

July 5, 2021

**Resolution Number 2021-635**

Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
[Minister.mah@ontario.ca](mailto:Minister.mah@ontario.ca)

Subject: **Response to Provincial Consultation on Growing the Size of the Greenbelt**

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I am writing to advise that Regional Council approved the following resolution at its meeting held on June 24, 2021:

**Resolution Number 2021-635**

*That the staff comments on the "Consultation on Growing the Size of the Greenbelt" attached as Appendix I to the report of the Commissioner of Public Works, listed on the April 29, 2021 Planning and Growth Management Committee agenda, titled 'Response to Provincial Consultation on Growing the Size of the Greenbelt', be endorsed;*

*And further, that a copy of the subject report be forwarded to the Ministry of Municipal Affairs and Housing, the Cities of Brampton and Mississauga, the Town of Caledon, Toronto and Region Conservation Authority, Credit Valley Conservation, Conservation Halton, Nottawasaga Valley Conservation Authority and Lake Simcoe Region Conservation Authority.*

On behalf of Regional Council, I request that you give consideration to the above resolution.

Kindest personal regards,



Nando Iannicca  
Regional Chair and Chief Executive Officer

Copy: Kealy Dedman, Commissioner of Public Works  
Adrian Smith, Director of Regional Planning and Growth Management

Also sent to:

Laura Hall, Town Clerk, Town of Caledon  
Diana Rusnov, City Clerk, City of Mississauga  
Peter Fay, City Clerk, City of Brampton  
Hassaan Basit, CAO, Conservation Halton  
John MacKenzie, CEO, Toronto and Region Conservation Authority  
Deborah Martin-Downs, CAO, Credit Valley Conservation  
Robert Baldwin, CAO, Lake Simcoe Region Conservation Authority  
Doug Hevenor, CAO, Nottawasaga Conservation Valley Authority

**Nando Iannicca**  
Regional Chair & CEO

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APPROVED AT REGIONAL COUNCIL  
May 13, 2021

**5.5 Response to Provincial Consultation on Growing the Size of the Greenbelt**  
**Resolution Number 2021-482**

**Deferred to the next meeting of the Region of Peel Planning and Growth  
Management Committee**

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**REPORT TITLE:     Response to Provincial Consultation on Growing the Size of the Greenbelt**

**FROM:                 Kealy Dedman, Commissioner of Public Works**

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## **RECOMMENDATION**

**That the staff comments on the “Consultation on Growing the Size of the Greenbelt” attached as Appendix I to the report of the Commissioner of Public Works, listed on the April 29, 2021 Planning and Growth Management Committee agenda, titled ‘Response to Provincial Consultation on Growing the Size of the Greenbelt’, be endorsed;**

**And further, that a copy of the subject report be forwarded to the Ministry of Municipal Affairs and Housing, the Cities of Brampton and Mississauga, the Town of Caledon, Toronto and Region Conservation Authority, Credit Valley Conservation, Conservation Halton, Nottawasaga Valley Conservation Authority and Lake Simcoe Region Conservation Authority.**

## **REPORT HIGHLIGHTS**

- The *Greenbelt Act, 2005* provides for a mandatory review of the Greenbelt Plan every 10 years. The last review of the Greenbelt Plan concluded in 2017.
  - On February 17, 2021, the Province sought public comment on growing the size of the Greenbelt. Comments were due on April 19, 2021.
  - The initial focus areas for growing the Greenbelt are the Paris Galt Moraine and Urban River Valleys.
  - Regional staff continues to support the Ministry’s efforts to protect and maintain the Greenbelt and to consider where it may be appropriate to increase the size of the Greenbelt.
  - The potential expansion of the Greenbelt Plan Area to include portions of the Paris Galt Moraine outside the Greenbelt does not impact Peel.
  - Urban River Valley designations currently apply to all of the major river valleys in Peel connecting the Greenbelt to Lake Ontario, including the Credit River, Etobicoke Creek, West Humber and Main Humber River Valleys.
  - If proposals to increase the size of Urban River Valleys are considered by the Province, these should be based on topographic or ecological boundaries and not encroach into existing developed areas.
  - Comments regarding the consultation are proposed for Council’s endorsement including recommended criteria that should be considered by the Province if proposals to expand the Greenbelt are developed.
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# Response to Provincial Consultation on Growing the Size of the Greenbelt

## DISCUSSION

### 1. Background

The “Consultation on Growing the Size of the Greenbelt” was released on February 17, 2021 by the Ministry of Municipal Affairs and Housing. The posting is a policy proposal requesting feedback on ways to grow the size of the Greenbelt. The proposal identifies a study area focused on the Paris Galt Moraine and ideas for adding, expanding and further protecting Urban River Valleys (URV) as priorities. The consultation is also seeking suggestions on other potential areas to grow the Greenbelt. Comments for the proposal were due on April 19, 2021.

This report provides an overview of Regional staff comments that were provided to the Province in response to the consultation. A copy of the Region’s staff comments is included as Appendix I of this report for endorsement.

#### a) Context

The *Greenbelt Act, 2005*, established the Greenbelt as a broad area that is protected to preserve agricultural and natural heritage lands and promote social and economic activities while mitigating climate change. The Greenbelt Area includes lands covered by the policies of the Greenbelt Plan as well as the Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan. These plans work together with the Growth Plan to identify where urbanization should not occur. In Peel, the Greenbelt Plan Area covers approximately 57,650 hectares or about 81 per cent of the Town of Caledon and 46 per cent of the Region (see map in Appendix II).

