Provincial legislation.

Recommendation #6: Move forward with proposal to add the 45,000 hectares of land to the Niagara Escarpment Plan within the Greenbelt.



Recommendation #7: Amend the NEP proposed mapping to include the Halton Regional ROPA38 NHS.

Recommendation #8: Amend the NEP proposed mapping to include the newly created Cootes-to-Escarpment Ecopark System

Recommendation #9: The proposed intermodal rail truck facility in Milton should be located near existing major highway connections (401 or 410 or 407), not out in the rural area, which will force a tremendous increase in truck traffic through rural roads, and residential communities.

2) Strengthen Natural Heritage Protection

Identify and Protect the GGH's Natural Heritage System

Follow through on commitments to identify and protect a regional natural heritage system for the Greater Golden Horseshoe. Do this consistent with the approaches used to identify the Greenbelt's Natural Heritage System and Oak Ridges Moraine's network of Natural Core and Linkage Areas

RATIONALE

The OGA commends the government for its commitment to lead the identification of a regional natural heritage system for the Greater Golden Horseshoe (GGH), demonstrated in Growth Plan policy 4.2.2. A protected and connected natural heritage system is vital to conserving landscape health and resilience in the face of ongoing biodiversity loss and the impacts of climate change.

We have developed 24 specific recommendations for the Province to implement in the development of a GGH natural heritage system (Appendix E: List). The recommendations are underpinned by the following seven key principles, which should inform the provincial process of identifying the regional natural heritage system for the GGH:

- 1) The GGH's natural heritage system should protect biodiversity and enable its recovery and increase community resilience to the impacts of climate change through the enhancement of ecosystem services.
- 2) The natural heritage system must be a connected and integrated system comprised of existing natural features and functions and areas for restoration to be protected for the long term.
- 3) The design of the identification process must be transparent and consistent with the science-based approaches taken in identifying the Greenbelt's



Natural Heritage System and the Oak Ridges Moraine's network of Natural Core and Linkage Areas.

- 4) The GGH's natural heritage system must be developed together with the water resource system as these systems are functionally inter-related.
- 5) The development of the GGH's natural heritage system must be integrated with the Province's development of an Agricultural System as overlap and integration will be necessary.
- 6) The GGH's natural heritage system should provide a consistent framework with targets and standards which can be refined and integrated ("nested") at a local scale.
- 7) The regional natural heritage system must acknowledge and account for external ecological and hydrological connections beyond the GGH, including the Lake Iroquois Shoreline, the Great Lakes Coast, Lake Simcoe, the Kawartha Highlands, the Carolinian Zone, and the Algonquin to Adirondacks Corridor.

By following the key principals above, the vision of a natural heritage system set out in policy 4.2.2. "to maintain, restore or improve the diversity and connectivity of the system and the long-term ecological or *hydrologic functions* of the features and areas" can be achieved. The 25 recommendations below outline the specific steps to undertake in order to achieve these key principles.

Protect Species at Risk

Reinstate strong protections for the habitat of species at risk in the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan

RATIONALE

Under the guise of bringing policies for species at risk into closer alignment with the Provincial Policy Statement, 2014 and the Endangered Species Act, 2007 (ESA), proposed changes will significantly weaken protections for the habitat of species at risk under the GP, the ORMCP and, to some degree, the NEP. Simply put, this proposed alignment means that ESA permits and exemptions for activities that harm species at risk and their habitats will trump land use planning decisions on development and site alteration in the GP and ORMCP areas. It also means the removal of protections for species at risk from harmful activities on lands adjacent to their habitats in the GP and ORMCP areas. Finally, it means the narrowing of the scope of protections to the habitats of endangered and threatened species only



while the existing protections for the habitats of special concern (GP, NEP) and rare (ORMCP, NEP) species will be removed.

The ESA permitting process was never designed to take the place of land use planning. ESA permit applications are not reviewed through the lens of what the most appropriate land use designation is. Rather, they address a technical consideration – is the development proponent able to create an overall benefit to the species? If so, the permit is granted. The proposed alignment with the ESA is based on the faulty premise that ESA permits can serve as a surrogate for the consideration of species at risk habitat in land use decision-making.

In contrast, land use planning is fundamentally a values-based exercise. It is about determining what is the best use of the land – what activities should be allowed to occur where. With respect to the three provincial land use plans, they were designed to prioritize the protection of species at risk, and rare species in the case of the ORMCP and the NEP, over other land uses. Yet, under the proposed regime, once an ESA permit is granted or an exemption is registered development will be able to proceed, except within Escarpment Natural Areas and Escarpment Protection Areas.

Further, the new ESA exemptions approved by regulation in 2013 have dramatically weakened protections for species at risk. The ESAA's overall benefit standard has been replaced by a requirement to minimize harm. Hundreds of development proposals have since proceeded through exemptions, circumventing the permitting process, with no information about the types or locations of the activities or the species affected publicly available. On March 3, 2016, Ontario Nature learned that as of that date there were 1299 registered exemptions under the ESA. In response to our request for further details, ministry staff told us that: "Any additional requests would need to be submitted via the formal Freedom of Information and Protection of Privacy Act (FIPPA) process."

Improve External Connections

Update the current Greenbelt external connections policies to ensure these important areas are enhanced through planning and design and linked integrated watershed planning.

RATIONALE

Over the past 10 years, the Greenbelt's external connection policies have not been used or implemented to the degree that is necessary in order to steward and improve these important areas. The current plan goal to simply "maintain" is



insufficient to achieve any real ecological improvements. It is a key area of the plan that requires updating.

RECOMMENDATIONS

Recommendation #10: Adhere to all seven principles stated above in the design of the GGH's natural heritage system and follow the 24 recommendations set out in (Appendix E:List)

Recommendation #11: Ensure the strong policies that protect the Greenbelt's Natural Systems are applied to the identified GGH natural heritage system, and update Growth Plan Section 4: Protecting what is valuable which represent weaker protections:

- Change the sixth paragraph of 4.1 Context to: This Plan also provides for the identification and protection of natural heritage systems in the GGH outside of the Greenbelt Area and settlement areas. This Plan applies protections for natural heritage systems that are the same similar to those in the Greenbelt Plan in order to provide consistent and long-term protection for natural heritage systems in the GGH
- ~~Remove 4.2.2 (4) d) notwithstanding policy 4.2.2.4 b), an official plan may, based on an environmental impact study, establish alternative standards for development within the natural heritage system outside of the key natural heritage features, key hydrologic features and associated vegetation protection zones, provided that any alternative standards will maintain, restore or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features.~~
- ~~Remove 4.2.2 (5): Policies 4.2.2.1, 4.2.2.2, 4.2.2.3 and 4.2.2.4 do not apply to a natural heritage system that is within a settlement area boundary as it exists as of [placeholder for effective date], but policy 2.1 of the PPS, 2014 will continue to apply.~~
- ~~Remove 4.2.2 (6): Where a natural heritage system identified in accordance with policy 4.2.2.2 has been brought into a settlement area under the policies in subsection 2.2.8, policy 4.2.2.4 does not apply, but municipalities will establish policies and designations to ensure that the connectivity, diversity and functions of the natural heritage features and areas will be maintained, restored or enhanced.~~

Recommendation #12:

Mandate that Natural Heritage System mapping and monitoring data be made publicly accessible.

Recommendation #13: Reinstate policies that protect the habitat for all species at risk (Endangered, Threatened and Special Concern) including rare species where



they existed in the Greenbelt Plan, 2005; Oak Ridges Moraine Conservation Plan, 2002; and the Niagara Escarpment Plan, 2014 (Office Consolidation) and grow the Greenbelt so that these policies apply in the GGH.

Recommendation #14: Remove exceptions in the three plans proposed plans (GP, ORMCP and NEP) that reduces protection for species at risk. In particular:

- GP 3.2.5 (6): ~~A proposal for new development or site alteration within the Natural Heritage System is not subject to the policies of section 3.2.5.5 of this Plan where the only key natural heritage feature is the habitat of endangered species and threatened species.~~
- GP 3.2.5 (7) ~~Notwithstanding the policies of section 3.2.5 of this Plan, new buildings and structures for agricultural uses shall be required to provide a 30 metre vegetation protection zone from a key natural heritage feature, unless that key natural heritage feature is only the habitat of endangered species and threatened species, or key hydrologic feature, but are exempt from the requirement of establishing a condition of natural self-sustaining vegetation if the land is, and will continue to be, used for agricultural purposes. Despite this exemption, agricultural uses should pursue best management practices to protect and/or restore key hydrologic features and functions.~~
- ORMCP 22. (2) (5) ~~Any development and site alteration in Countryside Areas or Settlement Areas that is within the habitat of an endangered or threatened species, but only if, i. it is permitted under the Endangered Species Act, 2007, and ii. it is not within any other key natural heritage feature or the related minimum vegetation protection zone.~~
- ORMCP Table "Key Natural Heritage Features ..." make the following changes:

Item	Feature	Minimum Area of Influence	Minimum Vegetative Protection Zone
2.	Habitat of endangered, and threatened species, <u>species of special concern, and rare species</u>	None <u>All land within 120 metres of any part of feature</u>	None <u>As determined by a natural heritage evaluation carried out under section 23.</u>

- ORMCP add definition for "rare species": means a native species that is not currently at risk of becoming threatened but, because of its limited



distribution, small population or specialized habitat needs, could be put at risk of becoming threatened through all or part of its Ontario range by changes in land use or increases in certain types of human activity

- NEP 2.7 (6) Notwithstanding Parts 2.7.3, 2.7.4 and 2.7.5 above, development within the habitat of endangered species, ~~and~~ threatened species, special concern and rare species:
 - a) located within Escarpment Natural Areas, ~~and~~ Escarpment Protection Areas, Escarpment Rural Areas, Mineral Resource Extraction Areas except for development referred to in Parts 2.7.3 a) b) c) d) or e), will not be permitted; and
 - b) located within ~~Escarpment Rural Areas, Mineral Resource Extraction Areas,~~ Urban Areas, Minor Urban Centres and Escarpment Recreation Areas may be permitted pursuant to and subject to the policies of the Endangered Species Act, 2007 and all other relevant policies of the Plan.

Recommendation #15: Update section 3.2.6.2 by removing the “maintenance” clause and replacing it with enhancement as the minimum acceptable planning goal.

3) Keep Greenbelt Boundaries Strong

Strengthen the Greenbelt & Maintain Current Boundaries

Keep the Greenbelt boundaries intact by retaining and strengthening the plan policies.

RATIONALE

The Greenbelt Plan is one of the most popular provincial initiatives. Its success over the past 10 years has proven effective in protecting natural heritage and farmland and giving certainty to the agricultural community. The review process should be about improving the Plans, therefore the Greenbelt plan policies strengthened based on implementation experience over the last decade.

There are many forces that seek to shrink the Greenbelt’s boundaries and weaken protection of its countryside and natural features. These include including developer and municipal requests to remove land, swap land out or expand settlement areas for urban development purposes.

No land removals or landswaps



Land removal or land swap requests threaten the integrity of the Greenbelt. The protected landscape works to ensure long term viability of some of the best agricultural lands left in the province and Canada, while providing a framework for growth management that mitigates urban encroachment into protected Greenbelt lands. No lands should be removed from the landscape.

Grandfathered lands – Oak Ridges Moraine

The Oak Ridges Moraine landscape is particularly vulnerable to the rules concerning grandfathered applications in the ORCMP. The transition provisions need to be amended to end exemptions for applications where no land use decisions have been rendered. Applications should be required to comply with the full suite of policies in the updated ORMCP. Further the ORMC Act should be revised to require that approvals issued prior to the ORMCP coming into effect and not yet acted upon be revised and subject to the full Plan.

