Comments on the Proposed Bill 66 (Environmental): Schedule 10

Thanks to a workshop hosted by Environment Hamilton at Knox Presbyterian Church in Dundas on January 15th, 2019, I am better informed about the environmentally destructive powers of the proposed Bill 66 (Restoring Ontario’s Competitiveness Act, introduced in the Legislature on December 6th 2018) and the ways in which individual citizens and environmental groups can voice their opposition. As pointed out by EH staff, Bill 66 will open up Ontario’s Greenbelt for industrial, commercial and residential development (Greenbelt Act, 2005), undermine drinking water regulations (Clean Water Act), and regulations aimed to reduce the amount of toxic chemicals that industries are allowed to release into the atmosphere (Toxic Reductions Act).

I share the general concerns expressed by various local and provincial environmental conservation groups, including Environment Hamilton, the Hamilton Naturalists’ Club, the Toronto Field Naturalists, Nature Ontario, Environmental Defence, and the Canadian Environmental Law Association.

The following comments focus on Schedule 10 of the proposed legislation, which would allow municipalities to create an “open-for-business planning by-law” to circumvent planning requirements and land use restrictions under numerous provincial laws, plans and policies. Two million acres of natural areas and farmland in Ontario are currently protected under the Greenbelt Act. As a resident of the community of Dundas in the amalgamated City of Hamilton, I was encouraged by comments recently made by Mayor Fred Eisenberger: he has stated that he is *not* interested in the proposed "open for business" by-law, if it means sacrificing land within the City’s boundaries that is now protected under the Greenbelt Plan. The following scenario describes what could happen in one part of Dundas if Schedule 10 is adopted by Hamilton City Council. Dundas is blessed by its beautiful natural setting, bounded to the north by the escarpment, to the east by Cootes Paradise and RBG lands, to the south by the Dundas Valley Conservation Area and to the west by the Greenbelt. The Greenbelt protection begins as one approaches the end of residential development along Governor’s Road, where there is a clear transition to rolling hills, agricultural land and wooded areas. Given the opportunity, developers would be lining up to apply for permits to build housing, commercial/ industrial operations on these greenfield lands. This is undesirable from many standpoints: the destruction of scenic countryside, natural habitats for wildlife, trees and woodlots, increase in the number of vehicles travelling along Governor’s Road (more cars on the road contribute to greenhouse emissions); and greenfield development anywhere requires costly infrastructure. Governor’s Road is currently undergoing a major reconstruction project between Creighton Road and Davidson Boulevard, the street before Pirie Drive (which marks the western terminus of suburban development, bounded by a parcel of land owned by the Hamilton Conservation Authority. This project was based on the premise that the Greenbelt designation would prevent further development to the west. Governor’s Road provides the only route into downtown Dundas from the west. Any more traffic than it carries now (resulting from the construction of more housing) would create major points of congestion at the intersections of Creighton Road and Ogilvie Street. The encroachment of new residential and commercial development onto Greenbelt lands in municipalities that adopt Schedule 10 be hugely detrimental from an environmental standpoint.

I therefore *strongly oppose* Schedule 10 of Bill 66.