#### b) Initial Focus Areas

The Ministry of Municipal Affairs and Housing has identified two initial focus areas: A Study Area of the Paris Galt Moraine and URVs as initial priorities to consider expansions of the Greenbelt and has requested responses to the following questions.

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

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

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

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

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

*Are there other priorities that should be considered?*

## **Response to Provincial Consultation on Growing the Size of the Greenbelt**

### **2. Importance of the Greenbelt to the Region**

The continued protection and potential expansion of the Greenbelt is important as it provides for the permanent protection of a continuous agricultural land base, significant landscapes in the Greater Golden Horseshoe Region and natural ecosystems.

In Peel, the protection of the Greenbelt's land base and natural systems is critical to supporting the Region's resilience to a changing climate and helps offset emissions in carbon sinks that include agricultural lands and natural areas.

### **3. Findings and Implications**

#### **a) The Study Area of the Paris Galt Moraine**

The Paris Galt Moraine extends from just east of Belfountain in Caledon to an area southwest of Port Rowan in Norfolk County (see map in Appendix II). The potential expansion of the Greenbelt Plan Area to include portions of the Paris Galt Moraine outside the Greenbelt does not impact Peel as it is already located within the Greenbelt Plan and Niagara Escarpment Plan Areas. Within Peel, the Paris Galt Moraine's key features and functions are subject to protections in the Provincial Plans and the Region of Peel Official Plan.

#### **b) Urban River Valleys**

In January 2013, the Greenbelt Plan was amended to designate the major river valleys connecting the Greenbelt to Lake Ontario as URVs. The addition of URVs to the Greenbelt Plan Area included all of the major valley systems in Peel including the Credit River, Etobicoke Creek, West Humber River and Humber River. A URV designation has the effect of bringing the lands within the boundary of the Greenbelt Plan Area. Only publicly owned lands are subject to the policies of the URV designation. Lands with URV designations are subject to municipal official plan policies and certain policies of the Greenbelt Plan including those which promote the protection and enhancement of external connections to the Greenbelt. URV areas are often lands designated in municipal official plans for parks, open space, recreation, conservation and/or environmental protection.

The URV designation in the Greenbelt Plan currently applies to lands extending 60 m on either side of a river measured from the water's edge. With respect to whether the URV designation should be widened by increasing the 60 m on either side of a river, a review of existing URV mapping was undertaken in the Town of Caledon and the Cities of Brampton and Mississauga. The purpose of the review was to determine the extent of URV coverage and whether simply increasing the 60 m to delineate valley limits is appropriate.

Due to the narrow width of many valley sections and their location in built up areas, simply extending the offset would result in the incorporation of existing developed areas including tableland developed with residential and other uses within the URV. If the Province is considering revisions to URV mapping in the Greenbelt Plan, any revisions should be made on the basis of a defensible topographic or ecological boundary such as an interpretation of valley limits based on crest of slope mapping and not simply an increase to the offset.

## Response to Provincial Consultation on Growing the Size of the Greenbelt

The Ministry's consideration of revisions to URV designations should also take into account that in 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 or are areas undergoing re-urbanization including strategic growth areas such as at Port Credit in the City of Mississauga. Expansion of the URV designation in these locations should be avoided as it would result in misalignment of the policy intent of the Greenbelt Plan and not provide the policy framework needed to support appropriate planning for these areas.

### c) Other Potential Areas to Grow the Greenbelt

In 2017, the Province consulted on whether proposed additions or deletions to the Greenbelt should be considered through the Coordinated Land Use Planning Review of the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan. Site specific amendments to the Greenbelt Plan were considered and adjustments to the boundary were made based on requests received. In Peel, the Greenbelt Area boundary was not adjusted based on the Province's review of criteria and requests considered at that time.

The continued protection of the Greenbelt in Peel should be the priority in any review of the Greenbelt Plan Area boundary as this area provides for the protection of the Region's significant landscapes, headwater areas of major watersheds, and areas with high concentrations of sensitive natural heritage features and areas.

If the Ministry is considering other areas to include in the Greenbelt, any expansion should build on the systems approach of the Greenbelt Plan and be directly and functionally connected to natural heritage, water resource or agricultural systems. Criteria to include additional areas should take into account current and future growth needs and should fully consider the current growth management exercises being undertaken by municipalities, including the Region of Peel, to conform to the Growth Plan.

The *Greenbelt Act, 2005* provides for a mandatory review of the Greenbelt Plan every 10 years. The last review of the Greenbelt Plan concluded in 2017. A comprehensive review of Greenbelt expansion priorities should be included in the next review of the Greenbelt Plan once municipal growth conformity exercises for the 2019 Growth Plan are complete and there is a better understanding of the GTHA's growth needs at that time.

## CONCLUSION

In Peel, the Greenbelt currently includes extensive coverage of significant landscapes as well as headwater areas of major watersheds including areas with high concentrations of sensitive natural heritage features and areas.

The protection of the Region's water resource system, natural heritage system and agricultural system is governed by updated policy direction in the Provincial Policy Statement, Growth Plan, and the Region of Peel Official Plan, which is undergoing review to conform and be consistent with Provincial direction.

