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FROM: Elaine Capes  
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March 4, 2018

TO: protectingwater@ontario.co/greenbelt

SUBJECT: RESPONSE TO GREENBELT PROPOSAL

MC<sup>2</sup> is a ratepayers organization in the Town of Mono and the Township of Mulmur in Dufferin County. We have between 300 and 400 members, many of whom have expressed strong interest in the Greenbelt proposal.

As is our usual practice we have worked to provide a thoughtful and detailed response. Let us state upfront that we support the stewardship of land and water and indeed we are aligned with the rest of rural Ontarians who have been and continue to be the voices at the forefront of advocacy to preserve both.

However, let us also state up front that:

- we object to a process that fails to be collaborative;
- we object to the assumption being made that rural Ontarians do not value protecting the water and lands that they live on, when in fact we are the citizens who advocate most strongly;
- we object to the omission of the plan regarding fill dumping;
- we object to the continued exemption of aggregate operations;
- we object to the unnecessary and confusing overlap of ministries;
- we object to the continued undermining of local municipal planning intelligence and jurisdiction; and
- we object to the failure in this plan to examine financial implications.

The following document outlines in detail our concerns.

MC<sup>2</sup> has read with interest the proposal on the Greenbelt expansion. This interest was sparked by the recent proposal to expand Niagara Escarpment lands, which recommended, at the end of its review, that “additions to the NEP area be considered as part of a provincially-led process to grow the Greenbelt”. And the final recommendation of this study was:



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“As part of the provincially-led process to grow the Greenbelt, engage municipalities, stakeholders and indigenous communities, as partners in a collaborative process to further refine potential additions to the NEP area, and to evaluate the impact of CLTIP on municipal revenues and explore ways to mitigate these impacts.”

It was interesting to us that as a first step in the supposed collaboration/consultation process our communities were presented with what appears to be the product of a strong point of view about Greenbelt expansion, a point of view that appears to have dramatic implications for our communities and citizens. It would have been more productive to get input from the impacted communities before presenting a quasi-completed proposal as the first step in consultation. It would have been much more productive to set in place a true collaboration process; that is, a process that goes to each impacted element of the community (citizens, towns/townships, counties, indigenous communities, etc.) to identify their needs and ideas, which would then be integrated into a solution. A non-collaborative process, as in the case of the current proposal, can only set in place solutions that create problems for all elements in the community.

We should begin by saying that we know of few people in our communities who are not supportive of protecting water resources and green spaces. The first settlers who came to the area valued the rich land and water resources, as have many of the later arrivals. And while there may be exceptions, most of the property owners are strong stewards of the land, reflecting their values and their economic interests. This should always be remembered when governments prepare prescriptions for how our land should be managed. It would be highly productive to listen to people who have been living in our communities for long periods.

Given that our members generally support the central idea of the Greenbelt proposal, the areas for response in the consultation process will reflect the thought that “the devil is in the details”. As we review the often very vague elements of the proposal, we have a series of questions/issues that need to be addressed before any general plan should go ahead. These topics, and undoubtedly many others, must be the subject of serious discussion with the citizens, stakeholders, municipalities and indigenous communities...all of those impacted by the significant changes envisaged in the draft document.

Our questions/issues, to this point are as follows:

- **INITIAL GREENBELT LANDS:** The first phase of the Greenbelt went into effect in 2005. What has been the learning from that experience? What changes are needed? One example: a major threat to water and land



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resources is the dumping of contaminated fill, something that goes unmentioned in the current proposal. It appears clear to many of our members that the land-fill industry, like the aggregate industry, goes unchecked. The original Greenbelt has offered no protection from contaminated landfill. Continued efforts to get government to manage this problem are not as yet delivering any significant results. Even in current Greenbelt lands, where a key reason for action has been water quality, there is little or no protection from the Province. Can the case be made that all the attributes attached to potential Greenbelt expansion are fully and beneficially in place in the current Greenbelt areas? We would like to see a full analysis of the current Greenbelt, identifying what has worked and what hasn't, and indicating why it is an unquestioned model for expansion.

- **OVERLAPPING AUTHORITY:** A good case can be made for the fact that the current governing bodies put in place to manage our land use have all the tools needed to protect water and green space resources. The fact that the current expansion proposal recommends highly intrusive involvement of an expanded Greenbelt Authority. Over the recent past, both **Mulmur and Mono**, and undoubtedly many other municipalities, have developed **Official Plans** that provide extensive planning and zoning protection for their communities, in many aspects that include water and green space protection. These plans have been vetted and modified by the Ministry of Municipal Affairs, with final approval being given to the finished product. In 2016 **Dufferin County established its first Official Plan**, at the insistence of the Ministry, which again vetted and approved the final version. The **Nottawasaga Valley Conservation Authority** has developed and implemented plans to protect water resources. The **NEC** has been given strong authority to manage and control development in the lands covered by their mandate. **The Places to Grow Act** determined further controls and targets for development. The implication of the changes in the land use management system proposed in the Greenbelt plan is that all the current bodies, and their work, are incompetent; and that much value can be gained by eliminating meaningful local participation in land use planning. The proposal needs to clarify what is missing in the current planning system? A system the province has directed.

