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Stakeholder engagement to inform the 10-Year Coordinated Land Use Plan Review and the future success of Ontario's Greenbelt

Summary of discussion from a virtual engagement session on Water Resources and Hydrological Systems

Introduction

On Wednesday April 30, 2025, the Greenbelt Foundation hosted an engagement session to continue conversations identifying water resources and hydrological policies related to the Greenbelt. The purpose of this session was to revisit what we heard during an in-person roundtable discussion held in November 2024, refine key ideas, and discuss specific policy, implementation, or administrative changes in the Greenbelt Plans that would enhance protections for water resources and systems.

The session is part of a series of issue-specific stakeholder engagements held by the Foundation between November 2024 and June 2025. The discussions will help inform priorities for the upcoming 10-Year Coordinated Land Use Plan Review and long-term success of the Greenbelt, ensuring it remains effective and resilient for years to come and contributes to the sustainability of Ontario.

In addition to stakeholder engagement, the Foundation is also undertaking other activities in preparation for the Review including research and mapping projects to provide insights into emerging trends and pressures and support evidence-based decision-making.

Overview of Discussions

The earlier Water Resources and Hydrological Systems roundtable session highlighted the growing implications of inconsistent management practices for water and hydrological systems, along with the need to address climate change impacts, development pressures, and legislative changes through better access to data and science-driven solutions. In addition, participants proposed specific policy recommendations that would improve the effectiveness of the Plans (Appendix I). Select topics requiring further discussion were carried forward to the recent engagement session. The memo summarizing the previous roundtable session can be found [here](#).

The recent virtual engagement session focused on the following policy topics:

- 1) Erosion, flooding, and water quality
- 2) Watershed-scale planning
- 3) Oak Ridges Moraine protections

A total of 16 people participated in the engagement session (Appendix II). A recurring theme throughout the session was the need for comprehensive monitoring of water resources, including water-taking. Participants recommended prioritizing policy updates that integrate hydrological and natural heritage management, using system-scale approaches. Data transparency, monitoring,

enforcement, and municipal collaboration within watersheds are urgently needed. During the Review, it will be important to reassert the Greenbelt's role, and particularly the Oak Ridges Moraine, in providing critical water infrastructure for millions of people.

Policy Issue #1 - Erosion, Flooding, and Water Quality

Concerns were raised regarding the impacts of urban development and climate change on water systems. Participants outlined key areas to strengthen erosion control, water quality and flood mitigation policies in the Plans and more effectively address growth pressures and climate risks. Strengthening natural system protections upstream, enhancing hazardous land mapping, and clearly articulating the role of urban rivers valley in erosion control and water quality would further contribute to resilient planning, recognize the ecosystem services provided by nature, and ease cost burdens on municipalities. Clear definitions, monitoring gaps and enforcement resources also need to be addressed.

There was support for:

- Requiring monitoring of development activities during pre, active and post construction phases and integration of erosion mitigation policies from the Lake Simcoe Protection Plan.
- Strengthening key definitions (like “hazardous lands”) and using them in policy text to enhance clarity, implementation and regulatory enforcement.
- Integrating natural heritage and hydrological systems through Greenbelt policies such as explicitly protecting wetlands, drinking source water protection areas, and hazard lands within stormwater management policies.
- Adopting a watershed-scale approach to erosion control, flooding and water quality, moving beyond site-level policies to consider the full drainage area, and the downstream impacts of land use activities. Key actions include:
 - Strengthening protection for upstream natural systems and urban river valleys, recognizing their essential role in erosion control, water quality and downstream urban resilience.
 - Requiring data sharing to minimize impacts downstream.
 - Improving hazardous land mapping and management, and identifying areas for boundary expansion, particularly around the Greenbelt ‘finger’ lands.

Discussion Highlights

The Need for a Systems Approach

Stronger, clearer policy language is needed to integrate natural heritage and hydrological systems into the Greenbelt's policy framework and support a watershed approach that addresses cumulative and downstream impacts of land uses. Upstream headwater areas, including the Greenbelt ‘fingers’, face growing development pressures and require enhanced protection, along with urban river valleys that remain insufficiently protected and should be managed as connected systems from headwaters to receiving lakes. The robust erosion mitigation policies in the Lake Simcoe Protection Plan should be adopted across the Greenbelt.

Improving Monitoring and Enforcement

Participants identified major gaps and deficiencies in the monitoring of erosion and water quality noting that monitoring should be required for all phases of construction to accurately assess impacts on erosion and water quality. Inconsistent enforcement capacity across jurisdictions further undermines the effectiveness of erosion and water quality protections, signaling the need for enhanced resources. Citing examples like the City of Toronto, participants also stressed the importance of ensuring key definitions, such as hazardous lands, are comprehensive and clearly articulated to support consistent interpretation and effective regulatory enforcement.

