

December 2, 2022

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay St., 17th Floor  
Toronto, ON M5G 2E5

**Re: Ontario's Landscape Architects' Significant Concerns with Proposed Changes to the Greenbelt Plan**

Dear Minister,

The Ontario Association of Landscape Architects (OALA) is joining the growing number of professional organizations and other groups concerned about changes to the *Greenbelt Plan*.

The OALA is the regulatory body whose mission is to promote, improve and advance the profession of landscape architecture and maintain standards of professional practice that serve and protect the public interest. The OALA represents 2,000 professional landscape architects practicing in both public and private sectors across Ontario. We plan and design the public and private realm, including parks, streetscapes, green infrastructure, recreational amenities and manage natural landscapes that support our growing communities.

This letter outlines the following areas of concern for the current proposal to remove protected lands from the *Greenbelt Plan*:

- scientific criteria & rationale for the land removal identified
- impacts on natural functions and sustainability
- impacts on finite land resources & sprawl

The OALA appreciates and supports advancing legislation and programs that address the current housing crisis in Ontario. However, the Association believes, in the absence of knowing the science behind the Province's proposed changes to the *Greenbelt Plan*, that removal of areas from the policy area could have significant long term environmental consequences. Without this information and while other housing and development options exist, including urban infill options, we cannot support the proposed changes and loss of land in the protected Greenbelt area.

**With the Province's announcement to selectively remove 15 discrete tracts of land from the *Greenbelt Plan* is of concern to the OALA. Our organization is voicing its objection to removal of these lands from the *Greenbelt Plan* in view of the larger public interest and with particular regard for the potential impacts this proposal would have on Ontario's natural landscapes, systems, and environment, in the absence of a scientific rationale for this initiative.**

## **CONCERN ABOUT SCIENTIFIC CRITERIA & RATIONALE FOR LAND REMOVAL**

The *Greenbelt Plan* has been developed over half a century through a science evidence based consultative process, with the purpose of supporting sustainable development and providing environmental protection to Ontario. We believe the proposed removal of lands from the policy area by the Province should prior to any decision of removal of tracts follow the same science-based consultative and evidence based process.

Recently, the Province has put forward a suite of amendments to legislation that are considered risks to the Greenbelt lands. The cumulative effects of the proposed changes to associated legislation as outlined in Attachment No. 1 to this letter, have the very real potential to reduce the ability of the Greenbelt lands and its systems to perform their intended functions. To our knowledge, this has been done without undertaking the same science evidence-based consultative process.

## **CONCERN FOR IMPACTS ON NATURAL FUNCTIONS AND SUSTAINABILITY**

Ontario's Natural Heritage is composed of wetlands, forests, valleys, rivers, lakes and farmlands. Its health is reflected in the native biodiversity, features and inter-connected systems that have survived from precolonial eras. History unique to the Ontario landscape including our geologic, cultural and biologic record have created environments found nowhere else in the world. **These critical natural systems protect our water systems for the larger Greater Toronto Area (GTA) and Ontario long into the future.** The Province has shown its leadership in protecting these valuable natural heritage and water resource assets by instituting the Greenbelt and in establishing regulatory authorities that can act at regional and watershed scales.

Today, Ontarians are confronted with the impacts of climate change and biodiversity loss. It is well known that our natural heritage systems play a key role in nature-based solutions providing benefits such as mitigating and attenuating flood risks by infiltrating and slowing the runoff from more frequent and intense storms. Natural areas improve our mental and physical health. They provide food security by providing habitat for pollinators. Natural areas are filters contributing to our air and water quality. They provide habitat, recreation for people and simple amenities.

The *Greenbelt Plan* protects land to maintain vital environmental and ecological functions essential to the overall well-being of the Greater Toronto Area (GTA) and southern Ontario. **The proposed amendment's implementation will have long term impacts, consuming agricultural lands, and significant ecological and groundwater resources that cannot be replaced.**

**The OALA strongly recommends the Province reconsider its current proposal to take land from the established *Greenbelt Plan* to accommodate greenfield residential development.**

### **CONCERN FOR IMPACTS ON FINITE LAND RESOURCE & SPRAWL**

According to Ontario's Housing Affordability Task Force, "a shortage of land isn't the cause of the problem ... land is available." The Task Force further advised that "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." Residential development within outlying rural areas exacerbates urban sprawl, with more roads and other necessary infrastructure and facilities.

