

# GREENBELT FOUNDATION

## Growing the Greenbelt Submission



**April 19, 2021**



Possibility grows here.



## **Question 1: What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**

There are multiple benefits to expanding the Greenbelt in and around the Paris Galt Moraine (PGM). Given that some of the moraine system is already included in the Greenbelt, extending the boundary to fully encompass it is critical because partial protection does not protect its function within the water resource system. Given the high concentration of aggregate operations in and around the study area, the Greenbelt Plan's stronger rehabilitation policies would also be beneficial in restoring and enhancing the natural heritage, water resource, and agricultural systems.

### **Water Resource System Protection**

The Paris Galt Moraine (PGM) includes important discharge and recharge areas that provide critical drinking water to many communities and ensure base flows to several watersheds. The combination of often higher topography and permeable soils of the moraines creates ideal conditions for recharge to the underlying groundwater system, as well as the creation of headwaters for streams and creeks. They also contribute to flood attenuation and reduce downstream flooding by holding water on the landscape and focusing surface water into the ground. Urbanization of moraines can shift the moraines' function from recharge to runoff and result in excess surface water and flooding.

The PGM water resource system is an important source for base flows in the Credit River Watershed, the Grand River watershed (Fairchild, Blue, McKenzie & Boston Creeks and direct discharging to the Eramosa, Speed, Grand and Nith Rivers), and Long Point Watershed (headwaters of Big Creek, Nanticoke-Sandusk-Stoney Creek & Lynn-Black Creek watersheds). The groundwater supplies to the headwaters of these rivers are vitally important for providing colder water and improving water quality. The river systems provide habitat for cold water dependent species and vegetation.

Guelph is one of the largest cities in Canada to rely solely on groundwater for its drinking water supply. The City of Brantford, the community of St. George, and numerous private wells for domestic and agricultural use also rely on aquifers for their water supplies. The PGM is critical to maintaining that supply as the population of the city and surrounding areas is projected to grow significantly in the coming decades.

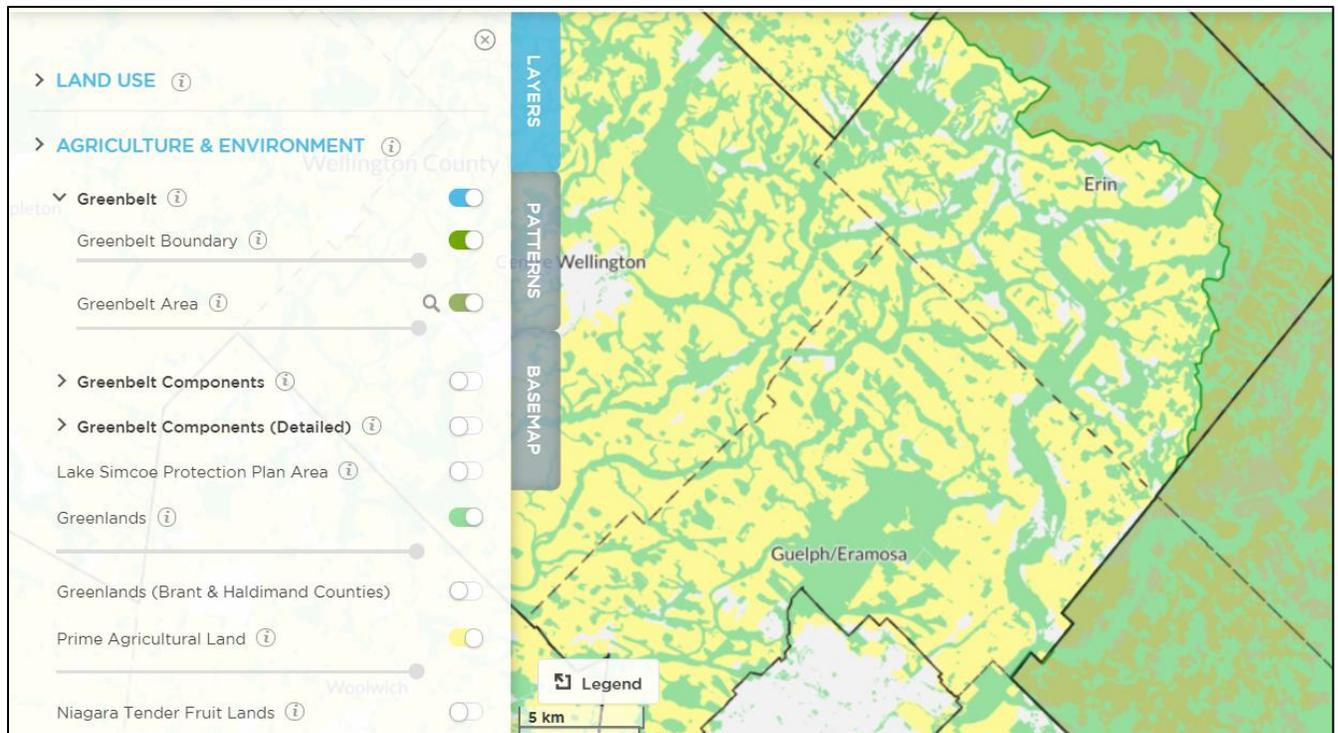


## Natural Heritage and Agricultural System Protection

The natural cover in the PGM is an important part of the regional Natural Heritage System (NHS) with linkages to the Greenbelt's NHS. There are significant habitat corridors that provide connectivity between the larger core areas in the Greenbelt, features in the study area, and further linkages to corridors heading south to Long Point.

Most of the land outside of settlement areas is prime agricultural land, often overlapping with the NHS (see Figure 1). These farming communities support a cluster of agri-food system components in and around the surrounding towns and cities.

