



March 7, 2018

Protecting Water  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, Ontario  
M5G 2E5

To The Honourable Bill Mauro and 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 support and feedback on the Protecting Water for Future Generations – Growing the Greenbelt in the Outer Ring Proposal.

First and foremost, our organization is strongly in support of Greenbelt expansion to better protect essential water resource systems in Ontario. We urge you to keep moving forward with this required expansion as expeditiously as possible.

### **1) Expand the Greenbelt**

While the Grand River Environmental Network is focused on the entire Grand River watershed from its inception at the Luther Marsh in the north, hundreds of kilometers south to the river's terminus at the shores of Lake Erie, much of our membership is based in the most heavily populated parts of watershed including Kitchener, Waterloo, Guelph, and Cambridge.

It was more than thirteen years ago that these cities were targeted for considerable population growth under the Places to Grow Act but then subsequently excluded from the Greenbelt Act. Despite formal requests from the Region of Waterloo and many citizens groups to be included in the Provincial Greenbelt to receive the same environmental protection and balance taken for granted by most of the GTA, we were excluded and left to fend for ourselves.

Waterloo Region has since battled for years to create local solutions to balance the significant growth and to protect our natural heritage, farmland, water aquifers and environmentally sensitive areas. While the 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 managed to develop and successfully put in place along the Waterloo Moraine and the Paris-Galt Moraine.

Waterloo Region is one of the largest communities in North America primarily dependent on groundwater for our drinking water. Greenbelt expansion as proposed 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 for everyone in the watershed.

**Recommendation #1 – Expand the Greenbelt to vulnerable water areas such as the Waterloo Moraine, the Paris-Galt Moraine, and other areas as proposed to reinforce local initiatives with a strong second layer of Greenbelt protections and help to ensure adequate future water supplies.**

## **2) Ensure the Strongest Protections Prevail**

It will be very important that any Greenbelt expansion address the concerns raised by the Region of Waterloo in February 2018 including ensuring that our stronger local provisions are not weakened or eroded in any way, that additional concerns about aggregates are addressed, that stronger local protections are not just allowed but encouraged, and that mapping utilize our Regional Official Plan mapping as well as other best available data.

We need all levels of government – local, regional and provincial – working together in a highly integrated and complementary fashion with the strongest of any protection local or provincial prevailing.

**Recommendation #2 – Work with all levels of government in a highly collaborative manner to ensure that the strongest possible protections prevail - either local protections or the Greenbelt protections – whichever is superior, and that the best available information and data is being utilized for Greenbelt expansion.**

## **3) Expand the Greenbelt to Additional Areas Urgently Needing Protection**

We also need to ensure additional areas are adequately protected. Within the Grand River watershed alone many important and essential areas have been left out of the proposed expansion area for no apparent reason.

We need to look at nature and watersheds as a complete functioning ecosystem; omitting key components for no apparent reason threatens the integrity and success of the complete watershed – particularly in our Grand River Watershed where so

many hundreds of thousands of people are dependent on its health for our future survival.

Looking into the future with this area expected to power so much of the provincial economy and welcome hundreds of thousands of additional residents – further straining our critical natural resources - protecting the entire ecosystem and the key components of the watershed becomes even more pressing and important.

Specifically:

**a) The Luther Marsh** – this massive wetland is of international significance for its natural areas and importance for migrating birds. It forms the crucial headwaters for the Grand River and needs proper provincial protection.

**b) Central Wellington County and North Eastern Waterloo Region** – too many areas of Wellington County and Waterloo Region such as Centre Wellington and Woolwich Townships have been omitted from the proposed Greenbelt expansion area. These areas of spectacular farmland are home to significant water features, kames, drumlins, creeks, tributaries and rivers such as the Grand River, Speed River, Conestoga River, etc. that are facing increasing pressures from aggregates and development.

Thankfully, some local townships have been very visionary in their environmental efforts (incredible tree-planting efforts in Centre-Wellington, Environmentally Sensitive Landscapes in Woolwich, etc.), however all would benefit from strong Provincial Greenbelt protection.

