

GREENBELT FOUNDATION

Response to ERO Posting: 019-6216

A Permanently Protected Greenbelt



Possibility grows here.

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The Greenbelt Foundation supports the Province of Ontario's commitment to improving housing affordability and meeting the demands of our growing Province. We assert, however, that these demands can and should be met by building and investing within existing settlement areas and without encroaching on Greenbelt lands.

For this reason and a variety of critical considerations outlined below, we do not support the current proposals for changes to the Greenbelt Plan.

For 18 years, The Greenbelt Foundation has been a trusted and effective partner to the Province in unlocking the enormous economic, ecological, agricultural and social, benefits of Ontario's Greenbelt, which is vital to the prosperity and growth of southern Ontario. We appreciate this partnership and look forward to continuing our work together.

As Ontario grows, we will need more of what the Greenbelt provides, not less. It is critical, as we work to address Ontario's housing needs, that policy decisions do not achieve unintended consequences that undermine the critical systems within the Greenbelt that serve millions of Ontarians. In this submission, we will outline various cautions and concerns related to:

- **Preservation of the interconnected systems that provide our clean air, drinking water and natural infrastructure that communities rely on for critical functions like flood mitigation and climate resiliency.** We must protect the integrated systems within the Greenbelt. Links in the system, once broken, cannot be recaptured. A number of the proposed land removals involve sites designated as environmentally sensitive, which involve core water resource system components including wetlands and groundwater recharge areas.
- **Protecting Ontario's agri-food system and agricultural land within the Greenbelt that provides us with a sustainable, local food source.** Agricultural land removal from the Protected Countryside in the Greenbelt will further fragment existing agricultural systems in and adjacent to the Greenbelt and jeopardize existing investments and future opportunities in a thriving Greenbelt agri-food sector. In addition, reducing the size of the Niagara Tender Fruit and Grape Specialty Crop Area undermines recent investments in expanding tender fruit and grape production. Collectively, various proposed changes would represent an unprecedented reduction in Greenbelt farmland, negatively impacting Ontario's vibrant agri-food economy.
- **Ontario risks repeating the mistakes of other Canadian and international jurisdictions.** Research on removal of land from greenbelt areas in other jurisdictions has demonstrated that incursions into greenbelt areas does not reduce housing costs but instead just encourages inefficient urban development patterns while undermining important natural system and agri-food benefits
- **Any changes to the Greenbelt geography should undergo a thorough review process to determine their true impact.** Making such significant changes to the Greenbelt geography outside the statutory 10-year review period and without a strong alignment with Greenbelt

Plan agricultural, water resource system and other goals creates perceptions of unfairness and sets the Province of Ontario on a path that may significantly negatively impact the unique benefits the Greenbelt provides.

- **Implications for Indigenous Reconciliation and First Nation interests are not sufficiently understood.** We are aware of work currently underway to assess Indigenous histories as well as traditional and existing interests in areas that would be impacted by the proposed removals. The province should ensure such considerations are fully assessed in any major land use process.

Accelerating housing and urbanization of areas of the Greenbelt when more than sufficient land exists in existing settlement areas is not consistent with cost-effective “smart growth” and will create very significant long-term infrastructure costs at a time when immense municipal infrastructure backlogs and deficits already exist. Targeting housing supply in the Greenbelt outside its existing settlement areas does not address the actual critical housing needs of Greenbelt communities and does not contribute to supporting the vitality of its rural communities and economies

We would also note that a number of the proposed “take-outs” including Duffins Rouge Agricultural Preserve do not meet the province’s own criteria including being adjacent to settlement areas, readily serviced with local infrastructure upgrades, and/or enable housing to be built in the near-term.

Ontario’s Greenbelt

The Greenbelt is an extraordinary and irreplaceable resource for Ontario, supported by an overwhelming majority of the public who take great pride in it. It is an economic powerhouse for Ontario, provides a source of clean drinking water and clean air for millions of Ontarians, helps build climate resilience and attract businesses, jobs, and families to the Greater Golden Horseshoe region.

In addition to providing us with fresh air, clean water, fantastic local food and drink, as well as world-class outdoor recreation and tourism experiences, the Greenbelt today provides more than \$9.6 billion in contributions to provincial GDP and directly supports 177,700 full-time jobs. It protects over 4,500 farms that earn 68 per cent more revenue per acre than the average Ontario farm.

The 2.1M acres of protected lands of the Greenbelt is home to 78 species at risk and includes 721,000 acres of wetlands, grasslands and forests that provide \$3.2 billion in ecosystem services, \$224 million per year in flood protection, and offsets 71 million tonnes of carbon.

Greenbelt protections are based on a systems approach that supports these benefits. Removing lands may result in unintended consequences that compromise these protections, which are key to a thriving and prosperous region.

Recommendations

The Province of Ontario should:

1. Withdraw the current proposed amendments to the Greenbelt Plan and Oak Ridges Moraine Conservation Plans and not proceed with the revocation of the Duffins Rouge Agricultural Preserve Act.

2. Maintain its commitment to protecting the permanence of the Greenbelt “in its entirety” and avoid implicitly or explicitly establishing a policy of “land swaps” in Greenbelt Plan administration.
3. Continue to work with municipalities on a housing strategy using existing designated lands and aligned with major regional infrastructure to achieve the housing supply needed.
4. Establish a public advisory process or forum to address the unique needs for housing in existing settlement areas in the Greenbelt and other rural communities.
5. Work with the Foundation on additional investments in Greenbelt natural infrastructure that help protect urban areas and growing communities.
6. Work with the Foundation on additional investments in Greenbelt local food and near-urban agri-food opportunities in the Greater Golden Horseshoe.

We look forward to an opportunity for continued discussion on how best to address the critical need for housing supply and improved affordability while retaining and growing unique Greenbelt benefits.

Commentary

Greenbelt’s permanence and integrity are critical to its success

Ontario’s Greenbelt permanence and careful management of any changes has been critical to its success. Permanency and certainty of the Greenbelt area is a critical part of its value. Farmers for example will not invest in an uncertain context or on land with limited term tenure rights. Land speculation drives up land prices and prevents access to agricultural lands for farming. Both urban and employment land developers benefit from fairness and certainty where the Greenbelt and Growth Plans establish long-term, consistent land use rules.

The Greenbelt is based on systems and landscapes – natural heritage, water resource and agricultural systems as well as iconic natural landscapes including the Niagara Escarpment and the Oak Ridges Moraine. Therefore, the lands protected by the Greenbelt must be considered holistically. The value of individual parcels may not always be readily apparent or obvious at a glance, but they are generally contributing to the health, vitality and economic output of the Greenbelt’s systems. Undermining the connectivity and resilience of our natural heritage, agricultural lands and water systems even in one area can significantly impact the province’s food supply and source drinking water supply.

