



Land Use Planning Review
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street
Fourth Floor, Suite 425
Toronto, Ontario
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May 28, 2015

RE: Co-ordinated Land Use Planning Review #012-3256

To The Honourable Ted McMeekin, Mr. David Crombie, the Land Use Review Panel and Ontario Growth Secretariat Staff

On behalf of the Grand River Environmental Network, a diverse group of citizens and community groups across the Grand River Watershed, please find below our input on the 2015 Co-ordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan.

Most of our input is in relation to Waterloo Region being targeted ten years ago for considerable population growth under the Places to Grow Act, but then subsequently being excluded from the Greenbelt Act. This exclusion happened despite formal requests from our Regional government and many citizen groups to be included in the Provincial Greenbelt so we could receive the same environmental protection and balance taken for granted by most of the Greater Toronto and Hamilton Area.

We make the following observations and recommendations:

- **Growing the Greenbelt** – Waterloo Region has struggled for years to achieve local solutions to balance our significant growth and to protect our natural heritage, farmland, water aquifers and environmentally sensitive areas. While our Regional Government has been very progressive and innovative, an expansion of the Provincial Greenbelt following our Countryside Line and Protected Countryside designations would provide considerable reinforcement to the protections we have been developing and putting in place along the Waterloo Moraine and the Paris-Galt Moraine landscapes.

Waterloo Region is one of the largest communities in North America almost solely dependent on groundwater for our drink water sources. Greenbelt expansion along our moraines would help to protect our headwater and groundwater recharge areas helping to ensure a safe, secure and renewable supply of water for our thriving Region as well as helping to provide improved future resilience.

The Province needs to either grow the Greenbelt through legislative acts or better facilitate expansion by allowing regional governments and not just the lower tier municipal governments to ask for Greenbelt expansion. Additional resources need to be provided to both regional and municipal governments to help promote expansion of the Greenbelt.

• **Prohibit Greenbelt Boundary Changes and Land Swaps, and Freeze Urban Boundary Expansions** – Waterloo Region’s Countryside Line designation will only be successful if it provides long-term confidence and assurance to our farmers that they can invest in their lands and will still be farming a generation from now.

Any boundary changes shatter this confidence, create doubt/uncertainty and drive speculation. Similarly the Greenbelt needs to stand strong for generations – any changes to its boundaries, the removal of lands, or weakening of protection will seriously threaten all aspects, objectives, and the long-term success of the Greenbelt.

Decades of designated land supply already exist – even here in “land-constrained” Waterloo Region, which developers like to call “land-constrained.” More than 3,000 hectares of land that have been designated for development now sit in undeveloped inventory. Additional urban boundary expansions are not required for decades, if ever, even at current rapid growth rates. Successful urban intensification, combined with generational trends and demographics, have invalidated any “justifications” for expanding urban boundaries.

• **Expand Buffers and Rural Support Programs** – Governments need to expand and strengthen buffers to better protect natural features and to ensure that agriculture has the space it needs to thrive. The Province should implement rural support programs for agriculture to ensure that farmers can move machinery and have the required nearby infrastructure (feed mills, implement dealers, farmers markets, farm gate sales opportunities) for long-term success.

• **Low Impact and Strongest Regulations** – The Province should ensure that activities permitted within the Greenbelt are low impact and align with the objectives of the Greenbelt. The Province should ensure that, when there is a difference between local regulations and provincial regulations, the most protective of the two applies.

• **Aggregates** – Better environmental protection from aggregate extraction operations is required. Pits and quarries need to be kept out of environmentally

sensitive areas and extraction below the water table should not be permitted anywhere. More enforcement and actual pit rehabilitation is required.

- **OMB Reform** – The OMB needs to be reformed so that it better represents citizens - not overwhelmingly developers. Official Plans should not be appealable in their entirety.
- **Approval Expiry Dates** – Development approvals need to have a set expiry date (perhaps five years) after which a re-application would be required that ensures that development meets the most recent standards.
- **Improve Natural Heritage Protection** – All four Greenbelt plans need to be better aligned, share more common definitions, and work to better protect natural heritage with larger buffers, fewer infrastructure projects such as highways and pipelines cutting through rural/environmental areas. Improved stewardship funding is required. The Greenbelt Foundation’s funding needs to be renewed and new programs developed to better support Greenbelt farmers, farm markets, stewardship programs, and restoration projects.

In conclusion, the Greenbelt has had a successful initial 10 years. It is having a real impact in guiding growth, protecting rural lands, and ensuring greenspace for generations to come.

However, it needs to be expanded to areas such as Waterloo, which are facing considerable growth and leapfrogging pressures. In addition, the programs need to be strengthened to avoid unacceptable intrusions and exceptions such as those that we have spoken to in this submission.

Please strengthen and update the good work the provincial government has been doing on the Greenbelt for the past decade and help to ensure the highest future quality of life for all Ontarians.

Sincerely,



John Jackson, Chair
Grand River Environmental Network