



March 15, 2021

**Re: ERO number 019-3136**  
**Consultation on growing the size of the Greenbelt**

Thank you for the opportunity to provide these comments. I am the planning consultant for Thomasfield Homes Limited who own and have an interest in properties located in Puslinch Township, specifically 381 Maltby Road, 424 Maltby Road and 7764 Wellington County 34. I am not in support of growing the Greenbelt for the reasons outlined in this letter.

The Province must be cautious to not create a Greenbelt expansion that will result in unintended consequences. People who do not want to live in the high density intensification within the Greater Toronto Area have the option to escape to the Greenbelt. What were farms, are now large prime residential housing lots located in the Greenbelt. Large properties within the Greenbelt provide the latest housing opportunity. Existing farm houses are able to be demolished and replaced or renovated. The Greenbelt has created the conditions for super-sized urban sprawl. In addition, municipalities are seeing the evidence of development leapfrogging over the Greenbelt. People from Toronto are “driving til they qualify” for a mortgage on a new home. This is contrary to the provincial goals to reduce traffic congestion and to reduce the generation of greenhouse gases.

The ERO posting states that,

*“The government has been clear that we are protecting the Greenbelt from development for future generations. The Greenbelt is home to much of Ontario’s vital environmental, groundwater and agricultural resources.”*

The Greenbelt permits aggregate uses which **impact** environmental, groundwater and agricultural resources, therefore, the Greenbelt does not add anything toward the protection of these environmental, groundwater and agricultural resources.

The properties located in proximity to Highway 401, Brock Road and Highway 6 (major transportation corridors) that could support significant residential and employment lands, will be potentially prevented from development, thereby stifling the economic recovery of Ontario. The Provincial Policy Statement refers to protecting major transportation corridors and employment areas, however, the potential Greenbelt expansion is at odds with these objectives. The proposed expansion of the Greenbelt will also surround the village of Aberfoyle preventing the Township of Puslinch from expanding its tax base. There will be potentially negative impacts to the Township of Puslinch and threaten its viability as a municipality.

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The ERO posting states that,

*“The plans provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions within the Greater Golden Horseshoe and beyond. They work together with A Place to Grow, which provides the overarching strategy for where and how growth can be accommodated in the Greater Golden Horseshoe.”*

The Provincial approach of protecting what is valuable through feature-based mapping is the correct approach and should be continued. In other words, protecting significant wetlands and prime agricultural lands for example that are correctly and accurately mapped should continue to be protected. This approach which is defensible and has been working does not require the Greenbelt to be expanded.

Key to this approach is that resources such as prime agricultural uses be **correctly and accurately** mapped. The Township of Puslinch includes lands that are not prime agricultural. By incorrectly including these lands as prime agricultural and, therefore, potentially within the Greenbelt, will direct development to properties that **are** prime agricultural lands, but happen to be located beyond the area of Provincial Greenbelt influence.

The Township of Puslinch Council in previous comments provided to the Province have included the following statements,

*“Whereas Highway 401 is a major goods movement corridor and connects the Greater Toronto area, southwestern Ontario and USA, and is a corridor for trade and economic development; and*

*Whereas the Province has emphasized the importance of residential and employment corridors next to transportation and transit corridors;*

*Whereas the Township has identified rural employment areas located adjacent to or near Highway 401 and Highway 6; and*

*Whereas lands currently identified as rural employment areas adjacent to Highway 401 and Highway 6 should continue to be recognized and protected as future rural employment areas; and*

*Whereas lands currently not identified as rural employment areas adjacent to or near Highway 401 and Highway 6 should be appropriately designated to permit future employment uses over the long-term to optimize and ensure the long-term viability of economic development for the Township of Puslinch, the County of Wellington and the Province of Ontario; and*

*Whereas the proposed Provincial Growth Plan – Draft Agricultural Land Base jeopardizes long-term economic viability and prosperity of the Highway 401 and Highway 6 corridor; “*

If the Township of Puslinch's needs are to be respected by the Province, the lands along the Highway 401 and Highway 6 corridors should not be included as expansions to the current Greenbelt.