## **Response to Provincial Consultation on Growing the Size of the Greenbelt**

### **APPENDICES**

Appendix I – Regional Staff Response to Provincial Consultation on Growing the Size of the Greenbelt

Appendix II – Map of the Greenbelt Plan Area in Peel

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*For further information regarding this report, please contact Adrian Smith, Chief Planner and Director of Regional Planning and Growth Management, Ext. 4047, [Adrian.smith@peelregion.ca](mailto:Adrian.smith@peelregion.ca).*

*Authored By: Learie Miller, Advisor, Environment Planning*

#### ***Reviewed and/or approved in workflow by***

Department Commissioner and Division Director.

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## Appendix I

### Response to Provincial Consultation on Growing the Size of the Greenbelt

Ministry of Municipal Affairs and Housing  
777 Bay St, Toronto ON  
M5G 2G2

April 6, 2021

#### Re: Consultation on Growing the Size of the Greenbelt (ERO 019-3136)

Thank you for the opportunity to review and comment on the above noted Environmental Registry of Ontario postings. The following comments are provided by Region of Peel staff as input to the Ministry to consider regarding Consultation on Growing the Size of the Greenbelt.

It is anticipated that a Report including these comments will be brought before Peel Regional Council for endorsement at the end of April. A copy of the Report and Council resolution will be forwarded to Ministry staff for further consideration at that time. Therefore, our comments here should be viewed as subject to Regional Council's endorsement.

#### Region's Position on the Greenbelt

Regional staff continues to support the Ministry's commitment to protect and maintain the Greenbelt and where feasible to increase its size. The continued protection of the Greenbelt in Peel is vital as it provides for the permanent protection of Peel's agricultural land base, its significant landscapes and ecosystems.

The protection of the Greenbelt's land base and natural systems is increasingly critical to supporting the Region's resilience to a changing climate and helps offset emissions in carbon sinks that include agricultural lands and natural areas.

#### The Paris Galt Moraine

The Paris Galt Moraine extends from just east of Belfountain in Caledon which is in Peel Region to Port Rowan in Norfolk County. In Peel, the Moraine is located in the Greenbelt Plan and Niagara Escarpment Plan areas and is currently subject to the land use designations in those Provincial Plans and policies in the Region of Peel Official Plan. No change to the boundary of the Moraine in Peel is recommended as the current policy framework provides protection for significant Natural Heritage features and functions of the Moraine (See Maps 1 and 2).

#### Additions/Revisions to Urban River Valley Designations in Peel

With respect to whether additional valleylands should be included in the Urban River Valley (URV) designation in Peel, 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 (See Map 3).



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### Response to Provincial Consultation on Growing the Size of the Greenbelt

Additional URV designations in Peel would seem to be unnecessary as the major connecting valleys are currently lands designated in municipal official plans.

#### Urban River Valley Designations outside of Peel

The addition of URV designations in other areas of the Greenbelt outside Peel to include major valleys not currently designated should be considered as this would provide a consistent level of protection for similar valley systems where these have strong functional connections to the Greenbelt's natural heritage, water resource or agricultural systems.

#### Widening the extent of current Urban River Valleys

With respect to whether the URV designation should be widened by increasing the 60 m either side of the water's edge to delineate the width of URV areas, a review of existing URV mapping was undertaken in the Town of Caledon and the Cities of Brampton and Mississauga. The purpose of the review was to determine the extent of URV coverage and whether simply increasing the offset to delineate valley limits is appropriate.

The URV's existing criterion of 60m measured either side of the water's edge effectively captures the most sensitive areas immediately adjacent to the watercourses of all the URV in Peel. Because of the narrow width of many valley sections and their location in built up areas, simply extending the offset would result in the incorporation of existing developed areas including tableland developed with residential and other uses (see Tables 1, 2 and 3). Based on this review, an extension of the offset is not recommended in Peel as all of the URVs are currently designated and protected as Core Areas of the Greenlands System in the Region of Peel Official Plan.

The mapped delineation of Core Valleylands is based on an interpreted topographic boundary and is not identified by applying a simple offset from water's edge. If the Ministry is considering revisions to URV mapping in the Greenbelt Plan, any revisions should be made on the basis of a defensible topographic or ecological boundary such as an interpretation of valley limits based on crest of slope mapping and not simply an increase to the offset. Digital elevation modelling to interpret valleyland limits should be considered if changes to URV mapping is proposed.

#### Special Policy Areas

The Ministry's consideration of revisions to URV designations should also take into account that in 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, and/or are identified as areas that are undergoing reurbanization including strategic growth areas such as at Port Credit in the City of Mississauga. 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.

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### Response to Provincial Consultation on Growing the Size of the Greenbelt

#### Conclusion

In Peel, the Greenbelt currently includes extensive coverage of significant landscapes as well as headwater areas of major watersheds including areas with high concentrations of sensitive natural heritage features and areas. Outside the Greenbelt, the protection of the Region's water resource system, natural heritage system and agricultural system is governed by updated policy direction in the Provincial Policy Statement, Growth Plan, and the Region of Peel Official Plan. The framework of the Greenbelt Plan, Growth Plan and Region of Peel Official Plan clarifies where and how future growth should be accommodated.

If the Ministry is considering other areas to include in the Greenbelt, any expansion should build on the systems approach of the Greenbelt Plan and be directly and functionally connected to natural heritage, water resource or agricultural systems.

