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Growing The Greenbelt:
How To Do it the Right Way

Introduction

Recently, the Honourable Steven Clark, Minister of Municipal Affairs and Housing, publicly talked about his desire to expand the Greenbelt. This document sets out the requirements and next steps that would be most effective in achieving this goal.

To begin, it is important to acknowledge the vision for the Greenbelt, as set out in the Greenbelt Plan:

The Greenbelt is a broad band of permanently protected land which:

- 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 that form the environmental framework around which major urbanization in south-central Ontario will be organized;
- 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.

The successful realization of this vision for the Greenbelt centres on effective collaboration among the Province, other levels of government, First Nations and Métis communities, residents, private and non-profit sectors across all industries and other stakeholders.¹

Permanently protecting lands in the Greenbelt is key to maintaining and improving the physical, social and economic health of Ontarians. Healthy ecosystems are the foundation of human prosperity and will become increasingly important for building a climate resilient Ontario.

The COVID-19 pandemic has made these facts clearer than ever before. Since the pandemic started, we all rely even more on Greenbelt-protected natural lands for our mental and physical health. We appreciate even more the Greenbelt-protected farmland and farmers that supply us with healthy local food and jobs. And we are profoundly grateful that Greenbelt-protected water resources provide us with a clean and secure water supply.

Collectively, people rely on Greenbelt-protected lands for over 180,000 jobs and \$9.6 billion in annual economic activity. Meanwhile, the combined activities of plants, animals, insects

¹ [GREENBELT PLAN \(2017\) \(ontario.ca\)](#), pp. 3-4.

and microorganisms in its wetlands, forests and rivers generate over \$3.2 billion in annual ecosystem services such as:

- fresh food and water;
- regulating services such as flood and disease control;
- cultural services such as spiritual, recreational, and cultural benefits; and
- supporting services such as nutrient cycling.

Because of all these attributes and benefits, expansion of the Greenbelt is clearly in the public interest. Bringing more lands under its permanent protection is a necessary precondition for a more climate resilient and prosperous future and the sooner this happens, the better for all of us.

Key requirements for expanding the Greenbelt.

No land removals

The land currently in the Greenbelt must remain in the Greenbelt. For years, developers and land speculators have been asking the provincial government to change the Greenbelt boundary to remove their land from Greenbelt protection. In some cases they suggest that other lands elsewhere be reclassified as Greenbelt lands so that the total Greenbelt area is maintained. At first glance this can seem reasonable but there are several reasons why such a move would effectively destroy the Greenbelt's capacity to protect farmland and key natural areas.

The consequences of land removal include:

- *A "Swiss-cheese" Greenbelt.* In 2017, the provincial government reviewed the current Greenbelt boundaries as part of the legislatively required 10 year Greenbelt Plan review. At that time they received over 650 requests from developer landowners to remove land from the Greenbelt². In the end, only minor adjustments were made to correct mapping errors made when the Greenbelt was established in 2005. The rest of the requests were denied because approval of these requests would have resulted in islands of development within the Greenbelt. Of course these new housing subdivisions, factories and big box stores would also need roads, sewers and water supply. Therefore these islands of development would need to be linked to towns and cities outside of the Greenbelt and a spider-web of development would begin to appear among the rest of the protected lands
- *Islands in a sea of development.* If the provincial government were to propose to ensure the Greenbelt does not get smaller in total area when new development is allowed within it, they would have to designate new lands outside as new Greenbelt lands. These sites would not necessarily be contiguous with the existing protected Greenbelt lands and in that case would be islands surrounded by the growing impacts and pressures of development.
- *Harm to both farm communities and ecosystems.* A spider web of subdivisions, roads and factories in the Greenbelt would reduce the ability of wild animals to migrate and interbreed, plant seeds to disperse and for forests and fields to clean our air and

² [RequestsToRemoveland_Allmaps.pdf \(greenbeltalliance.ca\)](https://greenbeltalliance.ca/RequestsToRemoveland_Allmaps.pdf)

water and absorb the rain. As urban development encroaches on agricultural land, people with no attachment to farming come into close contact with farm operations. This is the case when the urban envelope expands onto farmland without adequate buffers or when non-agricultural uses are permitted in rural areas. These give rise to conflict between farmers and new arrivals in the countryside, impeding normal farm practices and undermining the long-term viability of farming in affected areas.³

- *Once you start you can't go back:* Once a developer or a municipality is allowed to remove land from Greenbelt protection what would stop the next proposal from being approved? Once this happens the Greenbelt ceases to be a meaningful, permanent protection mechanism.
- *It's not fair:* Landowners or developers who have played by the rules and worked with the municipal planning system to get their land approved for development would be competing with someone who had sidestepped this public process and secured a development approval in the Greenbelt. This could undermine investor confidence in Ontario's planning system and lead development to locate in other jurisdictions.

In summary, allowing land inside the Greenbelt to be approved for development will make the Greenbelt no more protected than the lands outside of it. Therefore any credible and viable plan to expand the boundaries of the Greenbelt cannot allow land removals.