If lands along the Highway 401 and Highway 6 corridors are excluded from the proposed Greenbelt expansion (as they should be) there will not be a physical or functional connection with the current Greenbelt and this would create an unconnected island of Greenbelt land which is contrary to the stated intent of this posting as noted below in the ERO posting,

*“Connects physically and/or functionally to the current Greenbelt*

- *The Greenbelt is meant to be a continuous broad band of permanently protected land. Any expansions shall build upon the systems approach of the Greenbelt Plan and should be directly connected or have a strong functional connection through the Greenbelt's natural heritage, water resource or agricultural systems to not create unconnected islands of Greenbelt land.”*

The expansion of the Greenbelt is not necessary to ensure that provincial priorities are implemented as outlined in the ERO posting,

*“Considers impacts on existing provincial priorities*

- *As discussed below, expansions to the Greenbelt must consider their effects on other key provincial priorities outlined in the Provincial Policy Statement and A Place to Grow.”*

*“In deciding on where and how to possibly grow the Greenbelt, we must also consider other key provincial priorities that could be impacted. These key provincial priorities include:*

***Growth Management*** – Overall, the Greenbelt Plan broadly identifies where urbanization should not occur and A Place to Grow directs the majority of growth to fully serviced settlement areas. Currently, municipalities are working towards updating their official plans by 2022 to conform with the revised growth forecasts in Schedule 3 of A Place to Grow. Therefore, Greenbelt expansion needs to be considered in the context of these growth management exercises by municipalities.”

The Province has released housing and employment targets for the County of Wellington to 2051. In particular the implementation of these employment targets along the Highway 401 and Highway 6 corridor should not be pre-empted by the expansion of the Greenbelt.

***“Natural Heritage and Water Resource Systems*** – The Greenbelt Plan and A Place to Grow are aligned with and build on the Provincial Policy Statement to provide policy protection for natural heritage and water resource systems, features and areas, including habitat for endangered and threatened species. Both the Greenbelt Plan and A Place to Grow contain policies supporting and protecting a Natural Heritage System that is made up of these natural features and areas along with the linkages that connect them together. Similarly, policies in these plans protect water resource systems on a watershed basis, with the Greenbelt incorporating significant headwaters, river corridors, wetlands and other features.”

The natural heritage and water resource systems identified by the PPS and A P2G have been identified and protected by the County of Wellington Official Plan as approved by the Province.

Growing the Greenbelt has the effect to capturing lands that do not require protection and is not necessary.

***“Agriculture** – The Greater Golden Horseshoe contains some of Canada’s best agricultural land. Both the Greenbelt Plan and A Place to Grow have policies supporting and protecting an Agricultural System that is comprised of an agricultural land base (prime agricultural areas, including specialty crop areas, and other productive lands that form a continuous land base for agriculture) and an agri-food network (infrastructure, services and assets that support the agri-food sector).”*

The Township of Puslinch does **not** include some of Canada’s best agricultural land. The Township’s lands are being incorrectly characterized and brought into this process.

***“Infrastructure** – Both the Greenbelt Plan and A Place to Grow recognize that new infrastructure and upgrades to existing infrastructure will be needed to serve the substantial growth projected for the Greater Golden Horseshoe. Infrastructure, including highways to sewage and water treatment plants to corridors for transit and utilities, is permitted in these plans subject to certain conditions.”*

The Highway 401 and Highway 6 corridors are needed to serve the substantial growth projected for the Greater Golden Horseshoe and beyond.

Ontario has established a robust planning framework with a track record of protecting natural areas and prime agricultural lands which municipalities have been implementing. This should be recognized and lauded, not compromised by a political response of expanding the Greenbelt.

Yours truly,



Astrid Clos, MCIP, RPP