**Figure 1:** Prime agricultural land and the provincial natural heritage system in the study area (Neptis Grower, 2018)



*\*Note: areas in yellow indicate prime agricultural land, while areas in green indicate the natural heritage system*

## Development Pressure

Cities and towns in the region are projected by the province to significantly grow: from 925,000 today to a projected 1.2 million by 2031 (in the Grand River watershed), and 146,000+ projected new residents in Guelph-Wellington by 2051, a very significant increase from the 200,000



people living there today. Protecting the full extent of the Moraine and its recharge areas from development is an essential aspect of sustaining water supply. The Greenbelt Plan identifies areas where development should not occur and the PGM is one of those areas. The study area also contains a large concentration of pits and quarries. These important resource extraction activities need to be carefully managed and inclusion in the Greenbelt Plan would provide long-term clarity and consistent policies to balance economic, environmental, and water resource system concerns.

Some municipalities have already prepared for Greenbelt expansion in their Official Plan process. Waterloo Region, for example, has designated a rural area that would connect to the Protected Countryside of with the Greenbelt. The Greenbelt Plan would help to permanently direct growth away from sensitive areas, providing consistency and clarity for long-term land use planning in the area.

## **Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?**

The Greenbelt Foundation supports growing the Greenbelt to protect the PGM. In doing so, we recommend the government also seeks to optimize the benefits of Greenbelt expansion to the agricultural and natural heritage systems that are in and around the PGM. We also recommend that any existing stronger municipal protections should be allowed to remain in place under the expanded Greenbelt boundary.

The full geological extent of the PGM boundaries should be included within the expanded Greenbelt area to effectively protect its water resource system functions. Various studies have been completed that provide clear direction with respect to the moraine boundaries. Final assessment should be completed in consultation with the Grand River Conservation Authority, MNRF specialists, and other stakeholders. This assessment should consider whether there is a functional relationship with other adjacent moraines (Waterloo, Orangeville and Gibraltar) to provide a complete understanding of the water resource system. It is important to understand if there are common risks and vulnerabilities due to their interdependence or if the moraines function independently.

Opportunities to integrate more of the Growth Plan NHS and WRS into the Greenbelt area should also be considered when proposing an expansion area boundary. There is a high concentration of important features and corridors as reflected in provincial NHS mapping around the PGM. These are physically and functionally connected to the existing Greenbelt and incorporating them into the Greenbelt area would be an important addition for the long-term protection of the NHS. The majority of farmland in and around the study area are designated as prime agricultural areas and Greenbelt expansion offers an opportunity to prevent further fragmentation.



Some of the provincial NHS and WRS mapping of the area has not been ground-truthed in consultation with the public and conservation authorities. The Province, municipalities, conservation authorities, and other stakeholders should bring together all the best available data and technical information to develop accurate WRS and NHS maps to identify a proposed expansion area boundary.

The towns and villages within the Study Area that would be encompassed by the expanded boundary need consideration. Previous studies have shown the current built-up areas contain adequate land<sup>1</sup> to meet growth needs over the 2051 Growth Plan horizon. It is important that urban boundaries are not unnecessarily expanded as that would negatively impact achieving Greenbelt Plan policy objectives, i.e., protecting the water resource system, protecting and enhancing the NHS, and protecting and enhancing the agricultural system.

The intent of the Greenbelt Plan is to permanently protect and safeguard important natural and agricultural resources. If the relevant municipalities have provincially approved, stronger policies for protection of the NHS and WRS in their Official Plans than policies in the Greenbelt Plan, we recommend that these stronger municipal policies continue to apply. This would be consistent with Section 1.4.1 of the Greenbelt Plan, which states that “policies represent minimum standards” and decision-makers are encouraged to beyond these minimum standards to address issues of importance.

Given the particularly sensitive nature of moraine systems, the Province may wish to consider whether Oak Ridges Moraine Conservation Plan policies would be most appropriate to the study area in this context.

### **Question 3: What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?**

Urban River Valleys (URVs) are a key component for the long-term health of the Greenbelt’s natural system as they are important ecological linkages between the headwaters areas and the Great Lakes. They provide wildlife habitat and corridors, allowing for movement in response to climate change and land use changes. Despite intensive urbanization, Toronto’s ravines, for example, provide habitat for more than 560 significant species of plants, birds, reptiles, and amphibians.

URVs will become more important as the region’s population increases and will help address the profound impacts of climate change. They are critical green infrastructure, which help to

---

<sup>1</sup> Neptis Foundation (2017). *An update on the total land supply: Even more land available for homes and jobs in the GGH.*



minimize and mitigate the impacts of floods and have the potential to become increasingly significant recreational corridors linking urban and rural communities across the region.

It is also important to emphasize that URVs are more than a planning designation. They capture the imagination of the public and reinforce programmatic efforts to enhance and maximize their benefits. The protected status of URVs means they have great potential to be restored to a much healthier state.

The climate and landscape across Southern Ontario continues to change, and this is impacting rivers. As a result of continuing urbanization, summer water flows have increased dramatically in volume and frequency. Flood events are now much more frequent in late spring and summer than earlier in the century. Streambank erosion, suspended sediment loads, pollutants, and sewage bypasses are all issues of increasing concern. As rainfall intensity increases due to climate change, summer floods will become more frequent, severe, and costly.

At the same time, there is mounting pressure to put more infrastructure into the ravines. A URV designation would mean that Official Plan policies would need to align with the objectives of the Greenbelt Plan and policies.

Given that context, we would support the application of the URV designation to the remaining Greater Golden Horseshoe urban river valleys. We also encourage the Province to consider exploring the potential to add more of the north shore of Lake Ontario to the URV designation as it is an important east to west wildlife corridor that provides many recreational opportunities.

There are numerous public lands and some coastal wetlands that could be included in the Greenbelt as part of the URV designation. Listed below are specific parcels of public lands adjacent to the URVs that we also recommend be included into the Greenbelt based on a thorough analysis by conservation authorities.

### **Halton Watershed**

14 Mile Creek is currently designated as an URV in North Oakville; however, the designation does not continue past the North Service Road and connect to Lake Ontario. Consideration should be given to extending the URV designation for the remaining portion of Fourteen Mile Creek Valley, extending south to Lake Ontario.

### **Hamilton Watershed**

Both Stoney Creek and Battlefield Creek are urban river valleys that connect Lake Ontario to existing Greenbelt designated lands above the Niagara Escarpment. The Province may consider including these existing urban river valleys in the designation under the Greenbelt Plan to enhance protection for the features.



