

# Protect the Greenbelt



**OEAC**

Prepared by Suzanne Crellin for The Oxford Environmental Action Committee

ERO # 019-6216 December 4, 2022

Attention:  
Premier Doug Ford  
Steve Clark, Minister of Municipal Affairs and Housing  
Ernie Hardeman, MPP Oxford County and Chair of Standing Committee on Finance and Economic Affairs

Delivered via the ERO and email

Dear Greenbelt Consultation Public Input Coordinators

**Re: OEAC Opposes Plans to Degrade World's Largest Greenbelt – ERO# 019-6216 and Bill 23, The More Homes Built Faster Act**

The Oxford Environmental Action Committee (OEAC) is a non-profit organization based in Oxford County, Ontario. We promote responsible and environmentally sustainable land use planning, use of the precautionary principle in decision making, the safeguarding of Ontario's environment, and the protection of public health and wellbeing.

In 2005 Ontario expanded on the Oak Ridges Moraine Conservation Plan (ORMCP) and Niagara Escarpment Plan (NEP) areas to create the world's largest Greenbelt.

***[T]o provide for the maintenance of the Niagara Escarpment and land in its vicinity substantially as a continuous natural environment, and to ensure only such development occurs as is compatible with that natural environment."***

– Bill Davis, Former Premier of Ontario

The Greenbelt's designated Urban River Valleys and Protected Countryside areas beautify our province and conserve natural places and unique habitats. It also delivers \$9.6 billion each year<sup>1</sup> to Ontario's economy, and provides for recreation, culinary and eco-tourism, and agricultural activities. The Greenbelt's natural heritage features also do a lot of heavy lifting in the province, protecting source water and ecological biodiversity, and reducing the impacts of climate change. Ecosystem services provided by these protected areas have been valued at \$3.2 billion a year<sup>2</sup>.

During public consultation the province carried out in the spring of this year Ontario heard the clear opinion among conservation minded Ontarians that the Greenbelt needed to grow in order to protect more Urban River Valleys and natural heritage areas. Our organization has also previously asked for the Greenbelt to be extended through Oxford County and beyond, where we are dependent on ground sourced drinking water and are home to Carolinian forests and some of the province's most fertile soil. ERO 019-4485 and 019-4483 consultation did not give Ontario a mandate to trade out portions of the current Greenbelt for other lands. The lands

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<sup>1</sup> Greenbelt Foundation

<sup>2</sup> Greenbelt Foundation

within the Paris Galt Moraine and additional Urban River Valleys should absolutely be added to the Greenbelt, without a trade-off detrimental to the safe drinking water, natural places and the local food growing needs of Ontarians.

Bill 23 threatens to cut thousands of acres out of the Greenbelt, reduce the ability of Conservation Authorities to function as intended, and allow urban sprawl and environmental degradation across the province. This is to the detriment of Ontario residents, who are counting on their government to implement planning solutions that will simultaneously caretake our environment and the basics of public health – clean air, safe water, exposure to nature, and the growth of local food in healthy soil. Decisions made at this stage in the Anthropocene need to be innovative and thoughtful, with a future that includes more climate change impacts as a top concern for current and future residents of our province.

***"We are eroding the very foundations of our economies, livelihoods, food security, health, and quality of life worldwide".<sup>3</sup>***

–Sir Robert Watson, Chair, Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

#### **It doesn't make economic sense**

- The federal government won't foot the bill for disaster relief for provinces that allow building in floodplain areas<sup>4</sup> (such as those Conservation Authorities in Ontario would no longer be allowed to be consulted on)
- Greenbelt farms earn 68% more per acre than most Ontario farms<sup>5</sup>
- Culinary and eco-tourism and farming within the Greenbelt help to bring in over 9 billion<sup>6</sup> dollars a year from the protected area

#### **It doesn't make environmental sense**

- The Greenbelt's wetlands and geology perform hydrogeologic functions that filter water, recharge our aquifers and fill the rivers and streams that run through urban communities and rural lands. Wetlands also function to clean water contaminated by human activities, and help control floodwaters by absorbing water from the extreme weather events that are made more common with climate change.
- Canada's federal environment minister is reported to have said some of the lands Ontario's government have proposed to develop include floodplains, and indicated that *flooding is a top climate change cost of Canada*<sup>7</sup>

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<sup>3</sup> IPBES Global Assessment Summary for Policymakers. Ipbes.net, 2019

<sup>4</sup> Ottawa Citizen

<sup>5</sup> Greenbelt Foundation

<sup>6</sup> Greenbelt Foundation

<sup>7</sup> Feds won't help provinces for disaster compensation if housing built in flood areas, Ottawa Citizen

- Natural Heritage linkages make natural habitats and systems function more robustly. We need more functional and protected wetlands, aquifers, woodland habitats and grasslands.
- In **Ecosystems of Ontario**, the MNRF recognized the environment within the Mixedwood Plains Ecozone, which includes “Windsor, London, Hamilton, Toronto, Barrie, Oshawa, Kitchener-Waterloo, Peterborough, Kingston, and Ottawa” as at risk from “climate change... habitat fragmentation and smog<sup>8</sup>.” The Carolinian forests, prairie grass areas and wetlands in these areas contain “flora and fauna [that] are among the most diverse in Canada... the number of species at risk is also high”. Ecoregion 7E, which encompasses “Toronto, Hamilton, Burlington, St. Catherines, Niagara Falls, Kitchener-Waterloo, London, and Windsor” is host to “22 types of natural heritage areas” including the Greenbelt. “Many of Ontario’s species at risk occur here, including Acadian Flycatcher, king rail, prothonotary warbler, hooded warbler, spiny softshell turtle, blue racer, and small-mouthed salamander”.