Criteria to include additional areas should consider current and future growth needs and the current growth management exercises being undertaken by municipalities, including the Region of Peel, to conform to the Growth Plan. It is anticipated that Peel Region will need to accommodate growth in the future.

We trust that these comments are of assistance to the Province. Regional staff would be pleased to provide any clarifications or further comments.

Sincerely,



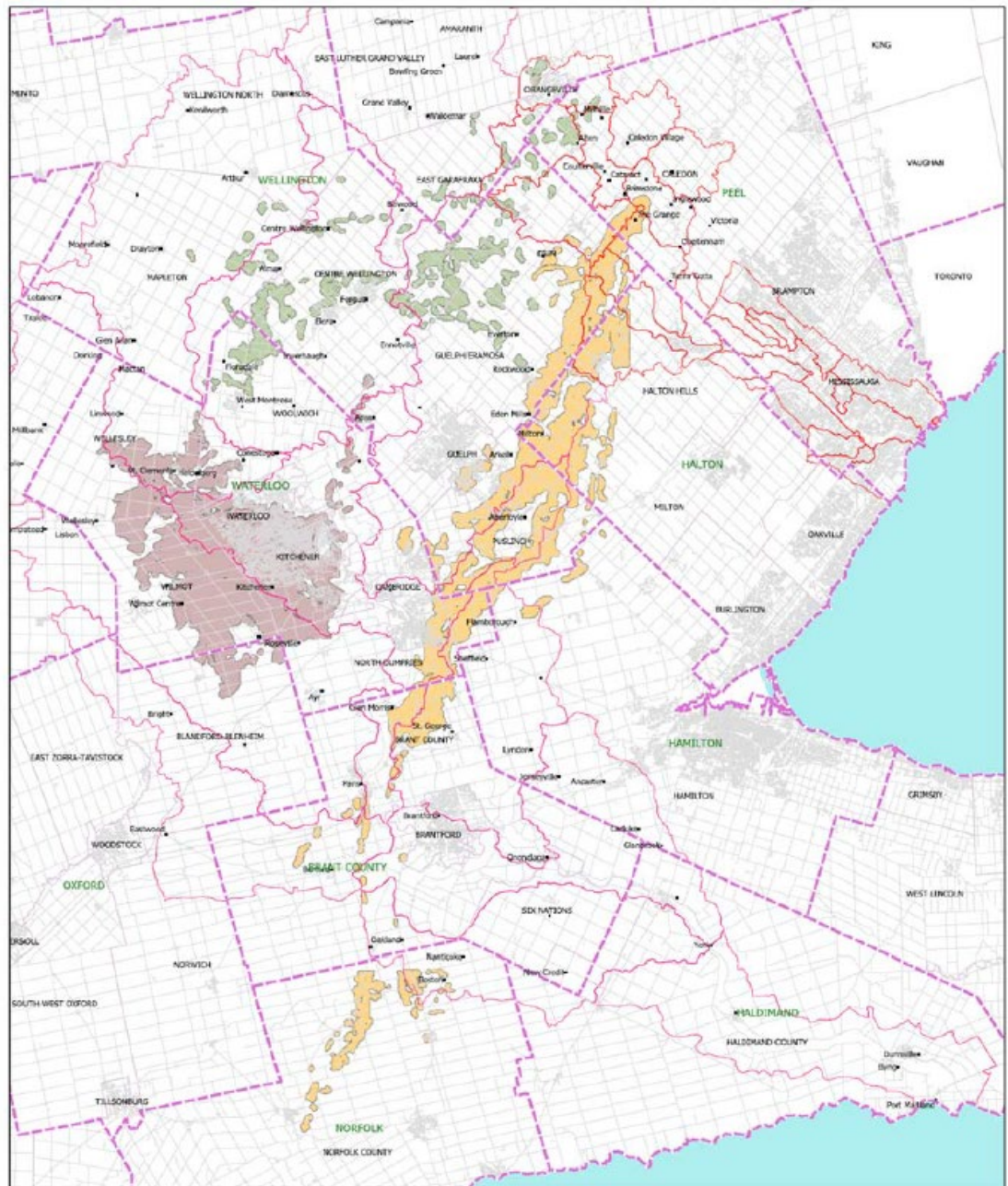
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## Appendix I Response to Provincial Consultation on Growing the Size of the Greenbelt



