

Via email

April 12, 2021

Growing the size of the Greenbelt

Ministry of Municipal Affairs
Provincial Planning Policy Branch
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5

Dear Ministry staff,

The Simcoe County Greenbelt Coalition and Rescue Lake Simcoe Coalition are pleased the government is taking this important step to expand the Greenbelt. We would like to offer our organizations comments in the province's consultation on growing the size of the Greenbelt at <https://ero.ontario.ca/notice/019-3136>.

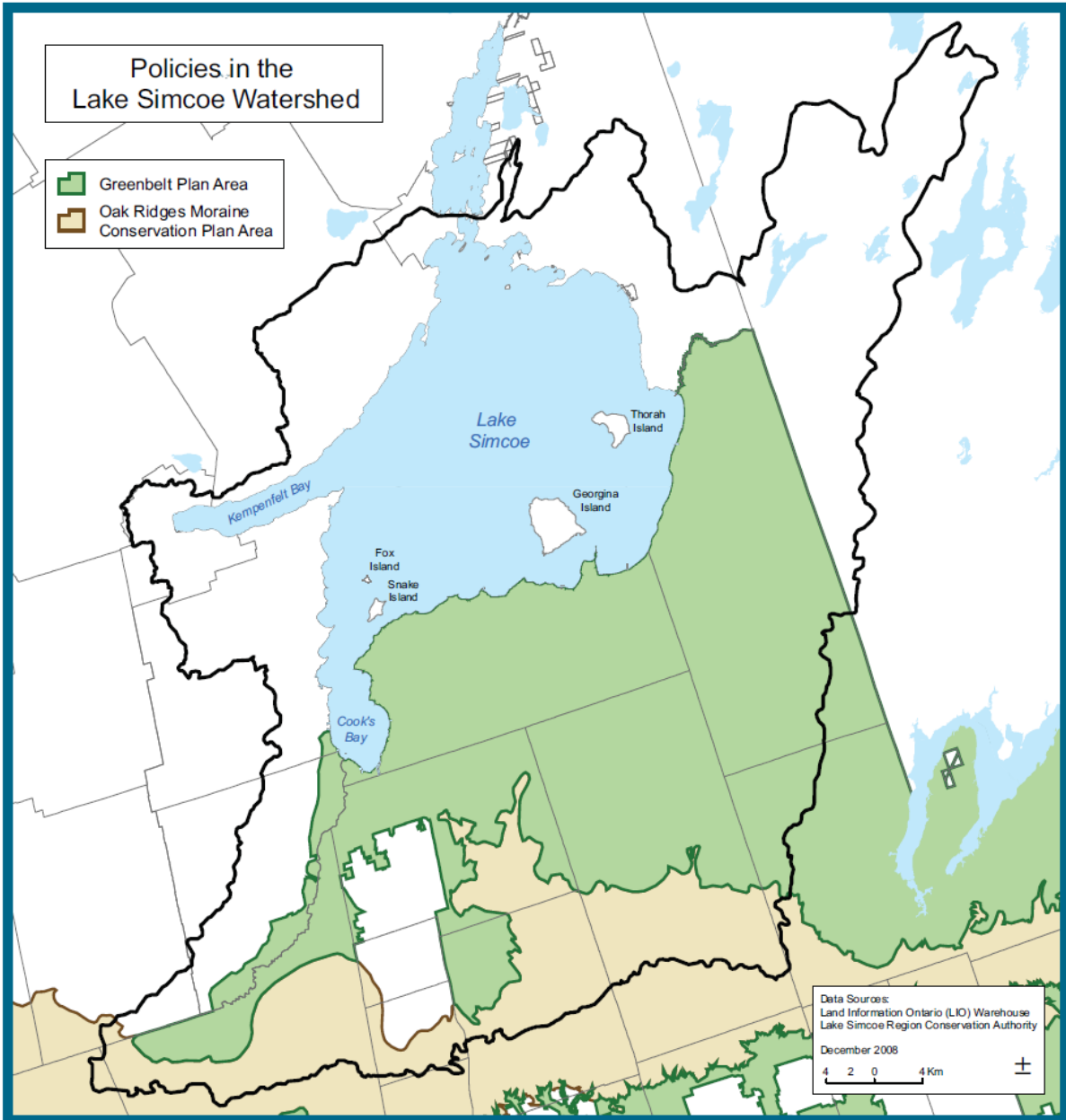
The Simcoe County Greenbelt Coalition (SCGC) is a coalition made up of ratepayers, naturalists, farmers, land conservancies, environmentalists and indigenous peoples. Our coalition is comprised of 42 groups from across Simcoe County and the province who are calling for Simcoe County to be included in an expanded Greenbelt.

The Rescue Lake Simcoe Coalition is an environmental charity focused on the health of the Lake Simcoe watershed. We now have 26 member groups around the watershed. Our coalition began after a failed attempt at including Simcoe County in the Greenbelt in 2005.

As Ontario Greenbelt Alliance members, we support the submissions of the Ontario Greenbelt Alliance and the Ontario Headwaters Institute at

<https://waterscape.ca/wp-content/uploads/PDF-Version-of-Submission-of-March-31-with-App-A.pdf>.