### **Credit Valley Watershed**

The Credit River is currently designated as a URV through Brampton and Mississauga. The eastern side of the river between Norval and Glen Williams in Halton Hills is designated as Greenbelt Natural Heritage System. However, the west side of the river valley has no Greenbelt designation. The Province should explore the opportunity to include this portion of the river under the URV designation.

Rattray Marsh coastal wetland Conservation Area is an important natural area that should be considered for addition to the Greenbelt.

### **Niagara Watershed**

Both Stoney Creek and Battlefield Creek are urban river valleys that connect Lake Ontario to existing Greenbelt designated lands above the Niagara Escarpment. The Province may consider including these existing urban river valleys in the designation under the Greenbelt Plan to enhance protection for the features.

### **Toronto Region Watersheds**

Duffins and Carruthers Creek, including the full extent of their headwaters, are facing significant development pressure to the very edge of the Protected Countryside areas of the Greenbelt boundary. While recognizing there are development interests, these areas should be considered a prime candidate for inclusion, given they are surrounded on three sides by the Greenbelt and critical to long-term flood mitigation and contain some of the remaining prime farmland in the whitebelt that is part of the agricultural system.

### **Central Lake Watershed**

The coastal wetlands areas at the mouth of Montgomery Creek and the valley land system north to Bloor Street in the City of Oshawa.

The connection between Second Marsh and McLaughlin Bay to the east and incorporate Darlington Provincial Park in the City of Oshawa and Municipality of Oshawa and Municipality of Clarington.

The Central Lake Ontario Conservation Authority owned lands forming the Westside Marsh within the Bowmanville/Westside Marshes Conservation Area could be added to the area currently designated at the Bowmanville Marsh in the Municipality of Clarington.



## Options for General Expansion of the Existing URV Designations

We have identified three options for expanding the current URV designation:

- Survey and map the 'bank edge' of the rivers in consultation with municipalities and conservation authorities so the boundary reflects the physical geography.
- Extend the designation to 200m or a distance equal to the widest point of the URV and include all public lands that are contiguous to the new boundary.
- Study the environmentally sensitive lands in each URV system and apply the designation to all public lands within that area.

## Question 4: Do you have suggestions for other potential areas to grow the Greenbelt?

The Greenbelt is a broad band of permanently protected land that:

- 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.
- Provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses.
- Builds resilience to and mitigates climate change.

The Provincial government's commitment to growing the extent and quality of the current Greenbelt is much needed in light of growing evidence about the twin climate and biodiversity crises and continued fragmentation of the agricultural system in the GGH.

The Greenbelt Plan supports long-term strategic planning around the issues that are essential to address a number of major challenges facing the region, in particular continued economic prosperity, building resilience to the impacts of climate change, and biodiversity conservation. It is also effective in communicating the importance of the NHS, WRS, and Agricultural System to the public and shows government leadership on these important topics. We have identified several areas that are adjacent to and functionally or physically connected to the current Greenbelt boundaries that are strong candidates for further Greenbelt expansion.

## Agricultural System

The Greenbelt protects 750,000 acres of some of Canada's best farmland against fragmentation and urban encroachment, while allowing for agriculture-supportive infrastructure and valued-added uses necessary to support a strong agricultural economy.



Since the implementation of the Greenbelt Plan in 2005, there has been no loss of prime agricultural land within its boundaries except to developments that had been approved prior to the Plan's implementation. Permanent farmland protection provides farmers with the certainty they need to invest in their businesses, whether to modernize, expand, or diversify them, and to plan for succession. Farmers in and around the Greenbelt also benefit from being close to one of Canada's largest consumer markets in the GTA and a robust agri-food network (i.e., the infrastructure, services, and other assets that support agriculture) in the GGH, including 60% of Ontario's food processing capacity. Together, the protected agricultural land base and the agri-food network make up an economically significant and viable agricultural system. Agriculture in and around the Greenbelt is a significant part of Ontario's agri-food sector, which contributes \$39.5 billion to Ontario's GDP and generates more than 822,000 jobs<sup>2</sup>.

Outside of the Greenbelt in the inner and outer rings of the GGH, however, we continue to lose prime agricultural land to urban encroachment and fragmentation. Given recent changes to the Growth Plan that allow for more flexibility in settlement area boundary expansions, lower density and intensification targets, and a longer planning horizon to 2051, encroachment on prime agricultural land will inevitably increase. The loss of prime agricultural land is permanent and negatively impacts the viability of the entire agricultural system, as there are critical synergies associated with having a concentration of farms and support services in an area. When we lose farmland, we lose not only the land forever, but also the jobs all along the agri-food value chain and the broader economic impact of the sector. Keeping the agricultural system intact is essential for preserving local food production, good quality soils and water resources for current and future generations, and agriculture and agri-food jobs that contribute significantly to the GGH's economy.

We recommend that the Province grows the Greenbelt to include more farmland in the GGH.

Criteria for identifying candidate areas could include:

- Prime agricultural areas: Prime agricultural areas support current and future opportunities for agriculture due to features like soil capability and a concentration of farms. They are a finite resource that is largely concentrated in southern Ontario, including in the GGH.
- Concentration of fruit and vegetable crops: As fruit and vegetable crops often require high-quality soils, particular climatic conditions, farmer knowledge and expertise, and close proximity to market, it is imperative we protect lands in the GGH that are well-suited to fruit and vegetable growing and are close to the supportive infrastructure for the sector.

---

<sup>2</sup> Ontario Federation of Agriculture (n.d.). <http://producingprosperity.ca/>



- Overlap with the Natural Heritage System: Identifying areas where prime agricultural areas and significant natural features are both present fulfills two of the Province's priorities for growing the Greenbelt.