Previous Greenbelt boundary changes

While we are aware of the many positions and perceptions regarding historic choices about the Greenbelt geography, it’s indisputable that the lands included in the Greenbelt were initially chosen through broad public consultation and have undergone extensive public reviews, including during the 2015-2017 ten-year Coordinated Land Use Plan review process. During that two-year process, the Province considered requests for changes based on “the original goals of the Greenbelt to:

- Sustain the environment by prohibiting new urban development in areas where it will endanger Greenbelt’s natural systems, including its water systems
- Encourage growth in existing urban areas, while supporting vibrant rural communities within the Greenbelt
- Support agriculture as a source of commerce, employment, and domestic food production
- Provide opportunities for recreational and other leisure opportunities to support the needs of our rapidly expanding population.”¹

The Province declined to make changes on a number of bases including removing land for settlement area expansions, removal of specialty crop areas, removing or redesignating areas within the Oak Ridges Moraine, and removing land necessary for the viability of robust natural heritage systems.

Greenbelt Foundation records indicate that more than 400 changes were requested and ultimately 17 removals were approved, based on factors such as alignment of the Greenbelt and Oak Ridges Moraine boundaries and where the Greenbelt boundary cut across major institutional, commercial or industrial structures. A total of 56 hectares (approximately 138 acres) were removed and 21 urban river valleys were included, resulting in a total net expansion of about 9,000 hectares (22,200 acres).

Ontario is seen as a leader globally in greenbelt protection

Our 2022 Global Greenbelts report studied how greenbelts around the world are evolving to respond to current and emerging conditions, including housing affordability needs. One of its key findings was that ongoing changes to greenbelt areas have not improved affordability. What is also clear based on this research is that the Ontario Greenbelt, one of the largest in the world, is an international success story. It has been successful relative to other greenbelt areas because of the robust, multi-faceted policy structures that support its success, because it has benefited from strong and consistent provincial leadership, and because it has benefited from ongoing investment and stewardship by a third-party organization, namely, the Greenbelt Foundation.

Ontario can provide all necessary housing without building in the Greenbelt

Numerous options exist that would not require building on some of the best remaining agricultural land in southern Ontario. An immense amount of land has already designated for urban development and housing supply. Earlier this year, the Housing Affordability Task Force appointed by the Ford government made numerous policy and procedural recommendations to bring housing to market sooner but noted plainly 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.”

Growing strategically and sustainably is key to Ontario’s success

Affordability is one of many key requirements for making Ontario livable and competitive. This is particularly true of the Greater Golden Horseshoe, a region whose growth is guided by a suite of provincial and municipal plans and policies to ensure that the region remains livable and sustainable

¹ How Sites were Identified, Ministry of Municipal Affairs and Housing (Last Updated: Jan 11, 2017) <https://web.archive.org/web/20180319212942/http://www.mah.gov.on.ca/Page15173.aspx>

by focusing growth as much as possible in existing urban areas and near existing major infrastructure investments. Those plans include *A Place to Grow: Growth plan for the Greater Golden Horseshoe*, the *Greenbelt Plan*, the *Oak Ridges Moraine Conservation Plan*, and the *Niagara Escarpment Plan*.

One of these plans is the Greenbelt Plan, which ensures that vital environmental and agricultural lands, as well as water resources are protected from encroaching development that would compromise their functions and services to the people of southern Ontario.

To achieve affordability, it is important to use the land designated for growth efficiently through intensification and the building of complete communities where people can afford to live near their workplaces, have access to transit, and where local economies are supported. We support processes that accelerate more of that housing to market in line with many of the Task Force's recommendations but emphasize that the land used first should be the land already designated for urban development.

Any discussions about housing supply must begin with an analysis of how much undeveloped land is already designated to accommodate projected population growth, understanding that municipalities are required to ensure such planning is in place and undertake a regular review of their plans to confirm it is up to date and adjust as necessary.

We agree with the Regional Planning Commissioners of Ontario, who report that:

Many municipalities maintain that substantial inventories of developable lands for housing exist that can proceed to construction now, but are not being built. There is an urgent need to review municipal land inventories to understand existing developable land availability to builders (e.g. draft approved plans of subdivision that can proceed to development today, larger parcels of pre-zoned land available for intensification) and the reason(s) for which development has not proceeded.²

Many estimates exist regarding the amount of available land and existing housing unit approvals in the Greater Golden Horseshoe region but all such estimates indicate that more land designation is not the solution. For example, one estimate identifies that there are over 35,000 hectares of land designated to 2051 that are currently unbuilt in Durham, Halton, Peel, York Regions and Hamilton alone³. Assuming a low rate of 17 homes per hectare⁴, this land would provide almost 600,000 homes, even before accounting for the 50 per cent intensification required by the Growth Plan, which could increase the number to over 1.2 million homes. Additionally, the City of Toronto's 2022 Land Needs Assessment reports that almost seventy years' worth of housing supply exists there, with 1,138,907 units:

The potential housing supply in the city is more than double the amount of housing required to accommodate the forecasted population growth between 2016 and 2051. The

² Regional Planning Commissioners of Ontario: MAKING ROOM: Shaping Big Housing Growth and Affordability in Ontario. November 18, 2022 - Final Report, pp.13

³ <https://www.canadianarchitect.com/architects-respond-to-ontarios-proposed-bill-23/>

⁴ 50,000 units distributed across 7,400 gross acres (2,995 ha) proposed for removal = 16.69 units/ha

surplus potential housing stock after accommodating the population growth forecasted by the Growth Plan at 2051 is equivalent to almost forty years of potential housing supply.⁵

Even before considering other areas of the Greater Golden Horseshoe, there is therefore clearly no need for Greenbelt lands to accommodate the government's targets.

Housing affordability must also be considered in relation to the full costs to individuals, municipalities, and the provincial government. All levels of government should be prudent in their development and infrastructure choices given the immense capital and long-term operating costs. Residents and taxpayers ultimately bear all costs whether it's in personal outlays for accommodation and transportation or ultimately as tax and rate payers sustaining infrastructure and services.

Costly development in areas such as the Duffins Rouge Agricultural Preserve would exacerbate existing community investment and infrastructure deficits – further reducing the ability to build schools, repair roads, and provide other services that residents value. As noted by FAO, Ontario communities already face immense infrastructure deficits (at about \$52 billion)⁶ and therefore it's critical we maximize use of existing investments and not create ever more downstream costs for residents.

