

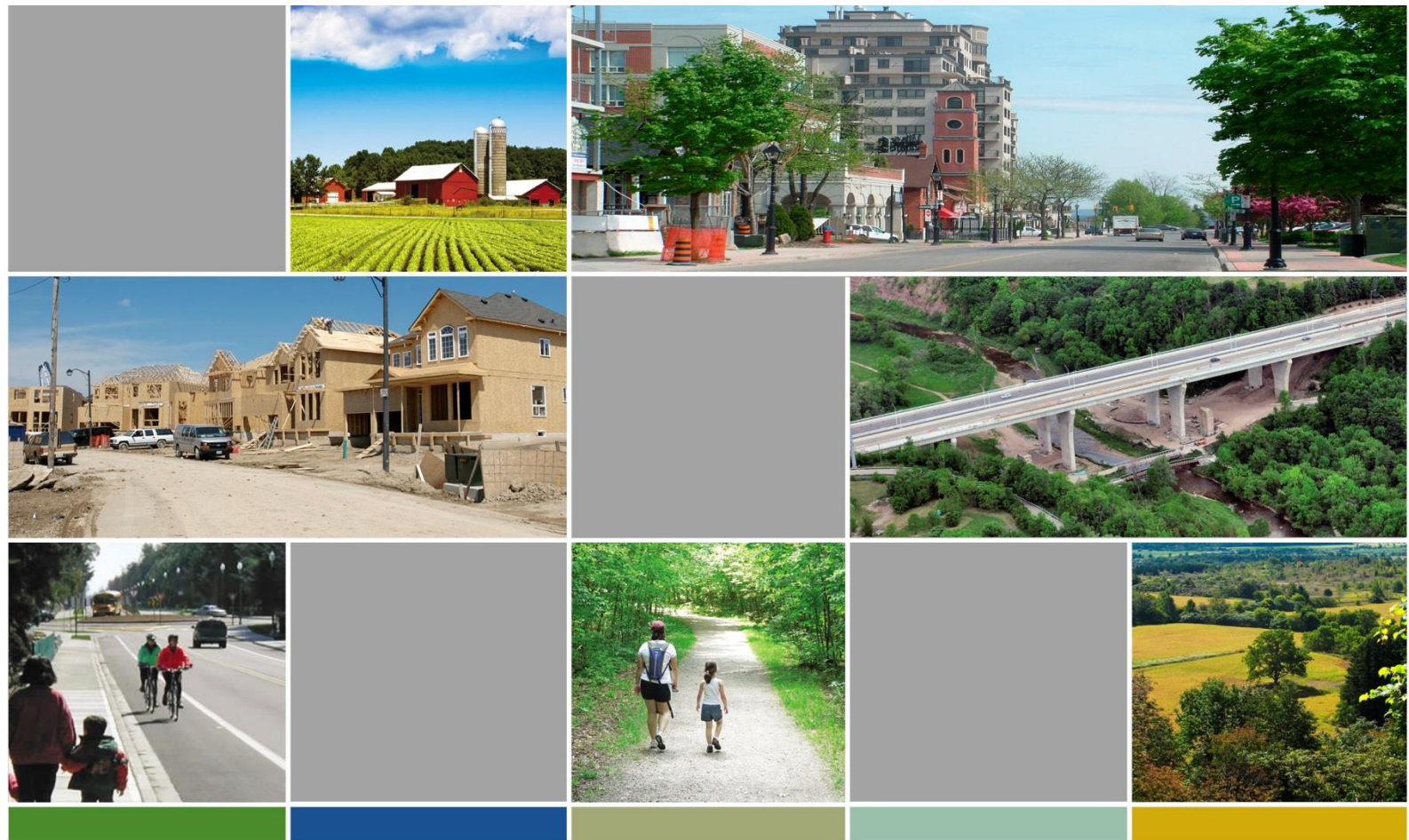
Halton Area Planning Partnership (HAPP)

2015 Coordinated Plan Review

Proposed Greenbelt Plan

Joint Submission

September 2016



Introduction

The Halton Area Planning Partnership (HAPP) is comprised of Halton Region and the following Local Municipalities: the City of Burlington, the Town of Halton Hills, the Town of Milton, and the Town of Oakville.

This submission represents HAPP's response to the document "Proposed Greenbelt Plan (2016), May 2016" (Proposed Plan) which was placed on the Environmental Registry as a Policy Proposal Notice (EBR Registry Number: 012-7195) on May 10, 2016. The Greenbelt Plan is being reviewed in a co-ordinated manner along with three other provincial land use plans, two of which apply in Halton Region – The Growth Plan for the Greater Golden Horseshoe and The Niagara Escarpment Plan. This is an opportunity to address challenges with the plans in a cohesive way.

Proposed changes to the Greenbelt Plan include changes to policies and mapping within the Plan, the introduction of Agricultural System and Agricultural Support Network, proposals for the introduction of impact assessments and classification methodologies to identify special land use areas and key landscape features which have not been consistently identified to this time.

The Halton Area Planning Partnership (HAPP) now takes this opportunity to have its collective voice heard by responding to the Proposed Plan. HAPP's submission provides comments on the Greenbelt Plan's proposed changes and provides HAPP's key recommendations in this letter.

HAPP's response includes:

1. This letter, which contains:
 - a. HAPP's Key Points regarding the whole of the document;
2. Appendix 1, which contains:
 - a. General comments regarding the whole of the Proposed Plan;
 - b. Comments specific to individual policies within the Proposed Plan

Background

A co-ordinated review of the four Provincial land use plans was undertaken in 2015. The Government of Ontario received extensive feedback after the initial round of consultations with stakeholders and the public. An Advisory Panel also provided its recommendations in December 2015 in their report, "Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015 – 2041".

The Government of Ontario has reviewed and considered all feedback received from stakeholders, the public, Indigenous communities and the Advisory Panel's recommendations. The government is now proposing changes to the four plans. The

following Key Points outline the general policy comments developed collaboratively among the members of HAPP for the province's consideration before completion of the Coordinated Plans review.

Key Points of HAPP's Response

1. Harmonization and Alignment

Although efforts have been made to harmonize definitions across the Plans and with the PPS, opportunities still exist to better harmonize terminology, definitions and, where appropriate, policies. For example the Greenbelt Plan provides definitions for key hydrologic areas, key hydrologic features, and key natural heritage features, but these definitions differ from those found in the Growth Plan. As well, natural heritage system and natural heritage areas are referred to in the Greenbelt Plan but are not defined within the plan. Aligning these elements is integral to balancing the requirements of each plan and achieving consistent implementation throughout the Greater Golden Horseshoe (GGH) and beyond.

Consistent development and application of key terms and definitions are again requested among the provincial plans. This includes careful attention to be paid to the development of the content, use, location and referencing of definitions of key terms across the Coordinated Plans. The inclusion of policies and feature identification criteria within definitions, or the inclusion of definitions within policies, detracts from clear interpretation and implementation of the plans. Definitions should be found in the definitions sections, policies in the policy sections, and methodologies and identification criteria established in secondary implementation documents.

2. Agriculture, Agricultural System and Agricultural Support Network

The draft Greenbelt Plan provides greater support for agriculture and the agricultural community by introducing and allowing for agriculture-related and on-farm diversified uses in the Greenbelt Plan Area, which is supported. However, HAPPs previous submission noted the need for policies that would support a 'systems' approach for agricultural processes, which was not fully addressed in the Greenbelt Plan.

The concept of an 'Agricultural Support Network' has been introduced into both the Greenbelt Plan and the Growth Plan. The definition for 'Agricultural Support Network' does not separate economic development supporting goals and land uses throughout rural municipalities. The vague nature of the definition and implied land use implications of this network may create confusion about how the economic, community and social support systems that are part of rural communities and lands may be supported by municipalities.

Furthermore, the definition for 'Agricultural Support Network' suggests that it includes elements such as "regional agricultural infrastructure". Given that "infrastructure" is also a defined term, it is not clear what the intent of "regional agricultural infrastructure" is. It is critical that municipalities understand the implications of this. In addition, the policy direction for municipalities as it relates to the 'Agricultural Support Network's is unclear, as the language used throughout the Greenbelt Plan is inconsistent (i.e., shall versus encourage).

3. Guidelines, Impact Assessments, Performance Indicators, Identification and Environmental Quality Criteria

The Greenbelt Plan and the Growth Plan both refer to a number of forthcoming provincial guidelines and systems mapping initiatives (e.g., watershed planning guidelines, agricultural system mapping, natural heritage systems mapping). As well, reference is frequently made to yet undeveloped classification systems (LEAR, Key Natural Heritage Systems, and Agricultural Systems), identification criteria (Natural Heritage Features), and impact assessment requirements (Agricultural Impact Assessments) throughout the plans.

These tools should be developed quickly, and in consultation with municipalities. It is recommended that the new tools reflect and respect existing criteria and processes in place at the municipal level, be harmonized across provincial plans, and continue to permit municipalities with more restrictive requirements to be more restrictive. In addition, the Province's proposal to lead a process to identify areas to be added to the Protected Countryside must be done in consultation with municipalities.

Municipalities and other public agencies frequently have sound, detailed data used in the development of their own mapping, which reflects local conditions and have resulted in the development of a comprehensive and refined product. These methodologies and resulting mapping are locally significant and should be used in the development of potential provincial land use system mapping changes.

Greater clarity is needed with regard to the expectations of municipalities and other public bodies as it relates to developing and reporting on performance indicators. Guidance and support from the Province to undertake this work is critical.

4. Provincial Systems Mapping

As part of the second round of consultation on the provincial plans, the province has indicated that GTHA scale mapping is intended to be undertaken to identify and establish, or update Natural Heritage Systems, Natural Systems, Agricultural System, Prime Agricultural Areas, and Urban River Valley connections. These initiatives will occur at a higher scale than those that have been undertaken by many municipalities in these areas.

These initiatives appear to provide consistent identification of these important land use systems and features as part of the Greenbelt Plan update. However, methodologies for these initiatives are not yet established, nor are the relative application of municipal land use and system identification maps which have already been determined and brought into force in Official Plans. It is requested that municipal data and mapping be used to refine provincial maps as they are revised or developed.

5. Site Specific Recommendations

It is requested that the Cootes to Escarpment EcoPark receive recognition in the Greenbelt Plan similar to the way in which the Rouge River Watershed has been recognized. This would include the introduction of general policies regarding the Province's commitment to support and protect this significant area. We strongly encourage the Province to incorporate the policies provided in draft in Appendix 1.b Section 3.2.8.