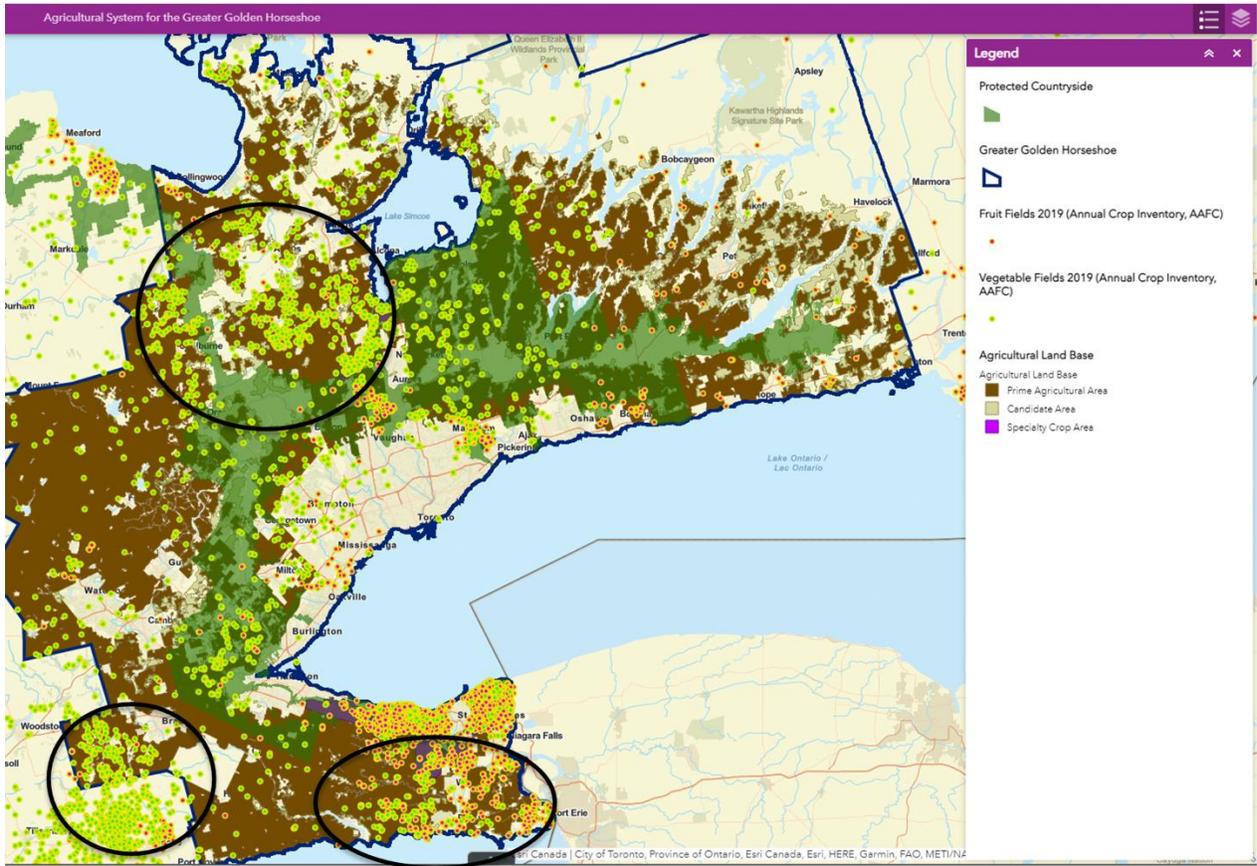
To identify candidate areas, the Province can draw on OMAFRA's [Agricultural Systems Portal](#), as well as municipal agricultural system mapping that is currently being finalized. Key stakeholders in the agriculture and agri-food sectors must be consulted.

Based on our own analysis of the Agricultural Systems Portal (see Figure 2), the suggested criteria listed above, and in consideration of the Province's other objectives for growing the Greenbelt, we suggest that the Province consider looking at the three following areas for Greenbelt expansion with an explicit emphasis on expanding farmland protection:

- South Niagara to Lake Erie, where there are prime agricultural areas and a high concentration of fruit and vegetable crops. South Niagara connects physically and functionally to the current Greenbelt.
- Niagara Escarpment through Dufferin to South Simcoe, where there are prime agricultural areas and a high concentration of vegetable crops immediately adjacent to and west of the Holland Marsh. Dufferin and south Simcoe connect physically and functionally to the current Greenbelt, particularly the Holland Marsh and the Niagara Escarpment.
- West Brant, where there is prime farmland and a high concentration of vegetable crops. West Brant connects functionally and physically to the Paris-Galt Moraine study area currently under consideration for Greenbelt expansion.



**Figure 2:** Agricultural System Portal (OMAFRA, 2021) with recommended candidate areas outlined in circles





## Natural Heritage and Water Resource System

### Regional Resilience and Natural Infrastructure

Southern Ontario is one of the most biodiverse regions in Canada and nature here benefits half the population of the province. Near-urban nature comprises the forests, river valleys, wetlands, savannahs, healthy soils, and other ecological features that surround and intersect our growing cities. This nature is critical to the health and well-being of communities and all life, and is one of our greatest resources for adapting to climate change. The proximity to urban centres puts near-urban nature at high risk of being degraded and lost, making increased conservation critical, most prominently in the GGH.

A recent report from the Nature Conservancy of Canada shows the scale of the biodiversity challenge facing southern Ontario in stark detail<sup>3</sup>. The loss of habitat and landscape fragmentation is a critical risk factor in planning for the impacts of climate change. Loss of biodiversity and natural infrastructure increases the exposure to extreme weather events and make the impacts more likely and severe, e.g., flooding, droughts, and heatwaves.

This consultation is an opportunity for the government to continue to add to the regionally significant natural systems that need permanent protection, improve connectivity, and be a basis for ongoing restoration action by including them in the Greenbelt.

### Access to Nature

The current COVID-19 pandemic has reinforced the importance of natural spaces and parks for recreation and community health and wellbeing. Prioritizing the conservation of Provincially and Federally held lands for park use would support the objectives of the Greenbelt Plan and serve as an important component of complete communities, providing benefits to support environmental protection and climate change adaptation and mitigation.

There is increasing evidence of the health benefits of nature, especially for urban communities with more limited access to natural spaces. At the same time there is a growing deficit in the provision of large parks in the GGH as supply is failing to keep up with population growth<sup>4</sup>. There are sections of the natural heritage system in the GGH inner ring that would be useful additions to the Greenbelt because of their proximity to densely populated urban areas.