Where development approvals pre-date the creation of the three plan areas, a sunset clause should be enacted to require the development to proceed within five years. If building permit approval occurs more than five years after the development approval has been granted, the development should be required to comply with the current-provincial policies.

Settlement Area Boundary Expansions

The OGA sees the new proposed policies in the Growth Plan section 2.2.8 and Greenbelt Plan 3.4.3 as hostile to the goals and objectives of the Greenbelt Plan. Proposed amendments that attempt to harmonize Greenbelt and Growth Plan objectives in the area of Settlement Area Boundary Expansions through the creation of a new Municipal Comprehensive Review (MCR) process may well be intended however, upon closer examination would cause many problems that run contrary to the stated vision and goals of the Greenbelt Plan itself.

"The Greenbelt is a broad band of permanently protected land which:

- *Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use;*
 - *Gives **permanent** protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized; and*
 - *Provides for a range of economic and social activities associated with rural communities, agriculture and resources uses.*
- (Greenbelt Plan, Government of Ontario, 2005, pg 4)*



Creating a new mechanism and process for ongoing and “anytime” town and village settlement area boundary expansions into Greenbelt protected lands not anchored in a 10 year review framework will serve to create a new mechanism that facilitates development on lands in the Greenbelt through municipal and then provincial and approval. This proposed change does not enhance protection of the Greenbelt, but rather signals to municipal governments, the development industry and land speculators that Greenbelt lands are open at any time for urban development expansions requests. Additionally, there are other problematic issues that undermine the very intent and integrity of the Plan including:

- The Municipal Comprehensive Review (MCR) Mechanism is ad hoc, not transparent and may be difficult to stop.
- The cumulative impact of settlement area boundary expansions in the Greenbelt will not be transparent to the public nor to MAH staff considering case-by-case approvals outside the context of the 10 year review
- The MCR mechanism sends a signal to developers and land speculators to buy agricultural land in the Greenbelt.
- The Proposed MCR mechanism is not amenable to public oversight.
- If adopted the MCR mechanism, it will likely lead to urban sprawl *within* the Greenbelt.

See Toronto Environmental Alliance (TEA) briefing Note (Appendix F: Brief).

RECOMMENDATIONS

Recommendation #16: The Greenbelt plan policies remain intact and boundaries remain unchanged with no land swaps or process for land swaps permitted in the Greenbelt.

Recommendation #17: The Greenbelt Boundaries remain strong and unchanged and the province deny the more than 650 development industry and municipal request that have been received under section 3.4.2.5 to remove land from the Greenbelt.

Recommendation #18: That section 3.4.3 Settlement Area Town/Village Policies in the Greenbelt Plan be removed and that the original Greenbelt Plan section 3.4.2.5 Settlement Area Town/Village Policies be reinstated. Or see Recommendation #16.

Recommendation #19: Amend GB policy 3.4.3 Town/Village Policies to ensure urban growth and settlement area expansions in to the Greenbelt are not permitted, unless considered at the time of Provincial review:



- GB 3.4.3 (3) As part of a 10 year Greenbelt Plan review, the Province ~~municipal comprehensive review under the Growth Plan, an upper or single-tier planning authority~~ may allow modest expansions of settlement area boundaries in accordance with policy 2.2.8 of the Growth Plan.

Recommendation #20: That Section 2.2.8 Settlement Area Boundary Expansions in the Growth Plan be amended to delete section L and M as they relate to Greenbelt Plan Town/Village Settlement Areas.

Recommendation #21: Boundaries of settlement areas in the Greenbelt and GGH should be frozen for at least 10 years or until 2031.

Recommendation #22: Reorient settlement area policies in current section 3.4.2 of the Greenbelt Plan for Greenbelt Towns and villages: prioritizing the development complete communities within existing boundaries.

Recommendation #23: Under current Greenbelt Plan section 3.4.2, for settlement areas, add policies to exempt small scale agricultural uses complimentary to existing agricultural lands or operations to support the rural economy and allow flexibility for farming communities within the Greenbelt.

Recommendation #24: Infill must be prioritized over greenfield development throughout the Growth Plan. Municipal Comprehensive reviews in the Growth Plan area should only occur every 10 years and coordinated with the Official Plan review (settlement area boundaries).

Recommendation #25: That section 3.4.2.5 be amended to include a definition of “modest” or that an appendix be added to address the need for this definition.

Recommendation #26: Enact a sunset clause for grandfathered development applications that predate the creation of the three plan areas in the Greenbelt. Create a five year timeframe for development to proceed and requiring building permits issued after the five year window to comply with current Greenbelt Plan policies and other relevant Provincial policies.

Recommendation #27: End exemptions for compliance of the full suite of ORMCP policies to grandfathered development applications on the Oak Ridges Moraine where no decisions have been made to date.

Recommendation #28: Amend ORMCP Act to require approvals issued prior to ORMCP coming into effect and not yet acted upon to comply with the full Plan.



Recommendation #29: Include more prescriptive policies under recreation use sections all four plans, i.e. ORMCP: define number of parking spaces allowed under recreation as banquet halls are not recreational uses.

Recommendation #30: Uplift and clarify Greenbelt Plan policies across all four plans, seeking the highest level of protection for agricultural land and natural heritage systems.

Recommendation #31: Create stronger policies to protect the Carden Alvar, wetlands, savannahs and all rare habitats within the Greenbelt and Growth Plan

Recommendation #32: Strengthen the Greenbelt landscape by provincially mapping a connected NHS and Ag system around it over time.

4) Deal with Infrastructure and Aggregates

Infrastructure and Aggregates

Protect the Greenbelt from fragmentation from linear infrastructure and aggregate extraction, while amending the Plan to meaningfully invest in and promote green infrastructure.

RATIONALE

The Greenbelt's natural heritage, water and agricultural systems are particularly vulnerable to aggregate mining/operations as well as new infrastructure, especially in an age of climate change. Both have significant and lasting impacts on the landscape which cause fragmentation and destruction of natural and agricultural heritage. This section below outlines concerns that require action as well as positive reaction to several amendment areas.

The OGA observes that some land uses continue to have priority over protection of natural heritage across the GGH. These include infrastructure and aggregate extraction (see, for example, policy 3.2.5.1c, p26 of proposed Greenbelt Plan). Both threaten key natural heritage features, key hydrologic features, natural heritage systems, water resources system and prime agricultural lands.

Such exceptions to the protection of natural heritage should not be permitted or only permitted with justification that the proposed land use is necessary in the public interest and that there is no reasonable alternative. If there is no other reasonable alternative found to linear infrastructure projects, offsetting should be made mandatory. As well, the proposed plans and regulations enable watershed



based targets to address protection of natural heritage and water resources through watershed and sub-watershed planning.

The Greenbelt and Growth Plan can work together to make better use of our existing infrastructure, however, some infrastructure facilitates urban sprawl which is contrary to the intent of the Greenbelt Plan. It is critical to keep infrastructure, such as highways, urban energy infrastructure (transmission lines, gas peaker plants, renewable energy projects) urban services and pipelines out of the Greenbelt's and GGH's agricultural lands, natural heritage features, core and linkage areas.

New Highway infrastructure generally and specifically the proposed GTA West 413 highway is particularly problematic for the Greenbelt. It presents a major threat to natural heritage and agricultural land protection, climate change action, and urban sprawl mitigation in the GGH etc. The proposed route cuts through pristine environments in the Greenbelt that is totally incompatible with the goal of the Greenbelt Plan. Given the provincial suspension of the EA process and the provincial panel review of the need and rationale for the highway, now is the time to remove it from the schedules of the Plans.

The OGA is pleased to see the proposed plans and regulations including green infrastructure and low impact development as mechanisms to address climate change. We also acknowledge the importance of commitments in the proposed plans and regulations to protecting natural heritage systems. Particularly, the proposed Greenbelt Plan improves upon the Provincial Policy Statement, 2014 by providing increased protection for natural heritage systems in the Protected Countryside (policy 1.2.2.2a, p6 and 1.2.3, p7 of proposed Greenbelt Plan). Ensuring resilience in a changing climate requires both protection of natural heritage systems and better stormwater management.

Guidance for green infrastructure and low impact development are key mechanisms to address climate change and we are pleased to see targets for reduction in the installation of impervious surfaces identified in the proposed plans (policy 3.2.2.3e, p24 of proposed Greenbelt Plan; s27(1), p28 of proposed Oak Ridges Moraine Conservation Plan; policy 4.2.2.1b)v, p41 of proposed Growth Plan). There will also need to be detailed guidance to assist in achieving these targets. As well, there should be provincially-led targets and guidance developed that is aimed at using green infrastructure and low impact development. In particular, there needs to be the development of targets restoring the urban tree canopy and wetland conservation and restoration.

Regarding infrastructure, the Greenbelt Plan now defers to the Growth Plan, it is important that the Greenbelt settlement areas are recognized as distinct from urban settlement areas in cities surrounded by urban areas, off the Greenbelt. Within



Greenbelt settlement areas direction should be provided to ensure that sewer infrastructure recharges aquifers and retains water quality such as membrane systems and constructed wetlands.

RECOMMENDATIONS

Recommendation #33: Remove exceptions for infrastructure and aggregate extraction from the protection of natural heritage.

Recommendation #34: Develop guidance for assisting municipalities in meeting the proposed targets for impervious surfaces.

Recommendation #35: Ensure that guidance is developed for local watershed and sub-watershed planning that includes establishment of targets for key aspects of green infrastructure and low impact development such as restoring urban tree canopy and wetland conservation and restoration.

Recommendation #36: Create new rules to restrict new highways, energy generation and transmission, fuel lines and urban services such as water and sewage pipes - incompatible with protecting the Greenbelt's and GGH's agricultural and natural systems.

Recommendation #37: Prioritize transit infrastructure and investment in the Growth Plan to existing urban areas and urban growth centres.

Recommendation #38: Require municipalities to consider green infrastructure as part of the planning process and include a certain percentage of green infrastructure into their plans under section 4.2 of the Greenbelt Plan.

Recommendation #39: Develop new guidance for municipalities to ensure that sewer infrastructure recharges aquifers and retains water quality such as membrane systems and constructed wetlands.

Recommendation #40: require offsetting that maintains and enhances ecological linkages for any new infrastructure that is placed in rural or countryside areas.

Recommendation #41: Restrict any and all 400 Series highway extensions from crossing in or through the Greenbelt.

Recommendation #42: Maintain current Greenbelt Plan prohibition on extending lake-based sewer or water services to communities not already served by such systems.

Recommendation #43: Update language in section 4.2 of the Greenbelt Plan to better define and clarify what is a "reasonable alternative" to better understand the type and scale of projects that fall under this section.



Recommendation #44: Where infrastructure projects are being considered in the Greenbelt, the province should require the completion of a full EA to evaluate the need, impact on urban development patterns (i.e. sprawl) and climate change while also assessing the direct impacts of any project on natural heritage features, groundwater quantity and quality.

Recommendation #45: Amend all four policies to explicitly not permit new extraction of aggregate resources on prime agricultural land.