There is a lack of understanding of the true impact of supply on prices, as compared to other factors such as location, housing type, transportation, employment options, property speculation and other market forces. Strong emphasis is needed on the type and location of development. It is often simply assumed that supply is the primary factor without further analysis.

Significant loss of agricultural land over the past decades has not resulted in affordability – and at the same time, rural communities and industries have unmet needs for local housing.

Urban boundary expansion almost always consumes agricultural land. The Ontario Federation of Agriculture has determined that “from 1996-2016, Ontario lost 1.5 million acres of farmland to development, at a daily rate loss of 175 acres per day. According to OMAFRA's 2021 census data, the average Ontario farm is 243 acres with many of our farms being family-owned and operated.”⁴ This trend continues without a true understanding of whether it actually contributes to affordability, particularly for residents of rural communities, and whether bedroom community options are not accessible for rural workers. This sustained loss has not perceptibly resolved the affordability challenge to date and should be stopped.⁷

Affordability for rural and agri-food workers is critical to sustaining and growing rural economies, which are often centred on tourism and agri-business sectors. Our own research has found that “(t)he lack of affordable housing makes it difficult to attract and retain employees with lower incomes working in

⁵ City of Toronto. (June 20, 2022). Report to the Planning and Housing Committee. Our Plan Toronto: Land Needs Assessment. Retrieved from <https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-227744.pdf> pp. 1-2

⁶ Municipal Infrastructure: A Review of Ontario's Municipal Infrastructure and an Assessment of the State of Repair (2021): <https://www.fao-on.org/en/Blog/Publications/municipal-infrastructure-2021>

⁷ Ontario Federation of Agriculture. (January 11, 2021). OFA urges farmland preservation to maintain demand for locally sourced food. Retrieved November 18, 2022 from <https://ofa.on.ca/newsroom/ofa-urges-farmland-preservation-to-maintain-demand-for-locally-sourced-food/>

manufacturing, retail, and service industries that support tourism. This has created situations in some municipalities where local jobs are unfilled, or where the majority of local workers commute to the municipality because they cannot afford to live there while those who live in the municipality commute outside of it for higher paying jobs.”⁸

Intensifying existing towns and villages with more diverse and affordable housing types such as mixed use, rental and secondary suites as-of-right, and above shops on main streets, is key to increasing rural affordability and healthy economies.

What Will These Proposed Changes Mean?

The Greenbelt Foundation is concerned that the proposed changes are introducing approaches such as “land swaps” and over-designation of settlement land areas that have significantly undermined greenbelt areas in other jurisdictions in Canada and internationally – without providing the ostensible benefits of sustainable urban growth and improved affordability.

Land swaps can be understood as a process of maintaining the size of an overall greenbelt area while interchanging different land areas that usually do not have the same quality or characteristics. Experience and research show land swaps in protected areas, such as in British Columbia’s Agricultural Land Reserve (ALR), result in fragmentation and ultimately degradation of the protected lands over time. In the case of the ALR that has also resulted in an empty land problem which significantly reduces the contribution of the land base to agricultural, economic and/or climate resilience:

“For example, in Metro Vancouver, only half of ALR land is used for farming while the other half is used for residential purposes or held by investors. Climate change also presents challenges to agricultural production as changes in precipitation and temperature lead to more severe storms, drought conditions, wildfires, and more frequent plant disease outbreaks.”⁹

The Ontario Greenbelt’s success has resulted historically from strong provincial leadership, a robust Greenbelt Policy aligned with other land use policies, such as the Growth Plan, and consistent and transparent administration over time. Our research on greenbelts globally reveals that in places like the Greater London Area in the UK providing local governments with lands from within their “Green Belt” and weakening the connection between long-term regional planning goals has resulted in the fragmentation of the land base and lack of policy coherency:

...the London [UK] Green Belt Council states that there is lack of a comprehensive strategy for the London Green Belt. There are 66 local planning authorities within the London Green Belt and there is little cooperation and consistency between these planning authorities on how to protect the Green Belt. All local authorities take their own positions on the Green Belt, resulting a fragmented approach to policy implementation.

...local councils are required to have enough land to meet their housing targets for the next five years. To meet those targets, local authorities will often remove land from the

⁸ Greenbelt Foundation. (June 2020). Growing Close to Home: Creating Complete Rural Communities. Retrieved from https://www.greenbelt.ca/complete_communities. pp. 18.

⁹ Macdonald, S., Chellew, C. and Hertel, S. (2022). Greenbelts Around the World Responding to Local and Global Challenges. Greenbelt Foundation. Retrieved from https://www.greenbelt.ca/global_greenbelts. pp. 32

*Green Belt. This change in land designation should only happen under “exceptional circumstances”, according to national planning policy. Local authorities continue to release large amounts of Green Belt land for new residential developments, despite planning policies to the contrary. The planning concept of exceptional circumstances is being interpreted loosely by planning staff and inspectors and used to justify development within the Green Belt.*¹⁰

The combination of these factors has put the London Green Belt under intense pressure for residential development. The number of dwellings proposed within greenbelt land has increased from 123,000 in 2016 to 233,000 in 2020 (an 89 per cent increase).¹¹ However, this new growth has not addressed affordability issues, as there is little evidence that affordable housing development in the London Green Belt is taking place.¹²

Similarly, in Melbourne, the city’s urban growth boundary was expanded several times including by 1,610 hectares in 2003; by 11,132 hectares in 2005; by 43,600 hectares in 2010 and by 6,000 hectares in 2012.¹³ The outcome of these constant expansions was that it removed incentives to encourage more efficient use of suburban and urban land and undermined the protection of the city’s Green Wedges. Planned new urban corridor dwellings rose from 180,000 units in 2004 to 284,000 units in 2008.¹⁴ In addition, these expansions fuelled land speculation in peri-urban areas during that time as developers hoped to gain significant profits with future urban growth boundary extensions.¹⁵

Like in the Greater Golden Horseshoe region, Melbourne is the centre of a unique agrifood sector for Australia, considered a “food bowl” area which contributes \$2.45B annually to the local economy and provides the basis for a robust agritourism sector. Concern about the impacts to agriculture systems has driven stronger state-level measures in recent years to prevent further urban expansion into their greenbelt areas.

Our research confirmed that Ontario is currently a leader in international greenbelt planning and management – with many jurisdictions looking to us as a benchmark. Ontario’s Greenbelt is a real asset. The protection of this asset depends to a large extent on the permanence of the concept behind it.

¹⁰ Ibid. pp. 66.

