**Federation of North Toronto Residents Associations**

**Submission to the ERO (number 019-6216)**

**Proposals to change the Greenbelt boundaries**

**Greenbelt Act, 2005**<https://ero.ontario.ca/notice/019-6216>

**December 4, 2022**

The Federation of North Toronto Residents Associations, representing over 30 residents associations, submits the following objections to the Ministry of Municipal Affairs and Housing on proposed changes to the Greenbelt Plan that would remove or redesignate 15 parcels of land, and add lands in the Paris Galt Moraine area.

Our submission is based on the following points.

1. **There is no proven need for this additional land.**

The government’s Ontario Housing Affordability Task Force 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 undeveloped land outside greenbelts*.”

The Province says developers must show significant progress on approvals and implementation by the end of 2023 with construction started by 2025 - but what constitutes *significant progress*? Why would the province prioritize greenbelt parcels over available building opportunities within the areas already designated for growth and servicing – where housing should be achievable more quickly and connected to transportation corridors? Why support more sprawl?

1. **No criteria have been provided to support taking away Greenbelt land.**

Talking away important Greenbelt lands without explanation is not acceptable. The province has not provided any criteria for determining the rationale behind the parcels being recommended for removal. Any contemplation of removing lands from the greenbelt should be subject to a thorough and transparent evaluation and using criteria established by experts, not developers’ desires and quid pro quos*.* In contrast, many of the proposed parcels for removal appear to be in the middle of nowhere, and within the boundaries of the natural heritage system. Mapping that was provided with the posting makes it very difficult to determine what features might be impacted or what land uses may be proposed around the location.

Once opened, the precedent has been set for future cases to be made for removal such that the initial purpose behind the Greenbelt becomes moot. As no criteria were used or disclosed that supported the selection of these properties it will be very difficult to stem the tide of future requests.

1. **Taking away parcels impact the benefits of the Greenbelt lands system**.

 Many of the parcels proposed to be removed are not adjacent to other developments as shown on Map 4 and many are within the natural heritage system boundaries. The land use changes are not confined to the boundaries of the development because access points, light, noise, human interaction with the remaining natural system, storm water drainage etc., and all have the potential to further degrade the Greenbelt system that ensures clean and abundant drinking water, cleans our air, assists in flood management, provides linkages for wildlife, plants and people.

1. **The loss of protected Greenbelt land will have major impacts on availability of land for recreational and agricultural uses and as well, will ultimately reduce Ontario’s climate resilience.**

Our growing population, as made clear during the pandemic, needs more recreational land, which is not always available in growth areas. Visits to a Greenbelt destination and to conservation areas increased substantially, up to 200%. To ensure sufficient space, Green Infrastructure Canada advises we need to add 32,000 ha. of large parklands over the next 30 years, certainly not reduce the currently existing lands that can help provide added parklands. The proposed reductions to parkland dedication fees will also reduce a municipality’s ability to provide land for recreation. Of course we do not want to lose protected agricultural lands that help supply us with food, now and in the future. And the Greenbelt lands are, of course, are needed providers of climate resilience.

1. **There is no scientific rationale for the proposal for trading lands, and it was proposed without municipal consultation.**

The province has hastily proposed opening 15 parcels amounting to 7,400 ha. of lands that have been designated part of the Greenbelt for 17 years, and adding back about 7,000 ha, mostly in the Town of Erin. This decision makes little scientific sense as it only partially covers the Paris Galt Moraine. It also provides for uncertainty in land use and land value, and invites speculation where landowners previously had both certainty and lowered expectations. Further, the proposal to add 2,400 ha. of urban river valleys, while being a recognition of their connection between Lake Ontario and the Greenbelt, functionally they were never lands that would have been built on as they are associated with the major river systems and have major constraints with floodplains and valley slopes*.* This amounts to double counting of already protected lands! What is the reason for this swap?

Respectfully submitted

Geoff Kettel Cathie Macdonald

Co- Chair Co- Chair

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Associations Associations