

**Region of Waterloo**  
**Planning, Development and Legislative Services**  
**Community Planning**

---

**To:** Committee of the Whole  
**Meeting Date:** April 13, 2021  
**Report Title:** Regional Response – Consultation on Growing the Size of the Greenbelt – Environmental Registry of Ontario Posting 019-3136

---

**1. Recommendation:**

That the Regional Municipality of Waterloo forward Report PDL-CPL-21-15, dated April 13, 2021 to the Ministry of Municipal Affairs and Housing as the Region's response to the Province's "Consultation on Growing the Size of the Greenbelt" (Environmental Registry of Ontario Posting 019-3136) and advise the Province that:

- a) the Region opposes any extension of the Greenbelt Legislation in Waterloo Region unless it provides for the following:
  - i) Adds policy language that encourages municipalities to go beyond the minimum standard set by the Greenbelt Plan;
  - ii) Includes policies that provide for the highest level of protection to prevail;
  - iii) Includes a policy framework that provides for the protection ground water resources that supply municipal drinking water;
  - iv) Revises the policies to permit municipalities to be stronger than the Greenbelt Plan with respect to aggregate resources as it relates to the protection of municipal drinking water supplies; and
- b) the Region requests the Province commit to enhanced municipal consultation beyond the minimum standard, and the use of best available technical information and municipal land use planning information as well as allowing for either current and/or ongoing municipal planning initiatives including Provincial Plan conformity exercises to be completed and respected prior to establishment of final mapping associated with the proposed Greenbelt expansion.

**2. Purpose / Issue:**

The Province is consulting on a possible expansion of the Provincial Greenbelt with a  
3586089

study area focussed on the Paris-Galt Moraine, as well as the potential to add Urban River Valleys including the Eramosa and the Speed Rivers. The study area includes portions of the City of Cambridge and the Township of North Dumfries (see Attachment A). This report reviews this Provincial initiative and if endorsed, the comments set out below would represent Regional Council's submission on this proposal.

### **3. Strategic Plan:**

The above comments broadly support Strategic Objective 3.5, which seeks to promote the efficient use of urban land, and protect and enhance agricultural and natural areas.

### **4. Key Considerations:**

In late 2017, the previous Provincial government proposed an expansion of the Greenbelt to include the Paris-Galt Moraine and the Waterloo Moraine. At that time, Regional Council indicated it was opposed to the expansion because the Greenbelt Plan could impose a lower level of protection than the Regional Official Plan, particularly in relation to mineral aggregate operations and source water protection. Attachment C contains a link to report PDL-CPL-18-07.

Previous concerns related to growing the Greenbelt included the inability of municipalities to adopt policies stronger than the Greenbelt Plan, the lack of policies related to source water protection, and the limitations put on municipalities with respect to more closely overseeing aggregate extraction in groundwater recharge areas.

The current proposal sets a study area around the Paris-Galt Moraine, a significant groundwater recharge area that runs southwest from Caledon to Brantford.

Lands in the study area and within Waterloo Region are already protected from urban development under the Regional Official Plan (ROP), which designates the majority of the lands as "Environmentally Sensitive Landscape" and "Protected Countryside". These two designations are key components of the Region's growth management strategy. They identify areas where urbanization should not occur and seek to provide permanent protection to the Region's most valuable agricultural, environmental and groundwater recharge areas.

The Greenbelt Plan does not limit municipalities from adopting policies that are more stringent than the requirements of the Greenbelt Plan, except in relation to agricultural uses and mineral aggregate resources. On those topics, the policies of the Greenbelt Plan prevail and municipal cannot adopt policies that are more stringent. Consequently, if the Greenbelt is extended farther into Waterloo Region, the Province could require the Region to remove or weaken some of its existing aggregate policies as they relate to lands covered by the Greenbelt. The ROP also prohibits aggregate extraction in Core Environmental Features. The Greenbelt Plan does not include this prohibition.

