

December 4, 2022

Electronic Submission only

ATT: Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3
greenbeltconsultation@ontario.ca

RE: Proposed Amendments to the Greenbelt Plan
ERO Posting 019-6216

Background:

Environmental Registry posting 019-6216 proposes to remove approximately 7,400 acres of land from the Greenbelt area in order to facilitate the building of 50,000 new residential homes. In total fourteen (14) removals have been identified across ten (10) municipalities. It is anticipated that construction on these lands would begin no later than 2025 and that the proponents of these changes would fully fund the necessary infrastructure up front. In compensation for the proposed removals, approximately 9,400 acres of lands will be added to the Greenbelt area in the form of lands within the Paris-Galt Moraine, as well as Urban River Valleys (URVs) identified through ERO posting 019-4485: Growing the size of the Greenbelt.

The Protected Countryside lands identified in the Greenbelt Plan are intended to enhance the spatial extent of agriculturally and environmentally protected lands covered by the Niagara Escarpment Plan and the Oak Ridges Moraine Plan while at the same time improving linkages between these areas and the surrounding major lake systems and watersheds. The Protected Countryside is made up of an Agricultural System and a Natural System. The Greenbelt Plan provides a broad framework for protection of key natural and hydrological features recognizing the interrelated nature of both.

It is expected that, although removed from the Greenbelt Plan and the Protected Countryside designation therein, the features making up the natural heritage system will remain protected by various levels of Provincial and municipal environmental policies-including remaining within the Provincial Natural Heritage System. As agricultural lands are not afforded the same level of protection from development once removed from the Protected Countryside designation, the following comments are primarily focused on potential impacts to the Agricultural System.

Discussion:

Previous Consultation

In 2021, a copy of correspondence provided to Burlington City Council regarding ERO posting 019-3136: Growing the size of the Greenbelt was submitted to the Environmental Registry for information purposes. Although the City did not identify additional lands for consideration in 2021 and is not directly impacted by the more recently proposed amendments, Burlington's urban area is largely bounded by the Greenbelt to the north and west. The City therefore has a strong interest in fully understanding the potential for future impacts to Greenbelt lands within Burlington, as well as how the currently proposed changes may impact the integrity of the Greenbelt system as whole. The City recognizes the importance of the conservation of these lands and wishes to emphasize the need for consistency with the original premise of the Greenbelt Plan- identifying where urbanization should not occur in order to provide *permanent* protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on the landscape.

Assessment Framework

On aggregate, potentially growing Greenbelt protected area by $\pm 2,000$ acres would represent a positive step in sensitive land conservation. However, a significant portion of the lands identified for addition are already provided a high level of protection. For example, URVs are largely conservation authority regulated hazard lands which enjoy further protection in provincial and municipal policy where key natural heritage features or hydrologic features are present. As the Greenbelt URV designation can only be applied to publicly owned lands and primarily serves to recognize the importance of connections to southern Ontario, the net extent of additional protection being gained is unclear.

Despite the proposed addition being greater than the removals on aggregate, a concern remains that quality and/or value of the lands have not been fully considered. In reviewing the proposal, it is unclear whether the assessment framework has appropriately distinguished between natural heritage and agricultural lands to ensure sufficient compensation of each Greenbelt system component. This is of particular concern in relation to agricultural lands, which are a highly limited and irreplaceable resource not just in Ontario but across Canada. This proposal will result in a net loss of protected agricultural lands, which may be exacerbated in future through additional removals that are offset by the addition of lands not suitable for agricultural purposes.

Given the strong protections provided for natural heritage and aggregate resources, development on agricultural lands is often framed as a 'lesser' impact in cases where it avoids impacts to natural heritage or aggregate resources. This creates an invisible hierarchy where agricultural lands continue to be put forward as the preferred location for development, despite stated Provincial interests in protecting Agricultural System viability. In the absence of a cumulative lens, individual Agricultural Impact Assessments at the time of application are likely to fall short of mitigating broader system impacts over

the long-term. For example, the cumulative downstream impacts of encroaching urban development may permanently alter the ecological integrity of the watershed and negatively impact the ecosystem services relied upon by farmers.

Individual impact assessments also fail to consider the edge effects associated with urban expansion, particularly in relation to urban encroachment driving land speculation at the urban fringe and contributing to the inflation of land prices. In addition to weakening the message of certainty that the Greenbelt was intended to provide, increasing land costs present a significant additional barrier to new farm entrants. This comes at a time when the industry faces both a looming succession crisis and a sharp increase in climate-related vulnerabilities.

The 2021 Census of Agriculture shows a continued trend of significant decline in the amount of agricultural land available for production in Ontario. The vulnerabilities of the agri-food system exposed by the global COVID-19 pandemic and numerous supply chain disruptions, further exacerbated by the increasing challenges of a changing climate, have highlighted the critical importance of preserving local food production capacity. Any proposed removal of agricultural lands from the Greenbelt should therefore be supported by comprehensive technical analysis in the form of an Agricultural Impact Assessment **prior** to such lands being made available for urban development.

This analysis should be informed by Land Evaluation and Area Review data, a detailed review of alternatives/demonstration of need, and consideration of cumulative long-term impacts to the Agricultural System at large. These precedent setting decisions should also be examined within the context of the recently announced “Grow Ontario: a provincial agri-food strategy”, which is premised on the concept that “*Ontario’s agri-food sector is and always will be a cornerstone of our thriving economy*”. In the absence of such analysis, it is not clear how ongoing urban encroachment will be managed over the long-term to ensure an appropriate balancing of Provincial interests and prevent the incremental erosion of the Agricultural System.

Next Steps:

The City recommends the consideration of a more transparent assessment framework and decision-making process, as this would allow all municipalities to better plan for any future removals the Province may suggest from other Greenbelt lands in future. The City of Burlington would like to understand, in more detail, the assessment framework used to consider the selected lands for removal and addition. The City is seeking clarity on the extent to which the affected municipalities were involved in the assessment process, specifically what conditions needed to be met regarding servicing and what agencies were consulted in that process.

A detailed numerical breakdown of the land removals/additions is also requested, showing existing designations (as per the applicable official plan/Provincial plan) contrasted with the proposed new designations and illustrated through mapping. The City would also like to better understand how section 5.7 - Monitoring/Performance Measures

of the Greenbelt Plan will be implemented with respect to the changes proposed through ERO posting 019-6216, as well as future removals/additions that may occur.

Please accept this letter as the City of Burlington submission on ERO posting 019-6216. Given the short period for consultation this letter has not been approved by City Council. This letter will be shared with the City's Committee's and Council at the earliest opportunity. Should Council determine any additional comments or refinements are required the Province will be advised at the earliest opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark H. Simeoni', with a stylized flourish at the end.

Mark H. Simeoni, MCIP, RPP
Director of Community Planning
Community Planning Department
City of Burlington