---

<sup>3</sup> Krauss and Hebb (2020). *Southern Canada's crisis ecoregions: identifying the most significant and threatened places for biodiversity conservation*.

<sup>4</sup> Green Infrastructure Ontario (2019). *State of Large Parks in Ontario's Golden Horseshoe*.



Greenbelt protection would allow for the possibility of creating future parkland and conservation areas with public access that would serve the needs of the growing population.

### **Landscape Connectivity**

Significant ecological and hydrological connectivity remain in the Greenbelt and its 21 river valleys, Rouge National Urban Park, Cootes to Escarpment EcoPark System, and Kawartha Highlands. These landscapes connect with the broader Great Lakes Basin and ecological landscapes in Canadian Shield and Eastern Canada. The topography along these areas within the GGH is helpful for climate change induced species migration, as it provides important microclimates that are not common on the surrounding flat landscapes. The GGH is a terrestrial pathway around the Great Lakes for species moving from New York state to Central Ontario. As the climate changes, this region will become an increasingly important migratory route for flora and fauna that support regional biodiversity. The Great Lakes are visibly the largest natural barrier to terrestrial species migration in eastern North America and the urban landscapes around the lakes could impede the movement of wildlife migrating with the changing climate.

In southern Ontario, including the GGH, loss of habitat and fragmentation is the primary threat to biodiversity, and improving connectivity through the GGH is recognized as a regional priority for biodiversity conservation. Despite the recognition of the importance of connectivity, protected areas and quality habitat in the GGH are quite disconnected across the landscape. They are interrupted by built infrastructure like roads and buildings, aggregate extraction, intensively tilled and degraded natural areas. Land use policies like those in the Greenbelt Plan reduce the rate of this fragmentation: the observed increase in fragmentation from 2011-2017 was lower inside the Greenbelt than in the rest of the GGH.

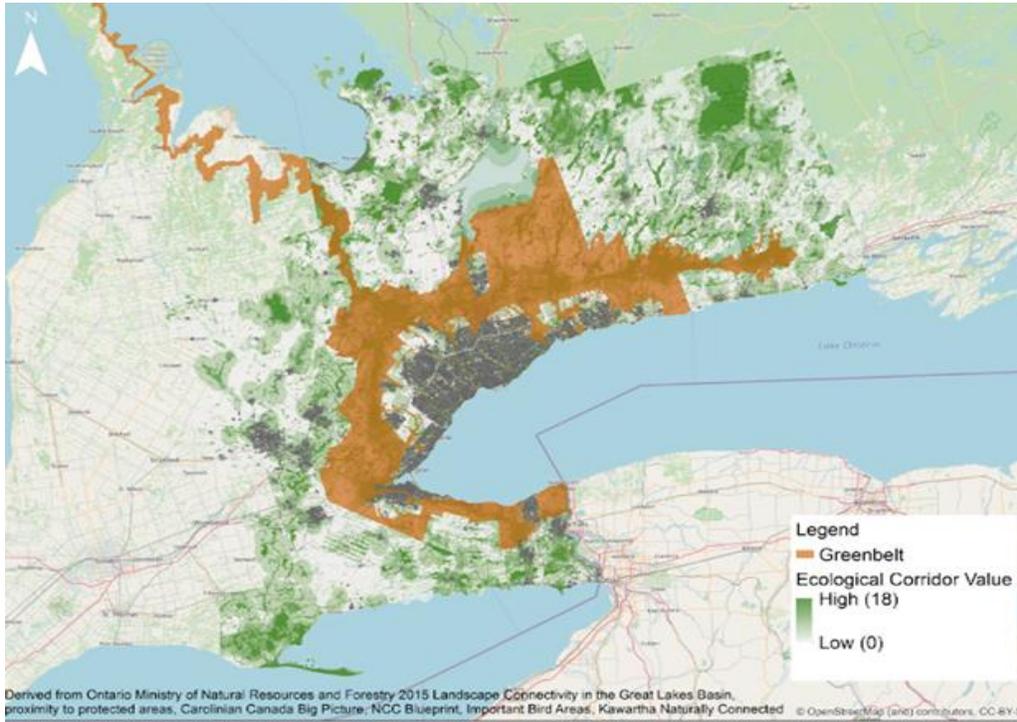
The Southern Ontario Nature Coalition<sup>5</sup> has drawn on provincial data, local conservation expertise, and Indigenous knowledge to study and identify critical habitats and wildlife corridors in the region. This analysis can inform the current consultation of Greenbelt expansion. The following series of maps (Figures 3, 4 and 5) summarizes their analysis.

---

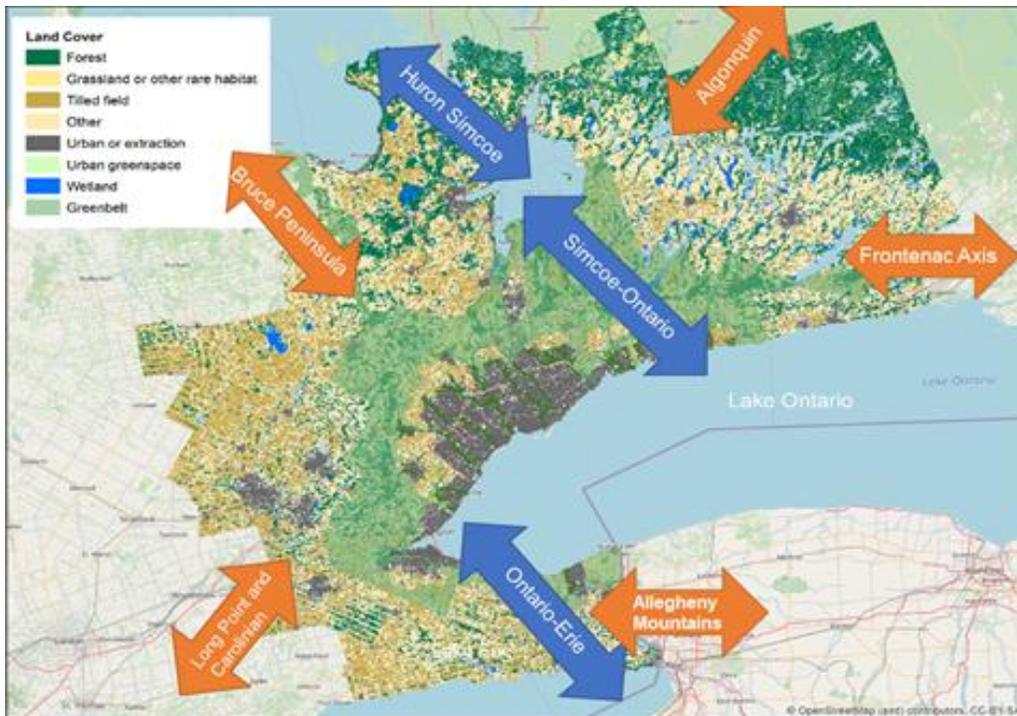
<sup>5</sup> Southern Ontario Natural Coalition (2021). *Technical report on the Near-Urban Nature Network of the Greater Golden Horseshoe.*