Build on What's Already been Done (don't reinvent the wheel)

Discussions about growing the Greenbelt have occurred since 2006. In 2017 lands in 21 urban river valleys around the Greater Golden Horseshoe and 7 coastal wetlands were added to the Greenbelt. As well, the Province launched an extensive consultation process⁴ to get feedback on adding land in 7 areas across the GGH to the Greenbelt.

As part of that consultation process, member groups of the Ontario Greenbelt Alliance submitted [a map](#) containing additional lands to be added to the Greenbelt, known as the "Bluebelt Expansion Area"⁵. The proposed Bluebelt Expansion area involved extending the Greenbelt to protect areas of high ecological and hydrological value such as moraines, wetlands, headwater areas and coldwater streams.

The work done in 2017, including the Bluebelt proposal, should form the basis of new plans to expand the Greenbelt.

Work towards simultaneously improving public health, local food security, water security, climate resilience, biodiversity conservation and economic prosperity.

The COVID-19 crisis has made it abundantly clear that governments have a duty to protect the public interest. This is equally true for issues that require long term action, like the protection of key natural infrastructure, including the Greenbelt.

³ Page 24: <https://environmentaldefence.ca/report/report-farmland-at-risk/>

⁴ [Ontario Consulting on Greenbelt Expansion | Ontario Newsroom](#)

⁵ [Greenbelt_Bluebelt_VS_Prov_FINAL_03_\(d3n8a8pro7vhmx.cloudfront.net\)](#)

The belief that long-term ecological and social health can be sacrificed for short term economic benefit for a few has been proven wrong time and again. The huge economic, social and ecological benefits provided by the Greenbelt demonstrate the value of its protection today and the promise of even greater value in the future.

The Province CAN act to simultaneously improve public health, help farmers create a more secure local food supply, better protect our water resources, and build climate resilience in ways that create economic prosperity for Ontarians by expanding the Greenbelt.

Acknowledge that there is more than enough land to grow the Greenbelt and build complete communities to handle projected population growth.

Discussions about expanding the Greenbelt will once again ignite debate around how much new land is needed to house and employ Ontario's projected population growth. The evidence is clear. There is more than enough land already set aside for development within existing town and city boundaries to meet the demand for all types of housing and businesses until far past 2031. This is because each municipality is required by law to identify and zone enough land for these uses up to at least 2031 and are now required to update these projections for the period up to 2051 by the end of 2022.

In fact for all municipal regions except **Toronto and Hamilton** growth has been less than projected and there are existing large surpluses of land available for development. For example, the City of Mississauga has more than 20,000 units of housing that is approved and waiting for developers to proceed within its urban boundaries⁶. **Appendix 1** at the end of this report provides a summary of how much developable land is approved for new houses and business in each part of the Greater Golden Horseshoe. So instead of developing in the sensitive farmland and natural areas of the Greenbelt, it is clear that we can, and should, build complete communities (gentle density, people friendly, walkable, jobs close by, climate resilient) inside the boundaries of our existing towns and cities.

Consult with Indigenous Communities.

The Province must consult with Indigenous communities about expanding the Greenbelt within their traditional territories. The duty to consult is a constitutional obligation that arises from s.35 of the Constitution Act, 1982, which recognizes and affirms Indigenous and Treaty rights. Their age-old commitment to protecting land needs to be honoured by ensuring their voices are key to any discussions involving expanding the Greenbelt.

Next Steps

Based on the above information and requirements, the Province can best move forward to expand the Greenbelt by taking the following immediate actions and developing these longer term processes to complete the expansion process:

Immediate Actions

⁶ Jason Bevan, Planning Strategies Director, City of Mississauga at Urban Land Institute webinar on Nov 26, 2020. Confirm via email or phone and get link

1. Commit to expansion of the Greenbelt and continued permanent protection of all the lands within the existing Greenbelt area..
2. Cancel the planned GTA West (Highway 413) and Bradford Bypass. These highways are expensive, not necessary and will permanently damage existing lands within the Greenbelt. As well, there are many other options available to manage the transportation needs of Ontarians that do not require sacrificing vital farmland, natural spaces and water resources.
3. Bring forward the [Bill 71, the Paris Galt Moraine Conservation Act, 2019](#) that will provide for protection of this important area and allow expansion of the Greenbelt westward
4. Prioritize the addition of the Carruther's Creek headwaters area adjacent to and bisected by the parts of the existing Greenbelt. This would help to address the risks to development in this sensitive area identified by the recent TRCA Carruther's Creek Watershed study.
5. Release the results of the previous public consultations on Greenbelt expansion that occurred in Bluebelt consultations from 2017. This information is a treasure trove that would provide Ontarians with a wealth of information and data that would help to guide future discussions about where to expand the Greenbelt and help to demonstrate the views of Ontarians regarding Greenbelt expansion.
6. Other priority sites? W-S, Brantford?

Longer Term Expansion Process

7. Using the information from previous public consultations develop ecological, hydrological, social and economic criteria to be used to evaluate candidate areas for expansion.
8. Prepare draft maps of expansion areas for public and Indigenous consultation
9. Finalize candidates and undertake regulation of these areas as part of the Greenbelt

Appendix 1

To be completed