

Staff Report



To	Committee of the Whole
Service Area	Infrastructure, Development and Enterprise Services
Date	Tuesday, April 6, 2021
Subject	City of Guelph response to Provincial Consultation on Growing the Size of the Greenbelt

Recommendation

1. That the report entitled 'City of Guelph Response to Provincial Consultation on Growing the Size of the Greenbelt', dated April 6 2021, be endorsed and submitted to the Ministry of Municipal Affairs and Housing as the City's response to the provincial consultation on growing the size of the Greenbelt (ERO# 019-3136).
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Executive Summary

Purpose of Report

To provide Council with staff's recommended response to the Provincial request for input to the Province's "Growing the size of the Greenbelt" consultation. The deadline for submitting comments to the Province is April 19, 2021.

Key Findings

The Province released a proposal to consider ways to grow the size and further enhance the quality of the Greenbelt, on February 17, 2021 through the Environmental Registry ([ERO # 019-3136](#)). The proposal focuses on two key elements as a priority:

- A study area of lands focused on the Paris Galt Moraine, which is home to critical groundwater resources, and
- Ideas for adding, expanding, and further protecting urban river valleys

The Province has also identified six principles it will follow for expansions for growing the Greenbelt:

1. No consideration of removal requests or land exchanges
2. No consideration of policy changes
3. Supports Greenbelt Plan objectives, vision, and goals
4. Follows the existing amendment process for the Plan
5. Connects physically and/or functionally to the current Greenbelt
6. Considers impacts on existing provincial priorities

Staff have reviewed the public consultation document, the following key comments are based on this review and interdepartmental consultation:

- This proposal would benefit from a watershed-based approach to identify areas for potential inclusion in the Greenbelt Plan
- Inclusion of settlement areas intended to accommodate growth within the Greenbelt is not consistent with policy and is not appropriate
- The urban river valley designation is not necessary
- Any expansion of the Greenbelt should be balanced with other Provincial priorities including protection of water supply necessary to support municipal growth

Staff will continue to monitor this Provincial study process.

Financial Implications

This current Greenbelt expansion study does not have direct financial implications other than the resources required to participate in the study review process. Should the Province decide to proceed with formally amending the Greenbelt Plan/Area, the potential financial implications of any such changes would have to be assessed in the context of specific amendments proposed.

Background

The [Greenbelt Plan](#) and its corresponding boundary were established under the Greenbelt Act, 2005. The Greenbelt Plan is one of the cornerstone plans that informs and shapes growth management in the greater golden horseshoe.

The Greenbelt Plan was updated as part of the Co-ordinated Land Use Planning Review, the updated Greenbelt Plan came into effect on July 1, 2017.

The purpose and vision of the Greenbelt Plan is to establish a broad band of permanently protected land which:

- Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use,
- Provides permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south central Ontario will be organized,
- Provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation, and resource uses, and,
- Builds resilience to and mitigates climate change.

The Plan places lands within the Greenbelt into a protected countryside land use designation that is composed of an agricultural system and natural heritage system. There are also policies for infrastructure, natural resources (aggregates), non-agricultural uses, parkland, open space and trails, as well as settlement areas (towns/villages and hamlets) within the protected countryside. The Greenbelt does not include settlement areas intended to accommodate growth.

The urban river valley designation of the Greenbelt Plan is intended to integrate the Greenbelt into urban areas that were not part of the Greenbelt's initial boundaries. The urban river valley designation only applies to publicly owned lands within river

valleys and is to be governed by local official plan policies providing that they have regard to the goals and objectives of the Greenbelt Plan.

The City [responded to a study proposal](#) by the Provincial government in February of 2018 which focused on protecting water by growing the greenbelt within the outer ring of the Greater Golden Horseshoe.

The Greenbelt Plan does not currently include lands within or adjacent to the City of Guelph.