Recommendation #46: Limit the expansion of new aggregate operation or wayside pits from the region's important key natural and key hydrologic features, their functions, the natural heritage and water resources systems and Oak Ridges Moraine Linkage Areas. Revise the policies as indicated below:

- GP 4.3.2 (3) Notwithstanding the Natural System policies of section 3.2 of this Plan, within the Natural Heritage System, mineral aggregate operations and wayside pits and quarries are subject to the following:
 - a) No new mineral aggregate operation and no wayside pits and quarries, or any ancillary or accessory use thereto shall be permitted in all the following key natural heritage features and key hydrologic features.
- Growth Plan 4.2.8 (3) Notwithstanding the policies of subsections 4.2.2, 4.2.3 and 4.2.4, within the natural heritage system identified in accordance with policy 4.2.2.2, mineral aggregate operations and wayside pits and quarries are subject to the following:
 - a) no new mineral aggregate operation and no wayside pit and quarry, or any ancillary or accessory use thereto will be permitted in all the following key natural heritage features and key hydrologic features.
- Growth Plan 4.2.3.(1) Development or site alteration is not permitted in key hydrologic features or key natural heritage features, with the exception of: ...
 - d) ~~mineral aggregate operations and wayside pits and quarries;~~
- ORMP Part II 12. (3) The following uses are permitted with respect to land in Natural Linkage Areas, subject to Parts III and IV: ...
 - 11. ~~Mineral aggregate operations.~~



5) Support Ontario's Agricultural Sector

Supporting Agriculture

Support agricultural viability through the GGH and identify an Agricultural System comprising the agricultural land base and an Agricultural Support Network. Also improve policy areas that further support farming viability.

RATIONALE

The OGA commends the government for its commitment to lead the identification of a regional agricultural system for the Greater Golden Horseshoe (GGH), demonstrated in Growth Plan policy 4.2.6. A protected and connected agricultural system including the land base, agricultural resources and infrastructure and support network is vital to conserving and permanently protecting a strong agricultural sector in the province for generations to come. Additional policies are also required to further assist the agricultural community to continue to thrive and coexist adjacent to an increasingly urbanized landscape. We are pleased that Sections 3.1 of the Greenbelt Plan and Section 4.2.6 in the Growth Plan reinforce the need for flexibility and other additional policies to better support the sector.

While Southern Ontario's GGH is home to some of the best remaining farmland in Canada, much of that land is facing intense development pressure, despite an excess of 25 years' worth of farmland already designated by municipalities to accommodate growth in both urban and rural settlement areas (*Neptis Foundation, 2015*). An area of prime farmland 1.5 times the size of the City of Toronto is in the process of being rapidly urbanized. As the agricultural sector plays such a vital role in Ontario's economy as one of North America's largest agricultural and agri-food industry clusters, with a unique diversity of primary farm production, food processing, food service, food distribution and retail that represents the fastest growing employment sector in Ontario and generates \$12.3 billion in annual economic activity, it requires permanent protection for it to continue to thrive.

RECOMMENDATIONS

Recommendation 47: Follow through on commitments to clearly define and identify the Agricultural System, which should consist of: (1) the agricultural land base (with consistent Land Evaluation and Area Review used across the region); (2) and the Agricultural Support Network (made up of agri-food assets important to the viability of the sector).



Recommendation 48: Ensure the Agricultural System and the GGH Natural Heritage System are integrated with the priority in policy to protect and enhance existing natural features and ecological functions.

Recommendation #49: Adhere to firm timelines for the identification and mapping process, consultation and finalizing the mapped system. A draft map should be presented publicly for consultation in January 2017, with final mapping completed and final amendments integrated by late spring 2017. Until the mapping is completed, place a moratorium on the Brantford/Brant annexation proposal.

Recommendation #50: Ensure a wide range of stakeholders to participate in defining the system to be mapped, as well as having input into the actual mapping process.

Recommendation #51: Permanently protect the GGH's agricultural system in legislation by including it in the Greenbelt or through a new agricultural land use designation with Greenbelt like protection policies to conserving the land base, supporting farming families and local economies long term that strengthen Ontario's overall economic position.

Recommendation #52: Municipal Comprehensive reviews and large municipal annexations (such as Brantford/Brant County) as part of the Growth Plan should not be approved prior to the mapping and protection of the Agricultural System.

Recommendation #53: Create new policies to increase protection of farmland from contaminated fill.

Recommendation #54: Ensure the farming industry and supporting services are also protected i.e.: agricultural system mapping, ensure scale of agricultural operations are compatible with rural land uses and protection of water quality and quantity.

Recommendation #55: Ensure proposed reduced setbacks for agricultural operations don't reduce overall water quality and that they are science based.

Recommendation 56: Amend GP policy 3.2.5(8) to clarify its intent by adding in language to explain how new requirements to protect the key natural heritage feature and/or key hydrologic feature and their functions will be implemented and evaluated in lieu of a natural heritage or hydrologic evaluation.

Recommendation 57: Amend GP policy 3.2.5(8) by adding language to limit the scale (new buildings or structures do not exceed a threshold size for major development (500 m²), or large-scale filling activities (>500m³) of agricultural and



agricultural-related, and on-farm diversified that are exempt from natural heritage or hydrologic evaluations.

Recommendation #58: Move forward with new requirements for Agricultural Impact Assessments (AIA's) for proposed aggregate operations in prime agricultural areas in section 4.3.2.4 of the Greenbelt Plan, and Section 4.2.1.2.g for proposed infrastructure crossing specialty crop and all prime farmland in prime agricultural areas.

Recommendation #59: Rural area in the Growth Plan sections 2.2.9.5 and 2.2.9.6 should be removed from the Plan.

Recommendation #60: Agriculture Policies: Need to change taxation policies that incent municipalities to convert land from agriculture to urban. Agriculture is taxed at 25 percent of the land value, province used to pay the remainder 75 percent. The province should re-instate this tax subsidy.

Recommendation #61: Expand the Environmental Farm Plan to support agricultural practices that mitigate GHG emissions (cover cropping to sequester carbon, riparian planting around wetlands, planting of hedgerows, managing woodlots, etc.).

6) Protect the GGH's Water Sources

Strengthen Water Protection

Better protect water sources and supplies across the GGH by adopting stronger integrated watershed planning requirements, integrating provincial priorities, plans, policies, and regulations.

RATIONALE

Water supplies and resources are one of Ontario's most important natural features and are valued highly by Ontarians. The OGA is pleased to see the adoption of an Integrated Watershed Planning (IWP) requirement throughout the GGH. However, there is a need to clearly link IWP to natural heritage system and features and comprehensively address issues such as watershed carrying capacity, and human made hazards including commercial fill/soil reuse.

Respect watershed carrying capacity

The proposed plans are intended to ensure that expanded settlement boundaries are only to be permitted when there is a watershed or sub-watershed plan that



demonstrates water quality and quantity will not be negatively impacted (policy 2.2.8.2e, p24 of proposed Growth Plan).

However, we continue to have concerns that watershed carrying capacity will be exceeded, unless forecasts for population and policy direction for settlement area growth take into account ecological and hydrological health. For example, in policy 6.3.2.1 (p62 of proposed Growth Plan), growth in excess of what is forecasted can be approved if various conditions are met. None of those conditions ensures that the watershed's carrying capacity will be respected. Further, the current Greenbelt Plan (2005) clearly is intended to prevent extension or expansion of Great Lakes based water and sewer systems. This important policy needs to be continued in the proposed plans.

Further, the current Greenbelt Plan (2005) clearly is intended to prevent extension or expansion of Great Lakes based water and sewer systems, unless certain criteria including failed services and protecting public health are met (p31, Greenbelt Plan 2005). This important policy needs to be continued in the proposed plans.

Ensure integration across provincial plans and regulation, and beyond

If the ambitious and laudable water management goals of the amended growth plans are to be fully realized, there must be integration across provincial ministries (MMA, MNRF, MOECC, and others) and numerous other planning and approvals entities in order to ensure coordination and the capacity for full implementation. Therefore, we support the recommendation of the Advisory Panel on the Coordinated Review to establish a "secretariat" that will "ensure effective coordination of actions by provincial ministries, the Niagara Escarpment Commission, municipalities, conservation authorities, and other local bodies" (Recommendation 85, p164 of Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015-2041).

The Ministry of Municipal Affairs' explanatory document states that the proposed changes would: "Align with other provincial initiatives which complement the land use planning framework in the region (e.g., the Lake Simcoe Protection Plan, Ontario's Great Lakes Strategy and source water protection plans)." (See [Shaping Land Use in the Greater Golden Horseshoe](#), p20 Appendix I:Website) We recommend that the government go further and establish the secretariat that the Advisory Panel advocated.

Link with provincial priorities, including Great Lakes-St Lawrence River protection

The purposes of the *Great Lakes Protection Act, 2015* (GLPA) are to protect and restore the ecological health of the Great Lakes-St Lawrence River Basin and to



engage individuals and communities in the pursuit of protection and restoration goal. Further, the GLPA envisions inter-ministerial cooperation in achieving the purposes of the Act, as demonstrated in the participation of the Great Lakes Ministers in developing Ontario's Great Lakes Strategy and in participating in the Great Lakes Guardians' Council. The Ministers of Municipal Affairs and Natural Resources and Forestry are Great Lakes Ministers. Within their mandates we expect that they will also seek to fully implement the GLPA.

The proposed plans and regulations reference Ontario's Great Lakes Strategy and any targets developed under the GLPA. For example, the Greenbelt Plan requires that municipalities "consider the Great Lakes Strategy, the targets and goals of the *Great Lakes Protection Act, 2015*, and any applicable Great Lakes agreements as part of watershed planning and coastal or waterfront planning initiatives." (policy 3.2.4.4, p25 of proposed Greenbelt Plan) It will not be enough that municipalities "consider" these provincial priorities in various land use planning decisions. If the purposes of the GLPA are to be realized, a stronger commitment to implementation is needed within our provincial lands use plans and regulations. We recommend using language such as "compatible with" rather than "consider" when referencing meeting goals of Ontario's Great Lakes Strategy and targets established under the GLPA.

Make use of existing legal tools to support integrated watershed management and implementation

The proposed plans and policies are aimed at enhancing integrated watershed management by, for example, requiring master plans for drinking water, stormwater, and wastewater. As well, included in the proposals are requirements for risk assessments and climate change adaptation strategies. In order to ensure integration of these planning exercises and to address urban water management issues beyond land use planning for new/expanded developments and infrastructure, we recommend that the use of existing, complementary tools, including the *Water Opportunities Act, 2010* (WOA).

Under the WOA, there are enabling provisions for municipal water sustainability plans (MWSP). The Act also contemplates targets, performance measures, evaluation and follow-up requirements in support of the MWSP. Making use of this existing legal tool will enhance the proposed plans and regulation by ensuring more integration of the master planning initiatives. Further, the implementation of the WOA can lead to the establishment of runoff quality and quantity performance targets based on watershed studies. These targets can be addressed in the MWSP, with strategies to achieve the targets, if targets are not achieved. The MWSP can therefore be used to implement green infrastructure on public lands (e.g., parks, rights of way, school yards) and private lands (e.g., parking lots). Currently, the



WOA only enables such actions. There are no implementing regulations. The Ontario government needs to move forward to establish regulations to implement MWSP, by engaging in consultations with a broad range of interested public bodies, agencies, and organizations.

We envision that the proposed and policies plans will be based on watershed plans developed by or in collaboration with conservation authorities. Fortunately, Ontario is currently undergoing a review of the *Conservation Authorities Act*. This is an important opportunity to ensure conservation authorities have the ability and tools to enhance integrated watershed management efforts.

Ensure that natural heritage systems protection is the top priority

We acknowledge the importance of commitments in the proposed plans and regulations to protecting natural heritage systems. Particularly, the proposed Greenbelt Plan improves upon the Provincial Policy Statement, 2014 by providing increased protection for natural heritage systems in the Protected Countryside (policy 1.2.2.2a, p6 and 1.2.3, p7 of proposed Greenbelt Plan). Ensuring resilience in a changing climate requires both protection of natural heritage systems and better stormwater management. We are concerned that some land uses continue to have priority over protection of natural heritage, including infrastructure and aggregate extraction (see, for example, policy 3.2.5.1c, p26 of proposed Greenbelt Plan). Such exceptions to the protection of natural heritage should not be permitted or only permitted with justification that the proposed land use is necessary in the public interest and that there is no reasonable alternative.

