



Land Use Planning Review  
Ministry of Municipal Affairs  
Ontario Growth Secretariat  
777 Bay Street  
Fourth Floor, Suite 425  
Toronto, Ontario  
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October 31, 2016

To The Honourable Bill Mauro, 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 feedback on the proposed amendments of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan.

Most of our feedback and input is in relation to the omission of Waterloo Region, Wellington County, Brant County, and other area municipalities from the Greenbelt Act more than ten years ago while simultaneously being targeted for considerable population growth under the Places to Grow Act.

Despite formal requests from the Region of Waterloo, the City of Guelph, and many citizen groups to be included in the Provincial Greenbelt to receive the same environmental protection and balance taken for granted by most of the GTA, municipalities across our watershed have been forced to try to develop their own solutions with varying degrees of success.

We suggest the following feedback to the proposed plan amendments:

- **Growing the Greenbelt** – We are very supportive of the concept of expanding the Greenbelt to the Grand River Watershed to better protect our hydrological resources. We are optimistic that the proposed mapping of areas facing development pressures being undertaken by the Ministry of Natural Resources and Forestry will be bold and visionary, protecting our essential water resources for the future generations that are going to be counting on them.

Areas outside the Greenbelt yet close to the GTA have struggled for years to create solutions to balance significant growth and to protect our natural heritage, farmland, water aquifers and environmentally sensitive areas. While the Region of Waterloo has been very progressive and innovative, pioneering the Environmentally Sensitive Landscape concept, the Countryside Line boundary concept, and the Protected Countryside designation, it has had to battle on its own at the OMB for years for these protections. An expansion of the Provincial Greenbelt would provide considerable reinforcement for the protections that have finally been put in place along the Waterloo Moraine and the Paris-Galt Moraine landscapes.

Waterloo Region along with other communities on the Grand River are some of the largest communities in North America dependent on groundwater for our most of our drinking water and water use. In fact, hundreds of thousands of people rely daily on our local groundwater aquifers for water needs. Greenbelt expansion along our Moraines would help to protect our headwater and groundwater recharge areas ensuring a safe, secure and renewable supply of water for our thriving region that is now driving so much of the provincial economy.

Local community and environmental groups including the Grand River Environmental Network have been very outspoken on the need to expand the provincial Greenbelt to not only Waterloo Region but the entire Grand River Watershed such as is being done with the Urban River Valley designations draining into Lake Ontario. Just because our river drains into Lake Erie doesn't mean that we don't face the same development and leapfrog pressures as the GTA.

We have continued to see strong support from the Region of Waterloo and its area municipalities for increased environmental protection, SmartGrowth, and Greenbelt expansion – particularly if it reinforces rather than threatens our locally developed solutions. Please refer to the recent submissions of the Region of Waterloo, City of Kitchener and City of Waterloo for additional information, feedback and ideas.

- **Clarify Reinforcement** - It will be essential in order to receive local municipal and regional support that when there is a difference between local regulations and provincial regulations, that the stronger of the two shall apply. This needs to be written clearly and unequivocally into the proposed amendments. We need to ensure that Greenbelt expansion will reinforce our local protections and not weaken them.

- **Lower Tier and Upper Tier Support** - We would hope that all levels of government would be actively engaged in any sort of Greenbelt expansion though we certainly appreciate the proposed changes allowing Regional governments and upper tiers - not just the lowest tier Municipal governments to ask for Greenbelt expansion.

- **Adequate Resources** - Additional resources need to be provided to both Regional and Municipal governments to assist with the expansion of the Greenbelt.

Resources also need to be made available for the ongoing stewardship and enhancement of protected areas once the Greenbelt is established.

There is an opportunity to address Climate Change by applying carbon tax revenues and tax credits to stewardship, restoration, enhancement, and projects increasing natural resilience to Greenbelt areas. Other countries globally such as Australia and Germany are investing in their Greenbelt areas to improve their resilience, ability to endure significant storms, droughts, wildfires, etc. in an era of increasing disruption. Our watershed needs this protection and resilience too.

• **Prohibit Greenbelt Land Removal and Land Swaps** – Waterloo Region’s innovative 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 that they will still be farming a generation from now.

Any boundary changes shatter this confidence, creates doubt/uncertainty and drives 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.

• **Freeze Urban Boundary Expansions** – Research from multiple sources shows that decades of designated land supply already exist – even here in what developers call “land-constrained” Waterloo Region. The developers themselves show that more than 3,000 hectares of land have been designated for development and sit in inventory. The City of Kitchener has an almost 30 year supply of land already provisioned.

Additional urban boundary expansions are not required for decades even at current rapid growth rates that now appear to be slowing due to generational trends, demographics, etc. and could stretch these existing designated land supplies even longer.

We urge you to implement an immediate urban boundary freeze province-wide until newer census data is released and there is a better understanding of growth patterns, how much land has already been over designated and is currently being held by speculators awaiting even higher prices - creating a false shortage and further constraining the housing market in a vicious cycle.

• **Agricultural System Mapping, Buffer Expansions and Rural Support Programs** – Expand buffers to better protect natural features and to ensure that agriculture has the space it needs to thrive. 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. And please continue to develop the process for the planned Agricultural and Natural Systems.

- **Aggregates** – Far 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 and not just developers. We are pleased to see the recent announcement of an OMB Review and will be participating in this essential undertaking.
- **Approval Expiry Dates** – Development approvals need to have a set expiry date (perhaps five years) after which a re-application for development meeting current standards would be required.
- **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, and 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.
- **Growth Plan Targets** – It is wonderful to see the higher targets in the Growth Plan for both intensification (i.e., 60%) and greenfield area density (i.e., 80 residents and jobs per hectare). Waterloo Region has already demonstrated over the past ten years how quickly and positively these numbers can shift as we move to revitalize our core areas, promote SmartGrowth, invest in transit and intensification , while reducing urban sprawl. Please don’t let other communities tell you it isn’t possible, we have made this shift and our economy is thriving as a result – attracting jobs, leading companies and new residents from around the globe.

Please note that we agree with the comments from our area municipalities that these targets may need to be phased in over time, that there need to be rewards (such as increased transit funding) for those communities achieving targets, and that some targets may need to be softened towards the permanent urban boundary edge of a community so that density is focused at the core and not at the periphery of a community where it may not be compatible with surrounding land uses.

In conclusion, the Greenbelt Plans and Places To Grow Act have had a very successful initial 10 years. They are having a real impact in guiding growth, protecting rural lands, and ensuring greenspace for generations to come.

However, the Greenbelt needs to be expanded, particularly to areas such as the Grand River watershed that is facing considerable growth and leapfrogging pressures. Expansion of the Greenbelt could create so many opportunities to better

facilitate stewardship and healthy rural landscapes alongside of thriving urban centers creating a vibrant balanced economy.

We urge you to move forward with the plan amendments, strengthen and update the good work the provincial government has been doing for the past decade, and help to ensure the highest future quality of life for all Ontarians.

Sincerely,

A handwritten signature in blue ink that reads "John Jackson". The signature is written in a cursive style and is centered within a light gray rectangular box.

John Jackson, Chair  
On behalf of the Grand River Environmental Network