

December 2, 2022  
Ministry of Municipal Affairs and Housing  
[greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

**RE: ERO 019-6216 and 019-6217 *Proposed Amendments to the Greenbelt Plan***

Please accept this Written Submission with respect to the ERO 019-6216 and ERP 019-6217 postings.

I am writing to the Committee as an individual and as a Registered Professional Planner in the Province of Ontario with over 30 years of professional practice in this province. I'm also writing as an individual who has spent the majority of my professional experience working for municipalities as a land use planner responsible for the review of development proposals and the development of greenland networks within neighbourhoods. Over the course of my career, I have facilitated the development of numerous parks, trails and open space systems and housing through subdivision approvals while attempting to safeguard nature and balance the competing interests of the public and developers. My deep experience of how our land use planning processes work as a manager and director provides me with a broad understanding of the mechanics across the Acts and spectrum of changes being proposed.

The proposed changes to the Greenbelt Plan in combination with the proposed changes to the Conservation Authorities Act and Planning Act are not in the interest of Ontarians. Rather, they are in the interest of specific land owners and will have far reaching impact on opening up other areas of the Greenbelt. The proposed removals are presumably based on the need to find land to build houses fast. No scientific basis for the recommendations has been cited. Even the assumption that the homes can be built fast is based on servicing being available close by and with capacity for expansion; which given the lack of research could also be a "pipe-dream".

*Proposed Rationale is not Credible*

The government justifies the proposal, which is a full reversal from first-principle commitments made as recently as March 24<sup>th</sup> of this year, on the basis of a need to find land to build 1.5 million homes over the next 10 years. This housing construction goal arises from the Report of the provinces' Ontario Housing Affordability Task Force, which reported to government on February 8, 2022. In that reporting, the Task Force clearly stated that "... *a shortage of land isn't the cause of the problem. Land is available, both inside the existing built-up areas and on developed land outside of the greenbelts.*"(p. 10, emphasis added). Further, through the Envision Durham process, at the direction of the Regional Council of Durham, suitable land supply for the region has been identified extending up to 2051 without the need to redesignate portions of the Greenbelt Protected Countryside and Greenbelt Natural Heritage System. Citing the need for 1.5 million homes over the next 10 years to justify the proposed removals or the need for the Greenbelt to supply urban land for housing is not credible and should be rejected.

### *Proposals in Durham Violate Core Greenbelt Plan, 2017 Principles*

Setting aside the stated justification, the proposed removals still violate the Greenbelt principles for the cases where Settlement Areas may be expanded. In instances where a municipality was in a process of expanding a settlement area prior to the Greenbelt's introduction, the expansion was still required to "not extend into the Natural Heritage System" (Policy 3.4.5.1 b).

Having grown up in Clarington, I know this property having visited many times in my youth. In addition, for the past 20 years I have been intimately involved in land use planning the EA for the 407 and its construction. From certain perspective this would appear to be a remnant parcel; however from an environmental perspective its qualities as part of the natural heritage system are significant.

The Clarington removal is especially egregious, as the boundaries are based on one single parcel of ownership which ignores the boundaries of the Greenbelt Natural Heritage System on the parcel – even when that portion of the Greenbelt Natural Heritage System protects a significant woodland and a 5.4 hectare provincially significant wetland unit. There is no rationale in any context that would justify extending urban development permissions onto that irreplaceable portion of natural heritage which is part of the former Lake Iroquois shoreline.

### *Proposal Does Not Honour Previous Commitments*

The CAs and the applicable Municipalities have previously commented in good faith on several occasions in response to the government's proposals to protect the Greenbelt for future generations by expanding its quantity and quality. Those comments were not intended to facilitate a future land exchange for urban development that would undermine Greenbelt Protected Countryside. Clarington with the support of CLOCA and GRCA have commented on urban valley lands and other protected lands that can be added to the Greenbelt, these are now being touted as the "offset" which was not the intent (see [ERO Posting 019-4485: Growing the size of the Greenbelt](#)).

The current proposal does not honour previous commitments to undertake Greenbelt Expansions without removals and undermines the integrity and permanence intended for the Greenbelt and especially elements of the landscape that form part of the Greenbelt Natural Heritage System. Under the proposal the Greenbelt will not be protected for future generations and should therefore be withdrawn.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Faye Langmaid".

Faye Langmaid, FCSLA, MCIP, RPP