Address human-made hazards planning

Limited policy direction is provided in the Provincial Policy Statement, 2014 regarding land use planning and human-made hazards such as contaminated land (policy 3.2, p32 of PPS, 2014). The proposed plans only deal with natural hazards such as flooding and erosion. To the extent that they are addressed due to threats to drinking water, some human-made hazards may be limited through the interaction of source protection planning under the *Clean Water Act, 2006* and the proposed plans and regulations. However, we encourage the government to do more to ensure all waters in the GGH are in good health by incorporating policies to deal with human-made hazards such as nuclear power plants and associated waste disposal.

Re: Soil re-use and regulation of commercial fill

It's been clear for some time that large-scale commercial and non-commercial fill operations continue to threaten the Greenbelt's agricultural and natural landscape, putting at risk water resources, habitat and ultimately affecting human health and



quality of life for residents. These issues must be addressed as a result of this review.

New development and infrastructure renewal in urban areas are generating significant amounts of excess soil materials, i.e., fill, that are being dumped across the GGH with the risk of contamination. Many site alteration bylaws, administered at the lower or single tier level, are ineffective as municipalities lack the resources for by-law enforcement. The proposed policies on managing excess soil in the four plans are general and high level in nature, however, stronger and more directive guidance is needed.

RECOMMENDATIONS

Recommendation #62: Ensure that forecasts for population and policy direction for settlement area growth take into account the watershed's carrying capacity.

Recommendation #63: Set conditions for growth in excess of what is forecasted that respect the local watershed's carrying capacity.

Recommendation #64: Ensure that extension/expansion of Great Lakes-based water and sewer systems are only permitted when criteria including failed services and protecting public health are met. Ensure that extension/expansion of Great Lakes-based water and sewer systems continues to be prohibited.

Recommendation #65: Establish a provincial secretariat that will be tasked with ensuring coordination and implementation of integrated watershed management, both within the proposed provincial plans and regulations and beyond.

Recommendation #66: Ensure that municipal decisions related to watershed planning are compatible with Ontario's Great Lakes Strategy, any targets established under the *Great Lakes Protection Act, 2015*, any other provincial commitments in other Great Lakes-St Lawrence River agreements, and are supportive of federal Great Lakes-St Lawrence River commitments.

Recommendation #67: Implement and enhance existing tools, including municipal water sustainability plans under the *Water Opportunities Act, 2010* and the review of the *Conservation Authorities Act*, to support integrated watershed management within the proposed plans and regulations.

Recommendation #68: Remove exceptions for infrastructure and aggregate extraction from the protection of natural heritage.

Recommendation #69: Incorporate policies within the proposed plans and regulations that address human-made hazards that threaten water quality in the GGH.



Recommendation #70: Prohibit large-scale commercial and non commercial fill operations from all areas of the Greenbelt.

Recommendation #71: Although Recommendation 68 is our preference, if large-scale fill operations are permitted, they must be:

- a) considered a use of land
- b) strictly restricted to less sensitive natural areas, and
- c) be adequately monitored

Recommendation #72: Limit smaller fill operations to being incidental to another use and ensure adequate monitoring.

Recommendation #73: Include in all four plans legislative provisions to operationalize proposed policies and amend the policies to specifically reference the Ministry of Environment and Climate Change's current fill management initiatives and ensure the results of this work, including best management practices are mandatory across the GGH.

7) Address Climate Change

Addressing Climate Change

Strongly prioritize climate action across the Greenbelt and Growth Plan policies, dedicate revenues from cap-and-trade programs towards investment in restoration, enhancement of the GGH's natural heritage and Agricultural system.

RATIONALE

With climate change a rapidly growing threat to communities around the world, it is important that we work to increase carbon-absorbing forest cover in the Greenbelt and increase the climate resiliency of communities through action such as greater use of green infrastructure, natural area restoration, aggressive tree cover targets and more compact urban form. We also need to place greater emphasis on services provided by nature, such as improved air quality, reduced temperatures, flood prevention and social benefits such as reduced anxiety, depression and cognitive wellbeing.

The OGA is pleased to see climate change at the heart of the revised proposed vision statement for the Greenbelt. The incorporation of climate change recognizing the links between the Natural Heritage and Agricultural Systems and water resource system protection. The focus on the role of municipal government as a key partner



that can help deliver the strong adaptation goals set out in the Growth Plan in section 4.2.10 is key to success.

The Greenbelt and Growth Plan are the province's most powerful tools for helping deliver strong action on Climate Change. Strengthening both plans policies to further help sequester carbon, encourage of net-zero communities and green and resilient infrastructure will drive meaningful action and achievement in line with Ontario's Climate Change Strategy 2015 and Action Plan.

RECOMMENDATIONS

Recommendation #74: Dedicate revenues from cap-and-trade to programs that restore and enhance the Greenbelt's and Growth Plan's natural landscape (including but not limited to: land securement and enhancement of existing natural systems in the Greenbelt and lands in the GGH as identified in the forthcoming NHS mapping exercise, and at risk farmland).

Recommendation #75: Dedicate revenues from cap-and-trade to further reduce emissions through additional investment in public transit, energy efficient buildings and living green infrastructure.

Recommendation #76: Dedicate revenues from cap-and-trade to invest in incentives for private land stewardship best practices and tax incentives for stewardship programs such as Alternative Land Use Services (ALUS) where ecological protection and enhancement is the outcome.

Recommendation #77: Amend section 3.2.2 of the Greenbelt Plan to include new policies that include the integration of climate change impact evaluations into planning decision making linked to municipal GHG inventories (i.e.1990 Baseline including land use).

Recommendation #78: Amend section 3.2.2 of the Greenbelt Plan to ensure Municipal GHG inventories include land use change emissions based on existing international conventions.

Recommendation #79: Upper and lower tier Municipalities should be required to develop greenhouse gas inventories, emission reduction strategies and publish performance targets and metrics annually just as large emitters are required to do.

Recommendation #80: Include targets and timelines to increase forest cover to 30% and support enhanced woodland reforestation particularly in the Greenbelt and rural areas.

Recommendation #81: To address the challenges of climate change and the ongoing loss of biodiversity, Greenbelt protection should be extended to adjacent



land of significant provincial interest including water, agriculture and natural heritage systems.

Recommendation #82: Climate change policies need stronger wording, substitute “encourage” for “shall” i.e. to ‘require’ green infrastructure.

Recommendation #83: Climate change mitigation and adaptation should be part of the criteria under the provincial Environmental Assessment process

Recommendation #84: Add text to new Climate Change policies in the Growth Plan 4.2.10, and in to the sections that guide natural heritage protection in the GP (3.2 Natural System) , ORMCP (Part III Protecting Ecological and Hydrological Integrity), and NEP (1.3 Escarpment Natural Area, 1.4 Escarpment Protection Area, and Part 3 The Niagara Escarpment Parks and Open Space System) encouraging municipalities to grow and enhance both the secured (e.g. easements, nature reserves, parks) and environmentally managed portion (e.g. stewardship programs like the ALUS program) of the natural heritage system.

Recommendation #85: Implement net-zero communities. Strengthen language to “require” climate change policies if we hope to move towards net zero communities.

8) Improve the Plan Policy Definitions & Related Provincial Policies

Related Provincial Policies

Clarify and update Greenbelt and Growth Plan policy definitions and address reform of complimentary legislation such as the Ontario Municipal Board (OMB) or Big Move Regional Transportation plan.

RATIONALE

For OGA members, the Greenbelt and Growth Plan definitions and terms are critical to the understanding and implementation of both at both the provincial and municipal level. We recognize the governments’ efforts to strike the right balance in creating consistent language and definitions across the four plans. This enables consistency with provincial policy while at the same time respecting special landscapes and natural differences (i.e. NEP & ORM) that require extra policy to protect natural features, values and environments. There are several additional areas we believe should be considered.



Conservation Organizations

The role of conservation organizations in moving forward with plan goals and objectives is critical, however changes must be made to recognize a broader definition of such groups across all four plans. This is particularly relevant to Land Trusts. The only Plan that defines “conservation organizations” e.g. an Ontario land trust and their ability to acquire or sever conservation lands as a permitted use is in the Niagara Escarpment Plan (NEP). To have “approved status”, MNR and the NEC must be individually and separately satisfied that the conservation organization is a registered charity with bylaws supporting “protection of the natural environment”. Since all Ontario land trusts that are registered as bona-fide members of the Ontario Land Trust Alliance (OLTA) within prescribed CLT best practices meet this definition, this basic eligibility criteria would be far better to establish in Plan definition and application. The same definition & criteria for Ontario land trust automatic eligibility and defined approval as a “conservation organization” can be now revised & updated for practical implementation reasons across all four plans and across all Provincial Plans

The Greenbelt’s Rural Communities & the GGH’s Natural and Agricultural Heritage Systems

Rural communities, towns and villages in the Greenbelt and GGH that have rural settlement areas, but lack requisite infrastructure required for complete communities should not be included in their municipal lands needs assessment or be included in the allocation of growth. These areas particularly those in the Greenbelt are not intended for large scale urban development. Clarity is required in both the Greenbelt and Growth Plan to ensure policies are consistent and protect these areas from unnecessary and inappropriate urbanization.

Defining the GGH’s natural Heritage and Agricultural Systems will be key over the next number of months. Once the province has finalized identifying and mapping the Natural Heritage and Agricultural system in the GGH, it will be critical to extend definitions and map data to the four provincial plans.

The definition of complete communities under the Growth plan needs to be updated to reflect a broader range of public values.

OMB & Office of the Provincial Facilitator

Over the years, many OGA member groups have fought cases to protect the Greenbelt, and lost, with grave consequences to countryside, natural heritage, the public interest and ultimately democracy. Although not part of the four plans, and as referenced by the Crombie Panel report, the OMB is an important part of the land use planning framework in the province that must be reformed if the four plans are to be effective long term.



The Ontario Municipal Boards has frequently undermined provincial policies including the Growth Plan and Greenbelt Plan. This quasi-legislative body as it is today is flawed and broken. Serious reform of the system is needed, but if accomplished, the OMB could become an important partner with the province in ensuring Greenbelt protections are upheld and that the Growth Plan is implemented according to its goals and objectives.

The office of the Provincial Development facilitator is another area where questionable, non transparent decisions inconsistent and often times contrary to provincial policy have been made in the past. Reforms are also needed for this body.

Transportation Planning

Provincial and Regional transportation planning such as the Big Move should be aligned with Greenbelt and Growth Plan objectives. Investments in transit should be prioritized to urban growth centres, instead of being placed within designated greenfields or whitebelt lands that are far flung destinations.

The goals of the Greenbelt and Growth Plan will be achieved if incentives and policies coordinate efforts to bring more urban growth centres with vibrant intensified communities served by transit to life.

RECOMMENDATIONS

Recommendation #86: Include the definition of Ontario Land Trusts as an approved provincial conservation organizations in all provincial plans including the Greenbelt and Growth Plan.

Recommendation #87: Revise both Greenbelt and Growth Plans to exempt rural towns and villages in the Greenbelt from growth plan intensification targets. Instead focus on the need for infill development that enhances the character of those communities and curbs settlement area expansions for urbanization.

Recommendation #88: Include the GGH's finalized Natural Heritage System and Agricultural System definitions and mapping in all four plans and relevant provincial policies.

Recommendation #89: Revise the definition of complete communities in the Growth Plan to include a broader range of public values including: clean air and water, greenspace, connected and healthy natural heritage systems, transit, neighbourhood amenities, green infrastructure and climate resilient infrastructure.

Recommendation #90: The Greenbelt Plan should define infrastructure. Private industrial waste management should not be included in the definition.