Resources/ Follow Up

- [Lake Simcoe Protection Plan](#)

Policy Issue #2 – Watershed Planning

Building on the actions outlined above, participants agreed that Greenbelt policies need to maintain the health of the water resource system, including groundwater quantity and quality, and reflect an integrated approach to watershed planning, which provides a more effective framework to manage growth particularly in areas such as water, wastewater, and stormwater management. It also supports long-term sustainability and mitigates climate risks by enhancing natural systems and functions.

Existing guidance documents will need to be updated to adequately defend policy positions and ensure consistent implementation. At the same time, participants expressed concern that the weakening of regional official plans could lead to the neglect of cross-boundary issues—such as aquifer protection and cumulative water takings. Improved data collection and application were highlighted as urgent priorities, noting the growing incidences in basement flooding and the critical need to protect groundwater.

The following actions were proposed:

- Supporting informed decision-making by integrating key Growth Plan policies in the Greenbelt, specifically on water and wastewater servicing and stormwater management that ensure supply and assimilative capacity limits are not exceeded and that inform watershed-scale erosion and flood mitigation actions.
- Retain the prohibition on providing Great Lakes servicing to avoid increasing growth pressures in the Greenbelt.
- Strengthening policies for watershed planning that encompasses the natural heritage system, hazardous lands, natural assets, and water quality.
- Increasing provincial responsibilities to support cross-boundary collaboration, including providing tools, technical guides, training, and enforcement mechanisms.
- Ensuring Greenbelt policies and definitions are harmonized with drinking water source protection policies such as Ecologically Significant Groundwater Recharge Areas (ESGRAs) and Significant Groundwater Recharge Areas (SGRAs), along with mapping of vulnerable areas including Wellhead Protection Areas (WHPAs), Highly Vulnerable Aquifers (HVAs) and areas with a higher Aquifer Vulnerability Index (AVI).

- Strengthening provincial oversight, expectations and resources for data collection, sharing and evidence-based application required to implement watershed-scale management including improving data accessibility on water use and quality.
- Requiring timely updates of water budgets to reflect population changes.
- Adopting climate change policies from Growth Plan in the Greenbelt Plans.

Discussion Highlights

Policy Integration and Cross-boundary Coordination

Watershed-scale management, as established under the O. Reg 686/21 of the *Conservation Authorities Act*, improves the ability to address the cumulative impacts of urban challenges such as stormwater management, erosion and water quality, and climate risks, while enhancing the natural environment. Strengthening the policy links between water systems, natural heritage systems, hazard lands, natural assets, and water quality in the provincial Greenbelt Plans will improve durability (over Official Plans) and consistency.

The lack of regional planning and new decentralized municipal planning structures will require collaboration, additional tools and resources such as guidance and glossaries, and greater oversight by the Province. The need to strengthen links between Greenbelt policy and provincial drinking source water protection policies was underlined.

Participants also raised concerns about municipal capacity to address the implications of inter-basin water transfers and permanent dewatering activities related to highways and infrastructure.

Data Accessibility and Application is Critical

Intergovernmental data collection and sharing are fundamental to effective watershed management and understanding cumulative impacts and climate risks. It was noted that persistent gaps in groundwater monitoring, data sharing, and management of groundwater data are elevating risks to public safety and property damage, particularly regarding high-volume dewatering projects and development-driven pressures.

Participants flagged that permitted water takings are not adequately tracked, limiting oversight and accountability. Many water takings bypass permit requirements by using the Environmental Activity and Sector Registry (EASR) threshold intended for smaller withdrawals, resulting in minimal oversight and limited data transparency. There is an urgent need for open and accessible databases on water use and quality to support adaptive, evidence-based decisions.

Capacity and Training Needs

There is a perceived lack of sufficient municipal expertise in hydrogeology and in some areas the capacity to implement and enforce policies. Updated definitions, technical guidelines, and enforcement mechanisms for water takings and discharge would be helpful, as would training or expertise to support municipalities during the approvals process.

Resources/ Follow Up

- [Ontario Headwaters Institute watershed map](#)

- [Ontario Headwaters Institute Grand River report](#)
- [TRCA Watershed based management strategy](#)

Policy Issue #3 - Oak Ridges Moraine Water Policies

Participants support maintaining the distinct policies of the Oak Ridges Moraine Conservation Plan (ORMCP) needed to protect groundwater supplies critical to the region and millions of Ontarians. Concern was raised about pressures to standardize policies across the Greenbelt and potentially the PPS, which would weaken protection of the Moraine. Participants observed that pressures to develop on the Moraine are increasing, leading to inconsistent municipal implementation of policies, noting recent approvals of development in sensitive features such as kettle lakes and wetlands. These pressures also increase concerns about the future use of MZO's in the Moraine. The following actions were proposed:

- The province continues to recognize the distinct landscape of the Oak Ridges Moraine within the Greenbelt and policies that protect its unique and critical groundwater resources.
- Increasing provincial support for monitoring and policy implementation support to municipalities.
- Strengthening policies in the ORMCP to reduce development pressures and avoid the siting of incompatible infrastructure.