Report

The Province released a proposal to consider ways to grow the size and further enhance the quality of the Greenbelt on February 17, 2021 on the Environmental Registry ([ERO #019-3136](#)). The purpose of the proposal is to look at possible Greenbelt expansion with a focus on two key elements as a priority:

- A study area of lands focused on the Paris Galt Moraine, which is home to critical groundwater resources, and
- Ideas for adding, expanding, and further protecting urban river valleys

As indicated in the ERO posting the Province has also identified six principles it will follow for expansions for growing the Greenbelt:

1. No consideration of removal requests or land exchanges
2. No consideration of policy changes
3. Supports Greenbelt Plan objectives, vision, and goals
4. Follows the existing amendment process for the Plan
5. Connects physically and/or functionally to the current Greenbelt.
6. Considers impacts on existing provincial priorities

The proposal also includes [a study area map](#) for the Paris Galt Moraine, which notes that the limits of the mapping are for illustrative purposes only and do not constitute a proposed Greenbelt boundary at this time.

The Province has also made it clear that the current consultation process is seeking feedback on the proposed study area and 6 discussion questions provided within the proposal. The Province has also committed to further consultations should it decide to propose any changes to the Greenbelt Plan area/boundary following the existing amendment process for the Greenbelt Plan.

Staff have completed a review of the information provided by the Province through the Environmental Registry posting, including the study area map, and developed responses to the proposal. The full staff response is provided in Attachment 2 and is the main comments are summarized below.

Comment 1

The study area for the Paris Galt Moraine would benefit from an increased understanding using a watershed-based approach to identify areas for inclusion in the Greenbelt Plan

The Provincial Policy Statement (PPS), 2020, A Place to Grow, 2020 and the Greenbelt Plan 2017 all recognize watersheds as the most meaningful scale for hydrological planning, however the study area mapping does not appear to include

or consider identification of key hydrologic features and key hydrologic areas based on a watershed approach. The Province should clarify how defining a boundary to bring the Moraine into the Greenbelt will have regard for other provincial policy direction emphasizing a watershed-based approach to water resource planning given the recognition of the Moraine's role in hydrological functions. The Province should also clarify how the findings and understanding of the Moraine from the 2009 EBR Review and State of the Knowledge of the Waterloo and Paris Galt Moraines Study will be considered and incorporated.

Using a watershed-based approach would also allow for the Province to develop technical criteria for including areas within the Greenbelt Plan and the Moraine functions could be considered as part of this approach.

The Province should also consider the cumulative regional risks to water resource systems at a regional scale in relation to growth pressures and the local planning context and in relation to future urban growth requirements to clarify how the expansion of the Greenbelt Plan area is the most effective way of addressing any identified risks or gaps in information.

Comment 2

Inclusion of settlement areas intended to accommodate growth within the Greenbelt is not appropriate.

The Province's study area for the Paris Galt Moraine does not include lands within the City of Guelph. This is consistent with the policies of the Greenbelt Plan which do not include settlement areas that are intended to accommodate growth within the Greenbelt Plan area. The entirety of the City of Guelph is designated as a settlement area.

The expansion of the Greenbelt Plan should not include settlement areas where growth has been directed under A Place to Grow, including Guelph. While staff recognize that portions of the Moraine are located within the southern portion of the City specific to its Clair Maltby secondary planning area, these lands:

- Are already subject to Official Plan policies including a natural heritage system which recognizes the significant landform of the Moraine as a natural heritage feature for long-term protection. Furthermore, the natural heritage system is a central element of the proposed community structure for the Clair-Maltby Secondary Plan area.
- An integrative subwatershed planning approach has been used to develop designations for appropriate land uses and plan for infrastructure as part of the Clair-Maltby Secondary Plan, in accordance with the requirements of A Place to Grow.
- The Clair-Maltby Secondary Plan has identified a water resource system and will include a policy framework for the protection of water resources and hydrologic functions in Clair-Maltby, including those which may not be directly connected to or included within the natural heritage system.
- The City will require future site-specific development applications to:
 - submit environmental studies based on a subwatershed planning approach that considers the water resource system and natural heritage system in an integrated manner, and
 - update the integrated groundwater-surface water model prepared for the Clair-Maltby Comprehensive Environmental Impact Study based on detailed

technical studies prepared in support of proposed development and on-going monitoring data to appropriately assess cumulative impacts.

In addition, the Province has said that consideration of policy changes to the Greenbelt Plan are beyond the scope of the current proposal, and policy changes would be necessary to consider expanding the Greenbelt into the City of Guelph.