Recommendation #91: Improve the clarity of policies to reduce interpretation issues. Use strong directive words such as “shall be consistent with” or “restrict” - not “prevent”, or “encourage”, (i.e. Greenbelt Plan policy 4.2.2.2. wording changes from the 2005 Greenbelt Plan from restrict to **prevent** in the 2016 Growth Plan are unclear and may weaken the policy outcome).

Recommendation #92: Make major reform of the OMB a provincial priority. Include reforms such as but not limited to:

- Increased support to municipalities during the appeal process
- Improved support for public participation
- Limit powers of the OMB
- Redefine expertise required to sit as a board member
- Ensure decisions are based on precedence to build support for better decisions that serve communities
- Province to once again play an active role defending provincial policy at the OMB or disallow appeals when provincial policy is correctly interpreted at the municipal level
- Limit the ability of cost awards against public interest groups and individual citizens through frivolous case test at start of a hearing
- Make all aspect of OMB decisions public
- Make OMB hearings open to the public, transparent requiring video recordings and open to the media
- Greenbelt and Natural Heritage related matters in the GGH should require joint board hearings with the Environmental Review Tribunal (ERT), or be referred to the ERT only

Recommendation #93: Review the need for the Office of the Development Facilitator and its role and powers. Make changes to address lack of transparency and public accountability such as public disclosure of settled cases.

Recommendation #94: Align provincial and regional transportation plans with the Greenbelt and Growth Plan by prioritizing investment in urban growth centres.

9) Stop Sprawl & Build Smart and Complete Communities

Stopping Sprawl & Building Smart and Complete Communities

Stop urban sprawl from threatening the prosperity of the GGH, destroying natural heritage and agricultural lands by creating a hard urban edge and by requiring increased intensification and density targets and updating policies such as the Land Needs Assessment Methodology and others.



RATIONALE

Urban sprawl is perhaps the greatest threat to the GGH's long term prosperity and livability. The damage this form of development has caused over the decades to our shared air, water and natural heritage and some of Canada's best and remaining farmland is irreparable. The social, environmental and financial costs to Ontarian's are too high a price to pay for a model of development that is outdated and destructive. Now is time to turn the tide, and move forward with a new pattern of smart growth, that protects that which needs protection, while promoting compact communities, where mixed use, affordable, walkable, transit and amenity supportive climate resilient neighbourhoods are the way of the future. We are pleased to see many positive proposed changes to the province's Growth Plan and offer these recommendations to further strengthen the plans for the effective implementation and achievement of the objective of encouraging more efficient compact growth in our cities while protecting the Greenbelt from sprawl. This is most critical to our region's future success.

The OGA understands that the GGH as Canada's largest urban region will undergo a profound change as it grows to accommodate millions more residents by 2041. The decisions we make about how to accommodate this growth will determine what types of communities we live in, how much time we spend stuck in traffic, the quality of the air we breathe, the water we drink and whether our farmland and forests continue to provide us with food and habitat for our unique wildlife. There's no question that new housing will be needed. The question is what form will that take and where will it go?

To better utilize the efficiencies of existing infrastructure more new growth must be focused in our existing urban areas that are already fully serviced. By directing growth within the built boundary of our cities and towns we also support investment in urban renewal to support the development of walkable cities with regular transit and bike infrastructure. We also need to be cognizant that it we can't treat all urban areas as the same. Small towns surrounded by the Greenbelt should not be the focus of intensification. It is also unlikely that most greenfield sites will ever support higher orders of transit such as Light Rail Transit but we commend the province for increasing density targets as an important step in creating greenfield communities that can support at least basic transit.

Assessments of municipal land budgets show that there is a surplus of designated lands to accommodate growth projections to 2031 and beyond ("*Understanding the Fundamentals of the Growth Plan*, Neptis Foundation, 2015 Appendix H: Report Neptis Foundation 2015). This surplus land, coupled with demographic changes



and higher intensification targets, creates an opportunity to implement smart growth policies and create transit-friendly communities.

Stopping the Cycle of Sprawl: Freeze Urban Boundaries

Freezing urban boundaries for the next 10 years is the key action the government can take at this time to ensure that the Growth Plan succeeds. Recognizing the current surplus of land designated for urban development – land 1.5 times the size of the City of Toronto and we object to the hoarding of land by some in the development industry. A freeze will serve to refocus the industry to achieve prescribed intensification and density targets as well as support infill development needed for the building complete communities. It will also relieve pressure being placed on municipal governments to expand urban boundaries unnecessarily. Now is the time to build up, not out, and encourage smart and innovative design.

Several recent reports point to oversupply of designated land including “*Plan to Achieve: A Review of the Land Needs Assessment Process and the Implementation of the Growth Plan*” (Appendix I: Report) and the Neptis Foundation Report “*Understanding the Fundamentals of the Growth Plan*”, 2015 (Appendix H: Report)

Build Complete Communities

The OGA supports the shift away from sprawl based communities towards complete and livable communities that support a mix of housing types and amenities and services. Supporting efficient development in urban growth centres, guided by mandatory requirements for intensification and densities, aligning growth with existing public transit, water, road and sewer capacity is key to shifting the land use planning landscape for the better. Ending exemptions will also ensure consistent and fair plan application of Growth Plan policies across the GGH. The government needs to remain firm on the new proposed targets. Do not permit requests from municipalities for exemptions.

In our view, protected lands in the Greenbelt, rural towns and villages are not the place for urbanization, nor are they areas for urban infrastructure that enable urban development on adjacent lands in municipal urban boundaries. Additionally, there is a need to update a range of policies including the Land Needs Assessment methodology,

There is clearly a need to update policies including those that govern land needs assessment methodology for employment areas, recreation areas, excess land policies and to introduce new policies for inclusive community design.

Intensification and Density Targets:



The OGA supports the proposed increases to intensification and density targets in the Growth Plan. Both will serve to guide growth and meaningfully shifting development patterns. This will also ensure efficient land use and secure the regions long term supply of land for decades into the future, further protecting the permanency of the Greenbelt and rural landscape and economy and, the natural heritage system, while reducing greenhouse gases, these targets require both a carrot and a stick to ensure municipal government meet the objectives.

New Land Needs Assessment Methodology

The land needs assessment methodology is in need of a strong update to help guide municipal application, ensure stronger achievement of the intensification and density targets and help with more consistent and uniform compliance.

Align Growth Plans and Transportation planning:

The OGA is pleased to see the proposed amendments that seek to further align and integrate transit with growth planning in the GGH. Section 2.2.4 of the Growth plan that sets out new requirements for minimum densities for lands near transit are a step forward to ensuring that transit and population forecasts intersect in a way that produces more compact, transit oriented communities.

Investment in new transit is important in supporting growth in the right areas. It will be important to improve the flow of people and goods across the region by prioritizing investment in public transit, and existing highways over building new highways so that the transportation network better serves and reinforces smart growth rather than sprawl.

New priority transit corridors should be designated only within DGA's where the density will support transit services. There is also a need to prioritize and use a phased approach to implementation, checking to see that population and compact growth proceeds as directed. It is important to recognize that not all DGA's or urban centres can afford to provide regular transit services or the public services needed to support urban growth. Extending transit to planned (non-existent) low density subdivisions is transit supporting sprawl, it is unaffordable and doesn't address the need for a greater variety of affordable housing options connected by transit in existing communities.

Other Plan Policies

Plan policies related to employment areas and recreational areas should be updated and new policies for inclusive communities should be put in place.

Employment areas



Prime employment lands are part of a complete community and should be located within urban areas and not on prime agricultural land at the edge of the GTA. Warehouses need to be located close to labour and transportation options like rail, transit, airports and logistic companies to maximize efficiency.

Recreation areas

Recreational uses need to be part of the community fabric not located in the countryside or Greenbelt requiring people to drive to exercise.

Inclusive communities

Seniors need to be part of the community, and senior's housing should be integrated into community hubs. Seniors housing facilities in the Greenbelt or outside of the urban core where transit and walking accessibility is limited should be strongly discouraged.

New-comers to the GGH also need to feel at home. There is a clear need for more municipal guidance under the Growth Plan a new section dedicated to encouraging inclusivity diversity, and planning guidelines for inclusive design of public facilities and public spaces

RECOMMENDATIONS

Recommendation #95: Freeze Municipal Urban Boundaries across the GGH for 10 years and create a hard urban edge beyond which urban development cannot proceed.

Recommendation #96: Place development emphasis on complete communities in cities but in rural communities where transit, sewers, emergency services, water systems are limited or not available greenfield growth should be restricted and infill prioritized until 2031 to ensure the Greenbelt is not compromised in the future.

Recommendation #97: Section 2.2.9.2 in the Growth Plan and section 3.2.8.2.5 of the Greenbelt Plan – Require community hubs to be located within a certain proximity to the existing urban core of a community.

Recommendation #98: Maintain the proposed increase in intensification targets (at 60%) and density targets for designated greenfield areas (at 80 residents and jobs per hectare) in the draft Growth Plan.

Recommendation #99: Amend Growth Plan section 2.2.2.4 to require all municipalities to meet intensification and density targets for urban growth centres to 2041 without granting exceptions.



Recommendation #100: Introduce municipal incentives and consequences for those municipalities successfully achieving intensification and density targets and those regularly failing to meet them i.e. enhanced transit funding, etc. for those who exceed the 60% intensification target.

Recommendation #101: Require yearly municipal reporting on target achievement, and require it to be publicly available.

Recommendation #102: Excess land policies should allow lands to be swapped for development purposes only within the designated urban boundary. Development should follow good planning principles, build out should occur in an orderly manner only after infill is built out.

Recommendation #103: Amend Excess Land policies in section 2.2.8.3 B & C to require re-designation of excess lands prior to any possible settlement area boundary expansion.

Recommendation #104: Clarify and simplify the land needs assessment process for Municipalities.

Recommendation #105: Create a provincial process to monitor Official Plans, and MCR to ensure that municipalities are all using the same methodology.

Recommendation #106: Ensure use of the most up to date census data to inform the designation of lands needed for urban development.

Recommendation #107: Ensure coordination between proposed density targets and the new Land Needs Assessment (LNA) process so more efficient use of land to provide for housing needs is the outcome.

Recommendation #108: Create and make public a layperson's guide to LNA to help the public understand the process.

Recommendation #109: Move forward amendments to section 2.2.4 of the Growth plan including new minimum density targets lands around near/transit hubs and corridors.

Recommendation #110: Increase minimum gross density targets in section 2.2.4.5 of the Growth Plan.

Recommendation #111: Connect transit services with existing urban growth centres. Transit services should not be extended to greenfield sites until density targets are achieved within the built boundary.



Recommendation #112: Prioritize and tie investment in public transit with relieving congestion and servicing existing urban areas that meet intensification requirements.

Recommendation #113: Prohibit prime employment lands and agricultural industrial uses on prime agricultural lands within the Agricultural Heritage System.

Recommendation #114: Prohibit high and/or low impact recreational uses for adjacent urban communities in the Greenbelt.

Recommendation #115: Incorporate senior's housing within community hubs, within urban growth centre wherever possible, close to transit and amenities.

Recommendation #116: Create new municipal inclusive design guidelines in the Growth Plan for public facilities and public spaces.

10) Overhaul Plan Implementation

Improve Plan Implementation for Long Term Success

Improve the implementation of the Oak Ridges Moraine Conservation Plan, Greenbelt Plan and Growth Plan by overhauling the framework for implementation, research, monitoring and reporting by creating a well resourced oversight body to work alongside the Niagara Escarpment Commission.

RATIONALE

Monitoring and oversight of the implementation of the Oak Ridges Conservation Plan, Greenbelt Plan and Growth Plan have been inadequate to date and there is much work to do to address this serious shortcoming. The presence of an implementable strategy for Plan implementation was the weakest part of the previous Provincial Plans. This is still inadequately and weakly addressed in the new draft Provincial Plans as they primarily consist of compliance actions in Official Plans and Zoning Bylaws for municipalities. There is a lot more clarity and direction required to ensure implementation success.