***The loss of biodiversity is one of the most pressing problems facing the planet. Biodiversity is fundamental to our own well-being and important for its own sake. Yet Ontario’s species are under tremendous pressure from habitat destruction, invasive species, overexploitation, pollution, disease and parasites, and climate change.***

– Dianne Saxe, Former Environmental Commissioner of Ontario

### **It doesn’t make sense as a solution for Ontario’s housing issues**

- Services to support housing including utilities, roads, and transit, are paid for by the public, and are already available in existing urban areas
- Ontario has fantastic resources to tap into for detailed information on how to provide the housing needed in Ontario without paving over the Greenbelt. We recommend **Density Done Right**<sup>9</sup> [https://www.torontomu.ca/content/dam/city-building/reports/Ryerson\\_CBI\\_Density\\_Done\\_Right\\_April2020FINAL.pdf](https://www.torontomu.ca/content/dam/city-building/reports/Ryerson_CBI_Density_Done_Right_April2020FINAL.pdf), **Planning Our Landscape**<sup>10</sup> and **A Happy, Healthy, Prosperous Ontario: Why we need more energy conservation**<sup>11</sup>.
- Implement the Ontario Housing Affordability Taskforce recommendations to support missing middle and multigenerational gentle density housing
- *The province’s Growth Plan for the Greater Golden Horseshoe claims it will accommodate the rapidly growing population in compact, complete communities that give residents a better quality of life. Instead, the Plan increases costly urban sprawl, by directing hundreds of thousands of people to new, distant suburbs with high servicing costs, few employment opportunities, and too little density to support public transit.*

<sup>8</sup> Ministry of Natural Resources, The Ecosystems of Ontario, Part 1: Ecozones and Ecoregions, 2009

<sup>9</sup> Density Done Right, Ryerson City Building Institute, Ryerson University, 2020

<sup>10</sup> Environmental Commissioner of Ontario 2004/2005

<sup>11</sup> Dianne Saxe, Environmental Commissioner of Ontario, 2019

*Proposed amendments to the Growth Plan will spread new suburbs over more agricultural land, forests and wetlands. This will drive up climate and air pollution, reduce resilience to floods, increase costs for municipalities, and lock future residents into long, difficult, expensive and congested commutes.*

*Ontario can and should accommodate its growing population (a 30% increase by 2041) without creating further urban sprawl and gridlock. There is room to add the right housing supply in the right locations – creating compact, complete communities with access to jobs and transit, while revitalizing the inner suburbs and other built-up areas that today are stagnant or losing population. Building a greater mix of housing in existing areas can shorten commutes, reduce fossil fuel use, help address high living costs, and protect natural areas and farmland<sup>12</sup>.*

### **It doesn't make sense for the health and wellbeing of Ontario's residents**

- Public health and wellbeing require natural systems – for community water resources, as buffers for human activities that cause air and water pollution, for greenspace and natural spaces that improve physical and mental health, habitat for flora and fauna including species at risk, and to grow local food
- The Oak Ridges Moraine Conservation Plan protected area filters water and recharges drinking water areas that provide tap water for over 76 million Ontarians<sup>13</sup>

**The only people who it makes sense for are wealthy land prospectors who snapped up protected Greenbelt lands shortly before a plan (Bill 23) was publicly announced to remove them from protection.**

Our organization endorses Ontario Nature's comments.

### Recommendations

1. Cancel plans to allow urban sprawl to cover over some of Ontario's most ecologically diverse, productive and protective lands. Development on these lands will grossly deplete the wild areas needed as habitat for species at risk within the province, will reduce the opportunities for passive recreation and enjoyment of natural spaces for Ontarians, and will diminish the crucial functions such as drinking water protection provided by Greenbelt lands
2. To apply a lens of environmental sustainability to all land use plans – Ontario isn't just for us now, it's for all future generations
3. To solve Ontario's housing issues by increasing building standards to avoid excess energy use and costs; through the development of gentle and medium density housing within lands already zoned for development within urban areas; by allow garden suites, tiny homes, and eco homes to be built across the province in areas already zoned for development

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<sup>12</sup> A Healthy, Happy, Prosperous Ontario, Environmental Commissioner of Ontario, 2019

<sup>13</sup> Greenbelt Foundation

4. To grow the Greenbelt and increase protections for moraine and water recharge areas, wetlands, woodlands and grasslands, and prime agriculture and specialty growing areas across Ontario

Sincerely,

Suzanne Crellin  
President, OEAC



*These comments are submitted in good faith regarding ERO# 019-6216 and related matters. The opinions and beliefs contained are those of the commenting organization, the Oxford Environmental Action Committee (OEAC), on proposals we believe may impact the natural environment and public health and wellbeing.*