



April 19, 2021

Ministry of Municipal Affairs and Housing

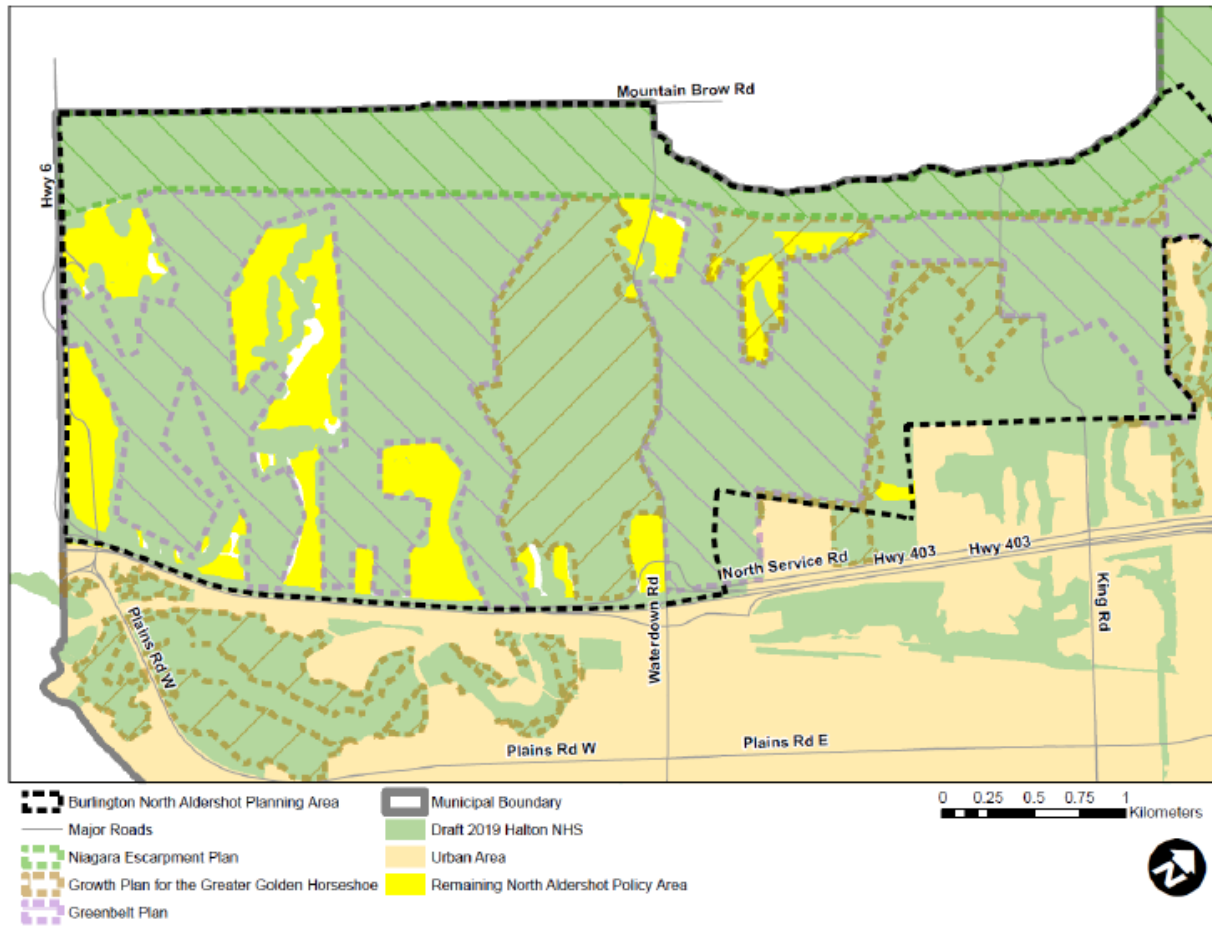
**Re: Environmental Registry of Ontario Number 019-3136  
Consultation on Growing the Size of the Greenbelt**

On behalf of our client Paletta International Corporation (PIC), we are pleased to make a submission regarding the above-noted proposal.

PIC received approvals for the development of their lands in the North Aldershot Planning Area in Burlington in 1996. With the introduction of the Greenbelt Plan in 2005, without any scientific basis or ground-truthing, the limits of the Greenbelt Plan significantly impacted the approved development.