In summary, the problems related to implementation fall generally into the following categories:

- inconsistent interpretation of the policies on-the-ground;



- insufficient coordination within and across provincial ministries, municipal governments, and conservation authorities;
- varying levels of capacity among implementers;
- lack of provincial guidance and clarity
- Weak and tardy provincial performance measures for both Greenbelt and Growth Plans
- complexity of creating a robust monitoring and evaluation system; and,
- political interference that runs contrary to achieving policy goals and transparency in decision making
- Lack of public engagement around Growth Plan vision and objectives and urban form transformation required

Clearly, the ultimate success of both plans rests with strong, effective and consistent implementation. It is critical at this time that the province set up a well thought out framework that ensures strong oversight, research, monitoring and reporting to effectively protect the Greenbelt and Growth Plan over the next decade as well as prepare for the next 10 year review. With the success of the Plans' implementation resting in the hands of many actors, it is imperative that the province set the stage for providing strong provincial guidance in addition to an independent and empowered oversight body with the mandate, expertise and adequate resources to assist the range of collaborative partners at the table. This body should work in conjunction with the existing Niagara Escarpment Commission to oversee monitoring and implementation of the three plans.

Need For A New Oversight body

We firmly support a strong provincial role in monitoring and enforcing the implementation of the provincial plans and to do that, the OGA recommends an NEC type commission or body for the oversight of the four plans that is balanced with representation necessary to develop performance indicators, gather data, monitor success, address implementation challenges, and help set strategies for outreach and education in a clear and transparent manner. The new body must be responsible for the development of a full monitoring and evaluation strategy in addition to performance indicators.

We also believe a multi ministerial body should be set up, with all relevant and affected ministries, which will liaise with and be a resource to the oversight body.

Coordination and Collaboration

The OGA fully agrees with the Friends of the Greenbelt Foundation that Coordination and Collaboration are key to the implementation success for both plans. We share the view that:



“Successful implementation of the Plans requires a coordinated effort, with continual dialogue and information sharing across implementing partners, including relevant ministries, municipalities, Conservation Authorities, and First Nations and Metis communities, among others.

There are opportunities to use existing inter-ministerial and inter-governmental mechanisms as needed to ensure coordination and collaboration, and to identify any gaps requiring other formal or informal mechanisms. This includes the Planning, Environment, Resource and Land Use (PERL) policy cluster with committees at the Deputy, Assistant Deputy Minister and Director levels, and the Regional Planning Commissioners of Ontario (RPCO) GTA/H Caucus of senior officials from upper and lower tier municipal governments. The RPCO also has working groups that, among other things, develop planning products such as standards. The CAOs of most of the CAs covering the Growth Plan geography already meet on a regular basis” - *Friends of the Greenbelt Foundation Submission 2016*.

Performance Indicators, Data Monitoring and Reporting

Understanding that all four plans are very distinct, strong performance measures for all four plans are needed in order to ensure robust data and data collection occurs. Additionally, the province needs to monitor the plans through annual reporting of this data.

Since the Greenbelt and Growth Plans were enacted it took several years before performance indicators were finalized and established. This means that limited data collection has occurred, severely hampering provincial attempts to understand the impacts of both plans over time prior to the review process commencing.

Over the next 10 years the government will need to demonstrate the value of a protected landscape and identify best practices. Given there are many stakeholders that have and will continue to be involved and responsible for collecting data and metrics when it comes to plan targets and objectives, it makes sense for the province to play a more active and engaged role and empower the new oversight body to update performance indicators for the plans and roll out their implementation. Plan policies need to be informed and performance indicators used to track improvements against objectives. After the new legislation is passed, the government should confer the role of updating new performance measures to the new oversight body, working with relevant ministries by 2018.

Provincial Guidance Materials and Tools:



The OGA is pleased to see the province responding to the need for guidance material and guidelines for various aspects of the Greenbelt and Growth Plan including: The GGH Agricultural & Natural Heritage System, watershed planning and storm water management, GHG inventories and emission reduction strategies with targets and performance measures as well as a new standard methodology for land needs assessment for all GGH municipalities. Here are several areas for improvement.

Municipal Guidance & Education

More however needs to be done by the province to regularly give guidance and educational updates to lower and upper tier municipalities (both staff and politicians). It isn't enough just to give municipalities policy tools. There needs to be ongoing education, monitoring and incentives to ensure the plans are implemented and interpreted correctly. Additionally, too many municipalities are depending on consultants (who may not be registered independent professionals) to determine growth allocations, and provide mapping. Further clarity and workshops on these themes would assist in deepening consistent understanding of the plans, their goals and objectives and implementation.

Tools for Conservation - Agriculture & ENGO Community

Better designed and improved tools such as well resourced monitoring programs, private land stewardship incentives and guidelines for best practices in urban & rural landscapes are urgently needed.

The OGA suggests that the province consult further with implementing partners in 2017 to identify other tools and/or technical guidelines that they feel would be helpful.

Adequate Financial Support

Ensure adequate funding for implementation is perhaps one of the most important aspects the government must address. In order to realise the full potential of the proposed plans and regulations, adequate and sustained funding must be provided to support municipalities and other public bodies in developing the tools to implement all aspects of the plans. Such funding will also need to cover the monitoring for performance and the education and outreach that will be necessary. We expect the government to provide adequate resources to fully implement the proposals.

Dedicating Provincial resources towards investment of provincial frameworks including an oversight body, ministerial supports, and municipal resources including conservation authorities, community organization resources and foundation resources are all necessary components of a strategic funding model that enables implementing partners to play an effective role in adoption of the Plans.



Increasing Awareness & Leveraging Provincial Investment

Over the past 10 years Ontarians have come to know and love the Greenbelt. The same focus and investment is now required for educating about the Growth Plan, its goals, objectives and outcomes and why this path is critical for Ontario's continued shared prosperity.

The government's investment in the Oak Ridges Moraine Foundation and Greenbelt Foundation have been worthwhile endeavours that have not only heightened public awareness about the richness of the GGH's agricultural and ecological heritage and economies that surround Ontario's GGH communities, but has also served to leverage many millions of dollars over and above original government investment. This leveraging of funds and new public and private sector partnerships serve to enhance and grow Ontario's economy in ways that are perhaps even difficult to quantify. The Government should continue the commitment to the Plans through education, research and outreach to relevant foundations that promote the goals of the Plans.

RECOMMENDATIONS:

Recommendation #117: Establish a provincial body (such as an NEC style commission) in legislation to oversee the implementation of the updated Greenbelt and Growth Plans including a clear process for monitoring and enforcement, public engagement, and transparent reporting to work alongside the Niagara Escarpment Commission.

Recommendation #118: Mandate the new commission with sufficient funding to lead environmental, agricultural and growth plan monitoring and with the authority to comment on planning decisions made throughout the region.

Recommendation #119: Mandate the new oversight body to bring forward revised performance indicators, including that which would help to understand progress in achieving the broader visions of the Plans (i.e. viable agriculture sector, restored natural heritage systems, compact, vibrant and complete communities, and a strong economy).

Recommendation #120: Create a provincial framework for greater inter-ministerial coordination and intergovernmental collaboration, including conservation authorities with yearly meetings and public minutes.

Recommendation #121: Create a provincial stakeholder yearly workshop engaging implementing partners and key stakeholders including NGOs, ENGO's (including the OGA and members), universities, agricultural organizations, First Nation communities and the development industry.



Recommendation#122: Engage the Municipal Leaders for the Greenbelt to assist with education and outreach to municipal partners.

Recommendation #123: Require all municipalities to monitor and report yearly on implementation in their respective jurisdictions and make the reporting publicly available.

Recommendation #124: Encourage and support ongoing data collection rather than waiting for the 10 year review year.

Recommendation#125: By 2018 adopt a new list of performance indicators for all four plans and host a series of stakeholder workshops to roll out the indicators.

Recommendation#126: Create municipal resources highlighting local and international smart growth best practices and design.

Recommendation#127: Create small catalytic provincial implementation grants for implementation directed to community groups, conservation bodies and land trusts to help move plan objectives forward within local communities.

Recommendation#128: Recapitalize the Friends of the Greenbelt Foundation, with a renewed mandate to promote education and outreach on both the Greenbelt and Growth Plan and to service and fund programmes both inside and outside the Greenbelt.

Conclusion

The OGA commends the government for moving forward with first of its kind legislation in the province protecting agriculture and natural heritage while directing growth to take a new shape and form. It's laudable to work towards creating an even stronger economy and putting Ontario on the track towards more sustainable urban planning that delivers the communities of the future that are smart, complete and resilient in the face of climate change. While we have outlined 128 recommendations to improve the proposed amendments, we feel strongly that if implemented, all Ontarian's would benefit by the strong leadership of a government that understands tomorrow's prosperity is based on the wise actions of today. Our 125 organizations collectively look forward to a smarter, stronger Ontario where our children and their children can breathe clean air, drink clean water, eat healthy locally produced foods, know a rich and protected ecological landscape and live in mixed use, mixed income diverse communities, served by high order transit, immune to many of the problems that a changing climate can bring if not adapted and mitigated for. A vision that with your support now can become a reality. The Greenbelt Plan and Growth Plan are that roadmap, we urge you to stand strong on that path.



Appendix

- A. OGA 2015 Submission**
- B. Rouge Watershed Headwater Areas Maps (2)**
- C. Carden Alvar, Simcoe County Maps (2)**
- D. Grow the Greenbelt Map**
- E. Ontario Nature Natural Heritage Expanded 24 Recommendations**
- F. Toronto Environment Alliance Brief: Greenbelt Settlement Expansion Policies**
- G. Government of Ontario Publication 2016 Link**
- H. Neptis Foundation Report 2015 Link**
- I. Greenbelt Foundation Report 2016 Link**
- J. Green Communities Canada Submission 2016 Link**



A. OGA 2015 Submission:

http://greenbeltalliance.ca/sites/default/files/OGA%20final%202015%20Plan%20review%20submission%20ebr_0.pdf

B. Rouge Watershed Headwater Areas Maps (2)

- 1) <http://greenbeltalliance.ca/sites/default/files/Markham%20Official%20Plan%20Map%203%20Land%20Use.pdf>
- 2) <http://greenbeltalliance.ca/sites/default/files/Markham%20Official%20Plan%20Map%205%20Natural%20Heritage%20Features%20and%20Landforms.pdf>

C. Carden Alvar, Simcoe County Maps (2)

- 1) <http://greenbeltalliance.ca/sites/default/files/1.pdf>
- 2) <http://greenbeltalliance.ca/sites/default/files/2.pdf>

D. Grow the Greenbelt Map

<http://greenbeltalliance.ca/sites/default/files/3.pdf>

E. Ontario Nature Natural Heritage Expanded 24 Recommendations

A Regional Natural Heritage System in the Greater Golden Horseshoe Recommendations from Ontario Nature, EcoSpark, STORM and Earthroots Revised October 26 2016

We commend the government for its commitment to lead the identification of a regional natural heritage system for the Greater Golden Horseshoe (GGH). A protected and connected natural heritage system is vital to conserving landscape health and resilience in the face of ongoing biodiversity loss and the impacts of climate change.

Below we offer 24 recommendations for implementing draft Growth Plan, 2016 policy 4.2.2 Natural Heritage Systems which states:

“2. Official plans will incorporate a *natural heritage system* as mapped by the Province, and will apply appropriate designations and policies to maintain,



restore or improve 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 in this subsection and the policies in subsections 4.2.3 and 4.2.4.