Please review the maps included at the end of this submission which support our appeal for Greenbelt expansion in Simcoe County. Greenbelt expansion would be helpful for the degraded waters of Lake Simcoe and Simcoe County.



Map of existing Provincial Plans applicable to the Lake Simcoe watershed

The Greenbelt covers 58% of the Lake Simcoe watershed.

Source: Lake Simcoe Protection Plan, 2009.

Recommended approaches for Strengthening the Greenbelt

Support Lake Simcoe through Greenbelt expansion

As you are aware, the province is currently contemplating changes to the Lake Simcoe Protection Plan. There is an opportunity to better protect the Lake Simcoe watershed from the impacts of development by applying Greenbelt policies to Simcoe County, the part of the Lake Simcoe watershed where there is no Greenbelt today. (See map above.) This would have the effect of better protecting natural heritage features and agricultural lands, while minimizing climate-change driving development and transportation patterns.

Our research has shown that phosphorus loads in Lake Simcoe have remained roughly the same since the Lake Simcoe Protection Act was passed, despite \$50 - 80 million of government investment, and that phosphorus loadings from new urban / suburban and infrastructure development is cancelling out remediation efforts. There is a relationship between high water flow volumes (resulting from high levels of precipitation) and high phosphorus loads. And there is also a relationship between high levels of forest and wetland cover and good water quality. Increasing natural cover and using more green infrastructure would mitigate the impact of high flows and reduce phosphorus going into the lake, and would increase the watershed's resilience to climate change. **Protecting natural heritage both limits development and reduces water quality impairments. It is a simple solution with multiple benefits.**

Simply accepting that phosphorus loadings from new development will continue to occur is not a sustainable approach for Lake Simcoe. We cannot afford to continually and permanently degrade Lake Simcoe – both as a water resource and as an economic generator.

Ensure meaningful dialogue with First Nations Communities in the expansion study area.

The principles of the Greenbelt regarding long term care and concern for the land before short sighted land use decisions seems to coincide with traditional perspectives of First Nations. However, it is imperative that this government uphold their moral imperative and obligations as outlined by United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Specifically Article 32 (2):

- *States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.*

Further, we urge the government to use its resources and influences to help ensure safe and plentiful water for all people including indigenous communities which routinely face boil water advisories and substandard water infrastructure.

In 2020 the Rescue Lake Simcoe Coalition worked with Cambium Aboriginal and a member of the Chippewas of Georgina Island First Nation to produce [a report](#) that defines and describes Traditional Ecological Knowledge (TEK). It is recommended that while consulting with area First Nations, the province fund a TEK study of the Lake Simcoe area in order to better prioritize lands that should be protected, from a First Nations perspective.

Determine methods that allow municipalities to financially benefit from protected Greenbelt lands. With a changing climate and ensuing extreme weather events, all natural infrastructure must be preserved. Currently, Ontario's municipalities are facing a \$60 billion infrastructure gap which does not even include retrofitting or replacing infrastructure for

future climate conditions or other challenges.¹ The cost to replace natural infrastructure with man made solutions is 13-35% higher than allowing the green spaces to exist unfettered. Potential ideas include allowing municipalities to use their Greenbelt lands as credits to sell on the cap and trade market or allowing municipalities to count these lands as capital assets within their budgets. Further, incentivizing provincial funding with those municipal infrastructure projects that include green-grey analysis (method for comparing the costs and benefits of alternative scenarios that involve the use of natural and/or grey infrastructure to achieve a specific outcome) would similarly increase the recognition and preservation of our natural infrastructure. With huge funding gaps and increased pressure on governments at all levels to do more with less, thoughtful solutions regarding funding climate change adaptations at the local level are desperately needed.

Use a climate change lens for Growing the Greenbelt

The bold approach that is needed to effectively protect water, mitigate climate change and create low-carbon communities is lacking. A low carbon environment necessitates low emissions cities and carbon sequestration in our rural areas - forests, wetlands and farmland. For this, we need to have large, intact natural heritage, water and agricultural systems.

Take into consideration that the world's 100 largest cities occupy less than 1% of the planet's land area; however their source watersheds cover over 12%.² This demonstrates that we often undersize the extent of an area that needs to be considered and protected to preserve our water systems.

Focusing solely on Urban River Valleys and parts of the Paris Galt Moraine as outlined by this consultation, is clearly undersized given the pressures of urbanization, climate change, biodiversity loss and water security issues. The provincially- defined areas for Greenbelt expansion support water health in some small areas of the province, but also leave equally important resource areas vulnerable. As such, we strongly recommend that the Greenbelt designation be applied to all areas in a region that are functionally connected to the provision of water, its flow, temperature and purity (ie. wetlands, forests, recharge areas, highly vulnerable aquifers, moraines, plains etc.). Failure to protect the full extent of our watersheds, regardless of the footprint of the cities and settlement areas, jeopardizes the entire watershed's sustainability. It would be wiser to provide a Greenbelt buffer (or small white belt) surrounding known, in-demand settlement areas or urban growth centres to maintain the functionality and full extent of surrounding natural heritage features and water resource systems.