¹¹ London Green Belt Council. (January 2021). ‘Safe under us? The shrinking of London’s local countryside. <http://londongreenbeltcouncil.org.uk/wp-content/uploads/2021/01/LONDON-GREEN-BELT-Threats-Report-January-2021-FINAL-1.pdf>

¹² Ibid.

¹³ Buxton, M. (2014). The expanding urban fringe: Impacts on peri-urban areas, Melbourne, Australia. In Maheshwari, B., Purohit, R., Malano, H., Singh, V., Amerasinghe, P. (Eds.). *The security of water, food, energy and liveability of cities. Challenges and opportunities for peri-urban futures*. London, England: Springer. pp.55-70.; Victoria Planning Authority. (n.d.). Key facts on Melbourne’s urban growth boundary. Victoria government. <https://vpa.vic.gov.au/greenfield/more-information/urban-growth-boundary-key-facts/>

¹⁴ Buxton, M. (2014). The expanding urban fringe: Impacts on peri-urban areas, Melbourne, Australia. In Maheshwari, B., Purohit, R., Malano, H., Singh, V., Amerasinghe, P. (Eds.). *The security of water, food, energy and liveability of cities. Challenges and opportunities for peri-urban futures*. London, England: Springer. pp.55-70.

¹⁵ Ibid.

Individual proposals for removal

The limited time for consultation precludes an in-depth analysis of all sites in this document – however we are providing some selected analysis on specific sites to illustrate larger system impacts.

Some sites are designated as rural/agricultural lands in municipal official plans, others include environmentally sensitive areas such as wetlands and groundwater recharge areas. Specific details about the sites and information about the housing proposed for these sites are also missing and prevent a thorough analysis of factors such as flood risk.

Several of the sites are also repeated requests for removal carried over from at least 430 in the 2015 Coordinated Review of Land Use Plans. Bringing these requests for removal back in a piecemeal fashion sets a dangerous precedent by which other property owners and developers may further press reconsideration of matters that had been considered settled.

The following list of sites for proposed removal from the Greenbelt is a preliminary analysis based on readily available data. **Lack of inclusion on the list of sites below does not indicate support for removal of the lands from the Greenbelt.** We remain firm in our support for a permanently protected Greenbelt boundary.

Lands proposed for removal include:

- 1) Water Resource System Sites
- 2) Agricultural System Sites
- 3) Natural Heritage System Sites

1. Water Resource Systems Sites

The Greenbelt includes areas of hydrological significance such as watersheds, urban river valleys, aquifers, recharge/discharge areas and wetlands that are necessary to sustain healthy ecosystems and drinking water consumption in the GGH region. For example, within the Greenbelt, there are approximately 100,063 hectares of wetlands.¹⁶ The total carbon sequestered by wetlands in the Greenbelt can be approximated at 25,016 tonnes per year.¹⁷

In addition, Greenbelt wetlands play a key role in protecting private and public property by reducing flood risk. Flooding is one of the most widespread and expensive natural disasters across Canada, and its impacts are expected to increase with climate change. In 2020, insurable losses within Canada related to flooding reached \$2.5 billion, making that year the fourth worst year for insurable claims since records began to be kept in 1983.¹⁸ A 2016 report by Green Analytics estimated the value of property protection

¹⁶ Green Analytics. (2016). Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. Greenbelt Foundation. Retrieved from https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital

¹⁷ Ibid.

¹⁸ Feltmate, B. and Moudrak, M. (2021). Climate change and the preparedness of 16 major Canadian cities to limit flood risk. University of Waterloo. Intact Centre on Climate Adaptation. Retrieved from <https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2021/02/16-Cities-Flood-Preparedness-1.pdf>

provided by wetlands within the Greenbelt to be \$224 million per year.¹⁹ The average wetland within the Greenbelt provides over \$1 million per year in protection to human property.²⁰

Communities in southern Ontario are making investments in wetlands within the Greenbelt. The Greenbelt Foundation has partnered with Conservation Authorities to develop business cases for several projects. For example, historic wetlands are being restored on top of the Niagara Escarpment in Hamilton to protect 306 mixed residential and commercial properties downstream currently experiencing flooding. Flood costs in any year could reach \$95.1 million under worsening climate scenarios.²¹ Cost for land securement and wetland restoration totals \$10-15 million compared to \$28 million for grey infrastructure solutions.²² The wetland area will be developed into a new community greenspace – Saltfleet Conservation Area and enhance biodiversity and wildlife connectivity in the region.

The Government of Canada is working with provincial governments and other partners on a National Adaptation Strategy, and the Greenbelt should be a prime candidate for a high level of investment to benefit 10 million residents in the GGH region. In order to attract these resources, our decision making should reflect a priority for protecting existing water systems rather than eroding them.

Below are selected sites proposed for removal from the Greenbelt where water resources systems will be impacted:

Land located in Clarington, northeast corner of Nash Road and Hancock Road (Map 8)

The Greenbelt designation of this land should be preserved to prevent loss of these significant natural heritage system features and functions:

- The site is approximately 34 hectares within the Greenbelt's Protected Countryside and the Natural Heritage System. The lands are located within the Black Creek watershed.
- On the site, there is a large 5.4-hectare unit of the Harmony-Farewell Iroquois Beach Provincially Significant Wetland Complex, a tributary of the Black Creek and natural heritage features including woodland, watercourse and fish habitat.²³
- The land is recognized as part of the Central Lake Ontario Conservation Authority (CLOCA)'s watershed level Natural Heritage System. It is an area of Natural and Scientific Interest (ANSI). In addition, the lands are recognized within CLOCA's Wildlife Habitat Network as being either "Core Habitat", "Secondary Habitat" or a "Regional Corridor" for the movement of sensitive plants and animals.²⁴

¹⁹ Ibid. This total was estimated over 15,000 provincially significant wetlands throughout the Greenbelt.

²⁰ Ibid.

²¹ Anielski Management Inc. (2019). Investing in the Future: The Economic Case for Natural Infrastructure in Ontario. Greenbelt Foundation. Retrieved from https://www.greenbelt.ca/economic_case

²² Ibid.

²³ Central Lake Ontario Conservation Authority. (November 22, 2022). Report on Provincial Consultation on Proposed Amendments to the Greenbelt Plan. Retrieved from https://www.cloca.com/files/ugd/3ac655_22d23ef9b756478ea7557830b0e49199.pdf

²⁴ Ibid.

