

Expanding Ontario's Greenbelt: How To Do it Right

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 province's 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 resiliency of local food systems and 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 and microorganisms in its wetlands, forests and rivers generate over \$3.2 billion in annual ecosystem services such as:

- fresh food and water;
- flood and disease control;
- spiritual, recreational, and cultural benefits

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

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.

Discussions about expanding the Greenbelt have been happening since it was first established in 2005. It's important to acknowledge that the creation of the Greenbelt was restricted to lands within the Greater Toronto and Hamilton area along with the tender fruit lands in Niagara. At present, the Greenbelt only covers 21% of the Greater Golden Horseshoe (GGH). The remainder of the GGH to the east, north, west and south was not considered for potential inclusion although substantial analysis was undertaken to document the natural, hydrologic and agricultural values of including more lands under Greenbelt protection.

Key requirements for expanding the Greenbelt.

Requirement 1: 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. This is unacceptable for several reasons and would effectively destroy the Greenbelt's capacity to protect farmland and key natural areas.

The consequences of land removal would include:

- *Harming both farmers and nature.* A spider web of subdivisions, roads and factories in the Greenbelt would reduce the ability of forests, fields and wetlands to clean our air and water and absorb the rain, of wildlife to move as needed for foraging, breeding and raising their young, and of plants to be pollinated and disperse seeds. As urban development encroaches on agricultural land and buffers between agricultural and non-agricultural uses are reduced, people with no attachment to farming come into close contact with farm operations. As the Ontario Federation of Agriculture has said, this can 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.²
- *Creating 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 7,000 requests from developer landowners to remove land from the Greenbelt.³ In the end, only minor adjustments were made to refine the mapping from 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

² <https://ofa.on.ca/resources/farmland-at-risk-report/>

³ [RequestsToRemovelAnd_Allmaps.pdf \(greenbeltalliance.ca\)](#)

housing subdivisions, factories and big box stores would also have required roads, sewers and water supply. Therefore these islands of development would have needed 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.

- *Creating 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.
- *Setting an irreversible, dangerous precedent.* 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.
- *Making Farmland less affordable:* If Greenbelt protection is not permanent and farmland is seen as open for development, there will be a significant impact on its value. Permanent protection keeps farmland more affordable for the purpose of farming.
- *Harming those who followed the rules:* 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.
- *Breaking the Law:* It is contrary to the fundamental purpose of the Greenbelt Act and Plan to protect it in perpetuity and is contrary to the Greenbelt Act which says while the Greenbelt Plan may be amended, no amendment shall reduce the total land area contained within the Greenbelt Plan.

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.

Requirement 2: Build on What's Already been Done (don't reinvent the wheel)

Discussions about growing the Greenbelt have occurred since 2005. 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.

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

⁵ [Greenbelt Bluebelt VS Prov FINAL_03 \(d3n8a8pro7vhmx.cloudfront.net\)](#)

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

Requirement 3: 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. 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.

Requirement 4: 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 is 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 Peel 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. As for commercial and industrial development, brownfields close to existing infrastructure should be the priority for siting.

Requirement 5: 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

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](#)

rights. Indigenous traditional practices, responsibilities and knowledge systems must be honoured by ensuring Indigenous 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 a longer term process to complete the expansion:

Immediate Actions

1. Commit to the continued permanent protection of **all the lands within the existing Greenbelt area** and the expansion of the Greenbelt.
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 while also generating significant pressure by developers and municipalities to allow development along them. 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 [Bill 71, the Paris Galt Moraine Conservation Act, 2019](#) that will provide protection for this important area and allow expansion of the Greenbelt westward.
4. Release the results (including maps) of the previous public consultations on Greenbelt expansion that occurred in 2017. This information, including the Bluebelt proposal, is a treasure trove of information and data that can guide future discussions about where to expand the Greenbelt based on the views of Ontarians.

Developing a Longer Term Expansion Process

We suggest the following principles shape the development of a new process to bring more agricultural lands, natural areas and water resources under the protection offered by the Greenbelt Act:

1. Consult with the public, community groups and farm organizations to get feedback on the criteria to be used and the lands to be considered.
2. Honour Canada's constitutional and Treaty obligations to Indigenous peoples.
3. Use the rich material from previous consultations, such as the Bluebelt proposal.
4. Ensure expansion criteria follow science-based ecological, hydrological, and conservation best practices.
5. Ensure that the economic viability of farming as a predominant land use is a key consideration.
6. Ensure expansion criteria help address structural injustices and inequities facing marginalized groups.
7. Analyse the impact of other government policies on existing and proposed Greenbelt-protected lands and develop recommendations to mitigate negative impacts.

Appendix 1

To be completed