It is requested that the approved Glen Williams boundary (which pre-dated the Greenbelt Plan) contained in the Halton Hills Official Plan be used to define the boundaries of the Greenbelt Plan Protected Countryside, including adding into the Protected Countryside an area to east of Glen Williams paralleling Tenth Line and removing from the Greenbelt Plan Protected Countryside, the lots on the west side of Confederation Street.

6. Urban River Valleys

Fourteen Mile Creek Valley is proposed to be added to the Urban River Valley (URV) designation; however the addition is mapped on Schedule 1 only as far south as the QEW. To achieve consistency with the proposed mapping of the other rivers added to the URV and the intent of the URV designation to show connections to Lake Ontario, consider adding the remaining portion of the Fourteen Mile Creek Valley down to Lake Ontario.

It is unclear how the widths for the Urban River Valleys were determined, as they do not appear to reflect the actual valley widths, hazard lands or municipally identified Natural Heritage System mapping. Use of municipal mapping of urban river valleys is requested to ensure consistency of location, valley widths and public owned lands.

Additionally, it is requested that all symbols, colours and boundaries used on the maps of the Greenbelt Plan are included in complete and thorough accompanying legends.

7. Climate Change and Net-Zero Communities

The introduction of policies addressing climate change and the concept of net-zero communities has been done without accompanying clarification of definitions or explanatory guidance to assist municipalities in understanding the implications or application of these policies. Further information and clear guidance on the goals of these policies and infrastructure changes which will be needed, are required.

Conclusion

Thank you for providing the Region and its local municipalities the opportunity to comment on the development of these policy changes.

Respectfully submitted,

A black ink signature, likely of Ron Glenn, consisting of a stylized 'R' followed by a horizontal line.

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APPENDIX 1: Joint HAPP Response to Proposed Changes to the Greenbelt Plan (May 2016)

Co-ordinated Land Use Planning Review - *Halton Region, City of Burlington, City of Oakville, Town of Halton Hills, and Town of Milton*

Proposed Greenbelt Plan	HAPP Recommendations
Harmonization and Alignment Between Plans	Consistency in the use, location and referencing of definitions of key terms in the Greenbelt Plan and the Growth Plan are requested.
Agriculture and Agricultural Systems	<p>Clarification is requested regarding the applicability of Agricultural Impact Assessments for the introduction of Agriculture Related and On Farm Diversified uses on agricultural lands. As well, consultation on the determination of triggers would be applied to require these assessments are required.</p> <p>Clarification of what is and is not included in the Agriculture Support Network is requested to assist in determining the boundaries and limits of this network. This will assist municipalities in determining how to best support and encourage the Agricultural Support Network.</p> <p>As well, clarification of the intended role of municipalities to support of what appear to be economic development goals (Agricultural Support Network) when support of the network is required (Shall protect). Policies addressing this should be modified to change "...shall be maintained and protected..." to "...encourage the maintenance and protection of ..." throughout the Greenbelt Plan.</p> <p>Additionally, the use of the term 'Agricultural-supportive Infrastructure' needs to be defined in the Plan. The existing definition of infrastructure identifies "physical structures that form the foundation for development", which would make the introduction of policies related to agricultural-supportive infrastructure unsupportable if it is used to justify extension of municipal water and sanitary services outside the Urban Area.</p>
Guidelines, Impact Assessments, Performance Indicators, Identification and Environmental Quality Criteria	<p>The Province's proposal to lead a process to identify areas to be added to the Protected Countryside is requested to be undertaken in consultation with municipalities. Additionally, municipalities are requesting to be consulted during the development of any proposed criteria developed for the purposes of identifying land use, agricultural or natural systems, or significant areas to be added to the Greenbelt, under this plan.</p> <p>It is requested that the provincial plans clarify the use of existing municipal impact assessment, identification criteria, or mapping methods, which may be more detailed than those to be developed by the province, to be able to continue to apply the more comprehensive approach, and support more stringent measures used in Official Plans by municipalities.</p> <p>Additionally, greater clarity is needed with regard to the expectations of municipalities and other public bodies as it relates to development and implementation of performance indicators and monitoring requirements. Guidance and support from the Province to undertake this work is critical.</p>

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Provincial Systems Mapping	<p>Where municipal refinement of Prime Agriculture, Natural Heritage or land use map layers have been completed, it is requested that the Province update their maps to reflect the more detailed and refined local data and mapping.</p> <p>This request includes consideration of the implications of proposed mapping changes, and the opportunity to use existing mapping and systems identification undertaken by municipalities to bring the province into sync with municipal analysis, data and municipal scale mapping.</p>
Site Specific Recommendations	<p>It is requested that the Cootes to Escarpment EcoPark receive recognition in the Greenbelt Plan similar to the way in which the Rouge River Watershed has been recognized. This would include the introduction of general policies regarding the Province's commitment to support and protect this significant area. We strongly encourage the Province to incorporate the policies provided in draft in Appendix 1.b Section 3.2.8 of this submission.</p> <p>It is requested that the approved Glen Williams boundary (which pre-dated the Greenbelt Plan) contained in the Halton Hills Official Plan be used to define the boundaries of the Greenbelt Plan Protected Countryside, including adding into the Protected Countryside an area to east of Glen Williams paralleling Tenth Line and removing from the Greenbelt Plan Protected Countryside, the lots on the west side of Confederation Street.</p>
Urban River Valleys	<p>Fourteen Mile Creek Valley is proposed to be added to the Urban River Valley designation; however the addition is mapped on Schedule 1 only as far south as the QEW. To achieve consistency with the proposed mapping of the other rivers added to the URV and the intent of the URV designation to show connections to Lake Ontario, consider adding the remaining portion of the Fourteen Mile Creek Valley down to Lake Ontario.</p> <p>It is unclear how the widths for the Urban River Valleys were determined, as they do not appear to reflect the actual valley widths, hazard lands or municipally identified Natural Heritage System mapping. Use of municipal mapping of urban river valleys is requested to ensure consistency of location, valley widths and public owned lands.</p> <p>Additionally, it is requested that all symbols, colours and boundaries used on the maps of the Greenbelt Plan are included in complete and thorough accompanying legends.</p>
Climate Change and Net-Zero Communities	<p>The introduction of policies addressing climate change and the concept of net-zero communities has been done without accompanying clarification of definitions or explanatory guidance to assist municipalities in understanding the implications or application of these policies. Further information and clear guidance on the goals of these policies and infrastructure changes which will be needed, are required.</p>

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Numeric Reference	Policy Text	Comments and Recommendations
1 Introduction		
1.1 Context	<p>Ontario's Climate Change Strategy, 2015 reaffirms the government's commitment to meet its long-term targets to reduce greenhouse gas emissions. Protecting agricultural lands, water resources and natural areas, and building compact and <i>complete communities</i> that are walkable and transit-supportive where appropriate will help reduce greenhouse gas emissions and will work toward the long-term goal of <i>net-zero communities</i>. Greenhouse gas emissions can be offset by "carbon sinks" found in natural areas such as the Greenbelt that also includes agricultural lands, <i>green infrastructure</i> and other greenspaces.</p>	<p>The carbon sink function of natural areas largely already exists (as their associated vegetation is largely already on the landscape) and therefore so does their associated emission offsetting. Climate change is happening despite this existing function therefore it is not clear how emissions can be offset by natural areas as only the conversion of more land into natural area through the Plan would achieve this.</p> <p>To be more accurate and to ensure that the protection of natural areas will not be incorrectly construed as providing additional climate change mitigation it is suggested that the wording be revised to:</p> <p>"Greenhouse gas emissions <u>reduction as currently provided by</u> natural areas such as the Greenbelt that also includes agricultural lands, green infrastructure and other greenspaces."</p>
	<p>The <i>Agricultural System</i> is a group of inter-connected elements that collectively create a viable, thriving agricultural sector and is made up of <i>specialty crop areas</i>, <i>prime agricultural areas</i> and <i>rural lands</i>. The Natural System identifies lands that support both natural heritage and hydrologic features and functions. Both systems maintain connections to the broader agricultural and natural systems of southern Ontario.</p>	<p>This context statement should be amended to replace "collectively create" with "are necessary to create". The components of a system do not in themselves create a viable system, but the collected components are needed to create a viable system.</p>
1.2 Vision and Goals		
1.2.1 Vision	<p>The Greenbelt is a broad band of permanently protected land which:</p> <ul style="list-style-type: none"> Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use; Gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health and 	<p>It is recommended that this be revised to:</p> <p>"<u>Contribute to</u> resilience and <u>mitigation of the effects of</u> climate change."</p>

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	<p>that form the environmental framework around which major urbanization in south-central Ontario will be organized;</p> <ul style="list-style-type: none"> • Provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses; and • Builds resilience to and mitigates climate change. 	
1.2.2 Protected Countryside Goals	To enhance our urban and rural areas and overall quality of life by promoting the following matters within the Protected Countryside:	“rural areas” is not a defined term in this document – the term should be changed to “rural lands” to reflect the definition and how the rest of the document has been amended.
	<p>2. Environmental Protection</p> <p>a) Protection, maintenance and enhancement of natural heritage, hydrologic and <i>landform features</i>, areas and functions, including protection of habitat for flora and fauna and particularly species at risk;</p> <p>b) Protection and restoration of natural and open space connections between the Oak Ridges Moraine, the Niagara Escarpment, Lake Ontario, Lake Simcoe and the major river valley lands, while also maintaining connections to the broader natural systems of southern Ontario beyond the <i>GGH</i> such as the Great Lakes Coast, the Carolinian Zone, the Lake Erie Basin, the Kawartha Highlands and the Algonquin to Adirondacks Corridor;</p> <p>c) Protection, improvement or restoration of the quality and quantity of ground and surface water and the hydrological integrity of watersheds; and</p> <p>d) Provision of long-term guidance for the management of natural heritage and water resources when contemplating such matters as watershed/subwatershed and stormwater management planning, water and wastewater servicing, development, <i>infrastructure</i>, open space planning and management, aggregate rehabilitation and private or public</p>	<p>1.2.2.2 a) This policy does not reflect a systems approach. It is recommended that this be revised to include natural heritage systems and linkages to hydrologic system as follows:</p> <p>“Protection, maintenance and enhancement of natural heritage, hydrologic and landform features, <u>areas, functions and systems</u>, including protection of <u>connectivity as well as</u> habitat for flora and fauna and particularly species at risk”</p>