Two points of interest can be made. First, is the assumption that a new central authority can do a better job than the incompetent local groups? A critical recommendation in the Proposal is that no municipality/county can legislate conditions that provide more control over land use than the Greenbelt requires. Such legislation would be invalid. This provision demonstrates the over-arching view that local authorities are not up to the



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job. This negative view of local competence needs to be addressed. The second important question is: at what point in the process will all of the current authorities, including our elected municipal representatives, be consulted on these critical changes? The bottom line question is: what added value are we receiving by further centralizing land use authority, when already all local plans are subject to the micromanagement and veto power of Provincial authorities?

- **FINANCIAL IMPACT:** The final recommendation of the group that proposed NEP modifications (quoted above) and withdrew their NEP amendment plan in order to allow the Greenbelt study to pick up their issues, said in their last sentence that the process should “evaluate the impact of CLTIP on municipal revenues and explore ways to mitigate these impacts.” There is little doubt that the Greenbelt expansion proposal, with limits on growth of “unserved hamlets” and on building within one kilometer of a water source, will restrict many municipalities from expansion that will build their tax base. Such expansion, already strongly controlled by local plans and Provincial regulation, is essential in managing revenue flow growth at inflation levels and in limiting tax increases. **There is no mention of revenue implications or revenue loss mitigation in the proposal, a serious omission** which would lead to the conclusion that this initial proposal, and the lack of any significant consultation with impacted communities, is still at the earliest stages of development. The issue of revenue loss is critical, and no matter how much the authors of this initial proposal would like to ignore that question, it can’t be left out of any serious thinking on the Greenbelt. There is the need to get started with the consultation/collaboration process that all involved know is essential.
- **TOWN/HAMLET EXPANSION:** The proposal recommends limiting the expansion of “Hamlets” which do not have full water and sewage disposal facilities. In rural towns and townships such communities are significant locations for growth, usually limited, which not only have been key to meeting Places to Grow Act targets, but in building the property tax base in rural municipalities which have little opportunity for growth of a commercial tax base. This proposal would have major implications to many aspects of the operation of these communities, and is yet another area where consultation needs to begin.
- **GRANTING BUILDING PERMITS:** One question that has arisen from many of our members related to how the proposal would deal with already issued zoning reviews and building permits on projects which have as yet not started with the actual building process.



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- **AGGREGATE:** As with all land use policies, laws, regulations and proposals issued by the Provincial Government, aggregate mining is exempted from any of the actions resulting from the proposed Greenbelt expansion. Aggregate operations have a wide range of potential issues for our communities, and one that is consistently raised and ignored is the impact on ground water, aquifers, and neighbouring wells. Such lack of balance in the Greenbelt management, both current and proposed, is distressing, particularly when it is so easy to see in our communities the substantial damage to the environment from aggregate mines. And, we should mention, again, the Proposal doesn't even mention contaminated fill dumping. In the end, we have to ask if the approach of the Provincial Government to environmental issues is serious when these major problems are ignored.

## **SUMMARY**

As we review the current Greenbelt proposal, the problems and issues that it raises, we have to keep reminding ourselves that if a genuine consultation/collaboration process was carried out, and if the proposals evolved to the point where these issues and questions were addressed, the idea of expanding protected lands is certainly attractive. To ask any reasonable group, community or citizen to support such an incomplete proposal is insulting, especially to our many members and citizens who are deeply committed to environmental protection.

The fact that such an incomplete document was presented must only be seen as an initial attempt to gain input; an attempt that will be followed up with serious discussions with impacted elected municipal representatives, with impacted community groups, and citizens. There remains a great deal of work to be done on this substantial change proposal, and we look forward to participating, and to supporting the process to achieve a workable and beneficial goal that most citizens desire. Only when the questions/issues we have raised are addressed with our many communities can our citizens begin to deal with and make judgments on the reality of what is being proposed.

Let us reiterate, that we support the stewardship of land and water, and that we are disappointed that in this proposal the Ministry has presented:

- a process that fails to be collaborative;
- assumptions that rural Ontarians do not value protecting the water and lands that they live on;
- complete omission regarding fill dumping;



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- continued exemption of aggregate operations;
- continued unnecessary and confusing overlap of ministries;
- continued undermining of local municipal planning intelligence and jurisdiction; and
- continued failure to examine financial implications.

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Elaine Capes  
President, Mono Mulumur Citizens' Coalition  
For our Board of Directors and Members

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