

April 19, 2021

Ministry of Municipal Affairs and Housing

777 Bay Street, 13<sup>th</sup> Floor

Toronto, ON M5G 2E5

via: greenbeltconsultation@ontario.ca

**Re: Comments on Growing the Size of the Greenbelt  
Environmental Registry # 019-3136**

Dear Members of the Greenbelt Consultation Team,

We appreciate the government's commitment to grow the Greenbelt. Please see my answer to the consultation questions below. Please also share our comments with the Ministries of the Environment, Conservation and Parks, Natural Resources and Forestry, and Agriculture, Food and Rural Affairs. This consultation raises important questions and possibilities for extending provincial planning leadership for areas west of the Greenbelt boundary in Brant County and the Grand River Watershed. The Paris Galt Moraine covers only part of the area where our organizations in Brant County are based.

DISCUSSION QUESTIONS

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

Brant County is dependent upon ground water. Brantford and Six Nations and other downstream communities are dependent upon the river. In order to protect the water sources for Brantford and Brant County and people downstream, we need to include

- the entire Paris-Galt moraine as depicted in the Blackport report (2009) ,
- **headwaters, streams, creeks and wetlands of the Grand River,**
- **land contiguous with the Greenbelt in Brant County**
- the Orangeville Moraine, and
- the Waterloo Moraine, and
- the Grand River watershed and all areas in the Bluebelt map.

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

This is too limited an area.

- Include all areas mentioned in Question one

- Recognize the dependency of communities up and down the Grand River on groundwater and the Grand River
- Extend protection of the Paris-Galt Moraine into Norfolk County (see mapping in the 2009 Blackport Report commissioned by the Ministry of Environment, Climate and Parks).

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

The Grand River watershed is the largest river watershed in southern Ontario, and it has been designated as a Heritage River.

Therefore, it is important to include

- **the headwaters, streams, creeks and wetlands of the Grand River Watershed** as well as all Urban River Valleys in the Greater Golden Horseshoe

