

**Submission on ERO 019-7739:**

**Proposal to Return Lands to the Greenbelt –  
Greenbelt Statute Law Amendment Act, 2023**

**From the Ontario Headwaters Institute  
November 22, 2023**

**1. Introduction**

This submission is from the Ontario Headwaters Institute, an Ontario corporation with charitable status.

After having worked for years with the goal of protecting headwaters, their natural heritage, and our receiving waters, we are adopting a new, aspirational goal of protecting watershed security – water for people and for nature.

Our website, at [www.ontarioheadwaters.ca](http://www.ontarioheadwaters.ca), will be extensively updated by early 2024, to better describe our new direction while maintaining our on-going interests in biodiversity, climate change, land use planning, resource extraction, and all aspects of watershed planning & management.

In the meantime, you can still find extensive information at that website, including our Brochure, a petition supported by 1,155 signatures that Ontario should finalize its Made-in-Ontario Environment Plan, and links to two sets of maps on the Greater Golden Horseshoe.



In general, we support the direction of the proposed bill to return land to the Greenbelt per se but find that the overall direction of the government since 2018, which painted environmental protections as red tape while seeking to expedite its Housing Action Plans, as ill-advised and purposefully myopic, courting future catastrophe on watershed security, biodiversity, climate change, regional agriculture, and aligned issues.

In addition, over this same period, the Premier has issued wildly changing and indeed what could be considered passive-aggressive positions on the Greenbelt. Caught on video telling developers he would open the Greenbelt, he stated he heard the public response and promised to not touch it. He subsequently called the Greenbelt a scam and attempted massive carveouts. The public outcry against that is what caused this new bill, yet the Premier just recently stated that the public does not give hoot about the Greenbelt and so is restricting debate to one hour at standing committee while the government is also seeking to end run the bill through other means.

These comments and actions have significantly lowered public trust in the government on housing, environmental safeguards in general, and protecting the Greenbelt in particular.

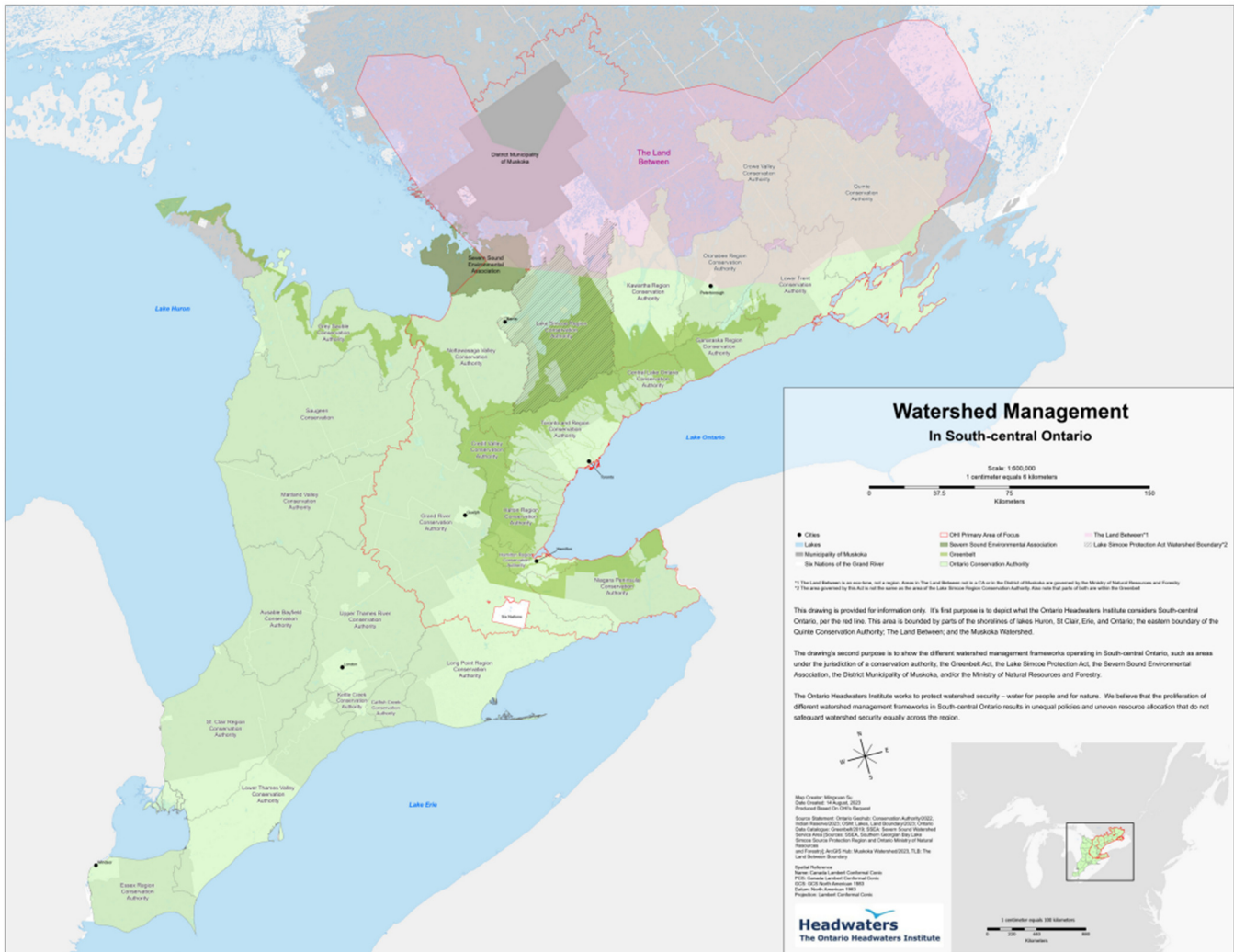
We urge the government to restore that trust by embracing the recommendations below.