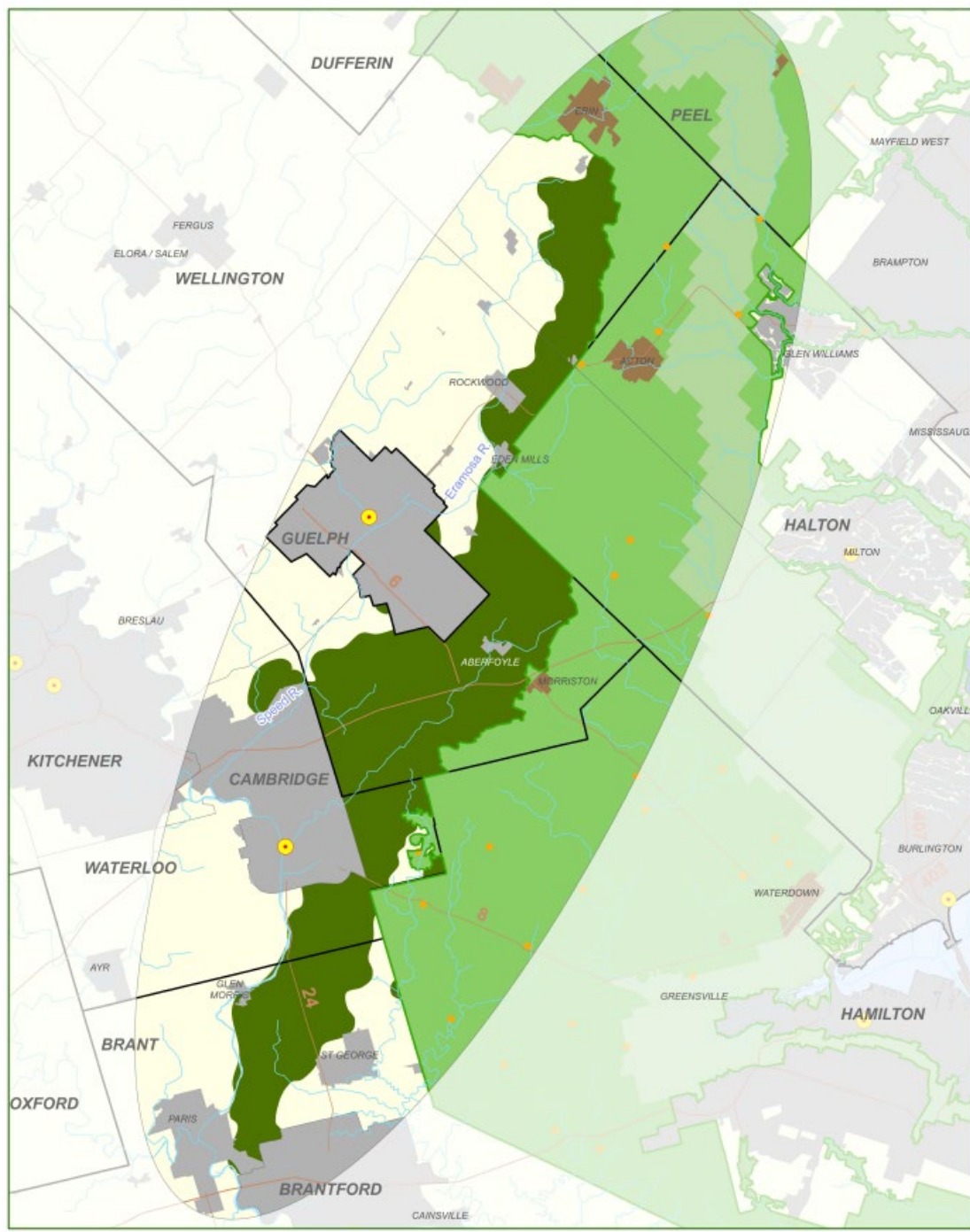
Map 1 – Physical Extent of the Paris Galt Moraine (Source: Blackport Hydrogeology Inc., Blackport and Associates Ltd., and AquaResource Inc., 2009)

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## Appendix I Response to Provincial Consultation on Growing the Size of the Greenbelt