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

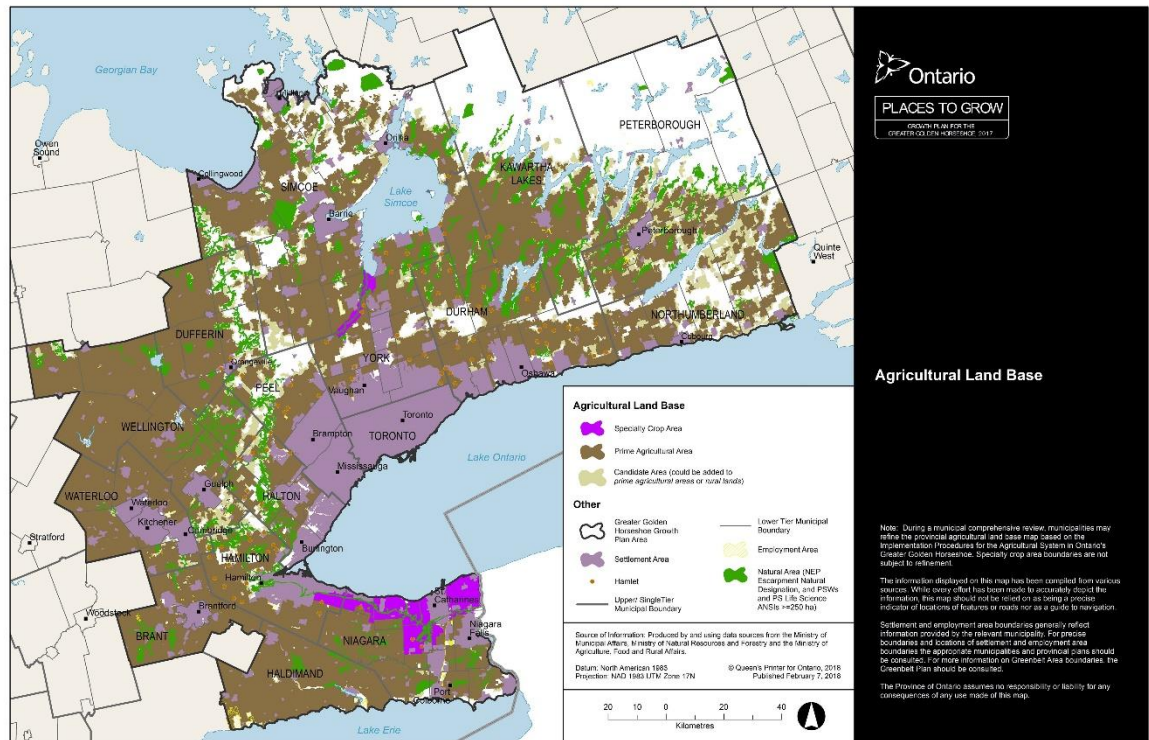
Yes

- Greenbelt the areas proposed in the **Bluebelt map** (Ontario Greenbelt Alliance),
- Greenbelt the natural heritage and agricultural systems in the Greater Golden horseshoe.
- **Allow additions to the natural heritage mapping. For example, we believe that the natural heritage land contiguous with the western border of the Greenbelt, between Hwy 403 and Colborne St. is deserving of more detailed mapping and consideration for inclusion in the Natural Heritage Map.**

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

Our suggestions support policies such as

- Ontario's Biodiversity Strategy,
- Ontario's Wetland Conservation Strategy,
- Ontario's Great Lakes Strategy,
- Ontario's Provincial Policy Statement: **protecting prime agricultural land**. See map of agricultural soils below. See Greenbelt Plan sections 1.2.1 and 1.2.2 for viability and protection from loss and fragmentation of the agricultural land base.
- The Greenbelt Act should default to the policy offering the highest level of protection for water, natural heritage and farmland protection, including municipal policies.



Expansion of the Greenbelt will enable these key concepts:

**Compact Housing and employment lands within existing urban settlement boundaries: stop sprawl development**

The Neptis Foundation (2017) found that there is more than enough land already designated for development to meet future housing needs in the Greater Golden Horseshoe (except Toronto and Peel).

- Build complete communities the within current urban settlement boundaries,
- Develop brownfields

**Transportation: Reduce our dependency on cars**

- Promote complete and walkable communities with public transit
- COVID19 has reduced the need to commute, with more people working from home

**Minister’s Zoning Orders (MZOs)-protect water, natural heritage and farmland**

- Do not use MZOs to fast-track development on natural areas and farmland.

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

- **Meaningful consultation** with Six Nations of the Grand and the Mississaugas of the Credit, including the traditional leaders and communities.

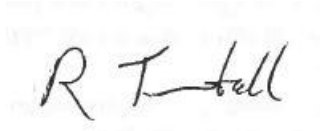
- **Climate Change:** Nature-based solutions will help us to lessen and adapt to the risks and impacts of climate change. For example, in 2019, the **Grand River watershed experienced severe flooding, particularly in Brantford**. Natural features reduce flood damage and financial losses. Expanding the Greenbelt will protect biodiversity, particularly species at risk. The Greenbelt will help to protect wildlife corridors, thus reducing habitat loss.
- **Health and well-being:** The Greenbelt expansion will contribute to
  - clean air and water
  - the local food economy, ensuring local food sovereignty and food security,
  - access to nature, which is particularly important during the COVID19 crisis.
- **Highest Standards Upheld:**
  - The quality of protection must be prioritized.
  - Recognize the better quality of protections in some jurisdictions including the Region of Waterloo.
  - Municipalities within the Greenbelt are not able to establish policies that are more restrictive on mineral aggregate extraction than those municipalities outside the Greenbelt Plan who are able to do so. The policies in the Provincial Policy Statement, the Growth Plan and the Greenbelt Plan generally represent minimum standards which decision-makers are encouraged to exceed to address matters of local importance.
- **Aggregate:**
  - No aggregate extraction below the water table.

“(E)xtending the Greenbelt ... would help landowners and local organizations to **work together to better manage, restore and secure sensitive lands** on a voluntary basis. Through Greenbelt designations, landowners and organizations would become eligible for a wider array of programs, such as stewardship cost-sharing programs, federal funding and incentives (e.g. Ecological Gifts Program) or prioritized agency advice and support” (Ian Attridge, Reimagine Peterborough).

We endorse the submissions from

- Ontario Greenbelt Alliance
- Ontario Headwaters Institute
- Canadian Environmental Law Association
- Greenbelt West
- Ontario Nature
- Ontario Farmland Trust
- Wilderness Committee
- Imagine Peterborough

Sincerely,

A handwritten signature in black ink that reads "R Tunstall". The signature is written in a cursive style with a large "R" and a long horizontal stroke for the "t".

Richard Tunstall, President,  
Langford Conservancy  
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A handwritten signature in black ink that reads "Ella Haley". The signature is written in a cursive style with a large "E" and a long horizontal stroke for the "y".

Ella Haley, Project Manager  
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**Sustainable  
Brant**