The province of [Ontario's Protecting Water Guidebook](#) has some good points we would like to remind the province of regarding cities and protecting water:

"Urbanization threatens the long-term health of hydrological systems throughout the

¹

http://www.climateontario.ca/doc/RACII/National_Assessment_Syntheses/SummarySheets/Chapter8-Water_and_Transportation_Infrastructure.pdf

²

<https://www.iucn.org/content/blog-three-ways-increase-investment-natural-infrastructure-home-and-around-world>

region. Urban development impacts water resources in several ways. Water cannot flow through hard and impermeable surfaces such as roads, buildings and other paved or concrete areas and often collects as surface runoff in drains and storm sewers. As a result, more water flows directly into streams and lakes, and less water seeps into the soil to recharge aquifers for drinking water and to support ecological processes. Innovations such as permeable pavements and other low impact development technologies can help reduce runoff, but these approaches are not relevant in all circumstances, and they do not fully eliminate the impact of urban development on hydrological systems.

“Pollution is a major concern for both groundwater and surface water. When contaminants such as nutrients, hydrocarbons, heavy metals, road salt, pesticides and animal waste seep into aquifers where groundwater is stored, the effects can be long term and difficult to reverse. That is why it is very important to prevent this pollution before it occurs.

“For surface water, the quality and purity of stormwater runoff can become compromised as it travels over an urban landscape and picks up contaminants. This untreated runoff is often discharged directly into a water body where it can impact drinking water sources, fish habitat and aquatic ecosystems.

“Following significant storm events, the increased flow and volume of stormwater across the surface of the ground can also cause flash flooding and erosion. This rapid stormwater runoff may enter streams, causing the erosion of stream banks. This process adds sediment to streams that can negatively impact fish and other aquatic species. Stormwater runoff can also increase water temperature, affecting the survival of fish species such as brook trout that need cold water.”

Recommendations for Growing the Greenbelt

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

The Province must be more ambitious in its approach to expanding the Greenbelt if it intends to protect precious farmland and natural areas from development and safeguard the countless benefits that they provide.

Moraines help to protect and recharge the groundwater aquifers that provide the basis for a broad range of needs, including drinking water supply for many of the communities, sustaining local ecosystems, and growth and economic management. Therefore we support the inclusion of the Paris-Galt Moraine, but recommend that all other moraines in the GGH be considered as well: e.g., Oro Moraine, Orangeville Moraine; moraine between Waterloo and Elora/Fergus; Escarpment Area Moraines such as the Gibraltar and Singhampton Moraines; the Horseshoe Moraines that flank the Niagara Escarpment to the north near Clearview.

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

Use a science-based approach to define the boundary so that it includes the area needed to protect all the headwaters and groundwater aquifers associated with the moraine and consequently ensures safe and abundant drinking water for dependent communities, sustains local ecosystems, and optimizes resilience to climate change impacts such as flooding and drought.

The Province must meaningfully consult with Indigenous communities about expanding the Greenbelt within their traditional territories. The duty to consult is a constitutional obligation that arises from s.35 of the Constitution Act, 1982, which recognizes and affirms Indigenous and Treaty rights. Indigenous traditional practices, responsibilities and knowledge systems must be honoured by ensuring Indigenous voices are key to any discussions involving expanding the Greenbelt.

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

We support the inclusion of Urban River Valleys, but strongly recommend that private lands also be included in this designation. It is private lands within the Urban River Valleys that are threatened with urbanization and development, not public lands. As noted in the Environmental Registry posting, publicly owned lands “are often lands designated in municipal official plans as parks, open space, recreation, conservation and/or environmental protection.” So their designation under the Greenbelt does little if anything to “enhance the quality of the Greenbelt,” as the government intends.

We recommend that the province designate entire river valley corridors rather than only sections flowing through urban areas in order to adequately protect water resources. Please consider the following for Urban River Valley designation: the Nith, Grand, Conestogo, Eramosa, Speed, Nottawasaga, Ganaraska, East Holland and Don Rivers, and Duffins, Carruthers, Twelve Mile, Gages and Cobourg Creeks.

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

Protect Simcoe County

Although 58% of the Lake Simcoe watershed is in the Greenbelt, none of Simcoe County is. It needed that protection in 2005 when the Greenbelt was created, but was excluded, in part no doubt to satisfy land owners and developers who were thwarted by the application of the Greenbelt to the south. As a result, Simcoe County became the wild west of development and that pattern continues to this day. More than 20 Minister's Zoning Orders (MZOs) have been requested in Simcoe County. Although not all have been approved, only 3 have been denied by the province.

Without a major shift in the scale of development, the low density land use pattern, and road building, Simcoe County is at real risk of losing groundwater resources, farmland and even more provincially significant land features. This negatively affects Lake Simcoe's health.

Particularly in south Simcoe County, streams are not healthy, and natural features are not abundant or well enough protected or to achieve the ecological goals of the Lake Simcoe Protection Plan. (The Lake Simcoe Protection Plan has a 40% "high quality natural cover target. We now have only 28% high quality natural cover in the watershed.) In the north, there is so much aggregate potential (see image 3 below) that the existing natural heritage system will be further cut up and water resources affected and polluted by future extraction. Supporting lake health must involve protecting critical recharge areas, highly vulnerable aquifers, and wetlands too. Now is the time to better identify and protect the natural features that conform to the protective policies. This could be achieved by expanding the Greenbelt throughout Simcoe County.