**Figure 3:** Areas of high ecological corridor value in and around the Greenbelt



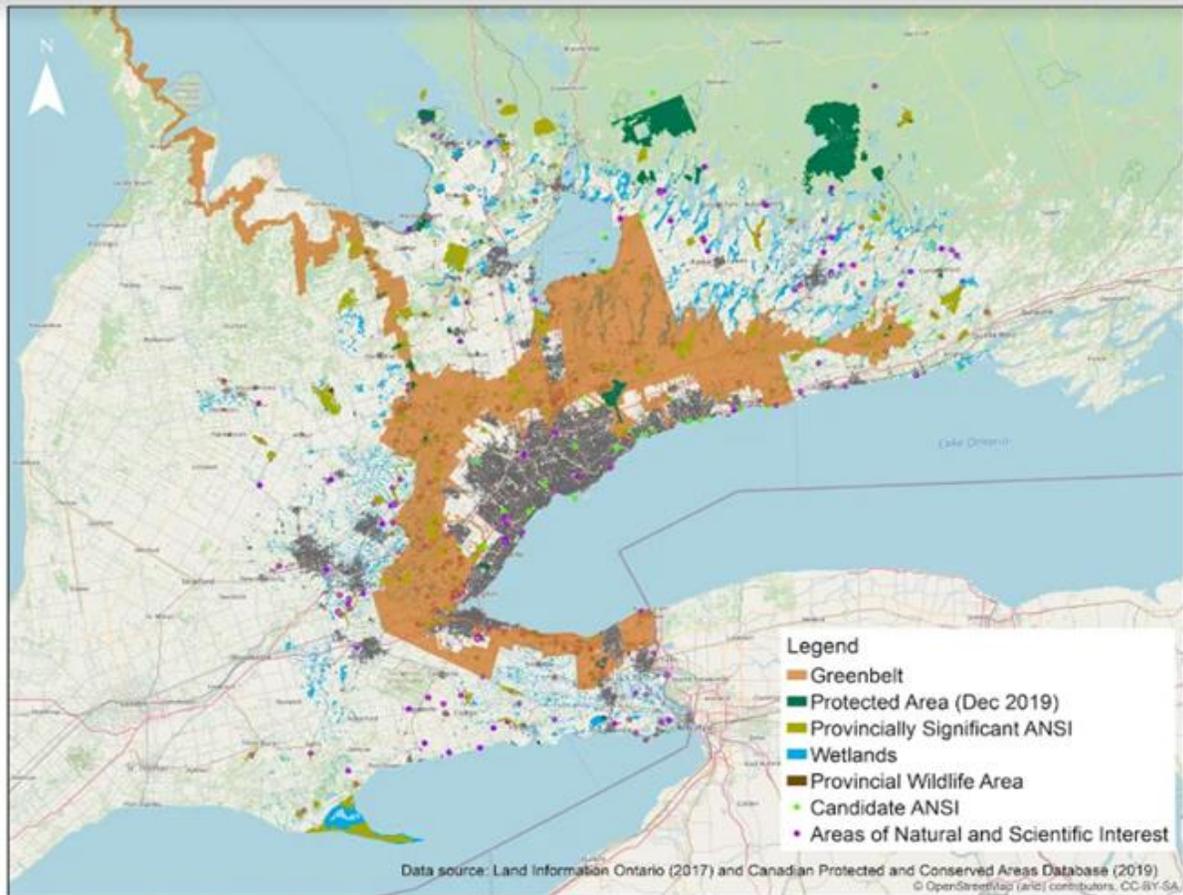
**Figure 4:** Biodiversity Connections beyond the Greater Golden Horseshoe



## Areas of High Biodiversity Value

There are many areas of high biodiversity value contiguous with the current Greenbelt boundaries, including some with high concentrations of wetlands around urbanizing areas (see Figure 5).

**Figure 5:** Areas of High Biodiversity Value



## Moraines - Water Resource System Infrastructure

There are several moraines that are functionally and physically connected to the Greenbelt that could be considered for inclusion in the Greenbelt. Moraines will become increasingly important as the climate warms and rainfall patterns are disrupted. Less frequent but more intense rainfalls mean it is important to protect natural features that recharge groundwater supplies and have the capacity to retain significant volumes of water on the landscape.