**c) Oxford County** – Just because Oxford County is located outside the arbitrary human-constructed boundaries of the Outer Ring doesn't mean that it doesn't play an essential role in the Grand River watershed. In particular, in the western and southern portions of our watershed significant parts of both the Waterloo Moraine and the Paris-Galt Moraine are located in Oxford County along with the headwaters of numerous important streams and tributaries. These natural features in Oxford feed the aquifers and rivers that communities such as Cambridge and Brantford ultimately rely on for much of their water needs.

Oxford County is home to some of the best farmland in Canada and has a progressive County government that would welcome Greenbelt expansion to help reinforce and augment their own environmental efforts.

Should the Greenbelt not be expanded to Oxford County, it will face an uncertain and likely very challenging future due to leap-frogging as it will be the narrowest part of the Greenbelt. Given Highway 401, Highway 403, major rail corridors, its proximity to Hamilton, Cambridge, Kitchener, etc., it will face incredible developmental pressures that likely no local government could combat or defend alone.

If the province is serious about best guiding growth and infrastructure across the GTA and surrounding areas to ensure future success for everyone, as well as truly protecting water, there is no possible way that Oxford could be overlooked and excluded from the Greenbelt simply because of an arbitrary jurisdictional boundary.

**d) Southern and Eastern Brant County, Northwestern Haldimand County –**

While the northern portions of Brant County are included in the mapping for the Greenbelt expansion study area, inexplicably the eastern portion of the county with so many vital headwaters and tributaries flowing into the adjacent Greenbelt boundary and facing development pressures from nearby Hamilton have been totally overlooked.

Similarly, large portions of Southern Brant County that contain numerous freshwater streams and wetlands that also warrant Greenbelt protection and have not been included like they should have. These water features tie into Northwestern Haldimand County that needs to be included as well.

**e) The Entire Grand River Waterway –** While portions of the Grand River have been proposed as potential Urban River Valley designation areas, it makes no sense to only protect broken bits and pieces of a continuously flowing river.

The entire river needs consistent protection from start to finish – particularly given the million+ Ontarians who depend on this watershed for all of their water and sewage/wastewater needs. Not only are the citizens dependent on this essential waterway but so many businesses, industrial operations as well as thousands of farms also depend on the province getting future protections right to ensure that we will have the required water resources for the decades ahead.

A strong, consistent Greenbelt designation is needed for this entire river course flowing into Lake Erie as so many rivers flowing into Lake Ontario (Humber, Don, Rouge, etc.) already have.

*Please see Appendix 1 in this submission for a Map of Additional Expansion Areas in the Grand River Watershed.*

**Recommendation #3 – Expand the Greenbelt to include the Luther Marsh, additional significant parts of Wellington County, Waterloo Region, Oxford County, Brant County and Haldimand County, as well as develop a Greenbelt URV-like designation for the entire Grand River watercourse.**

**4) Encompass the Entire “Bluebelt” with Greenbelt Expansion**

The Grand River Environmental Network is strongly supportive of the “Bluebelt” proposal developed by more than 100 community and environmental groups. We

hope that the government will seriously consider the wealth of information, data and expertise contained in the “Bluebelt” proposal for Greenbelt expansion.

**Recommendation #4 – Expand the Greenbelt to encompass the entire “Bluebelt” proposed by a broad coalition of environmental groups.**

**5) Alignment with Waterloo Regional Official Plan**

In Waterloo Region our Countryside Line designation, a firm urban boundary, 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 according to developers, more than 3,000 hectares of land have been designated for development and sit in inventory. 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.