- The Official Plan of Clarington designates this land as prime agricultural land, with areas included in the Natural Heritage System, a provincially significant wetland, and an area of natural or scientific interest.²⁵

In CLOCA's report on the proposed Greenbelt Plan Amendments, they stated that the removal of this land 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."²⁶ Furthermore, "there is no rationale in any context that would justify extending urban development permissions onto that irreplaceable portion of natural heritage in our watershed".²⁷

Finally, the Greenbelt Plan includes a focus on key natural heritage features within Lake Iroquois Beach within Durham Region, which this site is located within. Under Policy 3.2.6.3 of the Greenbelt Plan:

*"Portions of the former Lake Iroquois shoreline, particularly within Durham Region, transverse existing or approved urban areas. Municipalities should consider planning, design and construction practices that maintain or, where possible, enhance the size, diversity, connectivity and functions of key natural heritage features, key hydrologic features and key hydrological areas of those portions of the Lake Iroquois shoreline within their approved urban boundaries."*²⁸

CLOCA finds that "the proposed Clarington removal would be in direct opposition to this Greenbelt direction".²⁹ As a result of these concerns, CLOCA's Board of Directors recommended that the Province withdraw its proposed amendments to the Greenbelt Plan.³⁰ In addition, the Municipality of Clarington has objected to any removal of land from the Greenbelt.³¹

Land located in the City of Richmond Hill east of Leslie Street, north of Elgin Mills Road East, west of Highway 404 (Map 3)

These lands, while situated between Highway 404 and existing development, also straddle the Rouge River and should be carefully considered for risk to the river and watershed/water table, as well as adjacent and downstream flood risk for residential communities and degradation of water quality in the Rouge system.

²⁵ Clarington. (2018). Municipality of Clarington, Official Plan, 2018. Retrieved from <https://www.clarington.net/en/business-and-development/resources/Official-Plan/Clarington-Official-Plan-AODA.pdf>

²⁶ Ibid. pp. 4.

²⁷ Ibid. pp. 4.

²⁸ Ministry of Municipal Affairs and Housing. (2017). Greenbelt Plan, 2017. Retrieved from <https://files.ontario.ca/greenbelt-plan-2017-en.pdf>. pp. 29.

²⁹ Central Lake Ontario Conservation Authority. (November 22, 2022). Report on Provincial Consultation on Proposed Amendments to the Greenbelt Plan. Retrieved from https://www.cloca.com/files/ugd/3ac655_22d23ef9b756478ea7557830b0e49199.pdf. pp. 4.

³⁰ Ibid.

³¹ Municipality of Clarington. (November 28, 2022). Minutes from General Government Committee meeting. Retrieved from <https://pub-clarington.escribemeetings.com/Meeting.aspx?Id=2bd46f45-46db-4093-b0f1-6ddb9c134f89&Agenda=PostMinutes&lang=English>

2. Agricultural Systems Sites

Only 5 per cent of land in Ontario is farmland and a significant portion of the very best provincial agricultural lands are protected by the Greenbelt. We must do our utmost to protect a reliable, sustainable source of local food and continue to strengthen our agri-food economy.

Ontario's Greenbelt and Golden Horseshoe region supports the largest agri-food cluster and food and beverage processing sector in Canada. As of 2020, the Greenbelt's agri-food sector generated an estimated \$4.1 billion in GDP and close to 59,000 jobs, and benefits from the region's abundant fresh water supplies, fertile soils and warm climate; 10 million strong local consumer-base; and being next door to the lucrative United States market.³² Collaboration and availability of food, farms, jobs, businesses, innovation and government investment are needed to maintain and grow this important Ontario economy. The Greenbelt protections recognize this.

Agriculture is the predominant land-use within the Greenbelt at 750,000 acres (40 per cent of the Greenbelt and nearly 5,000 farm businesses and families). Fruit and vegetables farms produce higher yields and farm receipts than any other farm businesses in Ontario. With only 7% of Ontario's total farmland, the Greenbelt accounts for more than 48% of Ontario's fruit acres, 10% of Ontario's vegetable acres, and 42% of Ontario's nursery acres. The Holland Marsh Specialty Crop Area in the Greenbelt grows the country's largest supply of carrots and celery, while the Niagara Tender Fruit and Grape Specialty Crop Area contains 80% of all the province's acreage in grape production, peaches, plums, prunes, and apricots.

The Greenbelt Foundation with key partners such as Golden Horseshoe Food and Farming Alliance (an alliance of municipalities and farmers) have worked to raise the profile of this industry in Ontario and encourage investments. The certainty and commitment of the Greenbelt to agriculture has enabled and motivated farmers to invest.

An example of farmer investment is in the tender fruit Speciality Crop Area where two lands are proposed to be removed from the Greenbelt.

Niagara tender fruit growers are investing many millions of dollars to expand acres under production, produce new consumer varieties (sweeter peaches, cherries, pears, and plums with longer shelf lives), and achieve greater yields that support profits and jobs. Almost all tender fruit growers in Ontario are in the Greenbelt. Such investments have resulted in 212,000 new fruit trees planted since 2016 to support a local industry with an estimated market ("farm gate" only) value of \$60 million in 2021.

Proposed removals put these and future investments at risk. Since 2005, there have been multiple requests to develop tender fruit crop lands. There is no assessment of the impact on agricultural if these lands are removed.

For Ontario residents, the protection of farmland in the Greenbelt is one of the primary reasons why the Greenbelt has maintained such high public support over the past two decades. Local food supplies will help keep costs down and support the ability to keep food on grocery shelves. Greenbelt

³² SUMMIT72 Advisory Services. (2021). Understanding How Greenbelt Agriculture Feeds the Regional Economy. Retrieved from https://www.greenbelt.ca/gb_agriculture_economic_impact

farmers markets, on-farm markets, breweries, wineries, cideries and pick-your-own operations are popular attractions among families and residents and attract visitors world-wide.

Below are sites proposed for removal from the Greenbelt where agricultural systems will be impacted:

Duffins Rouge Agricultural Preserve (Map 6)

The Duffins Rouge Agricultural Preserve (DRAP) is the largest site proposed for removal and includes natural, agricultural and water systems. It is a uniquely important part of the Greenbelt, given its large-scale intact farmland, proximity to major agri-food consumer markets, and the fact that it represents one of the last remaining major natural heritage corridors that are critically important to biodiversity and environmental sustainability in the Greater Golden Horseshoe region.

The DRAP includes about 4,700 acres of prime agricultural lands in north Pickering. The preserve is part of a larger area (about 39,500 acres) that was expropriated in the 1970s for a proposed airport. The preserve lands are high-quality farmlands and have been recognized as Prime Agricultural Areas in the Region of Durham Official Plan, the Provincial Policy Statement, the Greenbelt Act and the Greenbelt Plan.