## 2. Land Use and Watershed Planning across South-central Ontario

Contrary to the direction in s 2.2 of the Provincial Policy Statement that “Planning authorities shall protect, improve or restore the quality and quantity of water by... using the watershed as the ecologically meaningful scale for integrated and long-term planning...”, the OHI is concerned that the Province is unaware of and/or disinterested in the fact that planning for the water resource system within the Greenbelt is one of six watershed planning frameworks in South-central Ontario, creating regional inequalities in how the water that people rely upon is protected differently in different areas.

These areas with different watershed planning frameworks are depicted in the drawing below, for which a full-size drawing is posted [here](#).



The drawing demonstrates not only the multiple areas with different watershed planning frameworks, but areas in which those frameworks overlap. Different watershed planning frameworks include those under the jurisdiction of conservation authorities, the Greenbelt Act, the Lake Simcoe Protection Act, the Severn Sound Environmental Association, the District Municipality of Muskoka, and/or the Ministry of Natural Resources and Forestry.

In addition to these geographic differences, there are huge discrepancies in policies from conservation authority to conservation authority, something the provincial governments pledged to address but never has, as well as from agency type to agency type. It is also worth noting that environmental assessments for new infrastructure within the Greenbelt are required only for the area directly under their footprint, and not for their impact on neighboring aquatic species nor on receiving waters.

The OHI believes that this proliferation of different land use and watershed planning regimes and policies in South-central Ontario results in the unequal and uneven allocation of resources that violate the intent of s 2.2 of the Provincial Policy Statement and do not protect watershed security equally across the region.

**In essence, the OHI suggests that land use and watershed planning must be treated as one, and we recommend that:**

- i) All aspects of Ontario's land use and watershed planning regimes be re-focused on watershed security and better integrated to achieve practical goals for inter-generational sustainability**

**In order to address the above, we also recommend that:**

- ii) Ontario revoke Bill 23 in a manner that restores the traditional mandate of conservation authorities and the previous protocols in the Ontario Wetland Evaluation System; and,**
- iii) Ontario commit to a sustainability lens for land use planning, from agriculture to complete communities, in a guidance document to accompany the Provincial Policy Statement, and that the PPS require conformity from planning authorities to minimum standards in that document.**

## **2. Protecting and Expanding the Greenbelt**

As mentioned in the introduction, it is quite clear to most observers that the Ontario government's efforts on the Greenbelt, municipal boundary expansions, and other initiatives have each experienced numerous contradictory policy changes, many of which seem to have been promulgated in the absence of any strategic coherence or meaningful consultation, thereby significantly weakening public trust in the government.

In addition to those missteps, the government appears to be missing in action on protecting natural heritage in an era of the biodiversity and climate crises, as well as not protecting provincial food security.

While leaving a detailed analysis of these issues to another time and/or other commenters, the OHI suggests that the government seize this time as an opportunity to redress its recent actions on the Greenbelt with a more assertive and visionary set of initiatives.

**These are that the government should:**

- iv) Amend and/or provide measures to ensure the implementation of meaningful public consultation for future changes to the Greenbelt prior to presenting the Greenbelt Statute Law Amendment Act, 2023, to the Legislature;**
- v) Eliminate the restrictions on environmental assessment for new infrastructure in the Greenbelt from its immediate footprint to their more fulsome impacts, such as may occur to areas adjacent to construction or with respect to lighting, migratory routes, noise, run-off, temperature, etc; and,**

- vi) Significantly expand the Greenbelt. Candidate lands are well known to the Government, having been suggested in consultations on Growing the Size of the Greenbelt, ERO 019-3136, which was itself an extension of Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring, ERO 013-1661. The OHI suggests these lands include:**
- All areas throughout the Greater Golden Horseshoe identified in Provincial inventories of Natural Heritage and/or Agricultural Lands;
  - All areas not already added to the Greenbelt from the Bluebelt proposal. This proposal was led by a coalition of four environmental organizations and was supported by more than 120 other groups, and address the areas in the list and drawing below -
- The remainder of the Lake Simcoe drainage basin
  - Significant recharge areas in Severn Sound and the Carden Alvar
  - Significant recharge areas in the Waverly Uplands
  - Wetlands and recharge areas across Clearview
  - The headwaters of the Humber, Don, and Rouge Rivers
  - The watersheds of Duffins and Carruthers Creeks
  - The South slope of the Oak Ridges Moraine and the Iroquois Shoreline in Northumberland County
  - The Luther Marsh, and
  - The Grand River watershed in Brant County.
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### 3. Conclusion

The government has admitted a mistake in the process of how it removed land from the Greenbelt.

Compounding that mistake with another effort that lacks a fulsome context of land use and watershed planning, and without meaningful consultation, won't restore public trust in the government.

The OHI offers our recommendations as a way for the government to restore some of that trust while protecting watershed security, moving to a sustainability lens for land use and watershed planning, and expanding the Greenbelt to be more resilient in a future threatened by the strengthening biodiversity and climate crises.

We are available to discuss our recommendations with you at your convenience.

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