

April 19, 2021

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Sent via email to: minister.mah@ontario.ca and greenbeltconsultation@ontario.ca
and submitted online through the Environmental Registry of Ontario

Re: ERO 019-3136 Consultation on growing the size of the Greenbelt

Dear Minister Clark,

Thank you for the welcome opportunity to provide input on expanding the Greenbelt.

SUSTAINABLE MILTON is a diverse group of 100 plus Milton residents committed to making our town, region and province a more sustainable place to live. We have among us scientists, professional planners, business owners and entrepreneurs, including those from the trades, engineering, architecture, geology, stewardship and landscaping – with local, national and international experience.

We see our organization as a partner and a supportive ally of our local governments and are actively engaged in Halton's Regional Official Plan Review, as well as, Milton's Official Plan Review. It is our intention to assist them in the promotion and protection Halton's Natural Heritage Systems, Agricultural Lands and Greenbelt, and foster a more environmentally conscious community. We support policies that minimize urban sprawl, support complete communities, establish green development standards and reduce reliance on personal combustion vehicles, all to address the declared Climate Emergency and promote sustainability.

Sustainable Milton strongly believes that "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." (from the extensively endorsed report entitled "Expanding Ontario's Greenbelt – Getting it Right").

We would also like to acknowledge and endorse three, separate submissions by the Ontario Federation of Agriculture, the Ontario Headwaters Institute, and the group of 48 organizations including Ontario Nature, Environmental Defence, the David Suzuki Foundation and GASP. We have used excerpts of all three submissions herein.

Question 1: What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?

We are very much in favour of adding the Study Area of the Paris Galt Moraine, but are also very concerned that all moraines in the GGH are not included in the Study Area. As documented in “Expanding Ontario’s Greenbelt,” the province conducted extensive consultations in 2017, to get feedback on adding land in seven areas across the GGH to the Greenbelt. As part of that consultation process, the “Bluebelt Expansion Area” was proposed by the member groups of the Ontario Greenbelt Alliance. The work done in 2017, including the Bluebelt proposal, should form the basis of any new plans to expand the Greenbelt.

RECOMMENDATIONS:

- The work done in 2017, including the Bluebelt proposal, should form the basis of any new plans to expand the Greenbelt.
- ALL lands in the conceptual designated greenfield area of the GGH should be added to greenbelt. In addition to protecting our watersheds and wetlands, our prime agricultural land must be protected from conversion.

Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?

Efforts to define a Greenbelt boundary, not just for the Paris Galt Moraine, should be based upon:

- A thorough, evidence-based understanding of the water resource system including groundwater systems, key hydrological areas, recharge and discharge areas, and well-head protection areas;
- Ensuring all key hydrologic features are captured in the defined boundary;
- Sustaining local ecosystems;
- Optimizing resilience to climate change impacts such as flooding and drought;
- The engagement of appropriate Indigenous Peoples in a process that respects and honours Canada’s constitutional and treaty obligations and moves forward in a spirit of reconciliation;
- In-person public consultation throughout the watershed to discuss proposed boundaries once the pandemic has abated; and,
- Clear and easy-to-implement options for properties outside a proposed boundary to be added to the Greenbelt.

RECOMMENDATIONS:

- A science-based approach to define the boundary;
- Protecting all key hydrologic features and functions;
- Engaging meaningfully with Indigenous Peoples;

- Conducting in-person consultations once suggested boundaries are identified and the pandemic has subsided; and,
- Developing clear and easy-to-implement options for property outside the boundary to be added.

Question 3: What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?

We support the inclusion of additional Urban River Valleys, but strongly recommend that private lands also be included in this designation. As noted in the ERO posting, publicly owned lands “are often lands designated in municipal official plans as parks, open space, recreation, conservation and/or environmental protection.” The designation of public lands under the Greenbelt will do little to enhance the quality of the Greenbelt, as the government intends. It is private lands within the Urban River Valleys, more so than public lands, that are threatened with urbanization and development.

Further, the addition of Urban River Valleys should not be considered an increase to the total land area within the Greenbelt Plan. In no circumstance should ‘greenbelting’ the Urban River Valleys be considered an acceptable means of maintaining the Greenbelt’s total land area in order to balance the loss of protected agricultural lands to development.

RECOMMENDATIONS:

- Include private lands in the addition, expansion and further protection of Urban River Valleys
- Do not offset the conversion of protected agricultural lands with the addition and expansion of Urban River Valleys

Question 4: Do you have suggestions for other potential areas to grow the Greenbelt?

While Sustainable Milton strongly recommends that the MMAH use a science-based approach to determine the minimum boundaries for the Greenbelt, we feel it should encompass no less than all the lands in the Conceptual Designated Greenfield Area, as defined on the Greater Golden Horseshoe Region map attached.¹ This will enhance, not only the size, but also the biodiversity, connectivity, and functions of natural heritage features, and improve the ecological integrity, social vitality, and economic prosperity of the broader Greater Golden Horseshoe.

