



April 19, 2021

Ministry of Municipal Affairs and Housing
777 Bay Street,
Toronto, ON M4G 2G2

Email: greenbeltconsultation@ontario.ca

RE: Consultation on growing the size of the Greenbelt (ERO 019-3136)

Please accept this letter in response to the Environmental Registry of Ontario – ERO 019-3136 posted on February 17, 2021. The Town of Caledon is pleased to provide initial comments on the above ERO posting. Please note, that the comments below should be viewed as subject to Council's endorsement, additional or modified comments may be forthcoming upon presentation to Council.

Town staff fully support the Ministry's efforts to protect and maintain the Greenbelt as it is home to much of Ontario's vital environmental, groundwater and agricultural resources.

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

- There appears to be limited impact on the Town of Caledon as it is at the north eastern end of the identified study area and where most of the lands is already within the Greenbelt Plan Area.
- Is there the potential that the conceptual Paris Galt Moraine area identified in the ERO posting be expanded beyond what is shown? If so, the Province is requested to confirm as additional comments from the Town of Caledon maybe forthcoming.
- A current challenge exists when applying Greenbelt policy at the municipal level when the boundaries of the policy area bisect existing lots of record, resulting in the potential for differing policy requirements, development pressures and protective capabilities between segments of shared land uses or facilities at individual properties.
- To maintain planning policy consistency the Province is requested to consider establishing Paris Galt Moraine-based expansions of the Greenbelt Plan Area in a manner that corresponds with the extent of existing lot boundaries.

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

- Consideration of existing built and natural features, including roadways, watersheds and key natural heritage and key hydrologic features, and the extent of agricultural land uses.
- The North-South oriented Heritage Road in southwest Caledon appears to provide a feasible boundary for rural expansion of the Greenbelt Plan Area in the Town as it offers a physical division of features that:
 - Aligns with the approximate Paris Galt Moraine study area boundary as identified in Caledon;
 - Would eliminate risks of lot line adjustments across an expanded Greenbelt Plan boundary; and

- Currently functions as a boundary division between the functional watershed jurisdictions of Credit Valley Conservation (CVC) and the Toronto and Region Conservation Authority (TRCA).
- The Province should consider establishing restrictions against the potential for future lot line adjustments between properties on either side of, and/or bisected by, the resulting Greenbelt Plan Area boundary, unless such lot line adjustments favour the protection of environmental features or the enhancement of agricultural viability.
- The Paris Galt Moraine Study Area mapping provided overlaps areas in Caledon already subject to the Greenbelt Plan and Niagara Escarpment Plan. Inclusion of these areas in the Greenbelt Plan Area is acceptable, though adding additional layers of policy consideration is unnecessary.

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

- URV designations currently apply to all of the major river valleys connecting the Greenbelt to Lake Ontario, including the Credit River, Etobicoke Creek, West Humber and Main Humber River Valleys. All of the URVs are currently designated and protected as Core Areas of the Greenlands System in the Region of Peel Official Plan.
- With regards to the Province's interest in "adding, expanding and further protecting Urban River Valleys", the Province is requested to consider removing any policy that establishes or enacts differing protective requirements upon lands based on the status of private or public ownership. Such status should have no bearing on requirements, efforts or opportunities to protect shared or influenced features that are recognized as having environmental significance.
- The northern branch of the Etobicoke Creek Watershed is located in Caledon, in an area of the "whitebelt" that has the potential urban development going forward. The Province should consider proactively evaluating these lands for Urban River Valley protection as part of the Greenbelt Plan Area prior to settlement area expansion in this area, to ensure that future development best fits the requirements for wholistic and sustainable protection of the environmental features in the watershed rather than reacting to development applications.
- Specific areas urban valleys have been historically developed within floodplains and in some cases are subject to Special Policy Area floodplain designations including in Downtown Bolton. An expansion of the URV designation and Greenbelt Area boundary in these locations would result in misalignment of the policy intent of the Greenbelt Plan and not provide a policy framework needed to support appropriate planning for these areas.
- Expansion of URV designations outside of Caledon will support the overall health and sustainability of these riverine systems, by providing consistent levels of protection, which is significant because of the interconnected nature of riverine systems, that don't align with municipal boundaries.
- Adding additional protection to Urban River Valley's aligns with the goals of adapting to climate change: River systems in Caledon are anticipated to be impacted by increased stream temperatures, erosion and levels of nutrients; localized flooding, spread of invasive species and promoting favorable conditions for algae blooms. Expanding buffers, where it makes sense, will contribute to the ability of these river systems to adapt to rising temperatures and extreme weather conditions, by protecting and enhancing the natural features surrounding them.

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

- With the Province's identification of environmental, groundwater and agricultural resources as "vital", the Province should consider incorporating features such as aquifers and Prime Agricultural areas as criteria for inclusion in growing the Greenbelt Plan. As these features are identified using rigorous scientific methods of evaluation, the criteria, transparency and justification of their inclusion should be highly defensible.

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

- Environmental and agricultural resources associated with large areas of rural land should continue to be viewed as fixed or non-reclaimable resources that reduce in viability once fragmented. Prioritizing the maintenance or enhancement of restrictions on their use or division maximizes their viability and can always accommodate future change when justified. Once altered to accommodate other provincial priorities, the features intended to be protected by the Greenbelt Plan cannot be fully reclaimed.
- Clear direction from the Province in the form of a policy declaration of the hierarchy of priority between, environmental, agricultural, development/growth and resources extraction mandates would be beneficial.
- Growth of the Greenbelt plays a significant role from a climate change perspective by protecting natural systems that contribute to resilience of climate change. Naturally forested, agricultural and greenspaces act as major carbon sinks to absorb and mitigate climate changing greenhouse gas (GHG) emissions; while also moderating and buffering against the impact of extreme rainfall (i.e. overland and riverine flooding) and extreme temperature (e.g. urban heat island effect). Decisions made today about the protection of natural features that contribute to the Province and Town's ability to respond to climate change, while balancing growth pressures responsibly, are significant in managing the challenges and opportunities associated with climate change.

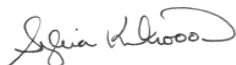
Question 6: Are there other priorities that should be considered?

- Recognizing the Greenbelt's mandate towards protecting the long-term viability of agricultural lands and limiting impacts from fragmentation, the Province should consider examining opportunities for setting severance or lot line adjustments restrictions that best protect the long-held standard of 40-hectare (100 acres) lot sizes. Setting minimum lot sizes of 22-hectares (55 acres) for new properties (both created and retained) in the Greenbelt Plan Area going forward could be one option for consideration.
- Further consultation with specific landowners should be considered if the Province pursues adding additional lands to the Greenbelt.

As we noted above, please accept these initial comments in response to the EBR posting as per the deadline. It is our intention to bring these comments forward to Town Council for review and endorsement. A formal response is forthcoming.

If you have any comments or require clarification, please do not hesitate to contact the undersigned.

Sincerely,



Sylvia Kirkwood
Chief Planner, Director of Planning
Planning Department
TOWN OF CALEDON

C: Mayor and Members of Council
Carey Herd, CAO, Town of Caledon