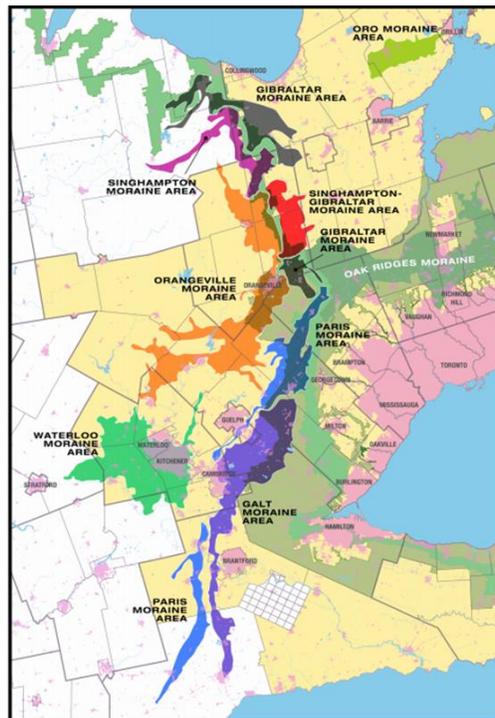


Moraines act as natural rain barrels. They filter and store rainwater in underground aquifers and are responsible for maintaining baseflow in the GGH's river system; for instance, the Waterloo Moraine contributes approximately 80% of the recharge in the Grand River watershed despite covering 30% of the land area.

The moraines are home to many important natural habitats, including provincially significant wetlands, kettle lakes, extensive forests, and provincially rare prairie savanna and peatland communities. These moraine habitats and river valleys will be increasingly important as wildlife corridors for movement, i.e., greenways to adapt to rising temperatures.

Moraines and other source water areas are highly sensitive to changes from increased urbanization, both directly from urban encroachment and loss of habitats, and indirectly from more impervious surfaces, wastewater and pollution, and unsustainable demand for water. Regional growth also demands aggregate resources, and without strong protections that address both land use and non-land use protections this could lead to irreversible groundwater and ecological impacts. All of the moraines identified in Figure 6 could be considered for future Greenbelt expansion.

**Figure 6:** Moraines of the Greater Golden Horseshoe<sup>6</sup>



<sup>6</sup> Save the Moraines Coalition (2020). *The Moraines of the Greater Golden Horseshoe*.



## **Specific Areas to Consider for Greenbelt Expansion**

The following areas are contiguous and connected to the current Greenbelt, have a high concentration of features of ecological value, and overlap with important features of the water resource system, making them strong candidates for Greenbelt expansion.

### **Niagara Escarpment to Lake Simcoe**

A logical extension of the Greenbelt would include a natural corridor between the physiographic regions of the Niagara Escarpment (NE) and the Canadian shield. A logical corridor already exists, originating within the existing Greenbelt/NE areas in the western portion of the Nottawasaga watershed extending eastward through the heavily-forested Pine River Valley toward the Nottawasaga River corridor. This area also covers the Singhampton and Gibraltar Moraines. Further connections could include incorporation of the globally-significant Minesing Wetland complex, and further eastward connection across an existing natural corridor that adjoins to the Oro Moraine.

The Oro Moraine covers 17,000 hectares and serves a number of critical ecological functions: groundwater recharge, filtering and controlling flow into the provincially significant Minesing Wetland, and habitat for a number of rare and endangered species. The integrity of the moraine as a natural area is being threatened by sand and gravel extraction, rural estate development, and the expansion of recreational facilities such as ski hills and golf courses, all of which are becoming increasingly common. This area also provides a critical natural corridor between the Greenbelt, Lake Simcoe Watershed, and Simcoe County. Much of this conceptual corridor is already dotted with protected designations such as Provincially Significant Wetlands, Areas of Natural and Scientific Interest, Provincial Parks, Regional Forests, and areas contained within the provincial Natural Heritage System.

### **Headwater areas of the Humber and Rouge Rivers, and Carruthers Creek**

Headwaters are sensitive areas that are important for groundwater discharge, stream flow and temperature, water quality, and provide critical biodiversity habitat. They also act as green infrastructure, maintaining permeability and reducing the risk of downstream flooding. Protection of remaining headwater areas currently outside the Greenbelt will improve the resiliency of downstream communities, and the region as a whole. There is also a high concentration of sites of high biodiversity value in and around the Specialty Crop Area and Niagara Escarpment that are proximate to the existing Greenbelt boundaries and would be logical inclusions for future expansion.

### **The Lake Iroquois Shoreline / Lake Ontario Shoreline in Northumberland to the Greenbelt**

This is a major east/west wildlife corridor on the north side of Lake Ontario. Its beach sands are a recharge/discharge area, and they support extensive forests and wetlands. The clays and



sands of the Lake Iroquois Plain along the current Lake Ontario shore are noted for their deeply cut forested valleys, coastal marshes, and provincially rare Great Lakes beach strand and dune communities. Between the Lake Iroquois Plain and the Oak Ridges Moraine there is the sensitive South Slope Physiographic Region sloping up to the Moraine. It is a major discharge area supporting many headwater wetlands, forested river valleys, and cold water streams with native Brook Trout.

CLOCA has identified the importance of this corridor in its 2015 Watershed Action Plan. Some sections of the Lake Iroquois Shoreline are included in the existing Greenbelt area but there are key gaps in protection in eastern Whitby, Oshawa, and north Courtice and Bowmanville. From a landscape perspective, this would be an important addition to the Greenbelt.

The north shore of Lake Ontario is also identified in the Watershed Action Plan as an important wildlife corridor for a number of species including the Monarch butterfly. There are opportunities to extend protection on public lands along the shoreline, as well as including a band extending 1km inland that would incorporate private lands.

### **South Niagara to Lake Erie**

There is a concentration of sites with high biodiversity value proximate to the Niagara Specialty Crop Area and Niagara Escarpment that would make logical additions to an expanded Greenbelt. These areas play an important role in landscape connectivity between the United States and Lake Erie migratory routes.

### **Lake Simcoe Watershed**

About two thirds of this watershed is in the Greenbelt. The largest lake in the Greater Golden Horseshoe, Lake Simcoe is important for its major cold water fisheries, and its watershed supports extensive wetlands and forests. Greenbelt expansion to include the parts of the watershed that are currently outside of its boundaries would streamline local land use planning and provide added protection to the watershed's natural heritage system, which is currently confined to the existing Greenbelt portion.