## **Analysis/Recommendations**

Waterloo Region is one of the largest municipalities in Canada to rely almost exclusively on groundwater resources for its drinking-water supply. Given that a large share of the region's groundwater recharge areas also overlap with some of the region's largest aggregate deposits, Regional staff have consistently recommended a precautionary approach when considering the extraction of mineral aggregate resources. This approach, which seeks to balance the need for aggregates with the need to protect drinking-water resources, is reflected in the policies of the ROP. As noted above, some of these policies are more stringent than the requirements in the Greenbelt Plan.

Staff have reviewed changes to Provincial Plans (Growth Plan) and other Provincial legislation, as well as consulted with the affected area municipalities and the GRCA to determine if there is any new information that would result in staff recommending a different position to that recommended in report PDL-CPL-18-07. It was determined that the original concerns expressed by the Region are still valid.

While staff appreciate the intent and overall objectives of the Greenbelt Plan, we believe the risk of it weakening some of the ROP's current policy protections outweighs its potential benefits. The Province has indicated it will not make any policy changes to the Greenbelt Plan. Consequently, staff are opposed to expanding the Greenbelt farther into Waterloo Region as proposed.

The Province is also seeking input on potentially designating a portion of the Speed River in Cambridge as an "Urban River Valley" in the Greenbelt Plan. This designation aims to connect urban river valleys to the Greenbelt to increase opportunities for public parks, trails and open spaces. Planning staff at the GRCA and the City of Cambridge do not see any major benefits with this proposal, as most of the affected lands are already protected by a range of local policies and the Conservation Authorities Act.

### **5. Background:**

Established in 2005, the Provincial Greenbelt Plan protects a broad band of land and is intended to provide permanent protection to agricultural lands and several significant natural heritage and groundwater recharge areas in southern Ontario. It works together with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, to identify where urbanization should and should not occur. Currently, a very small portion of the Greenbelt extends into the east side of the Township of North Dumfries (see Attachment B).

### **6. Area Municipality Communication and Public/Stakeholder Engagement:**

Planning staff in Cambridge, North Dumfries and the GRCA were consulted directly in the preparation of this report. Their comments align with the recommendations of this report. An advanced copy of this report was also circulated to the remaining area

municipalities for input.

### **Public/Stakeholder Engagement**

The Province is accepting public input on this proposal until April 19, 2021. Comments may be posted on the ERO website <https://ero.ontario.ca/notice/019-3136>.

#### **7. Financial Implications:**

Nil.

#### **8. Conclusion / Next Steps:**

If endorsed, staff will post this briefing note on the ERO website as the Region's response to this proposal. Staff will continue to monitor this proposal and report to Regional Council as necessary.

