

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)**

**Public Works**

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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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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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### 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,

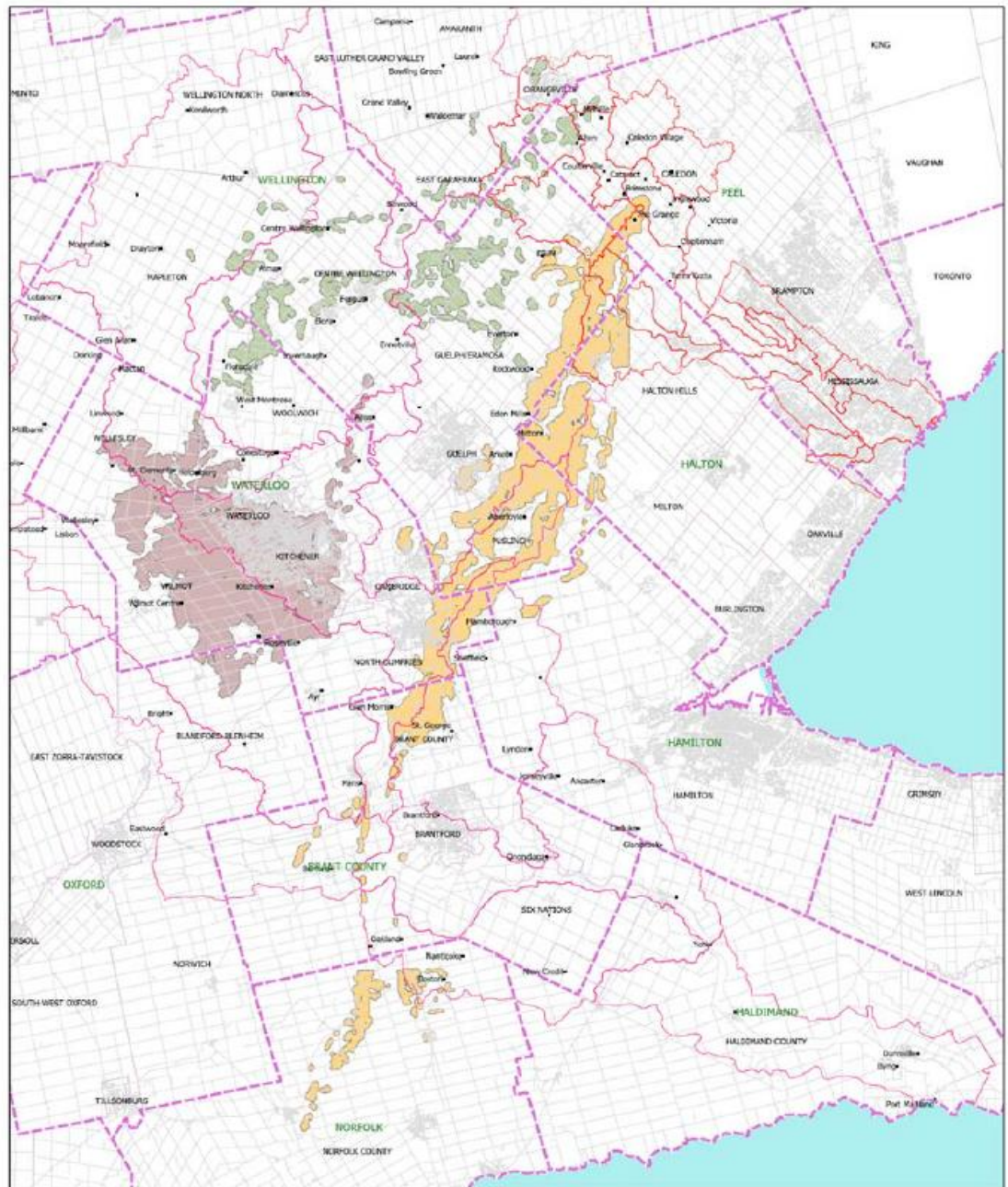


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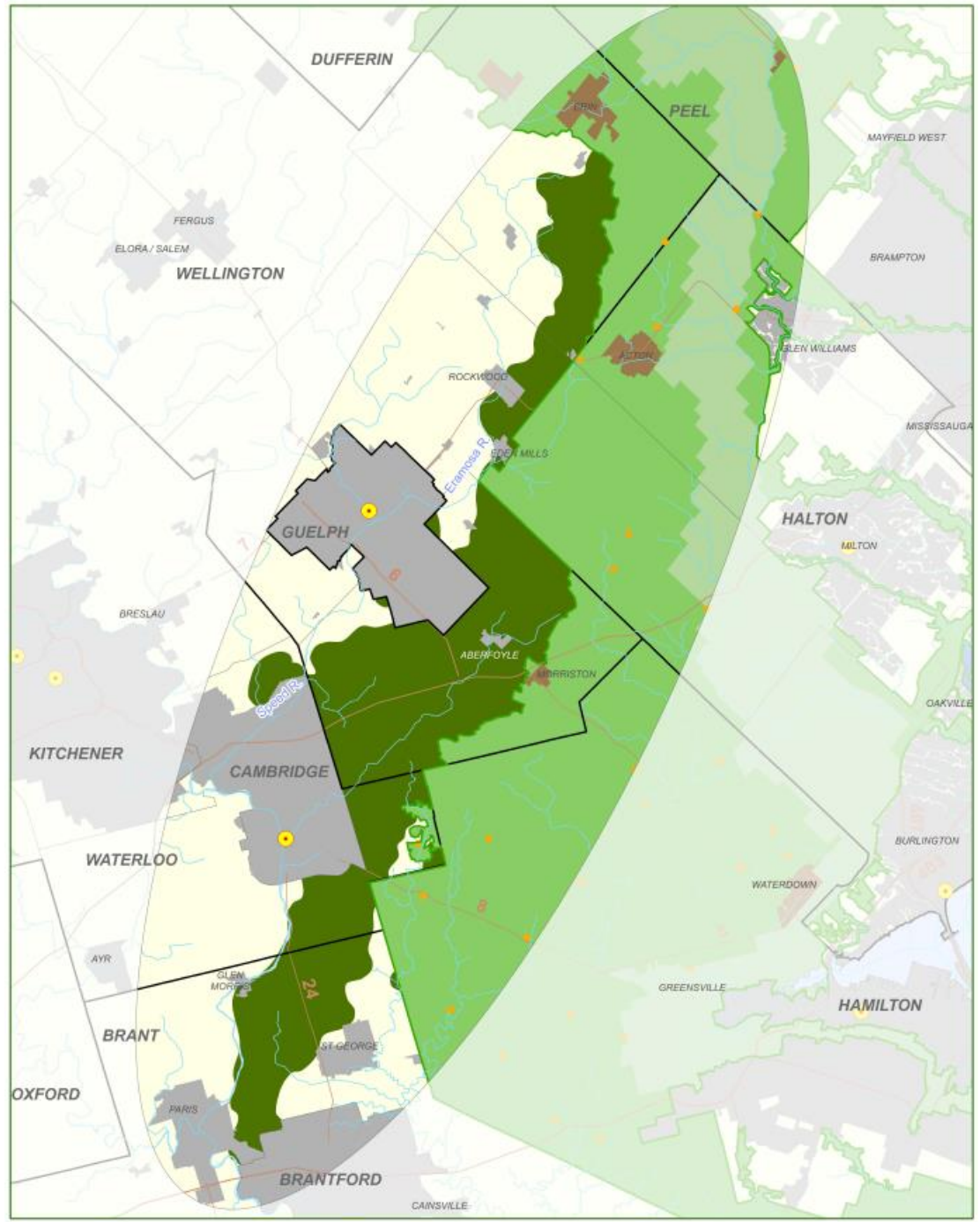


Map 1 – Physical Extent of the Paris Galt Moraine (Source: Blackport Hydrogeology Inc., Blackport and Associates Ltd., and AquaResource Inc., 2009)

