



November 26, 2023

Minister of Municipal Affairs & Housing  
17<sup>th</sup> Floor – 777 Bay Street  
Toronto, ON M7A 2J3

To Whom it May Concern:

**RE: ERO Posting 019-7739 Proposed Amendments to the Greenbelt Plan**

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On behalf of clients with land ownership within the Greenbelt Plan generally, we are in favour of maintaining the Greenbelt Plan and supportive of maintaining development limitations within the Greenbelt Plan and supporting the overriding objective of the Greenbelt Plan to provide clean air, drinking water and natural infrastructure that communities rely on for critical functions like flood mitigation and climate resiliency as well as protecting Ontario's agri-food system and agricultural land within the Greenbelt that provides us with a sustainable, local food source.

However, we suggest a stronger alignment of the Greenbelt Plan with the Growth Plan for the Greater Golden Horseshoe, proposed Provincial Planning Statement, local Official Plans as well as consideration of the recently passed Bill 23 (More Homes Built Faster Act, 2022) in determining lands which should remain within the Greenbelt Plan and should be objectively assessed with respect to:

- 1) proximity to adjacent existing built-up areas of a municipality (settlement areas);
- 2) locations where major infrastructure is available to service lands or alternatively suitability of lands to accommodate private services;
- 3) fragmentation of existing rural land parcels deeming lands otherwise unsuitable for large-scale agricultural production and or agriculture-related uses;
- 4) lands having no environmental features and or significant linkages.

The recent decision by the Ontario government to remove lands from the Greenbelt was short-sighted and required additional study to determine which of these lands could potentially provide a more balanced alignment of meeting housing objectives against maintaining the overriding objectives of the Greenbelt Plan.

In recognizing the Provincial objectives for creating complete and compact communities, the expansive nature of the Greenbelt contradicts the objectives of the Province's Growth Plan by

unnecessarily reducing the amount of developable land located close to existing services and infrastructure. We suggest that the current limit of the Greenbelt may encumber the opportunity to use otherwise developable tableland within the Greenbelt for development as part of potential settlement expansion areas. In our opinion, this land use configuration would serve no meaningful benefit to the overall Greenbelt or agricultural system and such remnant lands would be better served to accommodate urban lands uses for much needed housing.

To conclude, while generally supportive of the Greenbelt Plan to restrict development within the Greenbelt particularly lands designated for prime agriculture, consideration should be given to balancing objectives of other provincial initiatives and local policies to encourage development through greater analysis of individual parcels that may meet criteria for development particularly lands designated "Rural Lands" which have limited potential for large scale agriculture or agricultural-related uses.

Thank you for your consideration of this correspondence.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read "Nicolette van Oyen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nicolette van Oyen, BES, MCIP, RPP