#### **9. Attachments / Links:**

**Attachment A:** Map of Greenbelt expansion study area

**Attachment B:** Map of existing Greenbelt in Waterloo Region

**Attachment C:** Link to staff's previous report PDL-CPL-18-07 (DOCs # 2620558)

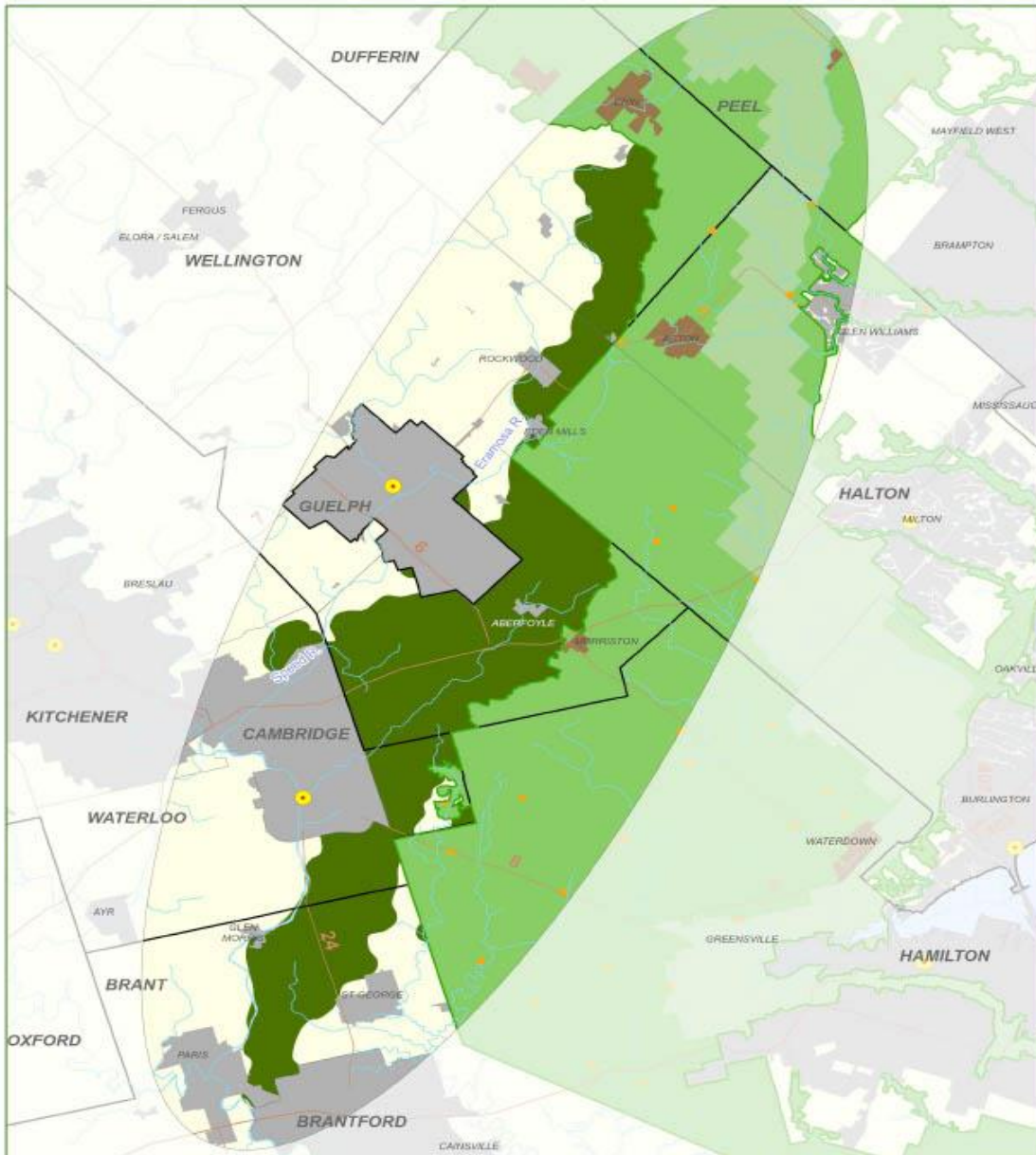
**Prepared By:** **John Lubczynski**, Principal Planner

**Brenna MacKinnon**, Manager, Development Planning

**Approved By:** **Michelle Sergi**, Acting Commissioner, Planning Development and Legislative Services

Attachment A Map of Greenbelt expansion study area

Growing the Greenbelt Study Area – Paris Galt Moraine



LEGEND

- Greenbelt Area (O.Reg. 59/05, as amended)
- Protected Countryside
- Towns / Villages
- Hamlets
- Urban River Valleys
- Niagara Escarpment Plan Area
- Paris Galt Moraine Study Area
- GGH Settlement Areas Outside the Greenbelt (incl. Brantford/Brant Annexation)
- Municipal Boundary
- Major Road or Highway
- Water
- Urban Growth Centres

This map is for illustrative purposes only to seek feedback on a Study Area of lands focused on the Paris Galt Moraine, growing the Greenbelt. The Paris Galt Moraine Study Area does not constitute a Greenbelt boundary.

Settlement boundaries generally reflect information provided by the relevant municipality. For precise boundaries and locations of Settlement Areas (e.g. Settlements Areas Outside the Greenbelt and Greenbelt Towns/Villages and Hamlets), the appropriate municipalities should be consulted.