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	stewardship programs.	
	<p>6. Climate Change</p> <p>a) Integrating climate change considerations into planning and managing the <i>Agricultural System</i>, Natural Heritage System and Water Resource System to improve resilience and protect carbon sequestration potential, recognizing that the Natural Heritage System is also a component of <i>green infrastructure</i>; and</p> <p>b) Integrating climate change considerations into planning and managing growth by incorporating techniques to reduce greenhouse gas emissions in resilient <i>settlement areas</i> and <i>infrastructure</i> located within the Greenbelt.</p>	1.2.2.6 b) A definition of resilient needs to be provided in this plan and in the Growth Plan.
1.2.3 Urban River Valley Goals		
1.4.2 Structure of the Plan	<p>The Greenbelt Plan consists of:</p> <p>Section 1.0 – Introduction: Describes the context for the Greenbelt Plan in southern Ontario and introduces the Plan’s Vision and Goals. The legislative authority for the Plan and how it is to be used and applied within the land use planning system are also set out in this section.</p>	
	<p>The <i>Agricultural System</i> is comprised of the agricultural land base (<i>specialty crop areas</i>, <i>prime agricultural areas</i> and <i>rural lands</i>) and the <i>Agricultural Support Network</i>. The <i>Agricultural Support Network</i> is a collection of elements that support agricultural viability, but is not a designation with a list of permitted uses. While the Greenbelt Plan identifies the boundaries of the <i>specialty crop areas</i>, it relies on official plans to further delineate the <i>prime agricultural area</i> and <i>rural lands</i></p>	<p>Identification of Prime Agricultural Areas in Official Plans through LEAR studies locally determined refinements of the provincial LEAR Prime Agricultural Areas.</p> <p>The policy should be revised to replace “further delineate” with “refine”.</p>
	<p><i>Settlement Areas</i> are comprised of Towns/Villages and Hamlets. Although this Plan shows boundaries for Towns/Villages, Hamlets are only shown as symbols. In both cases, this Plan defers to official plans for the detailed delineation of <i>settlement area</i></p>	<p>This paragraph has been slightly modified for additional clarity. For additional clarity, it would be useful to be specific on the circumstances under which the plan does apply to lands outside Towns/Villages and Hamlets (i.e. per external connections and urban river valley policies).</p>

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	boundaries. Generally, this Plan does not apply to lands within the boundaries of Towns/Villages and Hamlets. Official plans will continue to govern land use within these <i>settlement areas</i> . However, where expansions to <i>settlement areas</i> are proposed in the Greenbelt, the policies of both this Plan and the Growth Plan apply to such expansions.	It is recommended that this be revised to: “...However, where expansions to <i>settlement areas</i> are proposed in the Greenbelt, <u>and where land use decisions are made in relation to lands designated as urban river valley on Schedules 1 and 2</u> , the policies of both this Plan and the Growth Plan apply.”
	Lands in the Protected Countryside will be within one of the following policy areas: the agricultural land base (<i>specialty crop areas, prime agricultural areas, rural lands</i>), Towns/Villages, Hamlets or Shoreline Built-up Areas. In addition, lands may also be subject to the policies of the Natural Heritage System, Water Resource System, <i>key hydrologic areas, key natural heritage features</i> and <i>key hydrologic features</i> . Also described in this section are policies regarding parkland, open space and trails in the Greenbelt.	The use of “Shoreline Built-up Areas” is not consistent with the use of “Developed Shoreline” in Section 4.1.3 Developed Shoreline Policies later in this plan. This policy is recommended to be revised to: “Hamlets or <u>Developed Shorelines</u>”
	Section 6.0 – Urban River Valley Policies: Sets out policies for the Urban River Valley designation that applies to publicly owned urban river valley lands brought into the Greenbelt by amendment after approval of the Plan in 2005.	The Urban River Valley Policies are not appropriately placed in this plan. These policies should precede Section 4 – General Policies in the Protected Countryside. As well, Urban River Valley policies, and the features that they address, are external connections beyond the Greenbelt, which suggests that the external connections policies of Section 3.2.6 should be referenced.
1.4.3 How to use this Plan	The following is a brief description of how this Plan, read in its entirety, affects a specific area, land use or <i>development / infrastructure</i> /resource proposal.	
	1. Refer to Schedule 1 to determine if the lands are located within the NEP Area or the Oak Ridges Moraine Area. If the property is located in either of these areas, the policies of the NEP or the ORMCP continue to apply as set out in section 2.0. If the lands are located in the Protected Countryside designation, then the entirety of the Greenbelt Plan’s relevant policies apply. Determine if the lands are located within the Parkway Belt West Plan. If so, the policies of the Parkway Belt West Plan continue to apply as set out in section 2.0. Determine if the lands are located within the Urban River	Section 3.2.6 External Connections policies should be referenced in this section. As well, direction to apply the provisions in Section 3.2.6 that address lands adjacent to the lands designated as Urban River Valley. The policy is recommended to be revised to: “Determine if the lands are located within <u>or adjacent to</u> the Urban River Valley designation on Schedule 1. If so, the specific policies set out in <u>sections 3.2.6</u>

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	Valley designation on Schedule 1. If so, the specific policies set out in section 6.0 for the designation apply.	<u>and</u> 6.0 for the designation apply.”
	<p>2. If lands are within the Protected Countryside, determine which of the Geographic Specific Policies apply as described in section 3.0. This is accomplished by a series of steps.</p> <p>Refer to Schedules 1, 2 and 3 of this Plan to determine if the lands are located within a <i>specialty crop area</i> or a Town/Village or Hamlet. If lands are located in a <i>specialty crop area</i>, refer to the policies of this Plan. If lands are located in a Town/Village or Hamlet, refer to official plans.</p> <p>If the lands are not in a <i>specialty crop area</i> or Town/Village or Hamlet, determine in which municipality the lands are located and refer to the official plans that are in effect to determine if the lands are designated prime agricultural area or <i>rural lands</i> (or a similar designation). Once this determination is made, refer to the <i>Agricultural System</i> policies of this Plan (section 3.1) to determine if there are any additional restrictions or requirements relating to <i>prime agricultural areas</i> or <i>rural lands</i>.</p> <p>Refer to Schedule 4 of this Plan to determine if the lands are located within the Natural Heritage System. If so, refer to the Natural System policies of section 3.2, which is an overlay on top of the agricultural land base designations of the <i>Agricultural System</i> within official plans.</p> <p>Refer to official plans, data or information on natural features from provincial, municipal and agency (e.g. conservation authority) sources, and conduct a preliminary assessment of the property to determine if there are any <i>key natural heritage features</i>, <i>key hydrologic features</i>, or <i>key hydrologic areas</i> on the lands. If so, refer to the policies of sections 3.2.4 and 3.2.5 of this Plan.</p>	<p>Clarification is needed to make this instruction on how to read the plan consistent with that in section 1.4.2 (3rd section).</p> <p>A definition of the Agricultural Land Base needs to be added to this plan and if there is the intent to use this term, to consistently apply it.</p> <p>There is no inclusion of reference to adjacent lands. To resolve this, it is recommended to be revised to:</p> <p>“...key hydrologic areas <u>on or within 120m of key features.</u>”</p>

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2 Greenbelt Plan		
2.3 Lands within the Parkway Belt West Plan Area	The requirements of the Parkway Belt West Plan, deemed to be a development plan under the Ontario Planning and Development Act, 1994 continue to apply to lands within the Parkway Belt West Plan Area and the Protected Countryside policies do not apply with the exception of sections 3.2 and 3.3.	It is recommended that the following addition be made: “...with the exception of sections <u>3.1</u> , 3.2 and 3.3.”
2.5 Lands within the Urban River Valley Area	Lands within the Urban River Valley designation, as shown on Schedule 1, are subject to the policies of section 6.0 and the Protected Countryside policies do not apply except as set out in that section.	These comments are similar to those in section 1.4.3.1. Section 3.2.6 External Connections policies should be referenced in this section. As well, direction to apply the provisions in Section 3.2.6 that address lands adjacent to the lands designated as Urban River Valley. The policy is recommended to be revised to: “Determine if the lands are located within <u>or adjacent to</u> the Urban River Valley designation on Schedule 1. If so, the specific policies set out in <u>sections 3.2.6 and</u> 6.0 for the designation apply.”

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3 Geographic Specific Policies in the Protected Countryside		
	<p>Prime agricultural areas, are those lands designated as such within official plans.</p> <p>Rural lands are those lands outside of <i>settlement areas</i> which are not <i>prime agricultural areas</i> and which are generally designated as rural or open space within official plans.</p> <p>At the time of a municipal comprehensive review under the Growth Plan, upper and single-tier municipalities may have to amend their official plan designations for <i>prime agricultural areas</i> and <i>rural lands</i> in accordance with the policies of section 5.3.</p>	<p>The definition of Prime Agricultural Areas is provided in the Definition Section of this plan, and is unnecessary in this section of this plan.</p> <p>The definition of rural lands is provided in Definition Section of this plan, and is unnecessary in this section of this plan.</p> <p>As well, this definition/statement is an expansion of the other definition and this may lead to confusion.</p>
3.1.2 Speciality Crop Area Policies	For lands falling within the <i>specialty crop area</i> of the Protected Countryside the following policies shall apply:	
	<p>1. <i>Normal farm practices</i> and a full range of <i>agricultural, agriculture-related</i> and <i>on-farm diversified uses</i> are supported and permitted. Proposed <i>agriculture-related uses</i> and <i>on-farm diversified uses</i> shall be compatible with and shall not hinder surrounding agricultural operations. Criteria for these uses shall be based on provincial Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas.</p>	<p>Clarification of the role and applicability of municipally developed guidelines and the ability of municipalities to be more restrictive than the province are requested.</p> <p>Additionally, the finalization of the Draft Permitted Uses in Prime Agricultural Areas Guidelines is requested.</p>
	<p>5. Land use compatibility shall be promoted to avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on the <i>Agricultural System</i>, where <i>agricultural uses</i> and non-agricultural uses interface, based on provincial guidance.</p>	<p>This policy implies that potential impacts of non-agricultural uses on any part of or on the entire agricultural system need to be determined when changes to land use are being considered. This is too vague, as the agricultural system is composed of both agricultural land base and the support network, it is unclear how areas of impact would be determined.</p> <p>This policy is recommended to be clarified through the application of a scale or range of potential influence, indication if Agricultural Impact Assessments are required, and the mechanism to identify the boundaries of the Agricultural System.</p> <p>Guidance from the province is necessary to address these issues. This appears</p>