In 2019 the Rescue Lake Simcoe Coalition (RLSC) worked with cartographers from the University of Guelph to analyze the strength of the provincial and municipal environmental policies applied to the Lake Simcoe watershed landscape. The policies were categorized into three groups based on how strongly they inhibit land use changes: Best Policy Protection, Moderate Policy Protection, and Not Protected by Environmental Policy. These categories were tagged to the various natural features to which they apply, and the results mapped. Our full page map legend shows how the natural heritage features (and the policies that protect them) fit into our categories. The Lake Simcoe Protection Plan target of 40% high quality natural cover has not been met; now is the time to work towards that target. See image 1 & 4.

Methods and policy analysis are available [here](#).

We strongly suggest that the following areas be included in an expanded Greenbelt but not limited to:

- The remainder of the Lake Simcoe basin
- The whole of Simcoe County and its supporting ecosystems.
- Significant hydrological features in Simcoe County, including:
 - Highly significant recharge areas in Severn Sound and the Carden Alvar
 - Highly significant recharge areas in the Waverley Uplands
 - Wetlands and recharge areas in Clearview Township
 - All highly vulnerable aquifers, significant groundwater recharge areas and locally significant wetlands and moraines in Simcoe County

Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities (growth management, transportation, infrastructure, natural heritage, agriculture) mentioned above?

The protection of natural and water resource systems and farmland must take priority. They are finite, irreplaceable and invaluable in terms of community and ecosystem health and resilience to climate change. Expanding the Greenbelt and protecting nature, water and

farmland from development supports all provincial priorities given that they are the foundation of social and economic well-being.

Cancel plans to build the Bradford Bypass or “Holland Marsh Highway” in the Lake Simcoe watershed, which all levels of government are working, and paying, to protect. Not only would the Bradford Bypass go through Greenbelt land in East Gwillimbury (York Region), but it would also eliminate 9.5 hectares of provincially significant wetlands, 32.7 hectares of wildlife habitat and cross two large rivers that feed Lake Simcoe. Ironically these features are among the “best protected” environmental features in the Lake Simcoe watershed (see image 4). Their destruction ignores the reality of today, the climate crisis and is in complete contravention to the intent of the Lake Simcoe Protection Plan and the Greenbelt Plan. Instead, investing in transit would have long term impacts on reducing congestion and helps preserve natural space.

Cancel Highway 413 (GTA West) as well. These highways are expensive, not necessary and will permanently damage existing lands within the Greenbelt while also generating significant pressure by developers and municipalities to allow development along them (<https://environmentaldefence.ca/stop-the-413/>). There are many other options available to manage the transportation needs of Ontarians that do not require sacrificing vital farmland, natural spaces and water resources.

The Greater Golden Horseshoe's housing needs can be met within lands already designated for development. In all municipal regions except Toronto and Peel growth has been less than projected and there are existing large surpluses of land available for development. The Neptis Foundation estimated in 2017 that the total supply of unbuilt land to accommodate housing and employment to 2031 and beyond across the GGH is 125,560 hectares. Instead of developing in the sensitive farmland and natural areas, we can and should build complete communities (gentle density, people friendly, walkable, jobs close by, climate resilient) inside the boundaries of our existing towns and cities. Brownfields close to existing infrastructure should be the priority for siting for commercial and industrial development.

Refrain from using Minister's Zoning Orders (MZOs) to fast-track development on natural areas and farmland. [Conservation and agricultural organizations](#) are united in their opposition to this misuse of MZOs which sidestep community consultation and local planning processes. At risk are the many benefits provided by Ontario's farmland and natural heritage features and areas, including flood control, local food, water purification, carbon sequestration, biodiversity conservation, recreational opportunities and more.

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

Honour relations with First Nations: The government must proceed in a manner that honours and is informed by the responsibilities, rights, interests and Traditional Knowledge of Indigenous communities. Exploring options to expand the Greenbelt presents a potential opportunity to advance reconciliation among the peoples who share this land.

Climate resilience: Protecting natural and hydrologic systems from development is a recognized “nature-based solution” to climate change impacts. Ontario's Special Advisor on

Flooding noted in 2019 both the increasing frequency and intensity of extreme rainfall events and the importance of natural features such as wetlands in reducing associated flood damages and financial losses

(<https://files.ontario.ca/mnrf-english-ontario-special-advisor-on-flooding-report-2019-11-25.pdf>). Among its sources, the report referenced two studies: one commissioned by the Ontario Ministry of Natural Resources and Forestry in 2017 which found that “maintaining wetlands can reduce flood damages and costs by 29% in rural areas and by 38% in urban areas;” and another by the Insurance Bureau of Canada documenting the “cost-effective” ability of wetlands to reduce flood damages and associated costs.
(<http://assets.ibc.ca/Documents/Resources/IBC-Natural-Infrastructure-Report-2018.pdf>)