Map 2 – Growing the Greenbelt Paris Galt Moraine Study Area

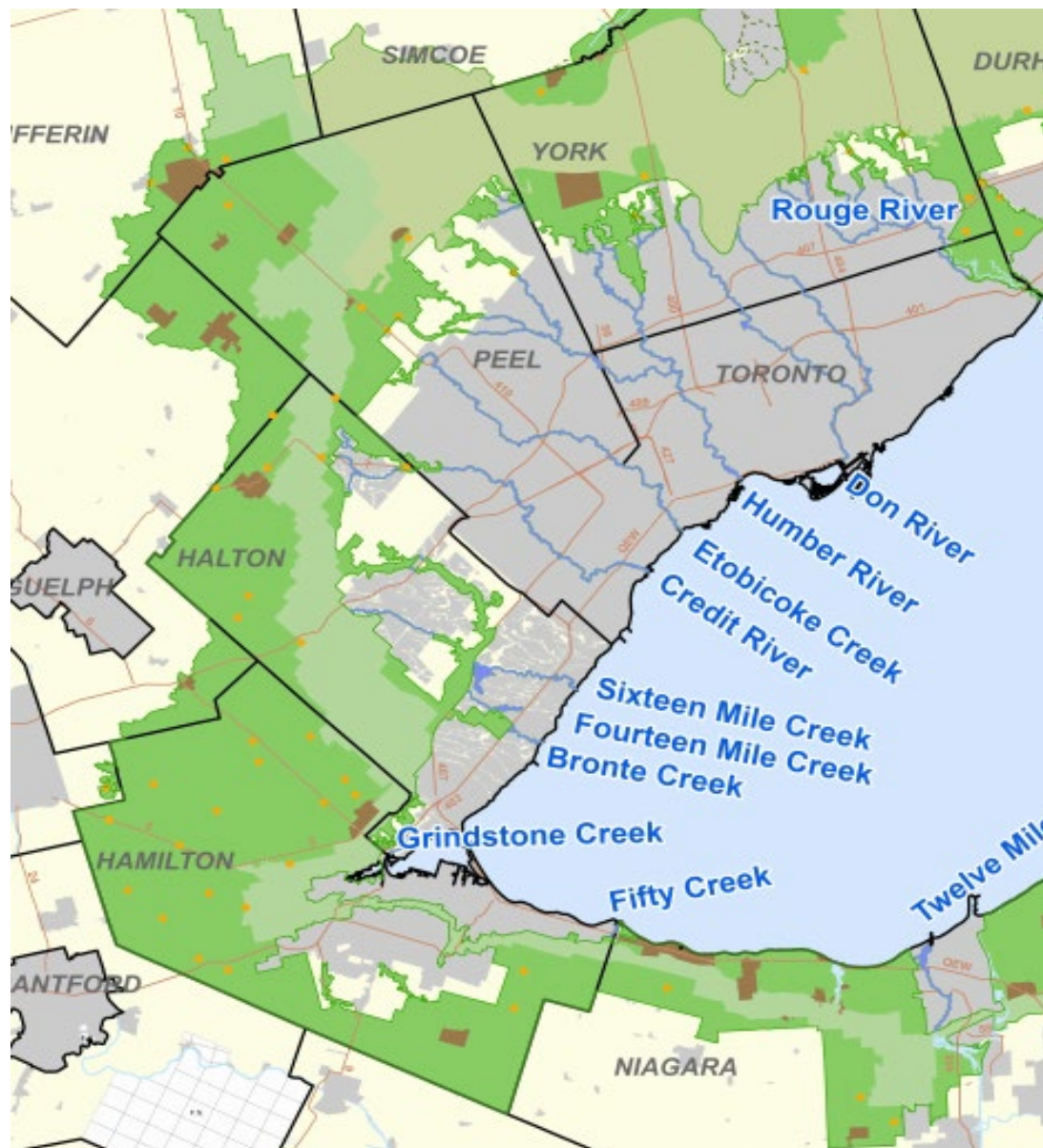


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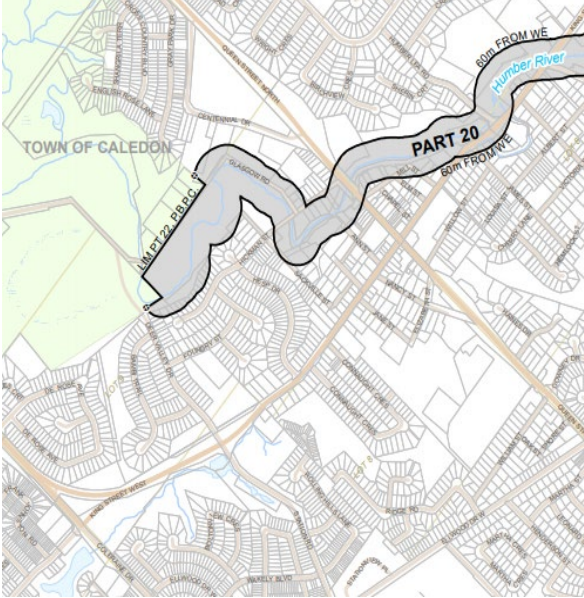
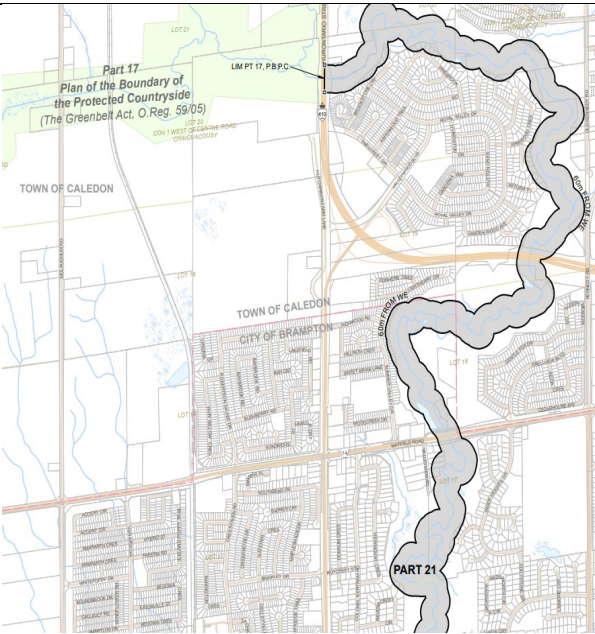
## Appendix I Response to Provincial Consultation on Growing the Size of the Greenbelt



Map 3 – Greenbelt Plan Urban River Valleys

## Appendix I Response to Provincial Consultation on Growing the Size of the Greenbelt

Table 1 – Review of Selected URV Designations in the Town of Caledon

Town of Caledon – Mapped Urban River Valley Areas	
	<ul style="list-style-type: none"> <li>- Section of the Humber River in Bolton</li> <li>- Valley section is well defined, however, it is in an area of the Humber River that has been historically developed within the Bolton Rural Service Centre and is currently subject to Special Policy Area floodplain policies</li> <li>- Extension of the offset would not align with the physical limit of the defined valley</li> <li>- an interpreted topographic boundary of the Humber River Valley crest of slope would provide a more accurate boundary of valley landform for the URV designation but may not align with policy direction for the Bolton SPA</li> </ul>
	<ul style="list-style-type: none"> <li>- Section of the Etobicoke Creek in the Town Caledon at Hurontario/HWY 10 in the Mayfield West/Valleywood area</li> <li>- West of Hurontario, Etobicoke Creek is included in the Greenbelt Protected Countryside designation</li> <li>- Valley section is well defined and developed with residential subdivisions on adjacent tableland</li> <li>- Extension of the offset would include some valleyland while also extending into existing developed areas</li> <li>- an interpreted topographic boundary of the Etobicoke Creek Valley crest of slope would provide a more accurate boundary for the URV</li> </ul>