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		to introduce the concept of buffering / edge planning between agricultural lands and proposed non-compatible land uses.
	6. The geographical continuity of the agricultural land base and the functional and economic connections to the <i>Agricultural Support Network</i> shall be maintained and enhanced.	<p>This statement appears to be a goal or objective, instead of a policy. This statement is not implementable as written and is not consistent with the softer language in policy 3.1.5.</p> <p>It is recommended that this be revised to:</p> <p>“...Agricultural Support Network be encouraged to be maintained and enhanced. “</p>
3.1.3 Prime Agricultural Area Policies	For lands falling within the <i>prime agricultural area</i> of the Protected Countryside the following policies shall apply:	
	1. <i>Normal farm practices</i> and a full range of <i>agricultural, agriculture-related</i> and <i>on-farm diversified uses</i> are supported and permitted. Proposed <i>agriculture-related uses</i> and <i>on-farm diversified uses</i> shall be compatible with and shall not hinder surrounding agricultural operations. Criteria for these uses shall be based on provincial Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas.	<p>Clarification of the role and applicability of municipally developed guidelines and the ability of municipalities to be more restrictive than the province, are requested.</p> <p>Additionally, the finalization of the Draft Permitted Uses in Prime Agricultural Areas Guidelines is requested.</p>
	3. Non-agricultural uses may be permitted subject to the policies of sections 4.2 to 4.6. These uses are generally discouraged in <i>prime agricultural areas</i> and may only be permitted after the completion of an <i>agricultural impact assessment</i> .	<p>This policy is too flexible to be implemented, including the use of “may be” and “generally discouraged”.</p> <p>Establishment of clear direction on the need for, content of and establishment of a baseline standard to be achieved for consideration of approval for proposed non-agricultural uses are necessary from the province.</p> <p>The application of a no negative impact standard for the introduction of a non-agricultural use would contribute to the quality of AIAs undertaken.</p> <p>It is recommended that municipalities be included in the development and review of proposed guidelines.</p>
	5. Land use compatibility shall be promoted to avoid, or if avoidance is not possible, minimize and mitigate adverse	This policy implies that potential impacts of non-agricultural uses on any part of or on the entire agricultural system need to be determined when changes

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	impacts on the <i>Agricultural System</i> , where <i>agricultural uses</i> and non-agricultural uses interface, based on provincial guidance.	<p>to land use are being considered. This is too vague, as the agricultural system is composed of both agricultural land base and the support network, it is unclear how areas of impact would be determined.</p> <p>This policy is recommended to be clarified through the application of a scale or range of potential influence, indication if Agricultural Impact Assessments are required, and the mechanism to identify the boundaries of the Agricultural System.</p> <p>Guidance from the province is necessary to address these issues. This appears to introduce the concept of buffering / edge planning between agricultural lands and proposed non-compatible land uses.</p>
	6. The geographical continuity of the agricultural land base and the functional and economic connections to the <i>Agricultural Support Network</i> shall be maintained and enhanced.	<p>This statement appears to be a goal or objective, instead of a policy. This statement is not implementable as written and is not consistent with the softer language in policy 3.1.5.</p> <p>It is recommended that this be revised to:</p> <p>“...Agricultural Support Network be encouraged to be maintained and enhanced. “</p>
3.1.4 Rural Lands Policies	For lands falling within the <i>rural lands</i> of the Protected Countryside the following policies shall apply:	
	2. <i>Rural lands</i> may contain existing agricultural operations and provide important linkages between <i>prime agricultural areas</i> as part of the overall <i>Agricultural System</i> . <i>Normal farm practices</i> and a full range of <i>agricultural, agriculture-related</i> and <i>on-farm diversified uses</i> are supported and permitted. Proposed <i>agriculture-related uses</i> and <i>on-farm diversified uses</i> should be compatible with and should not hinder surrounding agricultural operations. Criteria for these uses shall be based on provincial Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas.	<p>Clarification of the role and applicability of municipally developed guidelines and the ability of municipalities to be more restrictive than the province, are requested.</p> <p>Additionally, the finalization of the Draft Permitted Uses in Prime Agricultural Areas Guidelines is requested.</p> <p>Remove “existing” agricultural operations, as rural lands should allow for existing or future agricultural uses.</p> <p>In the case where criteria have been developed by municipalities, municipal guidelines/policies will also need to be considered.</p>
	4. Other uses may be permitted subject to the policies of sections 4.1 to 4.6. Where non-agricultural uses are proposed, the completion of an <i>agricultural impact</i>	Clarification of this policy is recommended through the establishment of clear, consistent Agricultural Impact Assessment procedures. This would include the establishment of direction on the need for, content of and

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	assessment should be considered.	<p>establishment of a baseline standard to be achieved for consideration of approval for proposed non-agricultural uses are necessary from the province</p> <p>Guidance from the province is necessary to address these issues. This appears to introduce the concept of buffering / edge planning between agricultural lands and proposed non-compatible land uses.</p>
	<p>5. <i>New multiple lots or units for residential development</i>, (e.g. estate residential subdivisions and adult lifestyle or retirement communities), whether by plan of subdivision, condominium or severance, shall not be permitted in <i>rural lands</i>. Notwithstanding this policy, official plans may be more restrictive than this Plan with respect to residential severances. Official plans shall provide guidance for the creation of lots within <i>rural lands</i> not addressed in this Plan. Regardless, new lots for any use shall not be created if the creation would extend or promote strip development.</p>	<p>Some confusion has been encountered in the past relating to whether this policy would apply to new retirement community and/or long term care communities not requiring lot creation; and therefore not triggering a plan of subdivision, condominium, group home or severance application. It is noted that the impact on the agricultural land base may be comparable for such land uses. It is recommended that this policy be rewritten to eliminate this confusion.</p>
	<p>7. Land use compatibility shall be promoted to avoid, or if avoidance is not possible, minimize and mitigate adverse impacts on the <i>Agricultural System</i>, where <i>agricultural uses</i> and non-agricultural uses interface, based on provincial guidance.</p>	<p>This policy implies that potential impacts of non-agricultural uses on any part of or on the entire agricultural system need to be determined when changes to land use are being considered. This is too vague, as the agricultural system is composed of both agricultural land base and the support network, it is unclear how areas of impact would be determined.</p> <p>This policy is recommended to be clarified through the application of a scale or range of potential influence, indication if Agricultural Impact Assessments are required, and the mechanism to identify the boundaries of the Agricultural System.</p> <p>Guidance from the province is necessary to address these issues. This appears to introduce the concept of buffering / edge planning between agricultural lands and proposed non-compatible land uses.</p>
	<p>8. The geographical continuity of the agricultural land base and the functional and economic connections to the <i>Agricultural Support Network</i> shall be maintained and enhanced.</p>	<p>This statement appears to be a goal or objective, instead of a policy. This statement is not implementable as written and is not consistent with the softer language in policy 3.1.5.</p>

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		<p>It is recommended that this be revised to:</p> <p>“...Agricultural Support Network be encouraged to be maintained and enhanced. “</p>
	<p>9. Where <i>public service facilities</i> exist on <i>rural lands</i>, consideration should be given to maintaining and adapting these as community hubs where feasible, to meet the needs of the community.</p>	<p>Public service facilities include a large range of uses and structures and this policy wants to see these uses/sites (which may be legal non-conforming) expand to be community hubs which is not a defined term in this document.</p> <p>Additionally, this appears to contradict the provincial direction of directing growth to Settlement Areas, and this will need to be addressed. Community hubs should be directed to Settlement Areas, however the policies must also recognize that there will be circumstances where a new public service facility must be provided outside of a settlement area (e.g. fire and ambulance services, road maintenance facilities).</p> <p>The development of community hub guidelines, and these future guidelines should be referenced similarly to other proposed guidelines in this plan.</p>
3.1.5 Agricultural Support Network	<p>Planning authorities are encouraged to implement strategies and other approaches to sustain and enhance the <i>Agricultural System</i> and the long-term economic prosperity and viability of the agri-food sector, including the maintenance and improvement of the <i>Agricultural Support Network</i> by:</p>	<p>This policy encourages agricultural economic development but the responsibility for maintenance and improvement of the network is unclear, and could have financial implications for municipalities beyond regular economic development responsibilities.</p> <p>Focus on Agri-food instead of agriculture in general is limiting and may encourage less attention to be paid to the protection and support for non-food related agriculture.</p> <p>It is recommended that this be revised to replace agri-food with agriculture.</p> <p>It is recommended that the role and responsibility of municipalities to maintain and improve the Agricultural Support Network be clearly outlined.</p>
	<p>e) Providing opportunities for agriculture-supportive <i>infrastructure</i> both on and off farms.</p>	<p>There is no definition of “agriculture-supportive infrastructure”, and a definition is necessary to clarify what is intended.</p> <p>The definition of infrastructure identifies physical structures that form the foundation for development, which would make this policy unsupportable if it is used to justify extension of municipal water and sanitary services outside the Urban Area.</p>

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3.1.6 Agricultural System Connections	The <i>Agricultural System</i> is connected both functionally and economically to the agricultural land base and agri-food sector beyond the boundaries of the Greenbelt. Agriculture is the predominant land use in the Greenbelt and is an important economic factor in the quality of life for communities in and beyond the Greenbelt.	Focus on Agri-food instead of agriculture in general is limiting and may encourage less attention to be paid to the protection and support for non-food related agriculture. It is recommended that this be revised to replace agri-food with agriculture.
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3.2 Natural System		
3.2.1 Description		
	<p>The Natural System within the Protected Countryside functions at three scales:</p> <p>3. The system is supported by a multitude of natural and hydrologic features and functions found within the GGH but outside of the NEP and the ORMCP. In particular, the numerous watersheds, subwatersheds and groundwater resources, including the network of tributaries that support the major river systems identified in this Plan, are critical to the long-term health and sustainability of water resources and biodiversity and overall ecological integrity. Official plans and related resource management efforts by conservation authorities and others shall continue to assess and plan for these natural and hydrologic features in a comprehensive and integrated manner, through the identification and protection of natural systems, building upon and supporting the natural systems identified within the Greenbelt.</p> <p>The Natural System is made up of a Natural Heritage System and a Water Resource System that often coincide given ecological linkages between terrestrial and water based functions.</p>	<p>3.2.1.3 Natural systems do not stop at the boundaries of the Niagara Escarpment or Oak Ridges Moraine and this policy needs to be clarified.</p> <p>It is recommended that this policy be revised to remove “outside of the NEP and the ORMCP”.</p> <p>Definitions, (natural system definition) should be moved to the definition section of this plan and be consistent among the provincial plans.</p>
	<p>The Natural Heritage System includes core areas and linkage areas of the Protected Countryside with the highest concentration of the most sensitive and/or <i>significant</i> natural features and functions. These areas need to be managed as a connected and integrated natural heritage system given the functional inter-relationships between them, and the fact this system builds upon the natural systems contained in the NEP and the ORMCP (see Schedule 4) and will connect with the Natural Heritage System that will be identified through the Growth Plan. Together, these</p>	<p>Consistency of the content and location of definitions among the provincial plans, including referencing of the Provincial Policy Statement, if the source of the definition, should be applied throughout this and the other plans.</p>