The original purpose of the DRAP to ensure these agricultural lands were protected in perpetuity is even more important now. As the Ontario Federation of Agriculture has noted, the most recent Census of Agriculture (2016 to 2021) indicates we have been losing the equivalent of 319 acres a day and over the period of 2000 to 2017, southern Ontario has lost more than 72,00 acres of prime agricultural land to urban development.

We would strongly recommend that the Province consider what DRAP offers in immense agrifood and agri-tourism opportunities. The removal of the DRAP is part of the government's larger plan for Greenbelt amendments to develop only 50,000 of the 1.5 million homes it has identified as being needed in the next 10 years. Relatively small housing gains achieved by developing the DRAP must be considered against what we would lose in terms of social, economic and agricultural opportunities.

Given that the agricultural land within the DRAP consists mostly of Class 1 soils – our most productive, but most limited and irreplaceable agricultural land in Ontario – continued protection and preservation of this area in the Ontario Greenbelt remains best aligned with long-term provincial interests.

The DRAP also helps protect both the ecological and agricultural integrity of the Rouge National Urban Park and the habitat and connectivity of species at risk – especially between Lake Ontario and the Oak Ridges Moraine. It is one important example of the type of near-urban nature systems that we must protect even as we grow and urbanize in the Greater Golden Horseshoe. Removing the DRAP protections could do irreparable damage to Rouge Park and connected natural heritage systems. Development of the preserve would devastate connectivity for species at risk such as the bank swallow, red headed woodpecker, eastern meadowlark, wood thrush, monarch butterfly, several species of bats and more.

A recent study of natural system connectivity features and needs between Rouge Park and the Greenbelt, including the Oak Ridges Moraine and major water systems like the Don River and Humber River,³³ concludes in relation to DRAP that:

³³ Gunnison, Kari, Eko-Kare International, Dec. 2022

- A treed-wetland swamp occurs in the middle of the region that is a key 'stepping stone' of natural habitat for animals moving east to west between Duffins Creek and Rouge Creek riparian systems. All natural area patches even small ones are important and their value is dependent on the configuration of the natural areas in the landscape when providing refuge for vulnerable species.
- Approximately 1,300 acres of the nearly 4,700 acres or 28% is existing natural cover and is part of the natural heritage strategy defined by the TRCA
- The existing road network is gravel low-volume roads, if land use changes to residential the road network will be upgraded and subsequently wildlife will be subject to increased negative effects of roads, that include fragmentation, and road mortality.
- Agricultural lands are often a component of the landscape matrix used by turtles and other wildlife species in Southern Ontario and in suburban landscapes. Agricultural land is less suitable than wetland-forest complex but much more desirable than anthropogenically disturbed land use to sustain wildlife populations.

It is unclear to us that this parcel meets the Government's own stated criteria for removal, given that Durham Region Staff report that:

*The Regional Works Department has advised that no plans have been developed to extend services into the Greenbelt. To date, no development proposals have been received, and no servicing solutions for these lands have been considered.*³⁴

It has been reported that this area includes about 60 parcels of land³⁵, many of which are presumably not adjacent to the edge of the Greenbelt or existing settlement areas.

These facts call into question the ability of the land to meet the following stated criteria as laid out in the ERO posting:

- The lands are adjacent to existing settlement areas
- The lands are adjacent to the edge of the Greenbelt area boundary
- The lands have the potential ability to be serviced in the near-term with local infrastructure upgrades to be entirely funded by proponents
- The lands proposed for removal have the characteristics that would enable housing to be built in the near-term.

These concerns should be considered along with the primary concern about loss of the natural and agricultural lands within the Preserve.

³⁴ Durham Region. (November 10, 2022). The Regional Municipality of Durham Council Information Package. Retrieved November 18, 2022 from https://icreate7.esolutionsgroup.ca/11111068_DurhamRegion/en/regional-government/resources/Documents/Council/CIP/CIP-2022/CIP-11102022.pdf

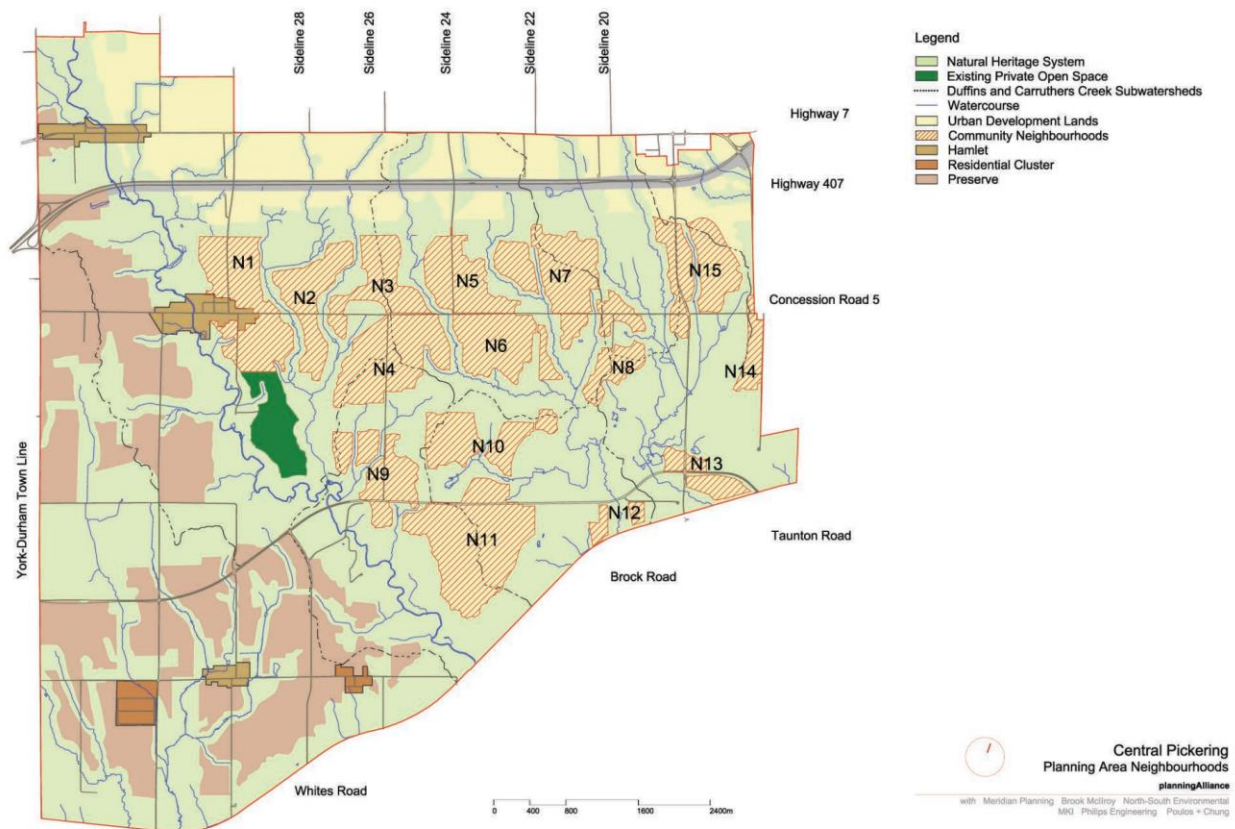
³⁵ CBC News. (November 11, 2022). Who are the GTA developers set to benefit from Ford government's Greenbelt land swap. Retrieved November 18, 2022 from <https://www.cbc.ca/news/canada/toronto/gta-developers-own-greenbelt-land-swap-1.6648273>