3. In implementing policy 4.2.2.2, a municipality may refine the boundaries of the *natural heritage system* in a manner that is consistent with this Plan as well as the upper-tier official plan, where applicable.”

These recommendations were developed by Ontario Nature, EcoSpark, STORM and Earthroots through consultation with many leading thinkers within Ontario’s conservation community.

Our recommendations, intended as high level guidance, are underpinned by the following seven key principles, which should inform the provincial process of identifying the regional natural heritage system for the GGH:

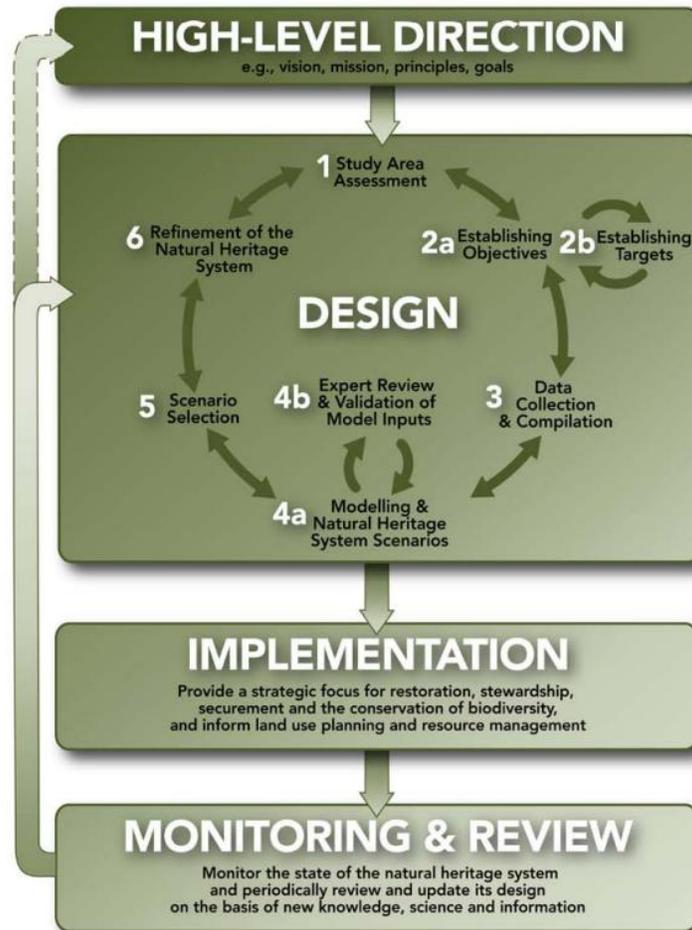
- 1) The GGH’s natural heritage system must be designed to: protect biodiversity and enable its recovery; and to increase community resilience to the impacts of climate change through the enhancement of ecosystem services.
- 2) The natural heritage system must be a connected and integrated system comprised of existing natural features and areas for potential restoration to be protected for the long term.
- 3) The identification process must be transparent and consistent with the science-based approaches taken in identifying the Greenbelt’s Natural Heritage System and the Oak Ridges Moraine’s network of Natural Core and Linkage Areas.
- 4) The GGH’s natural heritage system must be developed together with the water resource system as these systems are functionally inter-related.
- 5) The development of the GGH’s natural heritage system must be integrated with the Province’s development of an Agricultural System as overlap and overlay will be necessary.
- 6) The GGH’s natural heritage system should provide a consistent framework with targets and standards which can be refined and integrated (“nested”) at a local scale.
- 7) The regional natural heritage system must acknowledge and account for external ecological and hydrological connections beyond the GGH, including the Lake Iroquois Shoreline, the Great Lakes Coast, Lake Simcoe, the Kawartha Highlands, the Carolinian Zone, and the Algonquin to Adirondacks Corridor.

Following the key principles above will enable achievement of the vision set out in policy 4.2.2. “to maintain, restore or improve the diversity and connectivity of the system and the long-term ecological or *hydrologic functions* of the features and areas.” The recommendations below outline the specific steps to undertake in order to implement these key principles.

RECOMMENDATIONS

The following recommendations outline specific steps to follow in designing the regional natural heritage system. They are based on and consistent with the natural heritage system design set out in Ontario's *Natural Heritage Reference Manual* (Section A.4.2.2).

Figure A-1: Process for a Coordinated, Integrated and Comprehensive Approach for Natural Heritage Systems



1) Study area assessment

Appropriately, the broad study area for natural heritage system identification encompasses the entire GGH region, as set out in the context statement of section 4 of the draft Growth Plan, 2016. This regional scale will ensure consistent protection of natural heritage beyond the Greenbelt in both the 'inner ring' (i.e., whitebelt) and the 'outer ring.'

Over the last number of years, municipalities and conservation authorities have undertaken many studies, consultations and mapping exercises to identify science-based natural heritage systems in their municipalities and watersheds. Provincial leadership in identifying a regional system is welcome, and must build on these efforts by first assessing the current state of natural heritage systems mapping across the GGH. A natural heritage system defined in the Growth



Plan should ensure high-level consistency in standards and practices region-wide. For example, consistency in terms of appropriately sized core areas and corridors that enable plant and animal movement across the region is necessary to achieve regional connectivity. It should involve the refinement and updating of existing natural heritage systems. Simply stitching together existing municipal natural heritage systems will not achieve true functional connectivity sufficient to conserve biodiversity and mitigate climate change impacts across the entire region.

For planning purposes, it would be advisable to proceed at a smaller scale based on watersheds or groupings of multiple watersheds. Indeed, watershed-based systems should be considered the foundational pieces needed to solve the overall puzzle. As stated in the Provincial Policy Statement, 2014: watersheds are increasingly recognized as the most “ecologically meaningful scale for integrated and long-term planning.” Using watersheds as the lens for identifying components of the GGH’s natural heritage system will allow for the integration of community and conservation authority expertise as well as the consideration of differences in natural heritage cover and land uses across watersheds, helping to inform advisable variations in objectives and targets.

Recommendation 1: Ensure the study area for identifying the regional natural heritage system includes all municipalities in the GGH, thus providing the frame for consistent natural heritage protection beyond the Greenbelt in both the ‘inner ring’ (i.e., whitebelt) and the ‘outer ring’.

Recommendation 2: A provincially identified natural heritage system for the GGH should complement and build upon existing locally identified natural heritage systems and adapt those to achieve regional connectivity.

Recommendation 3: Use watersheds or groupings of watersheds as the basis for identifying natural heritage systems across the region.

Recommendation 4: Ensure that natural heritage features and corridors within settlement areas are included in the identification of a GGH natural heritage system.

2) Objective and targets for the Greater Golden Horseshoe

High level objectives and targets should be identified for the GGH in accordance with the Ministry of Natural Resources and Forestry’s *Natural Heritage Reference Manual* (2010) and Environment Canada’s *How Much Habitat is Enough, Third Edition* (2013). These targets and objectives should address the percentage of the region to be captured in the natural heritage system as well as the percentage of individual natural features that should be identified in the system (i.e. how much of the existing forested land, grassland, wetland etc. should be included in the system). The targets should reflect current landscape conditions as well as seek to identify how big the system needs to be in order to support the goals of long-term ecological function, biodiversity recovery, climate change adaptation and enhancement of ecosystem services. For the Greenbelt, 50% of the Protected Countryside was included in the Natural



Heritage System, while the Oak Ridges Moraine included 63% of its landscape in either Natural Core or Linkage Areas.

The targets and objectives may need to be refined at the watershed level based on local knowledge, landscape conditions and community priorities. This approach is consistent with the variations in the Greenbelt's Natural Heritage System where the "North Area" (areas north of the ORMCP, west of the NEP and north of Highways #5 and #8) and "South Area" (south of the ORMCP, east of the NEP and south of Highways #5 and #8) identify features by different criteria.

Recommendation 5: The objective of the natural heritage system should be to maintain, protect and restore biodiversity and natural and hydrologic functions and ecosystem services, and enhance communities' ability to adapt to and mitigate impacts of climate change in the GGH.

Recommendation 6: The targets of the natural heritage system should reflect science-based targets outlined in *How Much Habitat is Enough, Third Edition* and other watershed-based targets.

Recommendation 7: A target for the regional natural heritage system should be to include a minimum of 50% of the landscape beyond the settlement area boundaries. This target would ensure regional-scale landscape connectivity and be consistent with the approach to identifying natural heritage systems in the Greenbelt and Oak Ridges Moraine.

Recommendation 8: Core areas should aim to capture the highest percentage possible of existing natural heritage features. Where a functional clustering of features occurs, these should be captured in one large core area with appropriate buffers.

Recommendation 9: Corridors (linkages) among core natural areas should be made as wide as is feasible and should include multiple pathways to build much needed redundancy in the system. In areas beyond the Greenbelt, corridors should be at least two kilometres in width in order to ensure connectivity at a regional scale. This would be consistent with the Greenbelt's Natural Heritage System. In areas south of the Greenbelt, corridors may need to be narrower, but should include multiple pathways to improve functional connectivity.

Recommendation 10: Valley corridors should be wide enough to protect water and riverbank habitats, and provide for the free movement of plants and animals with appropriate buffers based on defined valleys and adjacent natural features.

3) Data collection and compilation

Creating a full list of relevant data and sources will be a critical early step in the exercise of identifying a regional natural heritage system. To ensure a high level of accuracy, it will be important to map data at a sufficiently fine scale. The methodology used to identify the



Greenbelt's and the Oak Ridges Moraine's natural system was 1:1,000. Additionally, drawing on the expertise of MNRF and conservation authority ecologists, local naturalists, First Nations, farmers, rural landowners and other community members will be key to collecting accurate and appropriate data.

Recommendation 11: To ensure all appropriate elements are included and to ensure consistency with the Greenbelt and Oak Ridges Moraine methodology, use a 1:1,000 mapping scale.

Recommendation 12: Undertake a GIS inventory of the natural heritage features in the GGH outside of the Greenbelt, based on the most recent air photos and existing data from all available sources. This inventory should include both data collection and identification of data gaps, with acknowledgement of the need for local-scale refinement, where possible.

Recommendation 13: Ensure that data are collected on the natural features and land uses to inform the identification and clustering of core natural areas and linkages. The *Natural Heritage Reference Manual* lists relevant biophysical and socio-economic information that will assist in identifying the natural heritage system (Page 162). These sources should be supplemented with updated Ecological Land Classification data from a common vintage and where possible, with identified municipal and watershed-based natural heritage systems.

Recommendation 14: Integrate a strong element of local public input to identify available data and potential data gaps by convening and working with First Nations, relevant community groups and major stakeholders.

4a) Methodology for Natural Heritage System Scenarios

The modelling of the GGH's natural heritage system must be aligned with the defined objectives and targets. The methodology must be grounded in sound conservation science and yet expressed in a manner that can be readily understood by the public. The methodology used should be capable of integrating a fine level of detail and high-resolution data (i.e. scale of 1:1,000) in order to ensure smaller but significant features (e.g. wetlands smaller than two hectares) are integrated in the mapping.

Cores areas are areas recognized for a high concentration of natural heritage features and functions and their vegetative protection zones. Based on the Greenbelt methodology, they should include at least 50% natural cover (woodlands, wetlands, steams, valleys) and/or at least 50% public land acquired for conservation reasons. The minimum size of a core area should be at least 500 hectares south of the Oak Ridges Moraine and east of the Niagara Escarpment and at least 1,000 hectares north of the Oak Ridges Moraine and west of the Niagara Escarpment. Definitions for core areas may differ between the areas inside the Greenbelt and outside based on existing land cover and land use context.



Though the Greenbelt methodology did not set a minimum for corridor widths, they were most often targeted at a two kilometre width. In areas south of the Greenbelt, corridors may need to be narrower, but should include multiple pathways to improve functional connectivity.