Comment 3

The urban river valley designation is not necessary

It is unclear how the proposal to expand the urban river valley designation through Guelph meets the objectives, vision, and goals of the Greenbelt Plan, as:

- The purpose of the urban river valley designation is to connect the rest of the Greenbelt to the Great Lakes and inland lakes.
- All of the existing urban river valleys in the Greenbelt Plan provide direct connections from the areas within the Greenbelt to Lake Ontario.
- The inclusion of the Speed and Eramosa River valleys through Guelph are part of a watershed which drains to Lake Erie, and the Greenbelt does not have any direct connection to Lake Erie, nor does the scope of this growing the Greenbelt exercise contemplate creating one.
- There is also no connection provided to any inland lakes.

The urban river valley policies do not add value or provide additional protection to river valley systems as they are not based on or informed by a natural heritage system framework. In addition, urban river valley policies only apply to publicly owned lands within 60m of either side of the watercourse. The designation does not provide any additional protections beyond what the City already has in place through its Official Plan. These areas are already subject to the City's Official Plan policies which meet or exceed the Greenbelt requirements, including for the natural heritage system.

As such there is no identified benefit or purpose to designating the Speed and Eramosa Rivers through the City of Guelph as an urban river valley, and their inclusion in the Greenbelt Plan is not necessary.

Comment 4

The Province needs to ensure any expansion of the Greenbelt is balanced with other provincial priorities including protecting the water supply necessary to support municipal growth.

The City of Guelph obtains most of its drinking water from groundwater sources outside the municipal boundary, including areas associated with the Paris Galt Moraine. The continued use and expansion of the City's water supply system is necessary to sustain the City and provide for growth in accordance with A Place to Grow.

As such the Province should ensure that projected growth associated with the area of the Moraine does not impact the ecological and hydrological integrity of the watersheds and water resource systems it supports. However, it should be recognized that growth, including the population and employment forecasts as required by A Place to Grow, will require new or expanded water supply, wastewater treatment and stormwater management systems.

The Province should ensure that the protection of the Moraine and associated water resource systems through a potential greenbelt expansion considers the provision of water resources necessary to sustain healthy aquatic and terrestrial ecosystems, as well as municipal drinking water supplies. This should include the province participating in resolving conflicts regarding the continued use and expansion of municipal infrastructure in order to achieve growth targets while also continuing to sustain the ecosystem.

Conclusion

There are numerous existing planning tools to protect the features and functions of the Moraine and recognize that the Moraine area is an important source of groundwater recharge that supports local drinking water sources and natural ecosystems. Staff's review concludes that:

- It is unclear if there is any additional benefit or protection for the Paris Galt Moraine and the Province should clarify its intended study purpose and approach, and
- That there is no benefit for the inclusion of the Speed and Eramosa River valleys in Guelph through an expansion of the Greenbelt and it is not necessary.

Staff are recommending that Council endorse this report as the City's response and that it be submitted to the Ministry of Municipal Affairs and Housing on or before the April 19, 2021 deadline for comments.

Staff will stay informed of the Province's review as information becomes available regarding any additional proposals or consultations on possible changes to the Greenbelt Plan.

Financial Implications

This current Greenbelt Expansion study does not have direct financial implications other than the resources required to participate in the study review process. Should the province decide to proceed with formally amending the Greenbelt Plan/Area, the potential financial implications of any such changes would have to be assessed in the context of specific amendments proposed.

Consultations

The Province posted the proposal to the Environmental Registry of Ontario for public comment on February 17, 2021 for a 61-day posting closing April 19, 2021. The province is leading the consultation process on this proposal and is inviting responses from the public. Members of the public are encouraged to submit comments to the Province directly.

Strategic Plan Alignment

The City's response to the Growing the size of the Greenbelt proposal aligns with the following priorities within the Strategic Plan:

Building our future – the City's response supports ensuring the continued use and future expansion of infrastructure for the City's water supply system including drinking water sources.

Sustaining our future – the City's response supports ensuring protection of green infrastructure including natural heritage and water resource systems.

Attachments

Attachment-1 Staff Presentation of response to growing the size of the greenbelt

Attachment-2 Response to growing the size of the greenbelt discussion questions

Departmental Approval

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