

Dec 4, 2022

Dear Minister Clark,

Re: ERO # 019-6216 Proposed Amendments to the Greenbelt Plan

Thank you for this opportunity to comment on ERO # 019-6216 Proposed Amendments to the Greenbelt Plan/

There is no need to remove 7,400 acres of valuable farmland and natural areas from Greenbelt protection when 88,000 urban acres across the Greater Toronto and Hamilton Area (GTHA) are already primed for development.

Detailed Analysis

To alleviate the housing crisis construction needs to start as soon as possible on lands that are close to where people already live, work and play. There is plenty of land available for development in existing urban areas already close to transit and urban services. Plus there are 88,000 acres within the Greater Toronto and Hamilton Area (GTHA) already zoned and ready for development that can easily be incorporated into existing transit and urban services. In sum, there is more than enough land already available within urban boundaries to exceed long-range housing targets.

Yet the Ontario government wants to remove 7,400 acres of farmland and natural areas from the Greenbelt to make way for housing developments a long commute away from where the majority of residents live, work and play. This makes little sense when well over 10 times as much land is ready for the development of mixed housing in communities where people already live and will do nothing to foster climate resilience.

The climate crisis requires immediate action. Permanently protecting environmentally important land and agricultural land in Ontario is crucial to mitigating climate change, protecting sensitive ecosystems, and ensuring food security for Ontarians. Every acre of natural area protected provides a wealth of ecological services and benefits. Disruptions to food supply-chains, increased transportation expenses, crop failures in other parts of the world, and the need to limit our use of carbon-based fuels, require us to enhance our food security by increasing our access to sustainably-produced, locally-grown food.

In the face of unprecedented and accelerating biodiversity loss and the ever-worsening climate crisis, it is vital that your government do its utmost to protect the farmland, wetlands, forests, rivers and other natural areas that sustain us. As Ontario's Housing Affordability Task Force explained in its 2022 report, we do not need to sacrifice environmental protection to address the housing crisis. That's because "a shortage of land isn't the cause of the problem." (p.10) There is a vast supply of land already open for development within existing municipal settlement boundaries.

Canada, as a rich developed country of the Global North, should become a leader in transition towards sustainable land use planning supportive of the net zero climate goals. Next week Summit in Montreal on biodiversity will strengthen conservation goals that would be next to impossible to achieve with undermining.

the Greenbelt. This would set us on sustainable path and greatly benefit existential climate/biodiversity crisis globally.

The Southern Ontario has the greatest diversity of species in Canada. At the same time, this is where close to 50% of all Canadians and 92% of all Ontarians live. Continued protection of the Greenbelt and our natural heritage is critical for this region to halt and reverse biodiversity decline. Ontario renewable resources, such as farmland, cannot be compromised to hold on sustainability for future generations.

The Greenbelt was created almost 20 years ago to help ensure natural areas and prime agricultural lands are permanently protected from sprawl development. The Greenbelt is part of a suite of laws designed to concentrate new housing development in places where people already live, work and play and close to existing transit and services.

The proposal to remove lands from the Greenbelt would do nothing to address the housing crisis and create liveable, affordable communities. But it would:

- destroy 7,400 acres of Greenbelt farmland and natural areas and the vital ecological benefits they provide;
- harm climate resilience by undermining the ecological integrity of the watersheds and natural systems in and around the Greenbelt;
- set a destructive precedent that Greenbelt-protected lands will be sacrificed when land speculators want to develop them, thereby creating an ecologically damaged “Swiss cheese” Greenbelt;
- exacerbate the practice of land speculators putting pressure on farmers within the Greenbelt to sell their valuable farmland, thereby reducing vital local food production;
- divert limited construction resources away from building homes where they are needed within existing urban boundaries to building expensive and environmentally damaging sprawl on what was once Greenbelt-protected land;
- build homes that would likely not be affordable, therefore doing nothing for those who need affordable housing now.

In summary, the proposal to unnecessarily remove 7,400 acres of land from Greenbelt protection means Premier Ford is prepared to break his long-held promise, first made in 2018, to never remove land from the Greenbelt to be rezoned for urban development, thereby enabling massive profits for land speculators. It would undermine the Greenbelt and do nothing to build affordable homes for people who need them the most in communities near existing transit, services and jobs. Instead, it would lead to large profits for land speculators and developers who want access to Greenbelt-protected land to build expensive homes in sprawl development.

Yours sincerely,