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**Appendix I  
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Table 2 - Review of Selected URV Designations in the City of Brampton

	<ul style="list-style-type: none"> <li>- Section of the West Humber River south of Castlemore west of Gore Road</li> <li>- Valley section is well defined and developed with residential subdivisions on adjacent tableland</li> <li>- URV designation based on 60 m offset includes immediate areas adjacent to main watercourse</li> <li>- Extension of the offset would include some valleyland while also extending into existing developed areas</li> <li>- an interpreted topographic boundary of the West Humber Valley crest of slope would provide a more accurate boundary for the URV</li> </ul>
	<ul style="list-style-type: none"> <li>- Section of the West Humber River at Mayfield and Airport Roads.</li> <li>- URV designation based on 60 m offset currently captures core valley</li> <li>- The extension of the offset would include some valley land but would also extend beyond the limits of the valley as currently mapped in the Countryside Villages and Vales of Castlemore Secondary Plans</li> <li>- an interpreted topographic boundary of the Credit River Valley crest of slope would provide a more accurate boundary for the URV</li> </ul>
	<ul style="list-style-type: none"> <li>- Section of Etobicoke Creek at Steeles and Hurontario</li> <li>- Valley section is well defined and developed with existing residential and commercial uses on adjacent tableland</li> <li>- URV designation based on 60 m offset includes immediate areas adjacent to main watercourse</li> <li>- Extension of the offset would extend almost entirely into existing developed areas</li> <li>- an interpreted topographic boundary of the Credit River Valley crest of slope would provide a more accurate boundary for the URV</li> </ul>

