

December 2, 2022

[greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

**Re: Proposed amendments to the Greenbelt Area boundary regulation (ERO 019-6217)**

On behalf of the City of Toronto, I am pleased to submit staff comments regarding ERO 019-6217 on the Environmental Registry of Ontario. We understand the Province is seeking feedback on proposed amendments to the Greenbelt Area boundary regulation as presented by the Province in support of Ontario's Housing Supply Action Plan 3.0.

Collectively, we share the Provincial objective within the Housing Action Plan that would create more housing for a broad spectrum of Torontonians. However, we do not support the removal and redesignation of 7,400 acres across 15 areas from the Greenbelt Plan and Oak Ridges Moraine Conservation Plan areas. This proposal would undermine the permanent protection of the Greenbelt and will threaten the region's natural and agricultural systems that are supported by this important land use plan.

We do not agree with removing lands from the Greenbelt as a strategy to address the worsening housing crisis within this region. This is an unwarranted proposal when sufficient lands remain within municipal boundaries to address the anticipated growth. The Housing Affordability Task Force, created by the Ministry of Municipal Affairs and Housing similarly does not support this strategy of introducing development within the Greenbelt:

"Greenbelts and other environmentally sensitive areas must be protected, and farms provide food and food security. Relying too heavily on undeveloped land would whittle away too much of the already small share of land devoted to agriculture." ([Housing Affordability Task Force Report, 2022](#)).

On November 24, 2022, Toronto City Council adopted the following motion:

"City Council request the Province of Ontario to rescind the proposed changes to the Greenbelt to protect environmental features that support biodiversity, natural spaces, recreation trails, agricultural land, and watersheds that sustain all residents of the Greater Toronto and Hamilton Area." ([Item CC1.2](#))

City of Toronto Council's request is consistent with the City's position of support for the protection of the Oak Ridges Moraine and Greenbelt, which has been firm for more than two decades. In the lead up to the Province's passing of the Oak Ridges Moraine Conservation Act in 2002, the City maintained strong support for a regional planning approach to minimize the environmental and social impacts related to urban sprawl, and protect the ecological integrity of the Oak Ridges Moraine.

In 2001, Toronto's Chief Medical Officer of Health, Dr. Sheela Basrur submitted a letter to the Chair of the Advisory Panel on the Oak Ridges Moraine supporting the "permanent protection" of the Oak Ridges Moraine, noting the human health benefits of "intact ecosystems and the clean air and water that they provide" ([Basrur, 2001](#)). At the same time, the City of Toronto further identified our "vested interest" in protecting and enhancing the health of the Oak Ridges Moraine and greater bio-region ([Hoy, 2001](#)). Since this time, the City of Toronto has continued to maintain our support for the protection of the Greenbelt and Oak Ridges Moraine, including identifying the Greenbelt urban river valleys in our Official Plan.

Toronto's Official Plan and updates made through [OPA 583](#) (approved by City Council on June 15, 2022 and submitted to the Province for a decision), include policies related to building a more livable urban region (Official Plan 2.1). This includes policies that guide the City's work with neighbouring municipalities, conservation authorities and the Province to address mutual challenges and implement the Provincial framework for dealing with growth across the GTA which:

- "k) protects, enhances and restores the region's system of green spaces, water resources, natural heritage features and functions, and the natural corridors that connect them;
- "l) recognizes the role of river valleys that connect the Greenbelt to Lake Ontario and protects the region's prime agricultural land; and
- "m) mitigates and adapts to the impacts of climate change, improves resilience, reduces greenhouse gas emissions, and contributes to greater environmental sustainability."

Land use patterns upstream from Toronto can influence the overall ecological health and resilience of the City. A permanent Greenbelt supports the foundation for the long term ecological integrity of the region's natural systems. The regional natural system supports Toronto's biodiversity, and increases our resilience to the impacts of climate change. Land swaps inherently undermine the Greenbelt's permanent protection, which will lead to greater conversion of land from natural and agricultural to impermeable and urban. At a broad scale, this type of upstream land conversion will increase the vulnerability of communities downstream to the stresses and shocks of extreme weather.

Maintaining the Greenbelt and Oak Ridges Moraine's protection in a permanent manner will enable the agri-food sector to make long term agricultural investments, and reduce speculation across a land base that includes the most productive agricultural land in the Country.

Though the lands proposed for removal and addition are not within the City of Toronto, the City is and will continue to be functionally connected to the broader Greenbelt. Urban River Valleys and Greenbelt Protected Countryside lands travel through the City along our major river valleys and link the Greenbelt to Lake Ontario.

### **Summary**

City staff have major concerns about the proposed removal of 15 areas, making up 7,400 acres from the Greenbelt and Oak Ridges Moraine. This type of removal of land from the Greenbelt and Oak Ridges Moraine will undermine those Plans' stated intent of maintaining permanent protection for valuable landscape features, including the regions headwaters, natural heritage and agricultural land base. If this decision proceeds as proposed, it will set a negative precedent that is in opposition to the intention of the Greenbelt as an area set aside "to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape".

Consistent with our comments to the Province during the 2021 consultation on growing the Greenbelt, City Planning staff support in principle, the expansion of the Greenbelt to include other moraines, key ecological features and prime agricultural lands.

The Greenbelt and Oak Ridges Moraine's Natural Heritage System policies help protect lands that provide vital ecosystem services for the region, including "water storage and filtration, cleaner air, habitat, support for pollinators, carbon storage and resilience to climate change" (Greenbelt Plan, 2017). The importance of these areas, the functions they provide, and their contribution to our quality of life will only increase as the region's population density increases. This exercise to grow the Greenbelt should include focused consultation with affected municipalities, landowners, as well as stakeholders such as the Greenbelt Foundation and Indigenous Treaty holders.

City staff welcome the opportunity to work with provincial staff to effectively implement the provincial policy led planning system, drawing on each of our strengths to protect essential ecological features and create sustainable, healthy complete communities.

Thank you for the opportunity to provide these comments.

A handwritten signature in blue ink, appearing to read "G. Lintern".

Gregg Lintern, MCIP, RPP  
Chief Planner and Executive Director  
City Planning Division

cc: Dr. Eileen de Villa, Medical Officer of Health, Toronto Public Health, City of Toronto  
Janie Romoff, General Manager, Parks, Forestry & Recreation, City of Toronto  
Lou Di Gironimo, General Manager, Toronto Water, City of Toronto  
Paul Johnson, City Manager, City of Toronto  
Senior Leadership Team (SLT), City of Toronto  
Karen Jones, Director of Intergovernmental and Agency Relations, City of Toronto