**Recommendation #5 – Ensure Alignment with Waterloo Regional Official Plan, Prohibit Greenbelt Boundary Changes, Land Swaps, and Freeze Urban Boundary Expansions.**

**6) Larger Buffers**

There is a need to expand buffers to better protect natural features and to ensure that nature has the space it needs to thrive. This includes not only buffers surrounding natural features within the Greenbelt but also ensuring the Greenbelt boundary is delineated with a sufficient buffer

**Recommendation #6 - Expand buffers in the Greenbelt and ensure adequate delineation buffers along Greenbelt boundaries.**

**7) Agricultural Support**

Rural support programs for agriculture need to continue to be implemented and part of any future Greenbelt expansion to ensure that farmers have thriving farm operations, the confidence to invest in new buildings, can move machinery easily

along rural roads, and have the required nearby infrastructure (feed mills, implement dealers, farmers markets, farm gate sales opportunities) for long-term success.

### **Recommendation #7 - Ensure Rural Support and Stewardship Programs**

#### **8) Permitted Development and Activities**

There is a need to ensure that activities and development permitted within the Greenbelt is low impact and aligns with the objectives of the Greenbelt. Ensure that when there is a difference between local regulations and provincial regulations that the stronger of the two protections shall apply.

**Recommendation #8 – Ensure low impact, compatible activities and that the strongest regulations prevail.**

#### **9) Aggregate Reform**

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 – particularly within the two-year time of travel to wellhead areas. More enforcement and actual pit rehabilitation is required.

**Recommendation #9 – Reform aggregate rules and practices to ensure better compatibility with Greenbelt objectives.**

#### **10) Ontario Municipal Board and Local Planning Appeal Tribunals**

It remains to be determined how successful OMB reform will be. Work will need to continue to ensure that citizens, communities, and the environment are better represented in the future - not just developers.

**Recommendation #10 – Continue to monitor and adjust OMB/LPAT Reform as required.**

#### **11) Natural Heritage System and Agricultural System**

Both the new Natural Heritage System (NHS) mapping and the new Agricultural System mapping need to be integrated into the Greenbelt Plan for consistency and simplicity. All plans need to be aligned, share common definitions, and work together in a cohesive, integrated fashion to better protect our province.

**Recommendation #11 – Ensure that the new Natural Heritage System and the new Agricultural System are part of the Greenbelt Plan and form a consistent protection system across vital parts of Ontario.**

**In Conclusion**

The initial provincial Greenbelt has been very successful. In fact, it would be hard to imagine our province without it now. It is having a real impact in guiding growth, protecting rural lands, protecting water, and ensuring green space for generations to come.

However, it needs to be expanded to areas such as the Grand River Watershed that are facing considerable growth and leapfrogging pressures. In addition to reinforcing our local protections with strong Greenbelt policy and permanence, there are many opportunities to better facilitate stewardship and healthy rural landscapes.

Please continue to move forward with this essential proposal for provincial Greenbelt expansion that we have been requesting for so long. There is a considerable need for better water and environmental protection not only across the Grand River Watershed but also to help to ensure the highest future quality of life for all Ontarians.

