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**Dec 4 2022 Comments on Proposed Amendments to the Greenbelt Plan.** ERO number019-6216

The proposal breaks Minister Clark’s own Ministry of Municipal Affairs and Housing 2021 pledge that:

“we’re not going to entertain any conversations about a land swap” on the Greenbelt and “Our government will not consider any proposals to remove or develop any part of it,”

The public cannot have any faith in government policy statements if the government’s pledges are not met. The government’s own 2022 Ontario *Housing Affordability Task Force* report stated that most of the solution must come from densification and “Greenbelts and other environmentally sensitive areas must be protected” (pg. 10). **The government should follow its own Task Force advice on keeping the environmental integrity and available farmland of the existing Greenbelt**

The government’s own *2022 Ontario Housing Affordability Task Force* report stated that most of the solution must come from densification. The Task Force said “**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.

**The government’s proposal to substitute other land to make up for lost Greenbelt lands does not provide scientific evidence to support that the new lands substitute the same benefits of the existing lands and their environmental contribution to the current Greenbelt.** **The government should provide peer reviewed scientific evidence that the qualities and benefits of an uninterrupted Greenbelt or other unique natural heritage features can be recreated by allocating land somewhere else.**

The Bill would allow development in currently protected wetlands and wildlife habitat under a yet-to-defined “offsetting” program. Developments having housing in wetlands makes no sense for new homeowners. **Remove the ability in Bill 23 to develop portions of the existing Greenbelt and be able to substitute non-contiguous lands for the loss of existing Greenbelt lands.**

**The GTA has over 80,000 acres of land already open for developing within existing municipalities without taking 7,400 acres away from the Greenbelt, as proposed by the government.** There is no need to further expand existing designated development areas, or take away from the Greenbelt. Encouraging sprawl would also create inefficiency in meeting the projected demand for housing instead of using select intensification**. Use gentle densification on already serviced lands to build housing, including government operations, like the LCBO ,government offices or MPP offices, or build the affordable homes itself.**

Approvals are not the issue. Strategy Corporation reports that the GTHA (Greater Toronto and Hamilton Area) already has over 200,000 approvals for housing that are not being built. **Build at least 50% of the existing approvals before setting new targets.**