The *Greenbelt Plan's* formulation over the last few decades has been based on scientific strategies and criteria for environmental benefits and protection. The integration of the natural environment in our urban areas has been a quintessential cornerstone to good development practices in Ontario. Our growing and redeveloping communities need substantial natural systems to remain healthy and resilient as the frequency and intensity of flood, heat and other extreme weather events increase.

The OALA is concerned about how current policy and planning decisions influence the permanent disposition of our finite land resources. We anticipate that eliminating lands from the *Greenbelt Plan* will impact the integrity of the essential natural systems that it was planned to protect. It will also reduce the already limited agricultural lands available in closest proximity to Ontario and Canada's most densely populated areas. Solving the current housing crisis should not be done at the expense of the food security and environmental sustainability of future generations.

**Instead, we encourage the government to work with municipalities to develop strategies and strengthen planning frameworks emphasizing creative redevelopment within existing built-up areas.** With policies and initiatives leveraging infill development opportunities wherever possible, housing can effectively, quickly and efficiently be provided within communities rather than encouraging development that contributes to types of sprawling development with its associated economic, social, and environmental challenges and costs.

## THE PUBLIC INTEREST

As city-builders, we as landscape architects appreciate the importance of managing growth and development. As stewards of the natural environment and our cultural landscapes, we also appreciate the importance of protecting the land, resources, community, and its diverse peoples. It is our hope that amendments to the legislative framework meant to bolster our housing needs will be balanced with the fulsome regard for all the needs of our complex society. While we agree that there is a need for more housing in Ontario, without a science-based justification for removal of lands from the *Greenbelt Plan* area, **we hold the view that the current proposal to remove lands from the *Greenbelt Plan* is not necessary to address the current housing crisis as other options, potentially less harmful to the land and environment, exist.**

**We look forward to receiving information from the Province outlining the scientific basis for selecting sites for removal from the *Greenbelt Plan*.** We are proposing to participate in a healthy productive dialogue with your government about how the OALA can assist in moving forward a long-term strategy and agenda for the *Greenbelt Plan* that maintains and enhances the essential services it provides to the Province.

We look forward to continuing to work with your government and the citizens of Ontario.

Yours truly,  
ONTARIO ASSOCIATION OF LANDSCAPE ARCHITECTS



Steve Barnhart OALA, CSLA  
OALA President

Encl. Appendix 1: Concern for Cumulative Effects on the *Greenbelt Plan* through related amendments to Ontario's Legislative Framework

## Appendix 1

### **CONCERN FOR CUMULATIVE EFFECTS ON THE *GREENBELT PLAN* THROUGH RELATED AMENDMENTS TO ONTARIO'S LEGISLATIVE FRAMEWORK**

Our concerns for proposed amendments to the *Greenbelt Plan* are closely related to changes proposed Ontario's policy on wetlands, and the download of planning authority from Regional and Conservation Authority agencies to municipal governments (Bill 23). Together, we believe these proposed amendments would have significantly adverse effects on the Greenbelt's conservation, management, and overall integrity.

Bill 23 risks impacting the invaluable services of our natural heritage systems throughout Ontario, including the Greenbelt. These are services that cannot be easily replaced and their loss to residential uses will contribute to biodiversity loss and greater impacts from climate change. Healthy natural heritage systems need to be managed at a comprehensive landscape scale (watershed, regional, local). The oversight role that Regional Governments and Conservation Authorities have provided must continue to serve. Municipalities do not have the professional expertise or capability to make decisions beyond their boundaries. Piecemeal decision-making affecting landscape relationships risks dire impacts to Species at Risk (SAR), wildlife habitat, biodiversity of Ontario's Natural Heritage as well as water systems and hazard management.

Natural heritage features like wetlands and forests are formed from the unique geologic and biologic history of their region and no two are alike. The proposed offsetting strategy put forward in recently proposed amendments to the Wetland Evaluation Policy does not recognize this. It cannot be assumed that an offsetting strategy can simply compensate for removal of wetlands without understanding the complexity of their formation. For example, constructed wetlands are feasible for marsh ecosystems, but we cannot easily recreate swamps, bogs or fens that can take decades or even centuries to form assuming the geologic, hydrologic and nutrient functions can be successfully established. While not opposed to offsetting, the proposed policy must consider the complexity of the natural functions and that some may not be replaceable within a human lifetime. Economic implications for feature replication are also important considerations to be successful.