Sincerely,

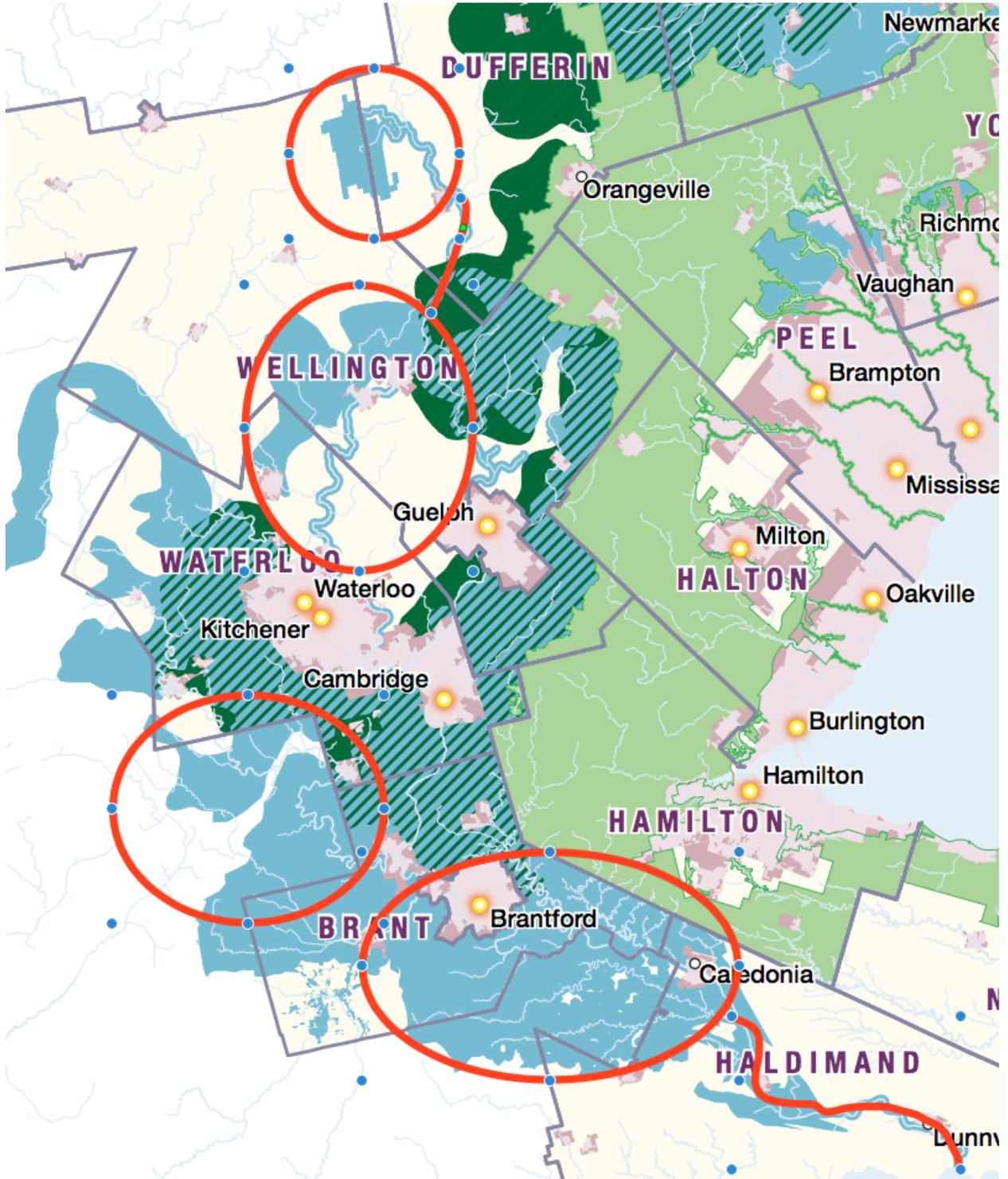


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On behalf of the Grand River Environmental Network

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**Appendix 1 - Map of Required Expansion Areas in the Grand River Watershed**



- 1) Luther Marsh
- 2) Central Wellington County and North Eastern Waterloo Region
- 3) Eastern Oxford County
- 4) Southern and Eastern Brant County, Six Nations and North Western Haldimand

## **Appendix 2 – List of Recommendations from the Grand River Environmental Network**

**Recommendation #1** – Expand the Greenbelt to vulnerable water areas such as the Waterloo Moraine, the Paris-Galt Moraine, and other areas as proposed to reinforce local initiatives with a strong second layer of Greenbelt protections and help to ensure adequate future water supplies.

**Recommendation #2** – Work with all levels of government in a highly collaborative manner to ensure that the strongest possible protections prevail - either local protections or the Greenbelt protections – whichever is superior and that the best available information and data is being utilized for Greenbelt expansion.

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**Recommendation #7** - Ensure Rural Support and Stewardship Programs

**Recommendation #8** – Ensure low impact, compatible activities and that the strongest regulations prevail.

**Recommendation #9** – Reform aggregate rules and practices to ensure better compatibility with Greenbelt objectives.

**Recommendation #10** – Continue to monitor and adjust OMB/LPAT Reform as required.

**Recommendation #11** – Ensure that the new Natural Heritage System and the new Agricultural System are part of the Greenbelt Plan and form a consistent protection system across vital parts of Ontario.