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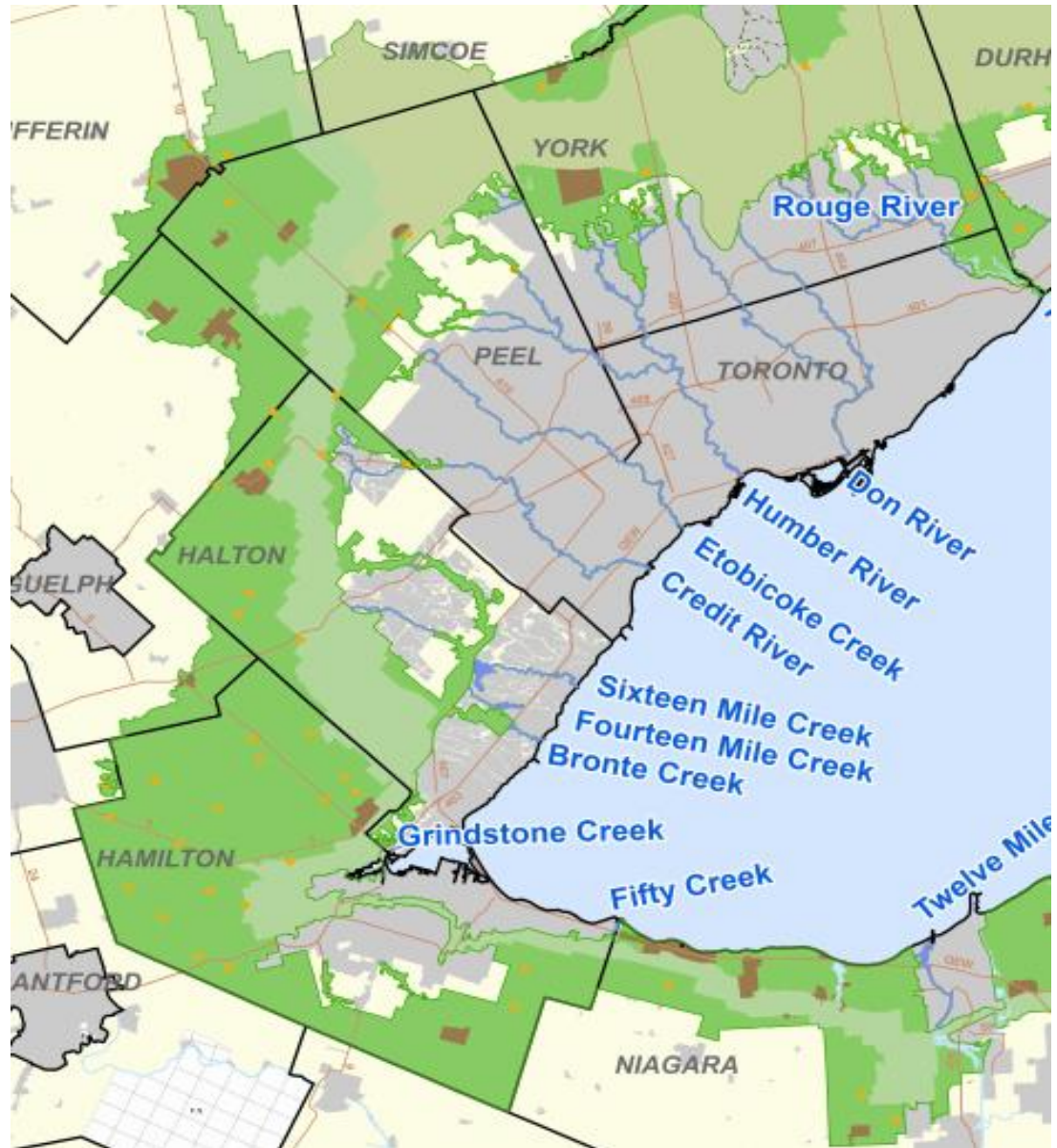


Map 2 – Growing the Greenbelt Paris Galt Moraine Study Area

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Map 3 – Greenbelt Plan Urban River Valleys

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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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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>

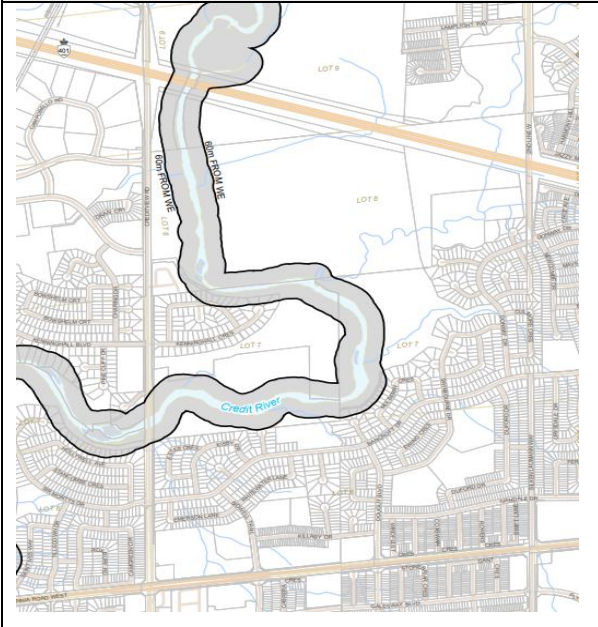
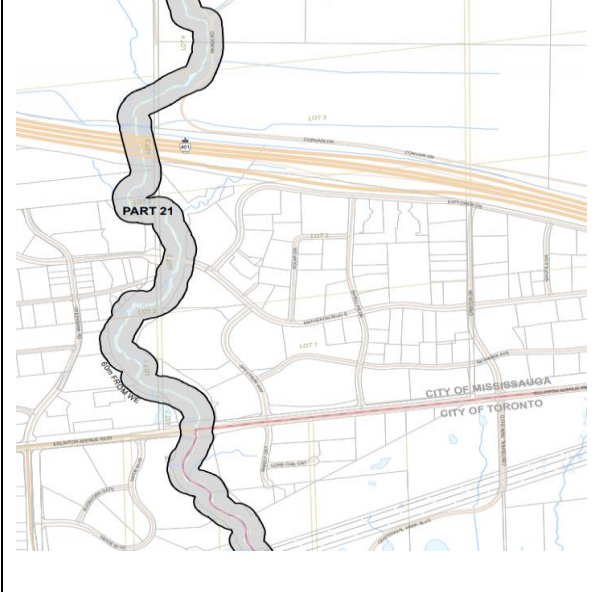



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Table 3 - Review of Selected URV Designations in the City of Mississauga

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>