Along with the removal of the Duffins Rouge Agricultural Preserve, the Province has proposed rescinding the Central Pickering Development Plan. The Plan affects an approximate 5,000-hectare (12,355 acre) area with a vision of a sustainable urban community in Seaton, integrated with a thriving agricultural system in the DRAP and an extensive natural heritage system.

Durham Region currently has 17,983 hectares of unbuilt growth area to 2051. Any immediate greenfield development in the Pickering area should go into Seaton, an area approximate to the DRAP, which has been under development for nearly 20 years and still has significant undeveloped capacity. That would align with Durham Region’s analysis in a recent Community Area Urban Land Needs Technical Report:

“All DGA Community Area lands within the City of Pickering (21%) are classified as vacant, representing 875 developable ha of land within the Seaton community and approximately five developable ha of land within the Duffin Heights DGA.”

The 2021 Pickering Land Needs Assessment indicates that only 828 units had been built, with a projection of 1,295 more projected for 2022, and 18,323 additional units proposed³⁶, an apparent buildout rate of less than 4.5 per cent. There is still room to accommodate then needed growth in existing Seaton lands.



³⁶ Detailed 20 Year Population Forecast, City of Pickering (March 2022)
<https://www.pickering.ca/en/business/resources/20YearPopulationForecastACC.pdf> p.52

Figure 1: Map showing the community lands designated for housing in Seaton, which are largely unbuilt. The blue line is Duffins Creek West, which is the boundary between the DRAP and Seaton.

As noted above, the Niagara tender fruit region which is protected by specialty crop status represents 90% of all tender fruit production in the entire province. Recent investments as noted above have significantly increased production as we seek to meet unmet demand for the local tender fruit that Ontarians love to enjoy.

Land located in the City of Hamilton at 331 and 339 Fifty Road (Map 11)

These lands are designated as a Specialty Crop Area under Hamilton's Rural Official Plan and should not be considered for removal.³⁷

Land in the Town of Grimsby south of the GO rail line, west of Oakes Road North, north of Main Street West, east of Kelson Ave North (Map 11)

This site contains groundwater recharge areas, and a portion of the site is designated as a Specialty Crop Area in Grimsby's Official Plan and should not be considered for removal.³⁸

3. Natural Heritage Systems Sites

The Greenbelt's natural systems provide clean drinking water for millions of Ontarians, clean our air and provide critical natural infrastructure that protects our communities against extreme weather events such as flooding and increases climate resiliency. These systems provide innumerable physical and mental health benefits to Ontarians. Maintaining the integrity of the Greenbelt's natural systems is becoming ever more critical as we experience the impacts from climate change and population growth. The conservation of natural systems is important because of their carbon sequestration and the habitat provided for species migration. For example, the total value of carbon stored in the forests, wetlands and farmland within the Greenbelt is estimated to be \$11.17 billion.³⁹ The annual sequestration from forests, wetlands and farming is adding to this amount at a rate of \$51.94 million/year.⁴⁰

In addition, forests and trees within the Greenbelt provide many benefits including improvements to air and water quality and cooler air temperatures. Extreme heat events are projected to continue to increase in the GGH, leading to growing risk of heat-related illness and excess deaths. Natural systems including the Greenbelt's urban river valleys and urban tree canopy can provide cooling benefits and build the resilience of communities. For instance, the Greenbelt Foundation's current heat modelling research looking at one residential neighbourhood in York Region has shown that by increasing the greenery cover to 76% in just this neighbourhood, over 255 emergency visits can be avoided, and 15 lives saved every summer season.⁴¹ Thus, the Greenbelt's natural systems can assist with reducing

³⁷ Hamilton (2021). Hamilton Rural Official Plan. Retrieved from <https://www.hamilton.ca/build-invest-grow/planning-development/official-plan/rural-hamilton-official-plan>

³⁸ Town of Grimsby. (2012). Town of Grimsby Official Plan. Retrieved from <https://www.grimsby.ca/en/doing-business/resources/Documents/Full-Official-Plan-2019.pdf>

³⁹ Green Analytics. (2016). Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. Retrieved from https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital

⁴⁰ Ibid.

⁴¹ Dardir, M., Wilson, J., Berardi, U. (forthcoming). Health-informed heat migration approach. The case of York Region. Greenbelt Foundation.

health care costs by removing air pollution. Health benefits provided by air quality improvements resulting from forest cover alone within the Greenbelt are estimated to be \$18 million/year.⁴²

Canada Target 1 is Canada's area-based conservation target as set out in Canada's Biodiversity Strategy which has been updated to conserve 25 per cent of Canada's lands, freshwater, and oceans by 2025, working toward 30 per cent by 2030. At the end of 2020, only 94,687 hectares of the GGH have been recognized as Protected Areas through Canada Target 1 accounting. This includes Rouge National Urban Park and provincial parks in the northeast and amounts to 2.6 per cent of the total area of the GGH, with the Greenbelt playing the role of protection in this region.

Below are sites proposed for removal from the Greenbelt where natural heritage systems will be impacted:

Land located in the Township of King east of Dufferin Street, south of Miller's Sideroad and west of Bathurst Street (Map 1)

A portion of this site is being proposed for removal from the Greenbelt, and the rest, which is in the Oak Ridges Moraine Conservation Plan Area, for redesignation from Countryside to Settlement Area.

The Oak Ridges Moraine is a geologically and hydrologically defined landscape and cannot simply be swapped out for lands elsewhere. As the "rain barrel" of southern Ontario, the permeability of its lands must be maintained.