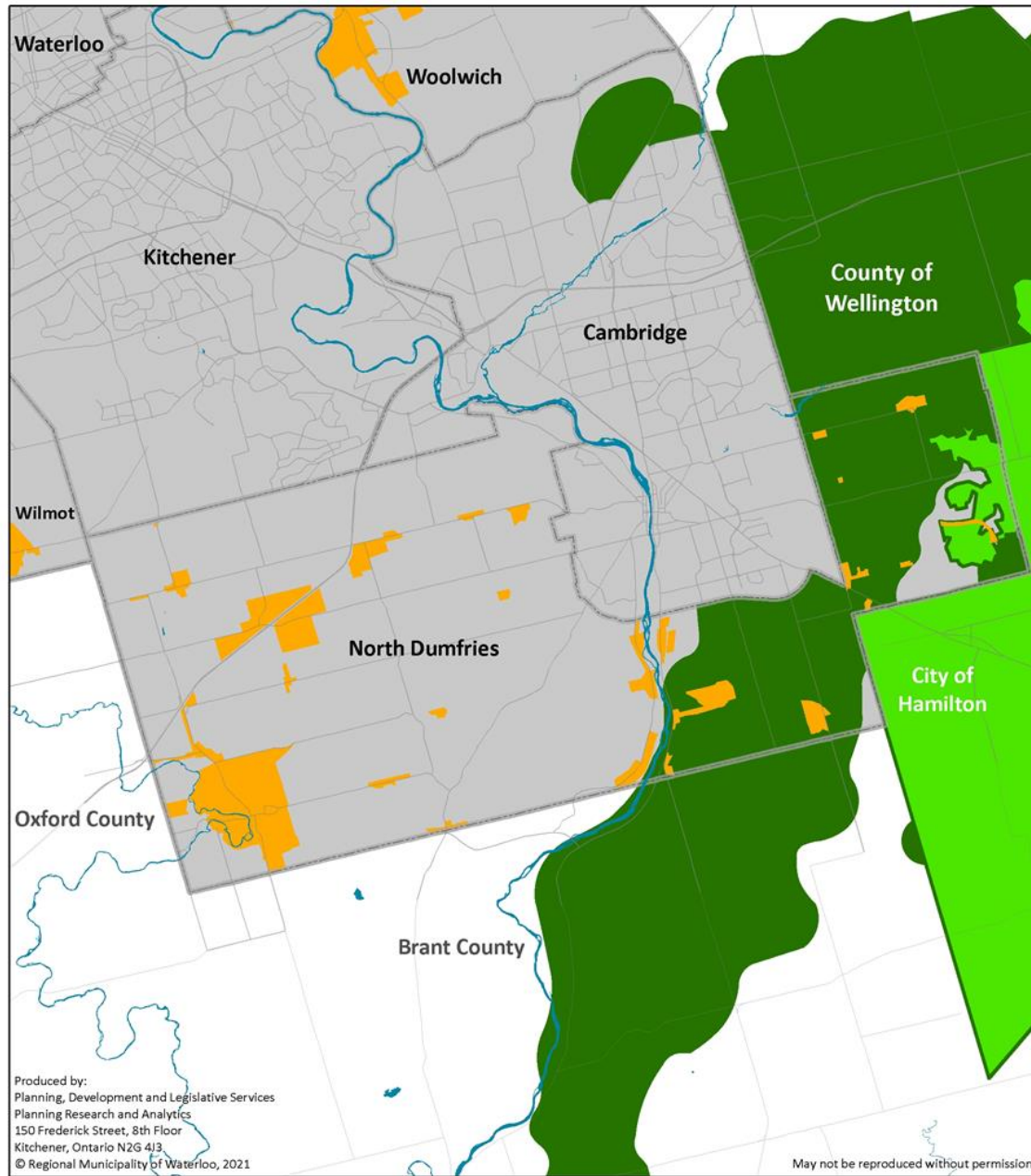
Source of information: Produced by and using data sources from the Ministry of Municipal Affairs and Housing, Ministry of Environment, Conservation and Parks and the Ministry of Energy, Northern Development and Mines.

Projection: UTM Zone17 NAD83




© 2021, Queen's Printer for Ontario

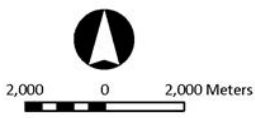


**Attachment B** Map of existing Greenbelt in Waterloo Region



Region of Waterloo

-  Settlement Areas
-  Greenbelt Study Area (Paris-Galt Moraine)
-  Existing Greenbelt Area



2,000 0 2,000 Meters