Discussion Highlights

Strengthen ORM Policies

The distinctiveness of ORM policies should be reinforced to prevent standardization across weaker planning regimes. Restoring provincial capacity for integrated water governance, technical review, and adaptive management would improve ORM policy implementation, oversight, and effectiveness.

Communicate About ORM Ecosystems

The lack of a provincial monitoring program for land use impacts and ecological health makes it difficult for people to understand ORM issues. A public monitoring mechanism for policy enforcement and land use changes would improve awareness. Visual or narrative representations would improve the communication of complex hydro-ecological impacts in simpler terms.

Prohibit Incompatible Infrastructure

There have been increasing instances of infrastructure intrusions in the ORM (e.g., cell towers, sewage corridors). Exemptions and micro-scale municipal servicing proposals threaten cumulative impacts on headwaters. There is a perceived pressure to reinterpret or dilute ecological and hydrological integrity provisions. Protections should be expanded for recharge areas with a prohibition on incompatible infrastructure (e.g., for-profit or energy corridors).

Resources/ Follow Up:

- Rescue Lake Simcoe Coalition letter expressing concerns about the [York Region Water and Wastewater Plan amendment](#) regarding inter-basin issues and pipes going through the ORM with no Environmental Assessment.

- [OLT case](#) challenging King Township's inclusion of ORM clauses in its by-laws.

Next steps

The Foundation would like to extend our appreciation for participants' time in attending the virtual engagement session and sharing your views and experiences. If you have more information or feedback for us, please contact us by July 17, 2025.

The Foundation has completed a total of ten issue-specific discussions on the upcoming 10-year Review with a broad group of stakeholders across the region. We are currently developing a comprehensive summary of key policy positions and recommendations. The summary will include input from roundtables held in November 2024 and the virtual sessions held this spring. Memos from both sessions are available [here](#).

We look forward to continuing to engage with you to confirm alignment, agreement and support with our key areas of focus for the upcoming Review.

Appendix I. List of policy recommendations discussed at the November 2024 roundtable.

Participants agreed that the Greenbelt is essential for protecting critical water resource systems that millions of people and the region's economy relies on in the Greater Golden Horseshoe. Principles underlying the Plans remain sound but require updates to adequately reflect current (and often complex) challenges. It was also noted that sections of the Plans use dated or insufficient language that doesn't adequately reflect current challenges or contexts. Protections for water resources outside the Greenbelt require similar consideration. Several key recommendations to strengthen the effectiveness of the Plans were suggested, including the following:

- Strengthen policies in the Greenbelt Plan to protect and manage urban river valleys.
- Stronger requirements are needed for watershed management planning both inside and outside the Greenbelt to approve developments and mitigate erosion and pollution while supporting sustainable growth.
- Require water quality monitoring before, during and post construction to improve knowledge about the water resource system and inform decisions.
- Adopt requirements or provide guidance for municipalities to use the best available data on water resource systems during development approvals and take advantage of Ontario's robust databases and systems.
- Review and update water resource policies in the Oak Ridges Moraine Conservation Plan to reflect current understanding and regional development pressures.
- Increase education about the value of the Greenbelt and intent of Plan policies and enforcement.
- Address challenges in maintaining watershed health and approving Official Plans by lower-tier governments.
- Enhance municipal capacity to meet obligations to protect and enhance water and hydrological systems through training, resources, and technical support as essential for effective water management.
- Support data-driven planning through a centralized monitoring system that tracks the Greenbelt's health and generates data-driven feedback to improve implementation over time.
- To improve protections of critical water resource systems, strengthen the environmental assessments and enforcement measures to mitigate risks. Stronger accountability mechanisms are needed in areas experiencing rapid growth.
- Support and provide resources for municipalities to model climate change scenarios and impacts on water resources.
- Establish policies to rehabilitate watersheds, with clear targets for metrics such as tree cover, riparian buffers, and wetland health. Provincial funding could be allocated to municipalities to implement these measures as part of a broader flood prevention and watershed quality strategy.

Appendix II. List of participating organizations in the Water Resources and Hydrological Systems virtual engagement session.

- Ontario Headwaters Institute
- Conservation Ontario
- Toronto & Region Conservation Authority
- Halton Conservation Authority
- Ontario Federation of Agriculture
- Rescue Lake Simcoe Coalition
- Oak Ridges Moraine Groundwater Program
- Simcoe County Greenbelt Coalition
- Save the Oak Ridges Moraine Coalition
- City of Toronto
- Peel Region