

# Memo

**To:** Minister Steve Clark, Municipal Affairs and Housing

**From:** GEI Consultants Ltd.

**Date:** November 15, 2022

**Re:** Letter of Support for Environmental Registry Posting (ERO # 019-6216):  
Proposed Amendments to the Greenbelt Plan (MAP #1)

GEI Project No. 2203704

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## 1.0 INTRODUCTION

This technical memorandum has been prepared in response to the Environmental Registry Posting (ERO) No. 019-6216 in support of Map 1. Map 1 includes a property owned by Bathurst-Green Lane Partnership (BGL), which is generally located south of Miller's Sideroad, east of Dufferin Street, north of Davis Drive West and west of Bathurst Street. This property is herein referred to as the Subject Lands.

GEI Consultants Ltd. (GEI) was retained by BGL at the time of purchase to characterize existing ecological, geotechnical, hydrogeological and servicing conditions within the vicinity of the Subject Lands. The northern portion of the Subject Lands is located within the Greenbelt Planning Area (i.e., Greenbelt), while the southern portion of the Subject Lands are located within the Oak Ridges Moraine Conservation Plan Area (i.e., Oak Ridges). Based on the current mapping, the Subject Lands are fully overlapped by these two planning areas.

With the increased housing demand from our population and existing communities, a review of the Subject Lands was undertaken to understand whether additional developable areas may be present. This review ensured the protection of natural heritage features within the landscape and provided opportunities for adequate servicing solutions to develop the Subject Lands. GEI completed a high-level review to identify areas within the Subject Lands that are currently included within the Greenbelt and Oak Ridges plan areas where opportunities to refine and/or remove existing designations could be considered.

Attached is a copy of our report containing our preliminary technical opinion where opportunities for development may occur within the Subject Lands in an effort to assist in relieving increasing housing supply pressures, while protecting ecologically and hydrologically sensitive areas.

Key findings from our review are summarized below.

## **2.0 ECOLOGICAL CHARACTERIZATION**

### **2.1 Presence of Natural Heritage Features**

The Subject Lands are generally characterized as agricultural fields that contain portions of natural heritage features. While on site to conduct the reconnaissance, cattle grazing was documented throughout the majority of these agricultural areas. In areas where cattle were not present, row crops were documented. Isolated portions of the Subject Lands still support naturalized vegetation communities; however, the existing Greenbelt and Oak Ridges Moraine Planning Areas are disconnected within the agricultural landscape.

Candidate and confirmed Key Natural Heritage Features (KNHFs) and Key Hydrologic Features (KHF) are shown on **Figure 4** of the attached report. They are also discussed within Section 3.3 of the report. The bulk of these KNHF and KHF were identified along three watercourses, including one watercourse in the south-western corner of the property (associated with the Core Area within the Oak Ridges Moraine Planning Area) and two watercourses located in the north-central and north-eastern portion of the property (currently identified as part of the Greenbelt Natural Heritage System). These watercourse corridors included provincially significant wetlands, significant woodlands, fish habitat as well as candidate significant wildlife habitat and species at risk habitat.

All KNHF and KHF identified within the report assumed a precautionary approach since no detailed ecological investigations were completed to inform the presence or absence of these features within the landscape. Ecological surveys should be completed under appropriate seasonal windows to determine the presence and extent of KNHF and KHF within the Subject Lands.

### **2.2 Preliminary Constraints Review**

Under Section 3.2.5 of the Greenbelt Plan (2017), 30 m vegetation protection zones (VPZs) are prescribed to KNHF and KHF. If the Greenbelt Plan was not applied to these lands, a review was undertaken to understand what the local planning guidance would be to protect these features.

Section 6.24-DP of the Lake Simcoe Protection Plan (2009) states that a minimum of a 30 m VPZ must be applied to all KNHF and KHF. The York Region Official Plan (2010 Consolidation) reinforces the VPZs outlined within the Greenbelt Plan and the Lake Simcoe Protection Plan.

Regardless of whether the property is located within the Greenbelt Planning Area, a 30 m VPZ would be required on all KNHF and KHF. Moreover, KNHF and KHF identified within the Core Areas associated with the Oak Ridges Moraine Planning Areas will be protected through the Oak Ridges Moraine Conservation Plan (2017). A 30 m VPZ will be applied to all KNHF and KHF within the Core Area.

### 2.3 Proposed Refinements

A 30 m VPZ was applied to all (candidate and confirmed) KNHF and KHF within the Subject Lands to protect the existing functions of these features. This is in alignment with provincial and municipal guidelines. The installation of a 30 m VPZ will ensure that all candidate KNHF/KHF will be retained in place with the opportunity for further enhancement within existing agricultural lands.