Promote and support personal health and well-being: Greenbelt expansion will provide many health benefits, including clean air and water and safe, local food. In addition, it presents an opportunity to maintain green spaces near our towns and cities, providing access to nature for current and future generations. The COVID pandemic has heightened public awareness of the significant health benefits of access to nature. These benefits include increased physical activity, better cognitive functioning, improved immune system functioning, greater resilience to stress, more positive social interactions and generally increased happiness. In fact, nine in ten Canadians feel happier when connected to nature.

https://view.publitas.com/on-nature/greenway_health_and_ecosystem_infographics/page/1

Advance complementary provincial policies: Greenbelt expansion presents opportunities to advance the achievement of objectives outlined in the Lake Simcoe Protection Plan, Ontario’s Biodiversity Strategy, Ontario’s Wetland Conservation Strategy and Ontario’s Great Lakes Strategy. These objectives include enhancing water quality, retaining and restoring vegetative cover, protecting wetlands, conserving biodiversity, improving the status of species of conservation concern, and restoring watershed health and resilience.

The challenges that lie before Ontario and the rest of the world are immense. While admittedly urbanization is a major threat, it is not the only one. Climate change poses a serious, life-threatening challenge and reminds us that protecting more, not less, is imperative. To allow us to have the best chance at mitigating climate change in this area, all recharge areas, lake basins, river valleys, forests and arable land need protection. Our organization urges you to expand your map areas as outlined above IN ADDITION to what has already been included in the study area map. Further, we encourage this ministry to lead the way in partnership with other ministries and levels of government to ensure that our actions take the bold, necessary steps to ensure the health of our world for future generations.

Thank you for this opportunity to comment.

Sincerely,

Margaret Prophet
Executive Director, Simcoe County Greenbelt Coalition

Claire Malcolmson
Executive Director, Rescue Lake Simcoe Coalition

Cc:
 MPP Khanjin andrea.khanjin@pc.ola.org
 Hon. Mulroney caroline.mulroneyco@pc.ola.org
 Hon. Downey doug.downeyco@pc.ola.org
 Hon. Dunlop jill.dunlopco@pc.ola.org
 Hon. Elliot christine.elliottco@pc.ola.org
 Hon. Scott laurie.scottco@pc.ola.org
 Hon. Bethenfalvy peter.bethenfalvyco@pc.ola.org
 Hon. Calandra paul.calandraco@pc.ola.org
 MPP Park lindsey.parkco@pc.ola.org