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	systems will comprise and function as a connected natural heritage system.	
3.2.2 Natural Heritage System Policies	For lands within the Natural Heritage System of the Protected Countryside the following policies shall apply:	
	<p>3. New <i>development</i> or <i>site alteration</i> in the Natural Heritage System (as permitted by the policies of this Plan) shall demonstrate that:</p> <p>a) There will be no negative effects on <i>key natural heritage features</i> or <i>key hydrologic features</i> or their functions;</p> <p>b) <i>Connectivity</i> along the system and between <i>key natural heritage features</i> and <i>key hydrologic features</i> located within 240 metres of each other, is maintained, or where possible, enhanced for the movement of native plants and animals across the landscape;</p> <p>c) The removal of other natural features not identified as <i>key natural heritage features</i> and <i>key hydrologic features</i> should be avoided. Such features should be incorporated into the planning and design of the proposed use wherever possible;</p> <p>d) The disturbed area, including any buildings and structures, of any site does not exceed 25 per cent (40 per cent for golf courses);</p> <p>e) The impervious surface does not exceed 10 per cent of the total developable area, except for uses described in and governed by sections 4.1.2 and 4.3.2;</p> <p>f) The compatibility of the project with the natural surroundings is optimized; and</p> <p>g) At least 30 per cent of the <i>total developable area</i> of the site will remain or be returned to <i>natural self-sustaining vegetation</i>, recognizing that section 4.3.2 establishes specific standards for the uses described there.</p>	<p>3.2.2.3 b) The addition of the distance of 240m or less separation between features is intended to provide clarity to this policy. However, it is requested that the source or justification of the distance chosen be provided either in this plan or in a guidelines document.</p> <p>Clarification is requested on whether there are intended to be limits to the number or extent of features to be connected as a result of this policy (e.g., certain number of metres away from core features).</p> <p>Some level of flexibility must be applied to development that occurs within the 240 metre connectivity area. There will be many cases where existing development (e.g. farm clusters, roads and other infrastructure) exist within the 240 metre area. Achieving connectivity in these areas may not be possible, and it would be more appropriate to direct new development to the areas that are already disturbed (e.g. new agricultural buildings or additions within an existing farm cluster).</p> <p>f) This policy is very weak and does not provide direction on how to determine “compatibility”, “optimization” and does not clarify what is intended by “project”.</p> <p>Presumably, an incompatible “project” would have significant implications and should be reconsidered or rejected during a permitting or design process.</p> <p>This policy should be removed or revised to address the issues above.</p>

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3.2.3 Water Resource System Policies	The following Water Resource System policies apply throughout the Protected Countryside:	
	1. All planning authorities shall provide for a comprehensive, integrated and long-term approach for the protection, improvement or restoration of the quality and quantity of water. Such an approach shall consider all hydrologic features and functions and include a systems approach to the inter-relationships between and/or among recharge/discharge areas, shorelines, aquifers, headwaters and surface waters (i. e. <i>Lakes</i> , rivers and streams, including <i>intermittent streams</i>).	It is unclear if these policies apply to settlement areas. 3.2.2.5 NHS does not apply in existing boundaries of settlement areas, but this provision is not in this section. The language should be consistent with NHS policies and with policies in Growth Plan.
	2. Watersheds are the most meaningful scale for hydrological planning, and municipalities together with conservation authorities shall ensure that <i>watershed planning</i> is completed to inform decisions on growth, development, <i>settlement area</i> boundary expansions and planning for water, wastewater and stormwater <i>infrastructure</i> .	<p>This policy has been strengthened with the change from “should” to “shall”, but this may lead to confusion about the need and mechanism to require a watershed plan.</p> <p>Guidance and funding to support municipalities are requested from the province for the development of these plans.</p> <p>Given the scale of watershed plans, and the number of municipal and conservation authority jurisdictions that could be involved, the province should provide clear guidance on which agencies should lead development of these plans. As well, provincial direction is requested regarding determination of triggers for their watershed study initiation, content, process and baseline standards to be met.</p>
	3. Cross-jurisdictional and cross-watershed impacts need to be considered in the development of <i>watershed plans</i> . The development of <i>watershed plans</i> and watershed management approaches in the Protected Countryside shall be integrated with watershed planning and management in the NEP, the ORMCP and the Growth Plan.	Watershed and water-related policies of draft Niagara Escarpment Plan do not align with similar policies of draft Greenbelt Plan. Greater harmonization is requested.

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3.2.4 Key Hydrologic Areas		
	<p>For lands within a key hydrologic area in the Protected Countryside, the following policies apply:</p> <ol style="list-style-type: none"> 1. <i>Major development</i> may be permitted where it is demonstrated that: <ol style="list-style-type: none"> a) The hydrologic functions of these areas shall be protected and, where possible, improved or restored through; <ol style="list-style-type: none"> i. The identification of planning, design and construction practices and techniques; and ii. Meeting other criteria and direction set out in the <i>watershed or subwatershed plan</i>. 	<p>3.2.4.1 a) ii) It is recommended that this be revised to read:</p> <p>“Meeting other criteria and direction set out in the watershed or subwatershed plan <u>where one exists.</u>”</p> <p>Clarification is requested to confirm whether key hydrologic areas must include all three areas (sig groundwater recharge areas, highly vulnerable aquifers <u>and</u> sig surface water features), or just one of three to be considered a key hydrologic area.</p>
	<ol style="list-style-type: none"> 5. A proposal for new <i>development</i> or <i>site alteration</i> within 120 metres of a <i>key natural heritage feature</i> within the Natural Heritage System or a <i>key hydrologic feature</i> anywhere within the Protected Countryside requires a natural heritage evaluation or a hydrological evaluation, which identify a <i>vegetation protection zone</i> which: 	<p>The identification or inclusion of a vegetation protection zone is not always possible in the types of development and site alteration permitted within Key Hydrologic Features and Key Natural Heritage Features as per Section 3.2.5.1.</p> <p>It is recommended that this policy be revised to:</p> <p>requires a natural heritage evaluation or a hydrological evaluation, which identify a vegetation protection zone which:</p>
	<ol style="list-style-type: none"> 8. Notwithstanding the policies of section 3.2.5.5, a natural heritage evaluation or hydrologic evaluation is not required for new buildings and structures for <i>agricultural, agriculture-related</i> and <i>on-farm diversified uses</i> located within 120 metres of a <i>key natural heritage feature</i> and/or <i>key hydrologic feature</i>, provided the features and their functions are protected from the impacts of the proposed building or structure by meeting the following requirements: <ol style="list-style-type: none"> f) The municipality or other approval authority has also considered the following in relation to determining any potential impacts of the proposal: 	<p>8. f) This policy is not clear when referring to other approval authority. It is recommended that this be revised to:</p> <p>“The municipality or other approval authority, <u>as appropriate</u>, ...”</p>

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3.2.6 External Connections	The Natural Heritage System is connected to local, regional and provincial scale natural heritage, water resource and agricultural systems beyond the boundaries of the Greenbelt and includes those areas designated as Urban River Valley in the Plan.	This policy limits consideration of Urban River Valleys to those that have been designated. At this time, there is only 1 designated URV. This may limit consideration of protection and support for URVs that have been identified on Schedules 1 and 4, but not yet designated.
	To support the connections between the Greenbelt's Natural System and the local, regional and broader scale natural heritage systems of southern Ontario, such as the Lake Ontario shoreline, including its remaining coastal <i>wetlands</i> , the Great Lakes Coast, Lake Simcoe, the Kawartha Highlands, the Carolinian Zone and the Algonquin to Adirondack Corridor, the federal government, municipalities, conservation authorities, other agencies and stakeholders should:	Clarification is required to provide direction on the process and trigger for involvement of representatives from each level of government and stakeholders identified in this policy.
	<p>The river valleys that run through existing or approved urban areas and connect the Greenbelt to inland <i>lakes</i> and the Great Lakes, including areas designated as Urban River Valley, are a key component of the long-term health of the Natural System. In recognition of the function of the urban river valleys, municipalities and conservation authorities should:</p> <p>3. Integrate <i>watershed planning</i> and management approaches for lands both within and beyond the Greenbelt taking into consideration the goals and objectives of protecting, improving and restoring the Great Lakes.</p>	<p>It is recommended that this be revised to :</p> <p>"The river valleys that run through existing or approved urban areas <u>(the Blue Urban River Valley Lines on Schedule 4)</u> and connect the Greenbelt to inland <i>lakes</i> and the Great Lakes <u>(the Green Dashed River Valley Connect Lines on 4)</u>, including areas designated as Urban River Valley, are a key component of the long-term health of the Natural System. In recognition of the function of the urban river valleys, municipalities and conservation authorities should:"</p> <p>3. It would be beneficial to reference the specific geographic areas being discussed in this policy.</p>
	These external connections are generally depicted by a dotted green line on Schedules 1 to 4, but are not within the regulated boundary of the Greenbelt Plan. Many of the external connections shown on Schedules 1, 2 and 4 at the time of the Plan's approval in 2005 have been added to the Greenbelt Plan as Urban River Valley areas and are subject to the policies of section 6.0 of this Plan.	<p>The identified Urban River Valleys do not appear to reflect the physical width of the actual valleys, hazard lands, or NHS that may have been identified by municipalities or CAs.</p> <p>The Plan proposes to replace the dashed green line in urban areas with a new Blue Urban River Valley line.</p> <p>The policy reference should be expanded to include a reference to the policies in section 3.2.6.</p>

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Recommended Section 3.2.8:

As included to recognize the Rouge River Watershed, it is recommended that the Cootes to Escarpment EcoPark System be identified in the Introduction to Section 3.2 'Natural System' of The Greenbelt Plan with the inclusion of a new Sub-Section 3.2.8 entitled 'Cootes to Escarpment EcoPark System'.

The following text is suggested for inclusion in Section 3.2.8 (or similar):

"The Cootes to Escarpment EcoPark System is recognized as a collaboration of nine land-owning agencies and organizations in the Hamilton-Burlington area that is working to protect and restore natural lands and establish ecological corridors or connection between existing partner lands in an area that is one of the most biologically rich areas in Canada.