When the Greenbelt was first created it exacerbated issues around equity because it failed to address the leapfrogging of development activity onto lands immediately beyond the Greenbelt. To address the gaps that became apparent, the Ontario government should designate all lands in the Conceptual Designated Greenfield Area of the GGH, that are outside of current urban boundaries,

¹ <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10852>

as Greenbelt. This should incorporate areas in the GGH Natural Heritage System, areas in the Bluebelt map², and any other headwater areas not captured in that mapping to the Greenbelt.

Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?

To our perspective, the removal of environmental and social considerations in the 2019 Growth Plan has upset the historic balances between natural heritage and development, and between private and public interests. Growing the Greenbelt presents an opportunity to restore the equilibriums and build a more resilient Greater Golden Horseshoe.

Supporting higher levels of intensification within existing cities and higher density targets in designated greenfield areas uses land more efficiently. Urban growth needs services and systems to support it. These urban systems are increasingly expensive and in the case of greenfield growth interfere with the ability to develop affordable housing.

By supporting a 60% intensification and 80 people and jobs per hectare density rate for designated growth areas (the rate needed to support regular bus service) and an expansion of the Greenbelt, more affordable urban growth could be achieved, and costly urban boundary expansions could likely be avoided beyond 2051.

We recommend the province prioritize growing the Greenbelt to reduce land speculation, limit extending expensive urban services into the countryside, avoid increased municipal debt loads, and reduce challenges to affordable housing.

Question 6: Are there other priorities that should be considered?

Create hard urban boundaries. 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. Complete communities become a given when you commit to hard urban boundaries. By supporting a 60% intensification and 80 people and jobs per hectare density rate for designated growth areas (the rate needed to support regular bus service) and an expansion of the Greenbelt, more affordable urban growth could be achieved, and costly urban boundary expansions could likely be avoided beyond 2051.

It is critical to embrace a multi-faceted approach to regional resilience. An updated Natural Asset Inventory for the Greenbelt that quantifies its ecoservices would be of great value to managers and policy makers. Estimates from the "Ontario's Wealth, Canada's Future: Appreciating the Value of the Greenbelt's Eco-Services" report prepared by the David Suzuki Foundation³ suggest that the

² <http://greenbeltalliance.ca/map/index.html>

³ <https://davidsuzuki.org/wp-content/uploads/2018/02/ontario-wealth-canada-future-value-greenbelt-eco-services.pdf>

Greenbelt's wetlands and forests hold the greatest value, worth over \$2.3 billion. It also estimates that the wetlands alone are worth an estimated \$1.3 billion per year (\$14,153/hectare) because of their high value for water regulation, water filtration, flood control, waste treatment, recreation, and wildlife habitat. The forests within the Greenbelt provide key services worth \$989 million each year because of their importance for water filtration services, carbon storage services, habitat for pollinators, wildlife, and recreation.

The Greenbelt's agricultural lands total value is substantial at an estimated \$329 million per year including cropland, idle land, hedgerows, and orchards. Key values include the pollination value of idle land and hedgerows, the storage of carbon in soils, and the cultural value of agricultural lands. At the watershed level, annual values within the Greenbelt range from about \$2,000 to greater than \$6,000 per hectare. With the province prioritizing the work of codifying these ecosystem values, any changes that would impact the Greenbelt would be addressed not only in ecological terms but also economic potential.

It is important to acknowledge that less than 5% of Ontario's land base can support any agricultural production. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland. That's 175 acres of farmland per day. If our province plans to continue to grow and prosper, we must also have a plan to protect our ability to produce food, fibre and fuel for the people of Ontario and beyond. The pattern of growth enabled by current provincial policies is unsustainable and needs to be resolved.

Given current circumstances, it has become increasingly clear that food security is no longer only a matter of equity. With the continued blurring of urban boundaries, and the conversion of prime agricultural land to residential (despite data and trends indicating that density and intensification should be prioritized over all other growth concepts), how is Ontario going to feed its growing population? The more prime agricultural land we convert to residential, the less we have to grow food! Add the potential destabilizing impacts of climate change and it won't be long before Ontario is unable to sustain its farmlands. Food production, as a stream of economic growth, will be curtailed rather rapidly and permanently, if land conversions continue to occur unchecked.

Do not allow development on wetlands under any circumstances, because they cannot be adequately replaced by any means. Man-made wetlands in alternate locations do not replace the natural heritage systems that our biosphere depends upon. We have seen time and again how human interference has unintentionally done irreparable harm and cannot be relied on to replace or supplement natural systems.

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.

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. Release the results (including maps) of the 2017 public consultations on Greenbelt expansion. 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.

Thank you again for the opportunity to participate in your initiative to expand the Greenbelt. We trust that our recommendations will be taken into account and would welcome an opportunity to discuss them with MMAH staff and advisors.

Sincere Regards,

Kim Bradshaw
Government Engagement Lead
Sustainable Milton
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