APPENDIX 1
 SUPPORTING MAPS

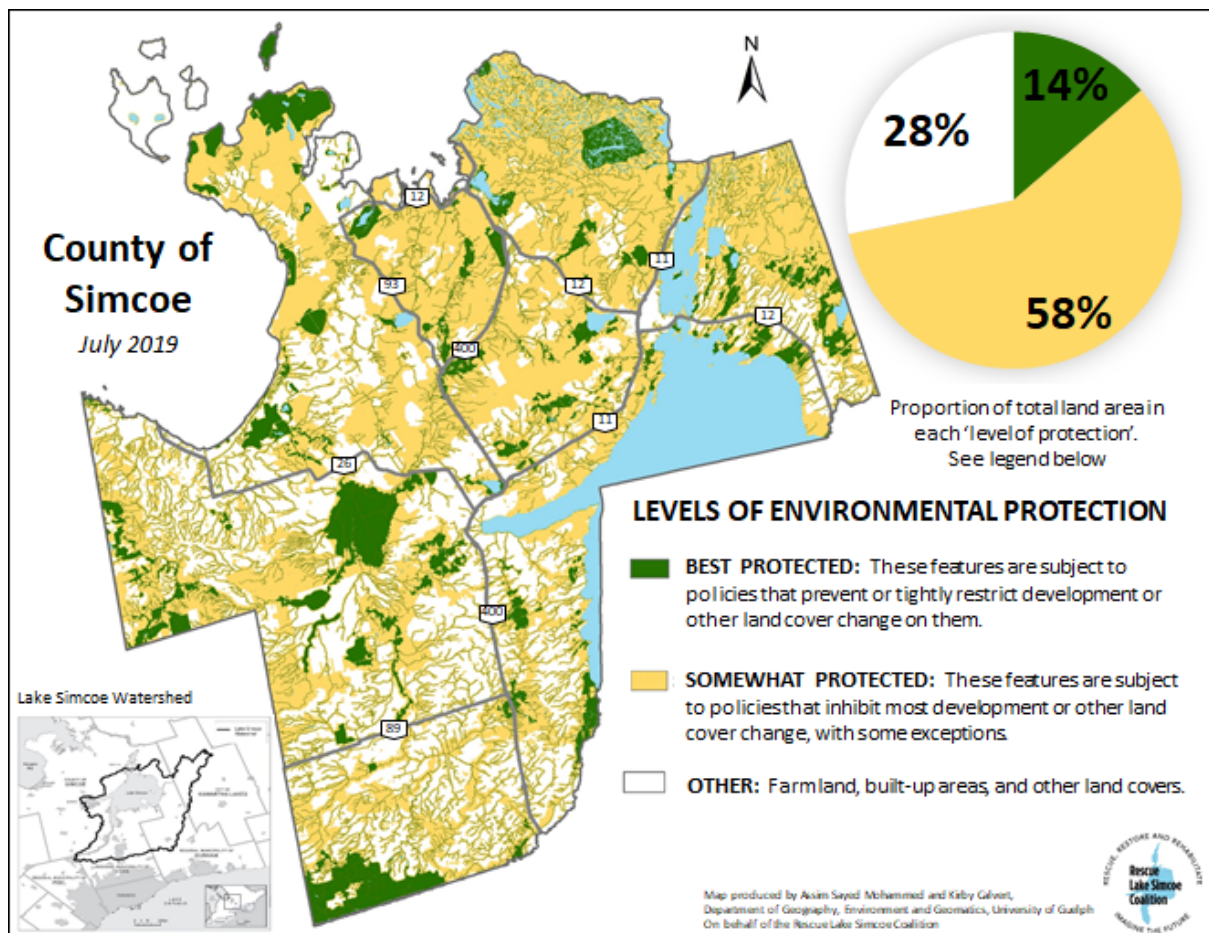


Image 1: This map indicates the extent to which land features are protected by environmental policy in Simcoe County. There is plenty of potential to increase the size and

the level of protection afforded to Simcoe County's Natural Heritage System. The full report is available at

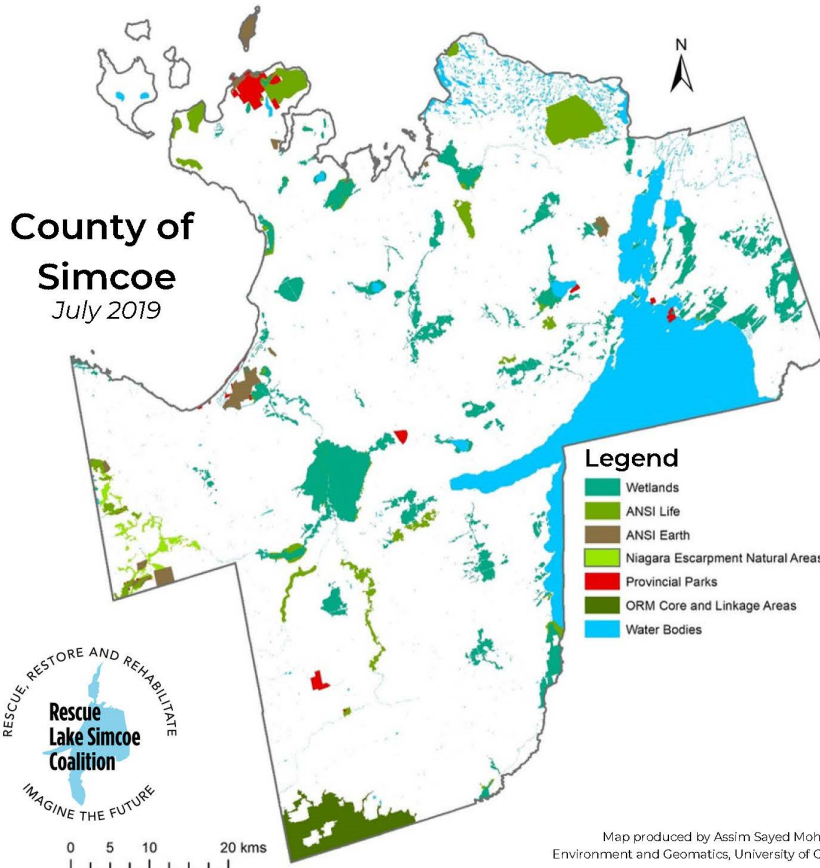
<https://rescuelakesimcoe.org/about-us/accomplishments/lake-simcoe-greenlands-project/>

Legend below.

Legend Label	Small legend text	Definition	Examples of permitted activities
1. BEST POLICY PROTECTION	These features are subject to policies that prevent or tightly restrict development or other land cover change on them. Permitted activities include aggregate extraction, infrastructure development, and stewardship related work.	These features are subject to policies that prevent or tightly restrict development or other land cover change on them. An Environmental Impact Assessment (EIA) is required to demonstrate environmental impacts of permitted activities are minimal and can be mitigated. Level 1 includes mostly features protected by provincial policies: - significant woodlands; - significant valleylands; - Provincially Significant Wetlands (PSWs); - Areas of Natural Scientific Interest (ANSI's); - Lake Simcoe shoreline; - natural areas abutting Lake Simcoe; - Significant Wildlife Habitat; - Provincial Parks - Natural Areas (Niagara Escarpment Plan); - Core Areas (Oak Ridges Moraine Conservation Plan).	- new aggregate operations, with restoration and environmental impact requirements, low footprint infrastructure that has been proven to have no alternative, non-intrusive recreation, maintenance of existing infrastructure, fish, forest, wildlife management, stewardship and conservation activities, flood or erosion control, retrofits to stormwater facilities.
2. MODERATE POLICY PROTECTION	These features are subject to policies that allow some site alterations or land cover change, having met criteria and conditions. Permitted activities include aggregate extraction, infrastructure development, and stewardship related work. Development and site alteration may be allowed, having met criteria and conditions.	These features are subject to policies that allow some site alterations or land cover change, having met criteria and conditions. An Environmental Impact Assessment (EIA) is required to demonstrate that environmental impacts are minimal and can be mitigated. Level 2 includes: Setbacks and vegetation protection zones around protected features such as	- new aggregate operations, with restoration and environmental impact requirements. - Having met criteria to demonstrate limited environmental impact: development and site alteration, wind power facilities. - No Environmental Impact Assessment required for: Low footprint infrastructure that has been proven to have no alternative, non-intrusive recreation, maintenance of existing infrastructure, fish,