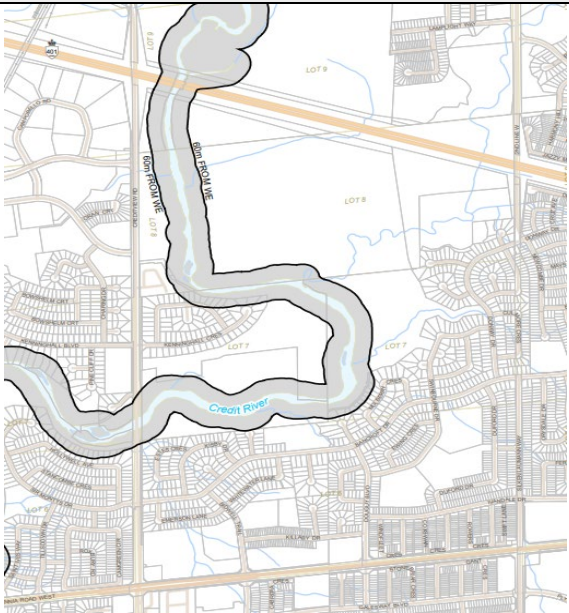
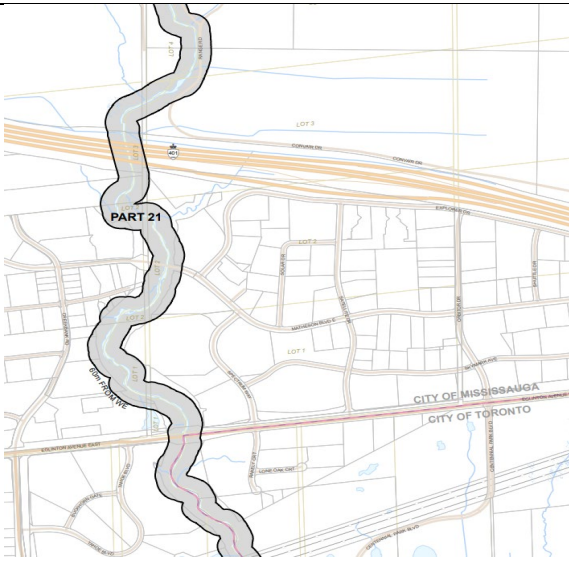
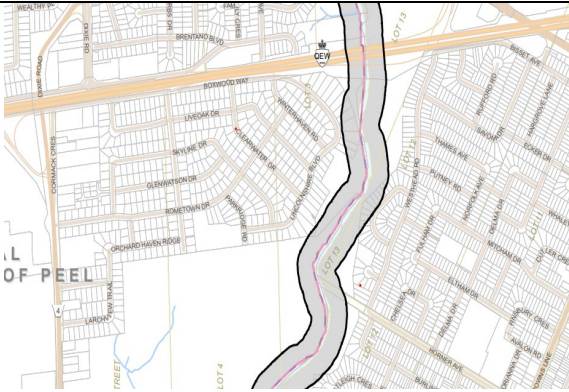
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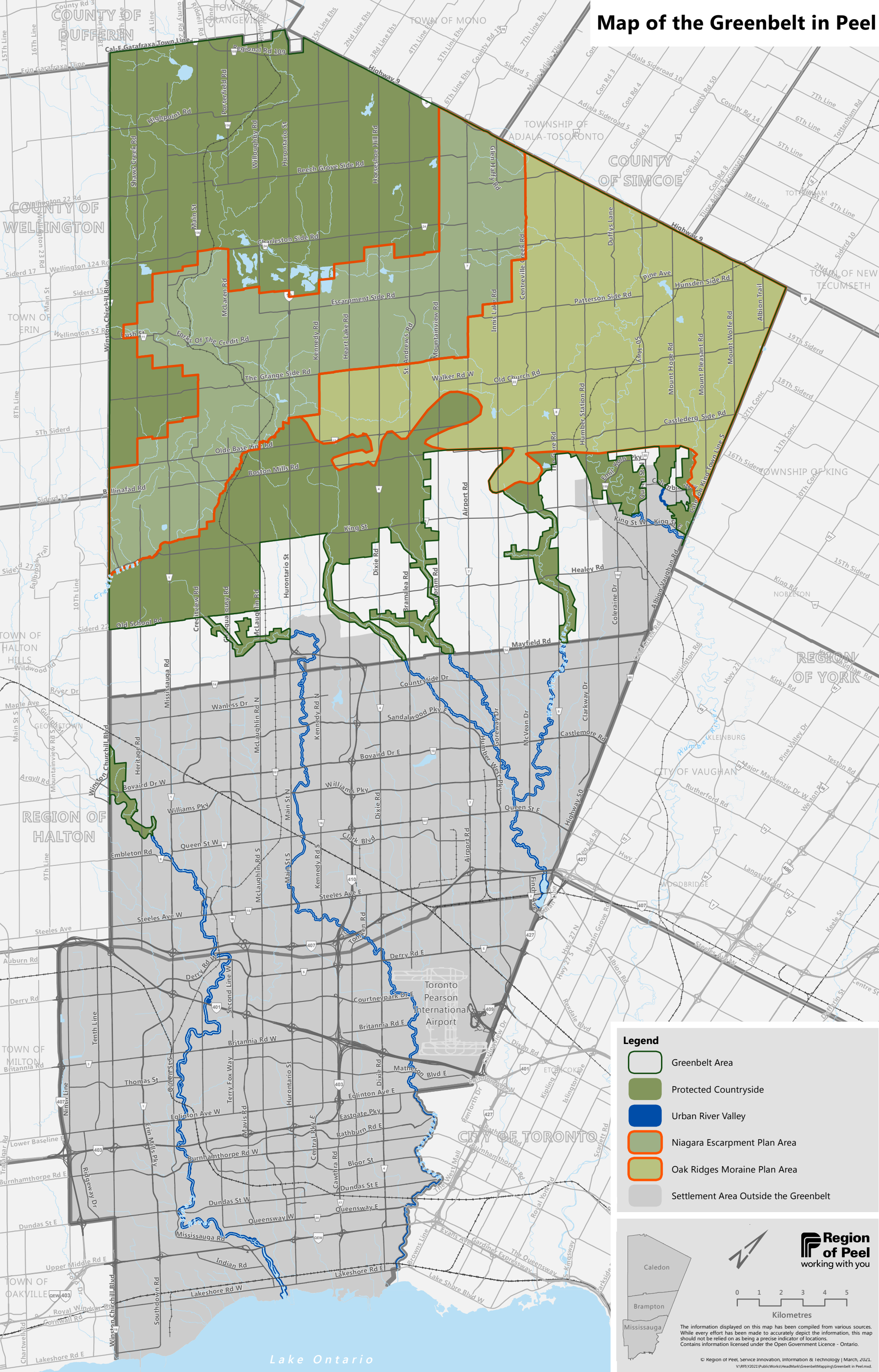
**Appendix I**  
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**the Greenbelt**

Table 3 - Review of Selected URV Designations in the City of Mississauga

City of Mississauga – Mapped URV Areas	
	<ul style="list-style-type: none"> <li>- section of the Credit River at Creditview south of Hwy 401</li> <li>- large areas of valley below crest of slope would be captured with an extension of the existing URV offset south of the 401 along with tableland areas currently developed with residential uses</li> <li>- an interpreted topographic boundary of the Credit River Valley crest of slope would provide a more accurate boundary for the URV.</li> </ul>
	<ul style="list-style-type: none"> <li>- section of the Etobicoke Creek running North and South of Hwy 401.</li> <li>- areas of valley below crest of slope would be captured with an extension of the existing URV offset along with tableland areas that are currently designated in Mississauga's Official Plan for Industrial, Business Employment, and Airport uses</li> <li>- an interpreted topographic boundary of the Credit River Valley crest of slope would provide a more accurate boundary for the URV aligned with the City of Mississauga's Greenlands designation of the Etobicoke Creek Valley.</li> </ul>
	<ul style="list-style-type: none"> <li>- section of the Etobicoke creek south of the QEW</li> <li>- increasing the URV offset would not reflect the actual crest of slope of the Etobicoke Creek Valley</li> </ul>



Map of the Greenbelt in Peel



**Legend**

- Greenbelt Area
- Protected Countryside
- Urban River Valley
- Niagara Escarpment Plan Area
- Oak Ridges Moraine Plan Area
- Settlement Area Outside the Greenbelt

**Region of Peel**  
working with you

0 1 2 3 4 5  
Kilometres

The information displayed on this map has been compiled from various sources. While every effort has been made to accurately depict the information, this map should not be relied on as being a precise indicator of locations. Contains information licensed under the Open Government Licence - Ontario.

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