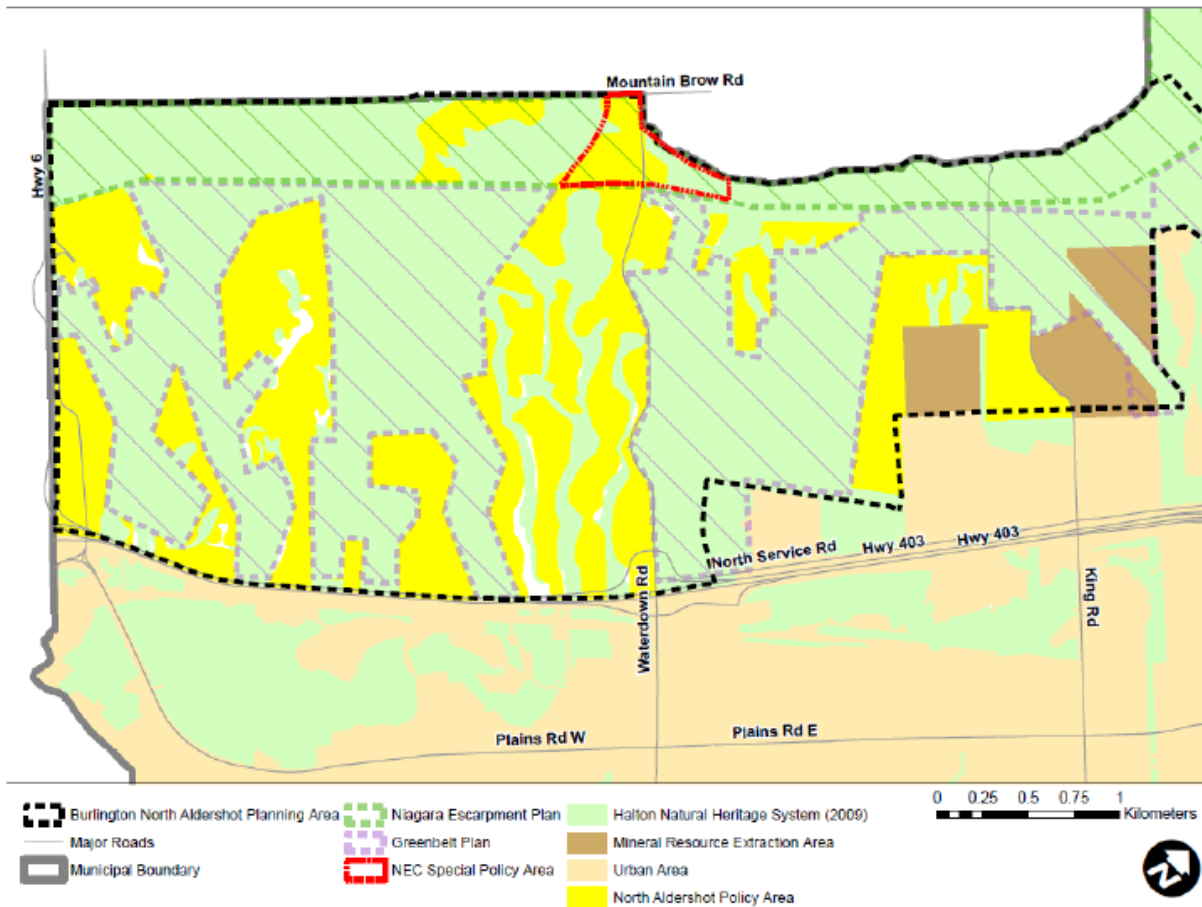
In conjunction with the co-ordinated Provincial Policy Review in 2017, a site-specific amendment UA24 to the Niagara Escarpment Plan was approved by Cabinet on February 13, 2020, to allow for a portion of the approved development. However, as part of the same review, the introduction of the Growth Plan Natural Heritage System, which is being implemented through the Halton Region Official Plan Review, would eliminate the current development approvals since all of the lands approved for development are intended to be designated/identified as Natural Heritage System Growth Plan in the Halton Region Official Plan (see Figure 16 below). The PIC lands are in the middle of the map with the orange/brown hatch running diagonally from top right to bottom left. The current Natural Heritage System is shown in Figure 11 below and the yellow areas represent developable lands.

**Figure 16: Draft 2019 Halton NHS and remaining lands within the NHSGP**



4450 PALETTA COURT  
 BURLINGTON, ON L7L 5R2  
 TEL. 905.634.2926  
 FAX. 905.634.3268  
 Email: [engineering/planning@metrocon.ca](mailto:engineering/planning@metrocon.ca)

**Figure 11 - 2009 Regional Natural Heritage System in the North Aldershot Area**



As a result, we disagree with principle 1 for Growing the Greenbelt Expansions:

“1. No consideration of removal requests or land exchanges

- This proposal is about growing the size and quality of the Greenbelt, and the government will not consider the removal of any lands from the Greenbelt.”

We believe removals/exchanges that recognize current development approvals should be considered.

We also want to ensure that any increase in the size of the Greenbelt does not take away from existing development approvals. In this regard, the current policy for the Urban River Valleys (URV's) is only applicable to publicly owned lands and the posting

indicates that “there may be opportunities for additional urban river valleys to be added or existing ones to be expanded to include additional publicly owned lands.” A similar approach should also be applied to any consideration to growing the Greenbelt.

**Question 3:**

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

It should only include publicly owned lands.

**Question 4:**

**Do you have suggestions for other potential areas to grow the Greenbelt?**

It should only include publicly owned lands.

We thank you for the opportunity to provide feedback on this proposal and look forward to seeing the final results of the consultation.

Regards,



Karl Gonnsen, P.Eng., MCIP, RPP

c.c. Angelo Paletta