This current Cootes to Escarpment EcoPark System partner lands cover approximately 3,900 hectares in the Hamilton-Burlington area at the western end of Lake Ontario. These lands stretch from the western terminus of the Desjardins Canal in Hamilton (to the west) to Brant Street in Burlington (to the east) and from the Niagara Escarpment (to the north) and the south shore of Cootes Paradise, Royal Botanical Gardens and Highway 403 (to the south).

The Cootes to Escarpment EcoPark System is a parks and open space system, rather than a single park. While lands remain in the ownership of the partner agencies and organizations, the partners are united in their defined mission which is to collaboratively continue preserving and enhancing the natural lands using a sustainable approach that balances natural ecosystem health with responsible human appreciation and activities.

Land use planning and resource management within those portions of the Cootes to Escarpment EcoPark System within the Protected Countryside shall comply with the provisions of this Plan.

The Province should, in partnership with the Cootes to Escarpment EcoPark System partners:

- a. Recognize the Cootes to Escarpment EcoPark System as an outstanding example of a collaborative initiative to expand the Province's parks and open space system.
- b. Encourage and support the further development and management of the Cootes to Escarpment EcoPark System and its associated open space recreational infrastructure and trails network.
- c. Promote good stewardship practices for public and private lands within and adjacent to the Cootes to Escarpment EcoPark System.
- d. Consider the Cootes to Escarpment EcoPark System and other similar collaborative efforts to expand the Province's Open Space System as priority areas for annual funding by the Province in relation to land securement, open space infrastructure development and management, and private lands stewardship activities."

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3.3 Parkland, Open Space and Trails		
3.3.1 Description	<p>A system of parklands, open spaces, water bodies, and trails across the Greenbelt is necessary to provide opportunities for recreation, tourism, and appreciation of cultural heritage and natural heritage. They serve as an important component of <i>complete communities</i> and provide important benefits to support environmental protection, improved air quality and climate change mitigation. This system currently supports a variety of passive and active uses, as well as health, economic and other quality of life benefits within the Greenbelt.</p> <p>A system of parklands, open spaces, water bodies, and trails helps address the causes and impacts of climate change by capturing and storing carbon, recharging aquifers and protecting biodiversity and sensitive areas.</p>	Existing parklands, open spaces, agricultural practices and natural heritage features and systems contribute to an existing level of carbon sequestration that is part of the existing carbon emissions balance. No additional sequestration will be added by existing ecosystems, only the creation of new natural areas, such as woodlands, forests, will contribute additional carbon sequestration.
3.3.2 Parkland, Open Space and Trail Policies		
	2. Encourage the development of a trail plan and a coordinated approach to trail planning and development in the Greenbelt to enhance key existing trail networks and to strategically direct more intensive activities away from sensitive landscapes; and	It is recommended that a definition be provided for sensitive landscapes in this plan and the other provincial plans as appropriate.
3.3.3 Municipal Parkland, Open Space and Trail Strategies		
	<p>4. Include the following considerations in municipal trail strategies:</p> <p>g) Ensuring the protection of the sensitive key natural heritage features and key hydrologic features and functions of the landscape.</p>	<p>It is recommended that trails be encouraged to connect residential areas and community amenities and services:</p> <p><u>h) Encourage trail connections to be created between residential areas, community amenities and services to enhance mobility throughout communities.</u></p>

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3.4 Settlement Areas		
3.4.1 Description	<p><i>Settlement areas</i> within the Greenbelt support and provide significant economic, social and commercial functions to <i>prime agricultural areas</i> and <i>rural lands</i>. They are an integral part of the long-term economic and social sustainability of the Greenbelt and this Plan envisions that they continue to evolve and grow in keeping with their rural and/or existing character.</p> <p>Land use patterns within <i>settlement areas</i> shall support the development of <i>complete communities</i> that support the long-term goal of becoming <i>net-zero communities</i>. The development of <i>complete communities</i> shall in part be achieved by facilitating the development of community hubs that involve the co-location of public services to address local community needs in convenient locations that are accessible by <i>active transportation</i> and, where available, transit.</p>	<p>Policies that stress land use patterns within settlement areas are somewhat out of place in the Greenbelt Plan.</p> <p>Promotion of community hubs in all settlement areas may not be appropriate. Further clarification of community hubs, including a definition, should be provided by the province.</p>
3.4.2 General Settlement Area Policies	<p>For lands within Towns/Villages and Hamlets in the Protected Countryside, the following policies shall apply:</p> <ol style="list-style-type: none"> 1. <i>Settlement areas</i> outside the Greenbelt are not permitted to expand into the Greenbelt. 2. Municipalities shall incorporate policies in their official plans to facilitate the development of community hubs that: <ol style="list-style-type: none"> a) enable the co-location of public services to promote cost-effectiveness and service integration; b) facilitate access through locations serviced by a range of transportation options including <i>active transportation</i> and, where available, transit; c) give priority to existing <i>public service facilities</i> within settlement areas as the preferred location, where appropriate; and d) enable the adaptive reuse of existing facilities and 	<p>The policies included in this section appear to be outside the scope of the Greenbelt Plan. While issues of soil and fill management are environmental management policies, community hub location, active transportation and facility use policies are better suited to the Growth Plan.</p> <p>If these policies are to remain in the Greenbelt Plan, the following requests and recommendations are proposed:</p> <p>Further clarification of community hubs is requested to reduce the opportunity for misinterpretation.</p> <p>This policy appears to be out of place in the Greenbelt Plan. This could simply be a Growth Plan policy and removed from this plan.</p> <p>To ensure a consistent provincial approach, it is recommended that the MOECC Soil Management Framework (under development) be referenced here (3.4.2.6).</p>

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	<p>spaces in <i>settlement areas</i>, where appropriate.</p> <ol style="list-style-type: none"> 3. Municipalities shall collaborate and consult with service planning, funding and delivery sectors to facilitate the co-ordination and planning of community hubs and other <i>public service facilities</i>. 4. Municipalities shall integrate climate change considerations into planning and managing growth in <i>settlement areas</i> in accordance with policy 4.2.10 of the Growth Plan. 5. Municipalities are encouraged to develop soil re-use strategies as part of planning for growth and to integrate sustainable soil management practices into planning approvals. 6. Municipalities and industry shall use best practices for the management of excess soil and fill generated during any <i>development</i> or <i>site alteration</i>, including <i>infrastructure</i> development, so as to ensure that: <ol style="list-style-type: none"> a) Any excess soil or fill is re-used on-site or locally, to the maximum extent possible; b) Fill received at a site will not cause an adverse effect with regard to the current or proposed use of the property or the natural environment. 	
3.4.5 Additional Policies for Settlement Area Expansion	<p>For <i>settlement areas</i> within the Protected Countryside, notwithstanding the policies of section 5.2.1, the following additional policies apply to municipally initiated <i>settlement area</i> expansion proposals:</p> <ol style="list-style-type: none"> 1. Where a municipality had initiated the consideration of a <i>settlement area</i> expansion prior to the date this Plan came into effect, such an expansion may be considered through the municipality's exercise to bring its official plan into conformity with this Plan as described in the municipal implementation policies of section 5.3. The proposed expansion shall: 	<p>The language "prior to the date this Plan came into effect" needs to be changed so it is clear if the policy refers to the 2005 Plan or the new Plan. For example, in section 4.3.2.9, the date is provided, which makes the interpretation very clear.</p>

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4 General Policies for the Protected Countryside		
4.1.1 General Non-Agricultural Use Policies		
	<p>2. Proposals for non-agricultural uses must demonstrate that:</p> <p>c) There are no negative impacts on key natural heritage features and for key hydrologic features or their functions; and</p>	<p>It is recommended that Section 4.1.1.2 c) be revised to include:</p> <p>“... functions, <u>as well as to linkages between these features....”</u></p>
	<p>For non-agricultural uses, the following policies apply:</p> <p>3. Where non-agricultural uses are proposed in <i>rural lands</i>, the completion of an <i>agricultural impact assessment</i> should be considered.</p>	<p>This policy should be strengthened to require an Agricultural Impact Assessment, with a baseline standard that needs to be met before approval of a permit for a non-agricultural use to be in keeping with the policies protecting the Agricultural System.</p> <p>It is recommended that this policy be revised to:</p> <p><u>“...must be considered before approval of a permit for a non-agricultural use. The AIA must demonstrate that it is in keeping with the policies protecting the Agricultural System”</u></p>
4.1.3 Developed Shoreline Area Policies	<p>Policy 4.2.4.5 of the Growth Plan applies to shoreline areas within the Protected Countryside.</p>	<p>A definition of a Developed Shoreline is required in this plan to provide clarity.</p> <p>Policy 4.2.4.5 of the Growth Plan, as referenced in this policy should be included in this plan to alleviate the need to move between plans to understand the policies.</p>
4.2.1 General Infrastructure Policies		
	<p>2. The location and construction of infrastructure and expansions, extensions, operations and maintenance of infrastructure in the Protected Countryside, are subject to the following:</p> <p>g) Where infrastructure crosses specialty crop areas and prime agricultural areas, an agricultural impact assessment shall be undertaken.</p>	<p>4.2.1.2) g) Clarification of the content, methodology and criteria for consideration to introduce infrastructure into specialty crop and prime agricultural areas is required. The establishment of a no negative impact standard, or its equivalent, would be of assistance.</p>
	<p>3. <i>Infrastructure</i> serving the agricultural sector, such as agricultural irrigation systems, may need certain elements to be located within</p>	<p>Infrastructure to support agriculture needs to be clearly defined in this plan to assist in determining the types of infrastructure intended, and</p>

