



March 26, 2021

Honorable Steve Clark  
Minister, Municipal Affairs and Housing  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto ON, M5G 2E5

Hon. Steve Clark;

**RE: York Region Response – ERO 019-3136 – Growing the size of the Greenbelt**

York Region thanks the Province for engaging the Region on Growing the size of the Greenbelt consultation. This letter outlines key comments that will be considered by York Region Council at their meeting of April 22, 2021 and Council's resolution will be provided to the Province.

York Region supports the Greenbelt Plan, vision and goals to provide permanent protection to natural heritage and water resources systems, support and protect the agriculture land base and build resilience and mitigate climate change. York Region has a strong interest in helping the Province meet the objectives of the Greenbelt Plan in a manner that meets the vision and goals of the Plan and facilitates Provincially mandated growth.

York Region has reviewed ERO posting 019-3136 and highlights the following key comments for consideration for growing the Greenbelt:

**1. Apply Urban River Valley policy protections to privately and publicly owned lands**

Regional Council endorsed recommendations in 2013 regarding Urban River Valleys in response to the coordinated Provincial Plans review. Current policy protection for Urban River Valleys does not sufficiently protect the natural heritage system as it only applies to publicly owned lands and could be perceived to diminish the importance of protecting other valley lands currently protected by municipal policy. We reiterate the position that Urban River Valley policies should apply to privately and publicly owned lands to provide greater protection of these important areas of connection.

## **2. Consider areas for expansion that would improve connectivity between existing natural heritage and water resources systems**

York Region is supportive of focusing growth of the Greenbelt in areas that ensure connectivity to existing natural heritage and water resources systems to meet the objectives of the Greenbelt Plan.

Ecologically/Significant Groundwater Recharge Areas (ESGRA/SGRA) and Highly Vulnerable Aquifers (HVA) are mapped by Conservation Authorities under the *Clean Water Act* and identify critical and vulnerable groundwater areas related to protection of drinking water areas and the environment. The Region recommends that the Province review mapping of large contiguous ESGRA/SGRA and HVA's to identify areas for potential expansion of the Greenbelt.

## **3. Provide clarity on how infrastructure can be planned across Greenbelt areas to support growth**

York Region is forecast to grow to 2.02 million people and 990,000 jobs by 2051. Servicing this growth should be a key consideration when identifying areas to grow the Greenbelt. For example, the Region relies on the Duffin Creek Water Pollution Control Plant to service both existing and planned growth. Any expansion of the URV designation within Duffin Creek area should not impact future expansion of the Duffin Creek Water Pollution Control Plant to accommodate the Region's growth allocations, Growth Plan requirements and related servicing capacity needs.

The Region recommends the Province ensure infrastructure can continue to be planned across Greenbelt Plan areas to support growth in existing urban areas, specifically lake-based services that are restricted but may be required to cross portions of the Greenbelt. In allowing for growth-related infrastructure, subject to Environmental Assessment approvals, balancing environmental and health protection with the need to service growth should be a key consideration when identifying areas to grow the Greenbelt.

## **4. Provide clarity on what enhanced protection for Urban River Valleys means beyond the Conservation Authority Act**

Many rivers, including Duffin Creek, were identified as Urban River Valleys when the Greenbelt Plan was amended in 2017. This Greenbelt designation and related policy seems duplicative of the protection already provided through municipal official plans and conservation authority regulations. For example, the Duffin Creek Pollution Control Plant property is more than 60 meters away from Duffin Creek, and the east end, closest to the stream, are dedicated for Stage 4 expansion. It will be critical that any extensions to the 60 meter offset not impact the ability to complete the Stage 4 expansion, which is required to service provincially-mandated growth targets. The

Province should clarify what, if any, enhanced protections are being contemplated above what is within the *Conservation Authority Act* and impacts on planned servicing expansions.

## **5. Recognize the importance of greenspace and flood protection benefits of green infrastructure**

The Greenbelt provides protection of environmental lands, which is critical to supporting flood protection, climate change mitigation/adaptation and the protection of human health. Green infrastructure is one of the most effective tools to help reduce runoff and help reduce flooding risks. The Greenbelt provides many benefits to human health, including improving air quality, reducing greenhouse gas emissions, source water protection, addressing extreme heat and extreme weather, providing opportunities for physical activity and recreation, improving local food security, and addressing social and mental health.

York Region would like to stress the importance of protecting greenspaces within the Greenbelt for the public from a physical activity and environmental health perspective, and to support healthy communities.

We thank the Province for considering the above comments on growing the size of the Greenbelt and look forward to continued engagement as it is updated.

If you have questions regarding this response or would like to further discuss these recommendations, please contact Teresa Cline, Program Manager, Planning and Economic Development, [Teresa.Cline@york.ca](mailto:Teresa.Cline@york.ca).

Sincerely,



Paul Freeman, MCIP, RPP  
Chief Planner  
Planning and Economic Development  
The Regional Municipality of York



Erin Mahoney, M. Eng.  
Commissioner  
Environmental Services  
The Regional Municipality of York

Attachment (1)  
12661814