### **Waterloo Moraine to Long Point**

The Waterloo Moraine is a sensitive recharge and discharge area, covering 400 square kilometres and plays a major role in the recharge of the local and regional groundwater system. It feeds the headwaters for the Alder, Laurel, Strasberg (cold water streams that support brook trout), Doon South, Blair, Bechtel and Bauman Creeks. It contains environmentally sensitive landscapes and over 70 Provincially Significant Wetlands are mapped within the moraine's boundary, most of which are within Laurel Creek subwatershed (northwest Waterloo). 25 of the region's 80 Environmentally Sensitive Policy Areas (ESPAs) are within the Waterloo Moraine.



The Moraine provides drinking water to the majority of residents of Kitchener/Waterloo, as well as rural residents in the western part of the region. There is an important wildlife corridor between Long Point and the Waterloo Moraine and connecting to the Greenbelt. There needs to be long-term consideration of how this important route can be protected and enhanced. Incremental expansions of the Greenbelt could help with this process. While this area is not currently contiguous with the Greenbelt, it would become so if the Paris Galt Moraine Greenbelt expansion came into effect.

### **Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?**

Given that rapid urban expansion is driving many of the challenges facing the Natural Heritage, Water Resource, and Agricultural Systems, it is important to recognize that Greenbelt expansion will not impede growth and economic development, but instead offers many benefits by supporting the Growth Plan to direct development on a more sustainable path.

Regional population growth is expected to continue long into the future—the GGH’s population is forecast by the province to grow by an extra 5.5 million from its current 8.7 million (for a total of 14.2 million people) by 2051. A quarter of this growth is allocated to the ‘outer ring’ municipalities of Simcoe, Brant-Brantford, Guelph-Wellington, Waterloo, and Dufferin, where Greenbelt policies largely do not apply. Analysis by the Neptis Foundation identified that despite the lower population numbers, the outer ring has designated almost as much land for development as the inner ring, a finding which suggests “the potential for leapfrog development beyond the Greenbelt.”

Rapid growth in Simcoe County is threatening to exceed the assimilative capacity (ability to absorb and filter waste) of the Nottawasaga and Lake Simcoe watersheds. Some local farmers report water shortages impacting their operations, and recent reports suggest groundwater quality may be at risk. Similarly, groundwater quantity is a growing concern in the City of Guelph and Wellington County, as population growth puts pressure on water supplies.

At same time, given the historic divergence of population predictions with lower growth than expected, urban boundary expansions need to move very carefully and be thoroughly scrutinized. The Province should consider requiring staging land designation and infrastructure investments to ensure we do not unnecessarily fragment and erode the agricultural system, and that we don’t invest in infrastructure that will go underutilized.



The Greenbelt Plan supports municipalities to grow more sustainably because it:

- Provides certainty for long-term planning and investment for municipalities, farmers, agri-food, tourism and other businesses, and developers.
- Supports directing growth to existing settlement areas to create compact, livable communities, which makes the most efficient use of existing infrastructure and minimizes new spending by governments and costs to taxpayers.
- Allows municipalities to adopt stronger policies and programs to support natural heritage and agricultural systems.
- Reduces inefficient use of land by limiting sewage and water infrastructure for settlements that do not currently have Great Lakes or Lake Simcoe-based services (except in cases to protect health).
- Provides permanent protection that cannot be undone or weakened by future municipal Councils.
- Extends equal protection to all wetlands and increases protection for streams, seepage areas and springs.
- Reinforces the importance of a “comprehensive, integrated and long-term approach” to managing water quality and quantity; this includes protecting vulnerable surface and groundwater areas from development, (e.g., recharge and discharge areas, aquifers, headwaters, and surface water areas), and encouraging planning across watersheds and municipal boundaries.

### **Land Supply for Development**

There is sufficient land already available to accommodate the projected population growth within serviced built-up areas. There are 125,560 hectares of unbuilt land to accommodate housing and employment<sup>7</sup>. This is a conservative estimate as it does not include smaller communities, estate residential subdivisions, or rural industrial and commercial.

A report by the Ryerson City Building Institute found that the City of Mississauga could add approximately 174,000 new residential units via low- and medium-density intensification around transit stations, along transit corridors, in existing neighbourhoods, and under-utilized urban lots, providing housing for 435,000 residents, or 85% of Peel Region’s assigned growth through to 2041. Given decades of low density development patterns, other suburban municipalities will similarly find they have a capacity to provide housing within their BUA if they undertake a similar analysis.

Malone Given Parsons (2018) found that approximately 70% of land within both the BUA and DGA in the GTHA is within a low-density designation, and the population and employment

---

<sup>7</sup> Neptis Foundation (2016). *No shortage of land for homes in the Greater Toronto and Hamilton Area.*



densities across the region are generally at or below 50 residents and jobs per hectare. The province should continue to encourage municipalities to consider opportunities for higher density development in these areas given it increases the use of existing transit systems, linear and other infrastructure, as well as services, making those past investments cost effective and reducing new infrastructure investment requirements.

### **Question 6: Are there other priorities that should be considered?**

The Greenbelt is an invaluable tool for maintaining the region's prosperity, but it is not sufficient on its own. The provincial government needs to consider how to support and fund the conservation and ecological restoration work that is needed in Southern Ontario and in near urban areas.

There are significant opportunities to support the agriculture and agri-food sector in this region, including expanded production and processing as well as agri-food tourism. As noted above, the sector is the second largest contributor to the province's GDP at \$39.5 billion/year, providing 822,000 jobs. Our own research<sup>8</sup> has identified the potential to increase supply of fruits and vegetables for local retail and export that would provide significant economic returns. In the GGH region, farm productivity is higher on average than the rest of the province as the region has just over half of the province's best farmland, as well as an amenable climate, and close proximity to domestic as well as US consumers. Around the world, it is understood that it is critical to protect farmland best suited to intensive food production given its significant economic contribution --- and once farmland is gone, it is gone forever.

#### **Contact Information:**

##### **Thomas Bowers**

Senior Manager Research and Policy  
Greenbelt Foundation

Tel: 416-960-0001 ext. 339  
[tbowers@greenbelt.ca](mailto:tbowers@greenbelt.ca)

---

<sup>8</sup> JRG Consulting Group (2020). *Plant the Seeds: Opportunities to Grow Ontario's Fruit and Vegetable Sector*, Greenbelt Foundation.