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	the <i>vegetation protection zone</i> of a <i>key natural heritage feature</i> or <i>key hydrologic feature</i> . In such instances, these elements of the <i>infrastructure</i> may be established within the feature itself or its associated <i>vegetation protection zone</i> but all reasonable efforts shall be made to keep such <i>infrastructure</i> out of <i>key natural heritage features</i> or <i>key hydrologic features</i> or the <i>vegetation protection zones</i> .	not suggest that all forms of infrastructure be extended beyond settlement areas.
4.2.3 Stormwater Management and Resilient Infrastructure Policies	In addition to the policies of section 4.2.1, for stormwater management <i>infrastructure</i> in the Greenbelt Plan the following policies shall apply: 1. Stormwater management ponds are prohibited in <i>key natural heritage features</i> or <i>key hydrologic features</i> or their <i>vegetation protection zones</i> , except for those portions of the Protected Countryside that define the major river valleys that connect the Niagara Escarpment and Oak Ridges Moraine to Lake Ontario. In these areas, naturalized stormwater management ponds are permitted provided they are located a minimum of 30 metres away from the edge of the river/stream and outside the <i>vegetation protection zones</i> of any <i>key natural heritage features</i> or <i>key hydrologic features</i> .	This general prohibition should apply to all Storm Water Management infrastructure, with the exception of conveyance pipes and outlet structures where necessary, and subject to no negative impacts to Key Natural Heritage Features and Key Hydrologic Features.
4.3.2 Non-Renewable Resource Policies	For lands within the Protected Countryside, the following policies shall apply:	
	2. Non-renewable resources are those non-agriculture-based natural resources that have a finite supply, including mineral aggregate resources. Aggregates, in particular, provide significant building materials for our communities and <i>infrastructure</i> , and the availability of aggregates close to market is important both for economic and environmental reasons.	This is not a policy and should be removed from this section. This would be appropriate in an introductory or descriptive section at the beginning of the natural resources policy section (4.3).
	3. Notwithstanding the Natural System policies of section 3.2 of this Plan, within the Natural Heritage System, <i>mineral aggregate operations</i> and wayside pits and quarries are subject to the following: c) Any application for a new <i>mineral aggregate operation</i> shall be	

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	<p>required to demonstrate:</p> <ul style="list-style-type: none"> i. How the <i>connectivity</i> between <i>key natural heritage features</i> and <i>key hydrologic features</i> will be maintained before, during and after the extraction of mineral aggregates; ii. How the operator could immediately replace any habitat that would be lost from the site with equivalent habitat on another part of the site or on adjacent lands; and iii. How the Water Resource System will be protected or enhanced; and <p>d) An application to expand an existing <i>mineral aggregate operation</i> may be permitted in the Natural Heritage System, including in <i>key natural heritage features</i>, <i>key hydrologic features</i> and in any associated <i>vegetation protection zones</i>, only if the related decision is consistent with the PPS and satisfies the rehabilitation requirements of this section</p>	<p>c) ii) A definition needs to be provided for “adjacent lands. This policy should include language to ensure that requirements are ecologically reasonable and maintain existing features.</p> <p>d) This policy should reference requirements of new operations as established in the ARA.</p>
	<p>5. New and existing <i>mineral aggregate operations</i> and wayside pits and quarries, within the Protected Countryside shall ensure that:</p> <ul style="list-style-type: none"> a) Rehabilitated area will be maximized and disturbed area minimized on an ongoing basis during the life-cycle of an operation; b) Progressive and final rehabilitation efforts will contribute to the goals of the Greenbelt Plan; c) Any excess disturbed area above the maximum allowable disturbed area as determined by the Ministry of Natural Resources and Forestry will be rehabilitated. For new operations the total disturbed area shall not exceed an established maximum allowable disturbed area; and d) The applicant demonstrates that the quantity and quality of groundwater and surface water will be maintained as per Provincial Standards under the <i>Aggregate Resources Act</i>. 	<p>5) b) This policy should be strengthened through inclusion of reference to municipal Ops.</p> <p>It is recommended that this be revised to:</p> <p>“...goals of the Greenbelt <u>Plan and existing municipal and provincial policies.</u>”</p>
	<p>6. When operators are undertaking rehabilitation of <i>mineral aggregate operation</i> sites in the Protected Countryside, the</p>	<p>Does this imply that existing ARA licences will be reviewed and amended where necessary to ensure that the objectives below are</p>

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	<p>following policies apply:</p> <ul style="list-style-type: none"> a. The disturbed area of a site shall be rehabilitated to a state of equal or greater <i>ecological value</i>, and for the entire site, long-term ecological integrity shall be maintained or restored, and to the extent possible, improved; b. If there are <i>key natural heritage features</i> or <i>key hydrologic features</i> on the site, or if such features existed on the site at the time of an application: <ul style="list-style-type: none"> i. The health, diversity and size of these <i>key natural heritage features</i> and <i>key hydrologic features</i> shall be maintained or restored and, to the extent possible, improved; and ii. Any permitted extraction of mineral aggregates that occurs in a feature shall be completed, and the area shall be rehabilitated, as early as possible in the life of the operation; 	<p>addressed? Has this happened? It should be clarified whether this policy applies to existing or future rehabilitation plans, or both.</p> <p>6) a) It is recommended that this be revised to: “...<u>connectivity is maintained and</u> long term ecological integrity...”</p> <p>6) b) ii) It is recommended that this be revised to: “ ... shall be rehabilitated <u>to its pre-extraction state as much as possible or subject to d) below</u>, as early as possible...”</p>
	<p>7. Final rehabilitation for new <i>mineral aggregate operations</i> in the Natural Heritage System shall meet these additional policies:</p> <ul style="list-style-type: none"> a. Where there is no underwater extraction, an amount of land equal to that under natural vegetated cover prior to extraction, and no less than 35% of the land subject to each license in the Natural Heritage System, is to be rehabilitated to forest cover, which shall be representative of the natural ecosystem in that particular setting or ecodistrict; b. Where there is underwater extraction, no less than 35% of the non-aquatic portion of the land subject to each license in the Natural Heritage System is to be rehabilitated to forest cover, which shall be representative of the natural ecosystem in that particular setting or ecodistrict; and c. Rehabilitation shall be implemented so that the connectivity of the <i>key natural heritage features</i> and the <i>key hydrologic features</i> on the site and on adjacent lands shall be maintained or restored, and to the extent possible, improved. 	<p>Any application, whether for brand new or expansion requires a new licence.</p> <p>6) a) It is recommended that this be revised to: “Where there is <u>no extraction below the water table...</u>”</p> <p>6) b) It is recommended that this be revised to: “Where there is <u>no extraction below the water table...</u>”</p> <p>6) c) It is recommended that this be revised to: “...to the extent possible, improved <u>in keeping with municipal Official Plan Natural Heritage System.</u>”</p>

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4.4 Cultural Heritage Resources	<p>For lands within the Protected Countryside, the following policies shall apply:</p> <ol style="list-style-type: none"> 1. <i>Significant cultural heritage resources</i> including <i>built heritage resources, cultural heritage landscapes</i> and <i>archaeological resources</i> shall be <i>conserved</i> in order to foster a sense of place and benefit communities. 3. Municipalities are encouraged to consider the Greenbelt's vision and goals in preparing archaeological management plans and municipal cultural plans in their decision-making. 	<p>1) Does this policy imply that archaeological resources can be removed to allow for development? This needs to be clarified and as does the definition of Conserved.</p> <p>3) This policy requires clarification regarding whether municipalities are to consider the Greenbelt's vision in plan preparation <u>and</u> decision-making.</p>
4.6 Lot Creation	<p>For lands falling within the Protected Countryside, the following policies shall apply:</p> <ol style="list-style-type: none"> 1. Lot creation is discouraged and may only be permitted for: <ol style="list-style-type: none"> a) outside the <i>specialty crop area</i> and <i>prime agricultural area</i>, the range of uses permitted by the policies of this Plan; b) within the <i>specialty crop area</i> and <i>prime agricultural area</i>, <ol style="list-style-type: none"> i. <i>agricultural uses</i> where the severed and retained lots are intended for <i>agricultural uses</i> and provided the minimum lot size is 16 hectares (or 40 acres) within <i>specialty crop areas</i> and 40 hectares (or 100 acres) within <i>prime agricultural areas</i>; and ii. <i>agriculture-related uses</i>, provided that any new lot shall be limited to the minimum size needed to accommodate the use and appropriate sewage and water services; 	<p>a) Clarification to ensure that municipalities can retain the ability to be more restrictive through official plan policies is requested.</p> <p>b) This policy appears to encourage further fragmentation of lots in prime agricultural areas. There is no mechanism to maintain properties in agriculture-related uses over time. Clarification to ensure that municipalities can retain the ability to be more restrictive through official plan policies is requested.</p> <p>Conversely, this policy could be removed from the Greenbelt Plan to alleviate the possibility of confusion and fragmentation.</p>

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5 Implementation		
5.3 Municipal Implementation of Protected Countryside Policies		
	<p>The province, in collaboration with the municipalities, shall undertake an exercise to provide consistent identification, mapping and protection of the <i>Agricultural System</i> across the GGH. Within the Protected Countryside, upper-tier and single-tier municipalities shall refine official plan mapping to bring <i>prime agricultural areas, specialty crop areas, and rural lands</i> into conformity with provincial mapping through a municipal comprehensive review under the Growth Plan. These refinements shall only be carried out where there are inconsistencies at municipal boundaries or discrepancies between provincial and municipal mapping that are significant. Aside from addressing these issues, municipalities shall continue to retain existing designations for <i>prime agricultural areas</i> within the Protected Countryside.</p>	<p>This policy is recommended to be amended to recognize the mapping done by municipalities that are more detailed and reflective of local conditions. This is especially true of Prime Agriculture where the results of LEAR studies are refinements of provincial land use identification processes.</p> <p>It is recommended that this be revised to:</p> <p>“...upper-tier and single-tier municipalities <u>shall collaborate with provincial ministries to refine mapping to ensure that provincial maps reflect municipal refinements of local mapping. This shall be done in keeping with provincial methodologies and guidance. This would apply to prime agricultural areas, specialty crop areas, and rural lands.</u>”</p>
	<p>Policies to support the <i>Agricultural Support Network</i> do not require separate land use designations in official plans. Municipalities are expected to provide policies to maintain and enhance the <i>Agricultural Support Network</i> and to identify the physical location of elements in the <i>Agricultural Support Network</i> in collaboration with the province. This work will assist with the long-term viability of the agri-food sector by planning for agriculture and the rural economy.</p>	<p>This could be a massive exercise and it will be difficult to know how far to take it, especially related to the agri-food sector. How does the province intend to keep the “physical location of elements in the Agricultural Support Network” current, given the wide reach of the system over such a large geographic area?</p> <p>It is recommended that this be revised to:</p> <p>“... provide <u>planning</u> policies to <u>encourage</u> and enhance the Agricultural Support Network...”</p>
5.7.1 Growing the Greenbelt		
5.7.1.4 Municipal Requests	<p>The Province shall also consider requests from municipalities to grow the Greenbelt with the Protected Countryside and/or Urban River Valley designations. In considering municipal requests, the province shall be guided by criteria which were developed for municipalities through a public consultation</p>	<p>Consider clarifying the means by which requests to grow the Greenbelt may be made:</p>