Recommendation 15: Ensure consistency with the methodology and modeling used to identify the natural heritage system of the Greenbelt and Oak Ridges Moraine and engage MNR district staff to help lead this process. The method must be based on sound conservation science and should include identification of major core areas in locations where there is a concentration of natural features, together with a series of corridors that provide connectivity between the cores and other areas using high resolution aerial photography (Source: “[Building a Greenbelt](#)”).

Recommendation 16: Build on existing municipal natural heritage systems and mapping exercises led by conservation authorities and ensure that modelling is consistent with the targets and objectives of the GGH’s natural heritage system.

Recommendation 17: Ensure that the identification of a natural heritage system considers both terrestrial systems and aquatic/hydrologic systems, (i.e., water resource systems).

Recommendation 18: Ensure that the identification of a natural heritage system is integrated with the Province’s development of an Agricultural System for the GGH.

Recommendation 19: Identify major external connections to natural systems beyond the GGH, including the Lake Iroquois Shoreline, the Great Lakes Coast, Lake Simcoe, the Kawartha Highlands, the Carolinian Zone, and the Algonquin to Adirondacks Corridor.

4b) Expert Review and Validation of Model Inputs

Advisory teams of experts and community members who can be quickly consulted on iterations of the modeling at the watershed-level would greatly enhance mapping accuracy and community buy-in.

Recommendation 20: Establish expert advisory teams with representatives from conservation authorities, MNR district biologists, First Nations, ENGOs and community groups (e.g. naturalists, community environmental groups, agricultural groups, land trusts) to assist with the review of the modeling in individual watersheds or groupings of watersheds.

5) Scenario selection

Once the GGH’s natural heritage system has been defined and refined through the knitting together of watershed-level natural heritage systems, it must be tested again against the regional objectives and targets. If these are consistent, then an important final step in this process will be to broadly consult the public on the regional natural heritage system.



Recommendation 21: A transparent and public consultation process, which includes posting a draft map for comment on the Environmental Registry in early 2017.

6) Refinement of the Natural Heritage System

Refinement of the GGH's natural heritage system should occur in a timely manner. The current time frame for the completion of the process of finalizing the GGH's natural heritage system is set for summer 2017. This tight timeline is appreciated and we are happy to help with timely feedback and input when those opportunities are available.

Recommendation 22: Maintain tight timelines to complete the final mapping of the GGH natural heritage system by summer 2017.

Implementation and Monitoring

The implementation and monitoring of a GGH natural heritage system will be important to measure effectiveness of this Growth Plan policy. Ongoing monitoring should include the development of key performance indicators and a regular performance reporting framework.

The policies within the Growth Plan with respect to the natural heritage system should be consistent with the high standard that exists for the Natural Heritage Features of the Greenbelt Plan.

The implementation of the GGH's natural heritage system should follow the same timelines as the other elements of conformity for municipalities following the completion of the Coordinated Land Use Planning Review.

Recommendation 23: Ensure adequate resources are directed towards the establishment of performance monitoring to assess the effectiveness of the protection of the GGH's natural heritage system.

Recommendation 24: Ensure implementation of the GGH's natural heritage system through integration into official plans. This should occur within the timing set out for other elements of conformity to new policies as a result of the Coordinated Land Use Planning Review.



F. Toronto Environment Alliance Brief: Greenbelt Settlement Area Expansion Policies

Briefing Note

Date: September 7, 2016

From: Franz Hartmann, Executive Director

Re: Impact on Greenbelt of Select Proposed Changes to Greenbelt Plan and Growth Plan



This note identifies the existing and proposed mechanisms within the Greenbelt Plan and Growth Plan regarding how towns/villages within the Greenbelt can request expansion of settlement areas for lands in the Greenbelt. It also summarizes how these changes might undermine the integrity of the Greenbelt.

The Current System (aka 10-Year Review Mechanism):

Currently, the Greenbelt Plan states that towns/villages within the Greenbelt can request “modest settlement area expansion” as part of the 10-year review process.

The Details:

Section 3.4.2.5 of the current Greenbelt Plan states:

At the 10-year Greenbelt Plan review period, modest *settlement area* expansions may be possible for Towns/Villages, provided the proposed growth:

- a. Is on *municipal sewage and water services* ;
- b. Would not exceed the assimilative and water production capacities of the local environment as determined on a watershed or sub watershed basis;
- c. Complies with any applicable *watershed plan* ;
- d. Does not extend into the Natural Heritage System;
- e. Does not extend into *specialty crop areas* ; and
- f. Appropriately implements the requirements of any other provincial and municipal policies, plans, strategies or regulations, including requirements for assessment of need, locational and similar considerations.



We have been told that over 600 requests have been made for boundary changes. We assume most of them are based on this section.

The Proposed System (aka MCR Mechanism):

Proposed changes to the Greenbelt Plan and the Growth Plan outline a mechanism that requires a municipality to perform a Municipal Comprehensive Review that justifies a boundary expansion. The municipality would then seek Provincial approval.

The Details:

Below are the relevant proposed changes to the Greenbelt Plan in new Section 3.4.3.

3.4.3 Town/Village Policies

For lands within Towns/Villages in the Protected Countryside, the following policies shall apply:

1. 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, save for the policies of sections 3.1.5, 3.2.6 and 3.3.
2. Extensions or expansions of services to *settlement areas* within the Protected Countryside shall be subject to the *infrastructure* policies of section 4.2 of this Plan, including the requirements regarding environmental assessments and *agricultural impact assessments*.
3. As part of a municipal comprehensive review under the Growth Plan, an upper or single-tier planning authority may allow expansions of *settlement area* boundaries in accordance with policy 2.2.8 of the Growth Plan.

The proposed new Section 2.2.8 in the Growth Plan states:

2.2.8 Settlement Area Boundary Expansions

1. A *settlement area* boundary expansion may only occur as part of a *municipal comprehensive review* where it has been demonstrated that:
 - a. based on the minimum intensification and density targets in this Plan and the land needs assessment provided for in policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through *intensification* and in *designated greenfield areas*:
 - i. within the upper- or single-tier municipality, and
 - ii. within the applicable lower-tier municipality to accommodate the growth allocated to the municipality under this Plan;



- b. the expansion makes available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.1 a), while minimizing land consumption; and
 - c. the timing of the expansion and the phasing of development within the *designated greenfield areas* will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.
2. Where the need for a *settlement area* boundary expansion has been justified in accordance with policy 2.2.8.1, the *municipal comprehensive review* will determine the feasibility of a *settlement area* boundary expansion and identify the most appropriate location based on the following:
- a. there are existing or planned *infrastructure* and *public services facilities* to support proposed growth and the development of *complete communities*;
 - b. the *infrastructure* and *public service facilities* needed would be financially viable over the full life cycle of these assets, based on mechanisms such as asset management planning and revenue generation analyses;
 - c. the proposed expansion aligns with a water and wastewater master plan or equivalent that has been completed in accordance with the policies in subsection 3.2.6;
 - d. the proposed expansion aligns with a *stormwater master plan* or equivalent that has been completed in accordance with the policies in subsection 3.2.7;
 - e. a *subwatershed plan* or equivalent has demonstrated that the proposed expansion, including the associated servicing, would not negatively impact the *water resource system*, including the *quality and quantity of water*;
 - f. *key hydrologic areas* and *natural heritage systems* should be avoided where possible;
 - g. for *settlement areas* that receive their water from or discharge their sewage to inland lakes, rivers or groundwater, a completed environmental assessment for new or expanded services has identified how expanded water and wastewater treatment capacity would be addressed in a manner that is fiscally and environmentally sustainable;
 - h. prime agricultural areas should be avoided where possible. Where *prime agricultural areas* cannot be avoided, an *agricultural impact assessment* will be used in determining the location of the expansion based on minimizing and mitigating the impact on the *agricultural system* and evaluating alternative locations across the upper-or single-tier municipality in accordance with the following:
 - i. the lands do not comprise *specialty crop areas*;
 - ii. there are no reasonable alternatives that avoid *prime agricultural areas*; and
 - iii. there are no reasonable alternatives on lower priority agricultural lands in *prime agricultural areas*;



- i. the *settlement area* to be expanded is in compliance with the *minimum distance separation formulae*;
- j. any impacts on agricultural operations and on the *agricultural support network* from expanding *settlement areas* would be avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated as determined through an *agricultural impact assessment*;
- k. the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;
- l. the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment and Lake Simcoe Protection Plans and any applicable source protection plan; and
- m. within the Protected Countryside in the *Greenbelt Area*:
 - i. the *settlement area* to be expanded is identified in the Greenbelt Plan as a Town/Village;
 - ii. the proposed expansion would be modest in size;
 - iii. the proposed expansion would be serviced by *municipal water and wastewater systems*; and
 - iv. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.

In short, the review process for deciding whether to proceed with settlement area expansion is transferred from the Province to municipalities, relies on municipalities to carry out some type of Municipal Comprehensive Review, and can take place at any time.

Implications of the Proposed Changes

Problem 1: the Municipal Comprehensive Review (MCR) Mechanism is not transparent and may be difficult to stop.

We have been told by experts familiar with MCRs that the current process (ie. The 10-year review mechanism) is much more transparent and amendable to meaningful public engagement than the MCR. Moreover, it's unclear what role, if any, the public has in a MCR.

We have also been told by experts familiar with MCRs that the proposed MCR mechanism will be time consuming and expensive and that once a MCR is instigated by a municipality, it will become very difficult to stop the Province from agreeing to a boundary expansion request.



Problem 2: The cumulative impact of settlement area boundary expansions in the Greenbelt will not be transparent to the public.

The MCR mechanism will be instigated by municipalities and will be locally driven. If boundary expansions happen, it will not require any changes to the Greenbelt Plan. That means the cumulative impact will not be tracked.

Problem 3: The MCR mechanism sends a signal to developers to buy agricultural land in the Greenbelt.

The proposed MCR mechanism means developers would only have to deal with municipalities in order to get current lands within the Greenbelt re-designated for development (the current mechanism requires them to seek provincial approval). This provides them with an incentive to buy agricultural lands adjacent to existing towns/villages and then convince municipal decision makers (who may be sympathetic to land development) to instigate a MCR that “justifies” a boundary expansion onto these lands.

Problem 4: The Proposed MCR mechanism is not amenable to public oversight.

By moving away from the existing 10-Year Review mechanism, the public will have a much more difficult time keeping track of proposed settlement area boundary expansions in the Greenbelt. The public will have to constantly track all the municipalities with towns/villages in the Greenbelt to see if MCRs are being planned or are occurring.

Summary

In short, the proposed MCR mechanism creates a new loophole that makes it much easier for developers and municipalities who want to develop lands in the Greenbelt to get provincial approval (compared to the current method). Put simply, if the MCR mechanism is adopted, it will likely lead to urban sprawl **within** the Greenbelt.



G. Government of Ontario Publication 2016 Link

"*Shaping Land Use in the Greater Golden Horseshoe: A guide to Proposed Changes*" [Shaping Land Use in the Greater Golden Horseshoe](#), p20

H. Neptis Foundation Report 2015 Link

"*Understanding the Fundamentals of the Growth Plan: Considerations for the 10-year review*" March 2016 <http://www.neptis.org/publications/understanding-fundamentals-growth-plan>

I. Greenbelt Foundation Report 2016 Link

"*Plan to Achieve - A Review of the Land Needs Assessment Process and the Implementation of the Growth Plan*", August 2016
http://www.greenbelt.ca/plan_to_achieve_report

J. Green Communities Canada Submission 2016 Link

<http://greenbeltalliance.ca/sites/default/files/Coordinated%20Land%20Use%20Planning%20Review%20-%20GCC%20Submission%20%28updated%29.pdf>