

Clarington

March 29, 2021

Ministry of Municipal Affairs
and Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto ON M5G 2E5

Re: ERO 019-3136, Growing the size of the Greenbelt
File No PLN 1.1.9.3

Thank you for the notification received on February 17, 2021. The Minister in speeches during the fall and winter of 2020 had indicated there would be some opportunity to Grow the Greenbelt. We had inquired with Ministry of Municipal Affairs and Housing (MMAH) staff at the end of January 2021 if there was going to be any consultation on Growing the Greenbelt and were informed it was not imminent. Notwithstanding, Clarington Staff are now aware of the recent Environmental Registry of Ontario (ERO) posting requesting comments on a proposal to grow the Greenbelt focussed on the Paris Galt Moraine and further protection of Urban River Valleys.

Discussions regarding the Greenbelt are very important to the Municipality of Clarington given the significant area of land within the Municipality located within the Greenbelt. Historically, we believe that the formulation and implementation of the Greenbelt Plan and the effect of its policies have not been clearly communicated by this or previous governments. For example, there are many residents and property owners within the Greenbelt that are not aware their land has been designated as Greenbelt until they approach municipal staff to obtain a planning approval only to learn their proposed use is not permitted and overall land use permissions are limited.

This lack of communication has led, in our opinion to misunderstandings with residents and property owners. Many do not believe the Greenbelt is to protect agricultural lands rather they believe it is only for natural heritage and water resource protection and that it has negatively impacted their property value and without consultation.

The Environmental Registry of Ontario (ERO) posting is seeking feedback on ways to grow the size of the Greenbelt, with a particular focus on the Paris-Galt Moraine in Wellington County, and further protections for Urban River Valleys. The Paris-Galt Moraine is not within our jurisdiction; therefore, we have no comments on its inclusion. The urban river valleys within Clarington are already addressed by our Official Plan policies and are mostly within municipal ownership. As the Greenbelt policies only apply to the municipally owned properties, there are no substantive impacts regarding the inclusion of Graham, Wilmot, Soper, Bowmanville, Harmony/Farewell valley lands.

The Ministry has stated that any additions to the Greenbelt would have to support Greenbelt Plan objectives, vision, and goals – in particular the goal of providing permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape and providing for the inclusion of publicly owned lands in urban river valleys.

Comments will or have been submitted from the Central Lake Ontario Conservation Authority (CLOCA) and Ganaraska Region Conservation Authority (GRCA) on the wildlife corridors that exist along the Lake Iroquois shoreline and Lake Ontario shoreline. The wildlife corridors are supported through policies in the Clarington Official Plan. Clarington Staff have worked co-operatively with the Conservation Authorities and major landowners along these corridors to ensure wildlife can move freely and that the long-term goal of maintaining these corridors remains a priority as part of our land use planning balance.

In addition, during the previous Coordinated Review of the provincial land use plans that took place between 2015 and 2017, the local conservation authorities had suggested that the Province make additions to the Urban River Valley Areas for publicly owned lands and Provincially Significant Coastal Wetlands, in Clarington these are (west to east):

1. Add the connection between Second Marsh and McLaughlin Bay in the City of Oshawa and to easterly to incorporate Darlington Provincial Park in the Municipality of Clarington;
2. Add CLOCA owned lands forming the Westside Marsh within the Bowmanville/Westside Marshes Conservation Area to the area currently designated at the Bowmanville Marsh in the Municipality of Clarington; and
3. Add the Provincially and Municipality of Clarington owned coastal wetlands at Wilmot Creek and Graham Creek on Lake Ontario.

Clarington's Official Plan policies and staff support these urban river valley areas being added to the Greenbelt.

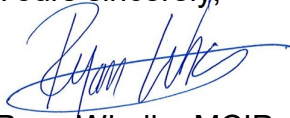
Clarington is about to undertake our Official Plan review to address the Durham Region Municipal Comprehensive Review (MCR) and the more recent *A Place to Grow*. The Region of Durham has indicated it is premature to take a position on growth of the Greenbelt due to the active status of the MCR (Report # 2021-INFO-25).

It would be premature for Clarington to comment on the ERO 019-3136 beyond the focus of urban valleys and publicly owned lands. We request that the Province continue to work with the Region of Durham through the required MCR and local OP updates to address and consider appropriate mapping of the agricultural land base (per *A Place to Grow*) and the growing of the greenbelt.

Clarington has previously requested the province study the agricultural potential of non-greenbelt lands outside the existing urban boundaries (e.g. the whitebelt). The concern is that some of the best agricultural land in Ontario may be urbanized because of lack of scientific understanding of these lands its importance to the agri-food sector. Currently in response to the overwhelming requests by property owners within the whitebelt area Clarington is holding public meetings to reconsider the request for such a study.

The current provincial consultation on growing the size of the Greenbelt provides an opportunity for key wildlife movement corridors and associated landscapes within Clarington (in the CLOCA and GRCA watersheds) to be added. Further, adding the coastal wetlands that are publicly owned would strengthen the quality of the Greenbelt as a provincial land use plan that recognizes the priceless value that natural heritage and water resources systems play across the Lake Ontario Shoreline.

Yours sincerely,



Ryan Windle, MCIP, RPP, AICP
Director of Planning and Development Services

cc: Mayor and Members of Council
Brian Bridgeman, Commissioner of Planning and Economic Development,
Durham Region
Ken Thajer, GRCA
Chris Jones, CLOCA