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	<p>process and released in 2008. These criteria include:</p> <ul style="list-style-type: none"> • Providing supportive council resolutions; • Demonstrating how the proposed lands connect physically or functionally to the Greenbelt; and • Demonstrating that a proposal would complement the Growth Plan and support other related provincial initiatives such as the Great Lakes Strategy and Climate Change Strategy and Action Plan. 	<p>“... requests from <u>single, upper and lower tier</u> municipalities to grow the Greenbelt”</p> <p>“... requests from <u>any</u> municipality to grow the Greenbelt”</p>
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6 Urban River Valley Policies		
6.1 Description	<p>The Urban River Valley designation as shown on Schedule 1 applies to lands within the main corridors of river valleys connecting the rest of the Greenbelt to the Great Lakes and inland lakes. The lands in this designation comprise river valleys and associated lands and are generally characterized by being:</p> <ul style="list-style-type: none"> • Lands containing natural and hydrologic features, including coastal wetlands; and/or • Lands designated in official plans for uses such as parks, open space, recreation, conservation and environmental protection. 	<p>Mapping of these Urban River Valleys show a designation limit of 60 metres from either side of the Water’s Edge. This approach does not reflect the natural changes to river channels due to natural processes.</p> <p>Top of bank should be referenced for the identification of any delineation of the urban river valleys, or their potential future corridor buffers.</p>
6.2 Policies	<p>1. Only publicly owned lands are subject to the policies of the Urban River Valley designation. Any privately owned lands within the boundary of the Urban River Valley area are not subject to the policies of this designation. For the purposes of this section, publicly owned lands means lands in the ownership of the province, a municipality, or a local board, including a conservation authority.</p>	<p>Only publicly owned lands are subject to the policies of the Urban River Valley designation. However, the policies of this designation may be applied to privately owned lands within the boundary of the Urban River Valley area at the discretion of a municipality. For the purposes of this section, publicly owned lands means lands in the ownership of the province, a municipality, or a local board, including a conservation authority.</p>

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Definitions		
<i>Agricultural Impact Assessment</i>	Means a study that evaluates the potential impacts of non-agricultural development on agricultural operations and the <i>Agricultural System</i> and recommends ways to avoid, or if avoidance is not possible, minimize and mitigate adverse impacts.	Clarification needs to be provided through guidelines, terms of reference or other criteria to assist in determining impacts on the Agricultural System, which includes the support network in addition to the agricultural land base.
<i>Agricultural Support Network</i>	Means within the <i>Agricultural System</i> , a network that includes elements important to the viability of the agri-food sector such as: regional agricultural infrastructure and transportation networks, on-farm buildings and infrastructure, agricultural services, farm markets, distributors and first-level processing, and vibrant, agriculture-supportive communities.	<p>The Agri-food sector reference should be revised to be the Agricultural sector.</p> <p>The concept of an ‘Agricultural Support Network’ has been introduced into both the Greenbelt Plan and the Growth Plan. The definition for ‘Agricultural Support Network’ suggests that it includes elements such as “regional agricultural infrastructure”.</p> <p>Given that “infrastructure” is also a defined term, it is not clear what the intent of “regional agricultural infrastructure” is. It is critical that municipalities understand the implications of this.</p> <p>In addition, the policy direction for municipalities as it relates to the ‘Agricultural Support Network’s is unclear, as the language used throughout the Greenbelt Plan is inconsistent (i.e., shall versus encourage).</p>
Agricultural System	Means a group of inter-connected elements that collectively create a viable, thriving agricultural sector. It has two components: 1) an agricultural land base comprised of <i>prime agricultural</i> areas including <i>specialty crop areas</i> and <i>rural lands</i> that together create a continuous, productive land base for agriculture; 2) an <i>Agricultural Support Network</i> , which includes <i>infrastructure</i> , services and agri-food assets important to the viability of the sector.	<p>This definition should be revised to replace “<u>agri-food assets</u>” with “<u>agricultural</u>” assets to ensure that all agricultural activity is included.</p> <p>As well, the use of “continuous” may not support near urban and urban agricultural lands from being considered part of a productive land base for agricultural production. Local food production on smaller, often isolated lands in and adjacent to urban development can be very productive.</p> <p>It is recommended that this be revised to” “...create a <u>continuous</u> productive land base...”</p>
Cultural Heritage	<i>Built heritage resources, cultural heritage landscapes and</i>	This definition should have the word “Means” at the beginning, to be

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Resources	<i>archaeological resources.</i>	consistent with the other definition formats.
Highly Vulnerable Aquifers	Means aquifers, including lands above the aquifers, on which external sources have or are likely to have a significant adverse effect.	<p>This term comes straight from the Source Water Protection exercises, yet there is no reference to the mapping of the highly vulnerable aquifers in the definition.</p> <p>This definition should reference the policies in the PPS 2014, the Clean Water Act and identification of these areas should be in keeping with Highly Vulnerable Aquifers mapping as revised from time to time.</p>
Key hydrologic areas	Means a <i>key hydrologic area</i> as described in section 3.2.4.	The definition found in the Growth Plan should be included in this definition section for consistency and to eliminate the need to have both plans to understand the content of this plan.
Key hydrologic features	Means a <i>key hydrologic feature</i> as described in section 3.2.5.	<p>The definition found in the Growth Plan should be included in this definition section for consistency and to eliminate the need to have both plans to understand the content of this plan.</p> <p>Regulated floodplains are included in the RNHS as key features but not included in the Greenbelt (and others) policies as key hydrologic features, and should be included in the Greenbelt Plan, or referenced as part of watershed/sub-watershed plans.</p>
Key natural heritage features	Means a <i>key natural heritage feature</i> as described in section 3.2.5.	The definition found in the Growth Plan should be included in this definition section for consistency and to eliminate the need to have both plans to understand the content of this plan.
Prime agricultural lands	<p>Means:</p> <p>a) <i>specialty crop areas</i>, and/or</p> <p>b) Canada Land Inventory Class 1, 2 or 3 lands, as amended from time to time, in this order of priority for protection (PPS, 2014).</p>	<p>This definition is a modification of the PPS 2014 Prime Agricultural Area definition. This definition should be consistent with the PPS and consistent with the Prime Agricultural Area definitions included in the other Provincial Plans.</p> <p>This definition has also been modified in the Growth Plan to include the Agricultural Lands definition as part of the Prime Agricultural Area definition.</p>

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		Consistency needs to be applied.
Sand barrens	<p>Means land (not including land that is being used for agricultural purposes or no longer exhibits sand barrens characteristics) that:</p> <ul style="list-style-type: none"> a) Has sparse or patchy vegetation that is dominated by plants that are: <ul style="list-style-type: none"> i. Adapted to severe drought and low nutrient levels; and ii. Maintained by severe environmental limitations such as drought, low nutrient levels and periodic disturbances such as fire; b) Has less than 25 per cent tree cover; c) Has sandy soils (other than shorelines) exposed by natural erosion, depositional process or both; and <p>Has been further identified, by the Ministry of Natural Resources and Forestry or by any other person, according to evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time.</p>	<p>The specific document which contains the necessary methodology for identification of sand barrens, or the criteria themselves, should be included in the policy to ensure consistent standards and approaches to classification and identification are used throughout the province.</p> <p>If the appropriate applicable methodology is to be used from the ELC (Ecological Land Classification) Manual, please include a reference to the document specifically, recognizing that the methodology may be amended from time to time.</p>
Savannah	<p>Means land (not including land that is being used for agricultural purposes or no longer exhibits savannah characteristics) that:</p> <ul style="list-style-type: none"> a) Has vegetation with a significant component of non-woody plants, including tallgrass prairie species that are maintained by seasonal drought, periodic disturbances such as fire, or both; b) Has from 25 per cent to 60 per cent tree cover; c) Has mineral soils; and d) Has been further identified, by the Ministry of Natural Resources and Forestry or by any other person, according to evaluation procedures established by the Ministry of Natural 	<p>The specific document which contains the necessary methodology for identification of savannahs, or the criteria themselves, should be included in the policy to ensure consistent standards and approaches to classification and identification are used throughout the province.</p> <p>If the appropriate applicable methodology is to be used from the ELC (Ecological Land Classification) Manual, please include a reference to the document specifically, recognizing that the methodology may be amended from time to time</p>

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	Resources and Forestry, as amended from time to time.	
Significant	<p>Means:</p> <p>a) In regard to <i>wetlands and life science areas of natural and scientific interest</i>, an area identified as provincially significant using evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time;</p> <p>b) In regard to <i>woodlands</i>, an area which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or due to the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history. The Province (Ministry of Natural Resources and Forestry) identifies criteria relating to the forgoing;</p> <p>c) In regard to other features and areas in section 3.2.4 of this Plan, ecologically important in terms of features, functions, representation or amount, and contributing to the quality and diversity of the Natural Heritage System. The Province (Ministry of Natural Resources and Forestry) identifies criteria relating to the forgoing; and</p> <p>d) In regard to <i>cultural heritage resources</i>, resources that have been determined to have cultural heritage value or interest for the important contribution they make to our understanding of the history of a place, an event, or a people.</p> <p>While some significant resources may already be identified and inventoried by official sources, the significance of others can only be determined after evaluation.</p>	<p>A specific document which contains the necessary methodology for identification of woodlands, or the criteria themselves, should be included in the policy to ensure consistent standards and approaches to classification and identification are used throughout the province.</p> <p>Although guidelines for their identification have been provided by the Province in the Natural Heritage Reference Manual, specific criteria has not been provided by the Province to date.</p> <p>Rather, municipalities provide identification criteria based on the provincial guidelines. Recognizing this, it is unclear how Significant Woodlands under this plan will be identified. It is recommended that municipal criteria consistent with the Natural Heritage Reference Manual be invoked in the definition</p>
Tallgrass prairies	Means land (not including land that is being used for	Recommend stating the specific MNRF evaluation procedures to be used to

APPENDIX 1: Joint HAPP Response to Proposed Changes to the Greenbelt Plan (May 2016)

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	<p>agricultural purposes or no longer exhibits tallgrass prairie characteristics) that:</p> <p>a) Has vegetation dominated by non-woody plants, including tallgrass prairie species that are maintained by seasonal drought, periodic disturbances such as fire, or both;</p> <p>b) Has less than 25 per cent tree cover;</p> <p>c) Has mineral soils; and</p> <p>d) Has been further identified, by the Minister of Natural Resources or by any other person, according to evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time.</p>	<p>identify Tallgrass Prairies as referenced in sub-clause d) that are acceptable for their identification.</p>
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