In addition to these, several enhancement areas were identified where there were opportunities to connect existing KNHFs, KHFs or KHAs. These enhancement areas are located where existing connections may not be present and/or identified in areas that would strengthen connections where they may be limited. Potential enhancement areas are identified on **Figure 8** of the report and are further discussed within Section 8.0 of the report. Potential enhancement areas include:

- Creation of a natural corridor between the KNHF/KHFs identified within the northern portion of the property to the Core Areas identified within the south-western portion of the property. Limited connectivity between these features is currently present because of the existing agricultural fields; thus, the creation of this linkage will allow for abiotic and biotic materials to be exchanged. This will also ensure that the northern KNHF/KHFs are not isolated from the larger ecological system;
- Enhancing existing farm crossing areas to restore ecological connectivity between existing features; and
- Revegetation of existing agricultural areas within the north-eastern corner of the Subject Lands where existing features are concentrated to strengthen ecological functions.

The proposed refinements of the KNHF and KHF boundaries reflect existing conditions within the Subject Lands. This ensures the appropriate protection of ecologically sensitive features, while identifying non-ecologically sensitive areas that could be suitable for other land uses.

VPZs and enhancement areas will be vegetated with native plant materials and will help create a more resilient and interconnected natural heritage system within and beyond the Subject Lands.

### **3.0 GEOTECHNICAL CHARACTERIZATION**

The commentary for geotechnical conditions was based on the desktop review and high-level background information available for the Subject Lands. The commentary may modify once detailed site-specific investigations and reports are carried out. Cohesive deposits of glacial till or clayey silt to clay are expected beneath the Subject Lands.

Slope stability and erosion hazards must be considered where confined valley systems are present on the Subject Lands. Based on the topography and expected soil conditions, it is estimated that any development setbacks related to slope instability and erosion hazards will

be within the environmental constraint areas shown on **Figure 7** within the attached report. This must be confirmed through slope inspections and additional detailed studies.

Overall, there were no geotechnical constraints identified that should significantly inhibit design and construction above or beyond typical approaches for similar sites.

#### **4.0 HYDROGEOLOGICAL CHARACTERIZATION**

Based on the expected soil conditions from the desktop review (glacial till or clayey silt deposits) and the Subject Land's topography, seepage areas or springs are not expected across most of the Subject Lands. These soil deposits often have a low permeability which precludes the free flow of water. At a preliminary level, the KHF of potential seepage locations (if any) are expected to be confined to the watercourse areas already delineated on **Figure 7** (within the attached report) as constraint areas.

The following summarizes Key Hydrologic Areas (KHAs) for the Subject Lands:

- No Significant or Ecologically Significant Groundwater Recharge Areas were identified.
- Two smaller areas on site were identified as Highly Vulnerable Aquifers (HVA), in the north-eastern and south-western portions of the Subject Lands along the watercourses / wetland areas as shown on Figure 6B within the attached report. The HVAs are generally with the constraint areas identified on Figure 7 within the attached report. Certain Land Uses that have a higher potential to contaminate the HVAs are not permitted in HVA locations.
- Significant Surface Water Contribution Areas for the Subject Lands are not expected based on the anticipated low-permeability soil conditions.

#### **5.0 SERVICEABILITY STRATEGY**

Servicing strategies proposed are an extension of existing municipal infrastructure within the area. These strategies provide flexibility with multiple sanitary options to confirm servicing functionality of the Subject Lands in both the Upper York Sanitary Solution (UYSS) and York Durham Sewage System (YDSS) Regional servicing plans. **Figures 9a & 9b** in attached report presents sanitary connections to the YDSS whereas **Figure 9c** illustrates a connection to the UYSS. **Figure 10** in the attached report presents watermain strategy with two connections to loop the development. Lastly, **Figure 11** presented the overall configuration and location of various end of facilities based on the drainage areas delineated by available topography data. Overall, the site is functionally serviceable by sanitary, water distribution, and stormwater based on the strategies presented.

BLG will fund the proposed infrastructure within the Subject Lands, including any extension or upgrades necessary to the existing infrastructure to specifically support this development.

## **6.0 CONCLUSION**

Based on the existing conditions, refinements to the Greenbelt and Oak Ridges Planning Areas are recommended based on the presence and extent of KNHF, KHF and KHAs. The proposed refinements to these planning areas are generally located within active agricultural areas. The review completed by our team confirms that the Subject Lands are suitable for urban development and would enable housing to be built in the near-term, given the availability of existing servicing infrastructure.

While Map 1 illustrates the removal of these lands from the Greenbelt Planning Area, the review of these lands at a local municipal planning level will ensure that the protection of sensitive ecological features will be preserved, where appropriate. The removal of the Greenbelt designations does not necessarily mean that sensitive features will be removed from the landscape; rather, this will allow for local municipalities to have authority to protect natural features while providing immediate aid to the Provincial Government in meeting their ambitious target to build 1.5 million homes by 2031.

**We support Ontario's proposed amendments to the Greenbelt Plan, specifically in relation to Map 1 as presented in ERO Posting No. 019-6216.**