		ANSIs, PSWs, permanent and intermittent streams and lakes; - significant groundwater recharge areas and highly vulnerable aquifers; - linkage areas (Oak Ridges Moraine); - Simcoe County Greenlands linkage areas; - features adjacent to level 1 features.	forest, wildlife management, stewardship and conservation activities, flood or erosion control, retrofits to stormwater facilities.
3. NOT PROTECTED BY ENVIRONMENTAL POLICY	These areas are already developed and / or are not subject to environmental protections.	These areas do not contain features that are protected. Level 3 includes: farmland; roads; settlement areas and built up areas. The Greenbelt Protected Countryside designation is included because it does not protect Natural Heritage Features. It does, however, restrict settlement boundary expansions.	N/A

Features Identified as Level 1 Protection in Simcoe County



Level one features enjoy the highest level of protection from land use changes in Simcoe County.

Together they represent 14% of the County of Simcoe's land area.

99% of the land identified as level one is well protected by provincial policies.

1% is from the County of Simcoe's Natural Heritage System.

Map produced by Assim Sayed Mohammed and Kirby Calvert, Department of Geography, Environment and Geomatics, University of Guelph, on behalf of the Rescue Lake Simcoe Coalition.

Image 2: These are the only natural features that are well protected by policy in Simcoe County. Less well protected natural features can be rezoned and developed, or can be altered, with some effort on the part of a landowner or development proponent.

Source: <https://rescuelakesimcoe.org/resources/>

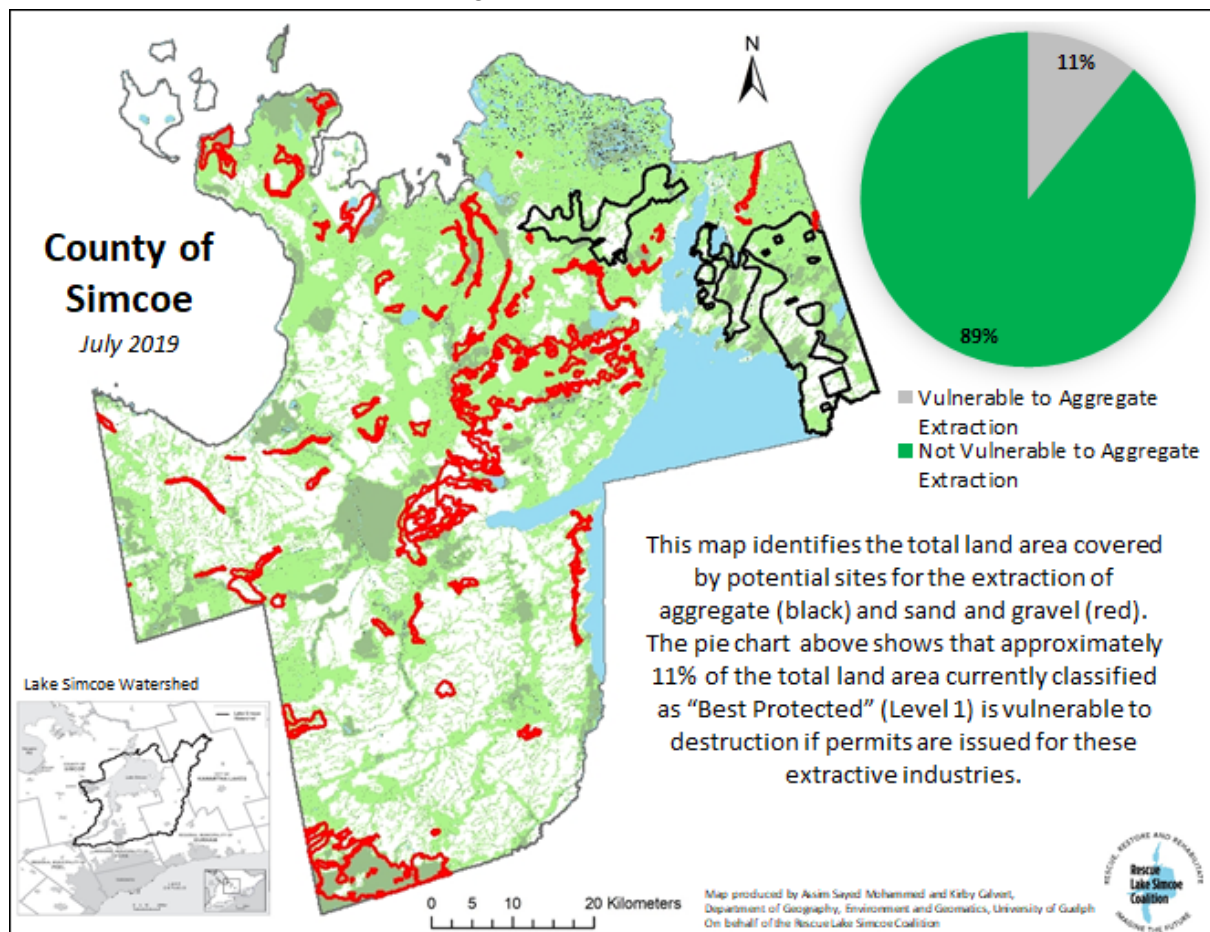


Image 3: Even within the best protected natural features, aggregate (stone, sand and gravel) extraction can occur. This map shows that 11% of the best protected area in Simcoe County contains aggregate resources that could be extracted. This further weakens the effectiveness of the environmental policy protection regime and natural heritage system and potentially reduces the land mass that is well protected from site alteration.