Lands located in the City of Markham at 10235, 10378 and 10541 Hwy 48 and in the City of Markham at 10379 Kennedy Road (Map 3)

These parcels appear to straddle the Rouge River – one of the largest 21 existing Urban River Valleys in the Greenbelt Plan Area – and should be considered relative to their value in managing risks today to watershed health and flood risks to potential housing today and in the future. The potential impacts of development downstream, as well as the potential for erosion on site should be carefully considered. As discussed in our Near Urban Nature project, "we're learning that its easier, cheaper, and more effective to protect these spaces and create green infrastructure, than it is to pay insurance after each extreme heat event or flood."⁴³

Sites such as these generally provide connectivity for terrestrial and aquatic wildlife. The Greenbelt as an ecological corridor is critical to biodiversity in southern Ontario, which happens to be one of the most biodiverse areas of the country. The connectivity of natural systems in the Greenbelt allows for species migration and endangered species to find suitable habitat.

⁴² Green Analytics. (2016). Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. Retrieved from https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital

⁴³ Greenbelt Foundation. (September 2, 2021). A Solution to Climate Change and Biodiversity loss: Recap of the Near-Urban Nature Information Session. Retrieved December 1, 2022, from https://www.greenbelt.ca/sonc_info_session

Proposed Additions to the Greenbelt

Proposed additions to the Greenbelt should be considered on their own merits, and not in the context of removals. In our submission to the Government's two rounds of consultation on growing the size of the Greenbelt in 2021, we advised that:

The Greenbelt Foundation supports the expansion of the Greenbelt Area to the [additional] thirteen proposed Urban River Valleys and applauds the Province's commitment to reject any requests for land removals or exchanges – building on the existing values, policies and success of the Greenbelt Plan...but it will be important to fully support these additions with funding to support ecological restoration activities and support for expansion of public access and new recreation trails, so their full potential as public assets can be realized.

We recommend that the Province also consider options for expanding the existing URV designation beyond the current 60 metre boundary where appropriate.

It should, however, be noted that the urban river valleys being proposed for inclusion all involve publicly-owned land and already enjoy some degree of municipal protection, further underscoring how land swaps cannot be considered solely on an acre for acre basis. Our past submissions have also recommended:

...that the Province proceeds with the proposed expansion of the Greenbelt to include the full extent of the Paris Galt Moraine, and refines the final boundary in consultation with Grand River Conservation Authority and local municipalities to draw on all available expertise relating to the function and extent of the PGM.

...that important areas of the natural heritage and agricultural system in and around the PGM should be included in determining the final boundary expansion.

Notwithstanding this general support for inclusion of the Paris Galt Moraine, a rationale for the added lands should be supplied so that a robust understanding can be developed. It is not clear from the consultation materials how or why this relatively small portion of the originally-identified study area was chosen. Again, this is a concerning approach in that it allows the removal of key Greenbelt lands without proper understanding of key benefits being lost. It is not clear that these lands were chosen based on an evidence-based systems approach that takes into account the hydrological, ecological or agricultural connectivity of the site.

Growing the Greenbelt Study Area – Paris Galt Moraine

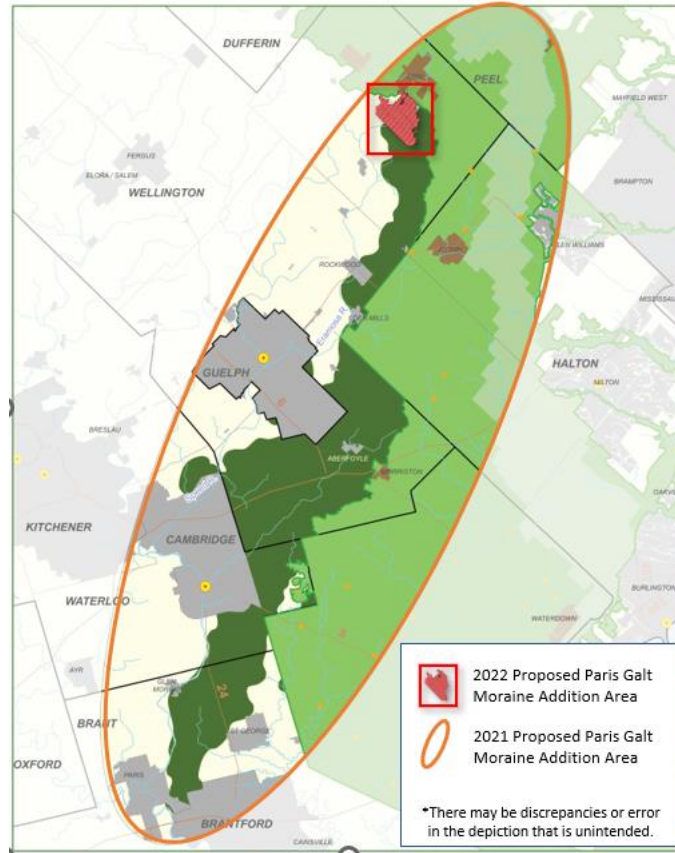


Figure 2: Map of the Land Area of the 2022 Proposed Paris Galt Moraine Addition versus the 2021 Proposed Paris Galt Moraine Addition

We also seek to understand the extent to which these lands are already designated for urban development, or effectively “grandfathered” for development.

The Government received a great deal of input from Ontarians in its past consultation exercises on growing the Greenbelt, and it should be given further review as lands are considered for addition. In particular, there were many calls, supported by the Foundation for inclusion, including adding headwater areas of the Humber and Rouge Rivers and Carruthers Creek as well as additional agricultural and specialty crop lands.

Conclusion

The Greenbelt is not just land. Its rivers and forests, farmland and trails provide Ontarians with clean air and water, a sustainable local food source and recreational opportunities directly linked to many physical and mental health benefits. Protection of the Greenbelt is crucial to the good planning that will make southern Ontario a desirable place to live, work and invest for generations to come. While proposals to increase its size are welcome, maintaining its integrity is more important than its expansion. We recommend that the Province not proceed with the current proposed amendments to the Greenbelt Plan.

More than ever, we need to protect the integrity and permanence of the Greenbelt as a critical landscape and invest in it as a key asset for Ontario's social, environmental and economic health.

About the Greenbelt Foundation

The Greenbelt Foundation stewards Ontario's Greenbelt, comprising over two million acres of protected land that provide clean air, fresh water, climate resilience, and a reliable local food source to help Ontario thrive.

The Foundation works to protect and enhance Ontario's Greenbelt – which today provides more than \$9.6 billion in contributions to provincial GDP and directly supports 177,700 full-time jobs – not to mention protecting critical agricultural lands including two specialty crop areas as well as iconic natural features such as the Oak Ridges Moraine and Niagara Escarpment.

We are focused on ensuring that Ontario sustains the critical water systems, local food and agricultural activities, natural heritage and climate resilience benefits of the Greenbelt – rich resources that make it a more livable and competitive region.