



January 4, 2013

Barbara Konyi  
Manager, Greenbelt Section  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay Street, Floor 14  
Toronto, ON M5G 2E5

Ms. Konyi:

**Re: Conservation Ontario's Comments on "Growing the Greenbelt – Proposed amendment to the Greenbelt Plan – Glenorchy Lands and Urban River Valleys" (EBR #011-6331) and "Growing the Greenbelt – Proposed amendment to the Greenbelt Area boundary regulation" (EBR# 011-6330)**

Thank you for the opportunity to provide comments on the proposal "Growing the Greenbelt – Proposed amendment to the Greenbelt Plan – Glenorchy Lands and Urban River Valleys" and the accompanying draft regulation "Growing the Greenbelt – Proposed amendment to the Greenbelt Area boundary regulation". The following comments are submitted for your consideration by Conservation Ontario (CO), which is the network of Ontario's 36 Conservation Authorities (CAs). These comments are not intended to limit your consideration of comments submitted individually by Conservation Authorities.

**Proposal #1: Add approximately 255 hectares (630 acres) of provincially owned lands in the Town of Oakville to the Greenbelt. The lands are part of the Glenorchy Conservation Area and would be subject to the Protected Countryside policies of the Greenbelt Plan.**

Conservations Authorities are supportive of the inclusion of the Glenorchy Conservation Area in the Greenbelt Plan. The Glenorchy lands are located in Conservation Halton's watershed. It is felt that the inclusion of the Glenorchy Conservation Area within the Greenbelt Plan will highlight the importance of these lands within the broader natural heritage system and will add to the existing protection afforded to these lands both through Conservation Halton's management as well as the Town of Oakville's Official Plan designations. Conservation Halton will be providing a letter directly to the Ministry indicating their support for Glenorchy's inclusion.

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Conservation Authorities are similarly supportive of the proposed regulation (EBR# 011-6330) to expand the Greenbelt Area in order to enable the policy coverage of the Greenbelt Plan to be extended to the Glenorchy lands.

**Proposal #2: Add a new Urban River Valley designation to the Greenbelt Plan to facilitate adding publicly owned lands in urban river valleys currently outside the Greenbelt Plan. The proposed designation would rely on municipal official plan policies for direction in urban river valley areas.**

Conservation Authority staff were supportive in principle of this proposed initiative. Conservation Authorities welcome the Province's continued efforts to expand the protection offered to natural heritage systems in Southern Ontario and connecting the Greenbelt to the surrounding Great Lakes. In spite of this support for the Province's efforts, there were multiple concerns expressed in regard to this proposal.

The proposed amendment would allow only publicly owned lands in urban river valleys to be included in the Greenbelt Plan. In reviewing this proposal, CA staff expressed concern that including only publicly owned lands may result in a patchwork of Greenbelt Plan designations along river valleys, as a result of differing ownership of the land. This appears to be contrary to the systems-based approach that the Greenbelt Plan advocates. In addition, the requirement to complete survey work for all of the lands to be included in the designation would be costly to the municipality. It is noted that no provincial funding for completing this survey work has been identified at this time.

Conservation Authority staff were also concerned that the proposed Greenbelt designation would rely solely on municipal Official Plan policies for direction in urban river valley areas. Given that there is no specific suite of policies proposed for the urban river valley designated lands, the protection afforded to the river valleys would remain effectively the same as currently exists within Official Plans, Conservation Authority regulations and other municipal by-laws that already protect these areas. It is unclear whether the Greenbelt designation would contribute significantly to the protection of these features.

While the creation of a specific suite of policies for urban river valley designated lands is supported by CAs, urban river valley systems often have competing demands and require management for multiple purposes. These demands may be different than what are experienced in more rural or agricultural parts of the Province. These uses may include recreational, infrastructure, restoration, and the remediation of flooding and erosion hazards. There may be challenges with the compatibility of existing Greenbelt Policies related to Key Natural Heritage Features and Key Hydrologic Features with the competing uses within an urban river valley system. It is recommended that the province work with municipalities and Conservation Authorities to identify appropriate policies for these important systems.

In addition, Conservation Authority staff require further direction on what specifically would be considered an "urban river valley".

While Conservation Authority staff are highly supportive of enhancing protection for urban river valleys, a number of implementation issues have been identified with the current proposal to add a new urban river valley designation to publicly owned lands outside of the Greenbelt Plan. It is recommended that the province consider amending the proposal to include both public and private lands to encourage a systems approach to valleyland protection; that a specific suite of policies be developed in conjunction with municipalities and CAs for this new Greenbelt designation; and that these policies should take into

consideration the surrounding community context and the need for management for multiple purposes (recreational, infrastructure, remediation of flooding and erosion hazards, etc). This new policy scheme may best be addressed as part of the full 2015 review of the Greenbelt Plan.

Once again, thank you for the opportunity to provide comment on the proposal “Growing the Greenbelt – Proposed amendment to the Greenbelt Plan – Glenorchy Lands and Urban River Valleys” and the accompanying “Growing the Greenbelt – Proposed amendment to the Greenbelt Area boundary regulation”. Conservation Authorities welcome the Province’s continued efforts to expand the protection offered to natural heritage systems in Southern Ontario. Overall they were highly supportive of the inclusion of the Glenorchy Conservation Area in the Greenbelt Plan as well as the accompanying regulation. CA staff were supportive in principle of providing municipalities with the opportunity to include urban river valleys within the Greenbelt Plan however numerous concerns were expressed with the implementation of the proposal as currently presented and these are highlighted in this letter. Should you have any questions about the above, please contact myself at extension 228.

Sincerely,

A handwritten signature in black ink that reads "Leslie Rich". The signature is written in a cursive, flowing style.

Leslie Rich, MCIP, RPP  
Policy and Planning Officer

c.c.: CAOs, Greenbelt CAs