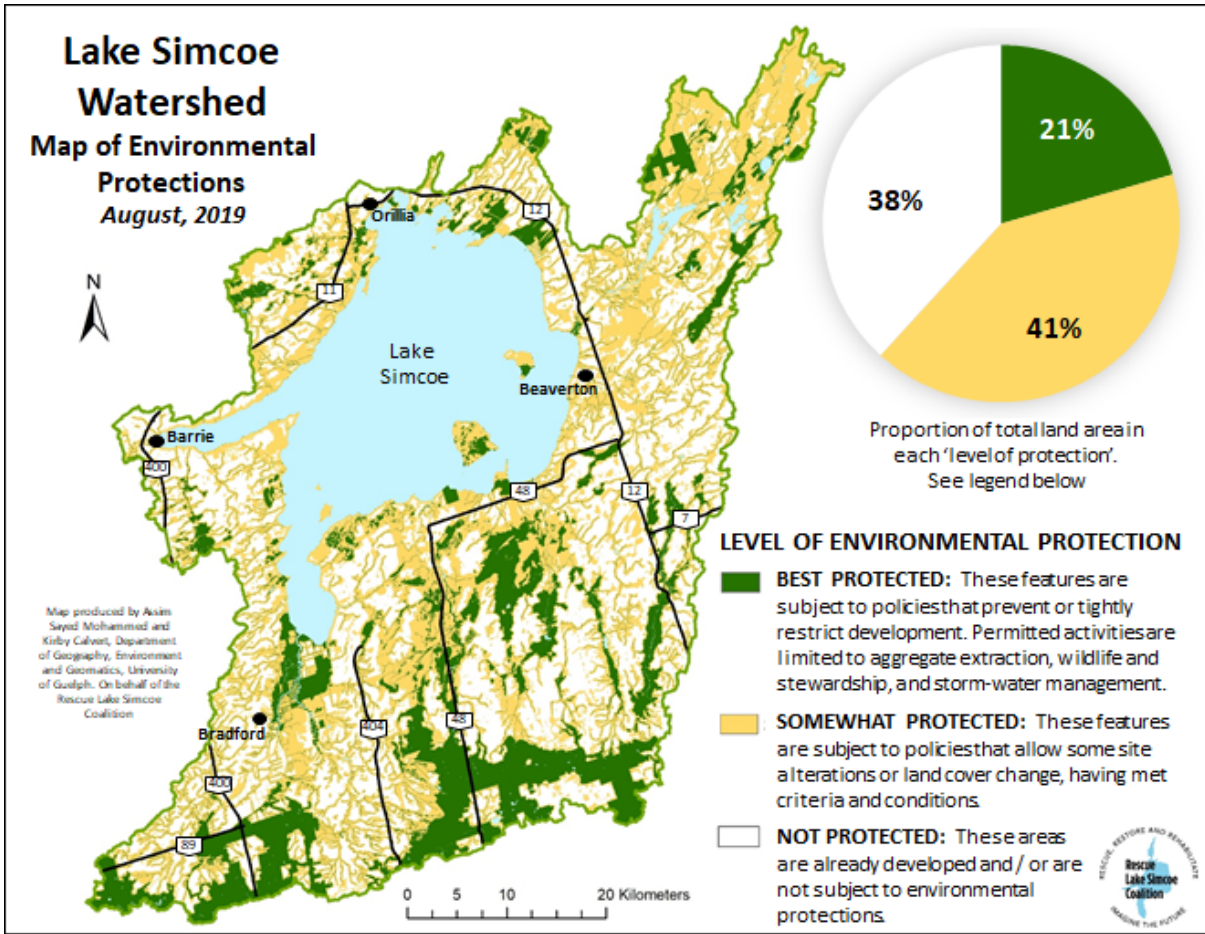


Image 4: The Lake Simcoe watershed has more land that is well protected than Simcoe County, at 21% and 14% respectively. The explanations include the presence of the Oak Ridges Moraine Plan in the south with Greenbelt overlapping, and Greenbelt in all of Durham and Northern York Region. The Lake Simcoe Protection Plan covers the watershed too. There has been a better effort to identify land features that should be protected following the implementation of these three provincial plans in the Lake Simcoe watershed, in contrast to the parts of Simcoe County outside of the Lake Simcoe watershed. There are features within Simcoe County that have been identified by the province as “high quality natural cover”, such as at Big Bay Point in Innisfil, but are not well protected. The Lake Simcoe Protection Plan targets 40% high quality natural cover in the watershed.