**Submission on ERO-019-6217**

**Proposed Amendments to the Greenbelt Area Boundary**

December 4, 2022

**FRIENDS OF THE GOLDEN HORSESHOE**

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The Friends of the Golden Horseshoe is a group that has a vision for healthy and prosperous communities throughout the region. We are writing to express strong opposition to the proposed removal of any land from the Greenbelt.

The proposed removals are a massive betrayal of all Ontarians. The people of Ontario were publicly assured by Premier Doug Ford and Steve Clark, Minister of Housing and Municipal Affairs, on multiple occasions, that the Greenbelt would be protected. The proposed removals renege on these explicit promises. A Greenbelt that is not protected is no longer actually a Greenbelt at all.

**No Need for Greenbelt Trade-offs**

There is absolutely no need for even one acre of the Greenbelt to be removed to accommodate future growth. There are well over 200,000 acres of approved, unbuilt urban land in the Greater Golden Horseshoe including 125,000 acres in the Greater Toronto Area and Hamilton – 45,000 of which the Minister approved just over the last month. In addition, there are plans to accommodate at least 2.5 million people within the boundaries of our cities. The City of Toronto alone has upwards of 700,000 housing units approved or in process and is known as the crane capital of North America with 230 cranes – more than the next 13 markets combined.

Any claim that Greenbelt lands are needed to accommodate growth is simply false as well as misleading.

Prior to this unprecedented attack on the Greenbelt, municipalities throughout the Greater Golden Horseshoe went through comprehensive municipal reviews to plan for growth to the year 2051 — adding tens of thousands of acres of land for housing. The Minister himself then added tens of thousands more acres to this inventory. None of these additions contemplated or proposed removal of Greenbelt lands nor did municipalities even consider these Greenbelt lands in their long-term sewer, water and transportation plans. With so much land already available for housing, there is no need to cut into Ontario’s Greenbelt.

**No Such Thing as Swaps as the Greenbelt was never meant to be a Moving Target**

The Government is trying to justify the removals on the basis that it is swapping in land by proposing to expand the Greenbelt in Wellington County and several urban river valleys. This is a false, bait-and-switch proposal.

There is nothing in the Greenbelt Act or Greenbelt Plan that speak to “swaps” in any way. Removing land from the Greenbelt and adding land elsewhere is antithetical to the purpose of the Greenbelt Plan. The Plan’s own Vision and Policies speak repeatedly about the Greenbelt being ***permanently*** protected land.

Lands were included in the Greenbelt in order to protect their role and function in southern Ontario’s agricultural, natural and water resource systems and to ensure the ecological integrity of the Golden Horseshoe. The Plan explicitly states that the Greenbelt forms “the environmental framework around which major urbanization in south-central Ontario will be organized”. It is not a future reserve for accommodating urban growth. Removing lands goes directly against these stated principles. It would abandon the protection of the farmland and natural/hydrological features and functions occurring on these lands.

Removing lands along the southerly edge and adding lands on the outer edge creates a “migrating” Greenbelt — as it leads to the Greenbelt being moved at the whims of politicians and developers. This obviously conflicts with and undermines the intended purpose of having a Greenbelt. A shifting boundary will leave this widely supported protected landscape in a never-ending state of uncertainty while continually exposing farmland and natural features within it to loss and/or degradation.

Farmers will no longer have the certainty to protect, invest in and grow their farms and businesses – which was the key agricultural goal of the Plan. It is shameful that the Government’s policies would allow this at a time when food costs are rising and the 2021 Census shows Ontario is losing 319 acres of the best farmland in Canada every day.

**Proposal Won’t Grow the Greenbelt**

Simply adding lands while removing protection on other lands is counterproductive. Any Greenbelt expansion should not swap land in and out of protection. It should add more protected area. The Government’s proposed land swaps would add urban river valleys that are already protected. This is not adding greenspace to Ontario at all.

Even the proposed land-swap proposal adding some lands in Wellington County is an incremental addition which ignores the actual characteristics of the Paris/Galt Moraine complex. It a weak effort based on weak science that does not pay heed to the Government’s own earlier consultation on Growing the Greenbelt. Any expansion should be holistic and based on extensive research and scientific data — in this case, research already done on the Paris/Galt Moraine. Rather than providing a meaningful and logical expansion of the Greenbelt, the current swap proposal trades areas in and out of protection as if they were playing cards.

**Public Input Needed**

The proposed removals will establish an extremely negative precedent. Landowners across the Greenbelt will seek similar treatment. During the 2016 review of the Greenbelt, there were upwards of 800 requests to have lands removed or exempted from the Greenbelt or its policies. Because the Greenbelt was considered protected until the Government’s new ill-advised moves, only about a dozen minor refinements were made in the Greenbelt Plan, 2017.

That will almost certainly change now that the Government seeks to open the Greenbelt to developers. Combined with the complete lack of public process surrounding the current proposal, these removals send a powerful signal to development land speculators that it is open season on the Greenbelt which will unleash massive increases in speculative land purchases in pursuit of similar windfall profiteering.

The lack of any formal, public process for considering amendments to the Greenbelt Plan establishes another far-reaching and troubling negative precedent – which will exacerbate speculative land acquisition in the Greenbelt by developers as they will see how others successfully engaged in secret meetings to secure the removal of their land. There are huge questions regarding how the current process was derived, who initiated it, why the land is allegedly needed, how properties were selected, and where the supporting information or analysis is.

The Government’s entire process was done in a secretive way — behind closed doors. The Premier and Minister explicitly and publicly promised not to touch the Greenbelt, then they did. This is an affront to all Ontarians and unacceptable and the broken promises will only serve to solidify people’s distrust and resulting lack of involvement in electoral politics.

The entire proposal should be stopped and any action taken so far to allow it should be reversed.

**Duffins Rouge Agricultural Preserve (DRAP)**

The proposed removal of the DRAP lands from the Greenbelt together with the repeal of the DRAP Act Act stand out in terms of egregiousness.

The DRAP lands form part of a major agricultural and natural/hydrological landscape together with the Rouge National Urban Park. The protection of the DRAP predates the Greenbelt. The placement of the restrictive easements ensuring its permanent protection were part of the efforts to protect this landscape. Intensive urbanization was never contemplated – including through the design of the Central Pickering Community Plan, the Duffins Creek and Rouge River watershed plans and the Rouge Park and Rouge North Management Plans.

Removal of the DRAP not only conflicts with this history of planning it also threatens the long-term future of the Rouge National Urban Park while diminishing the natural and hyrdological sustainability of the Rouge and Duffins watersheds.

The Duffins Rouge Agricultural Preserve lands were publicly owned lands sold at agricultural land prices ($4,000-$8,000 an acre) by the provincial government of then-premier Mike Harris. This sale was based on a promise to the public that these lands would be protected in perpetuity as agricultural and natural lands. Ontario agreed to sell this public land at these minimal prices in return for its perpetual protection. <http://www.stopthequarry.ca/documents/Duffins%20Rouge%20BG.pdf>

In the current market, developable land in the Greater Toronto Area sells for hundreds of thousands of dollars an acre. It was recently reported that a development company paid $50 million for a 100-acre parcel in York Region in 2021, which equates to $500,000/acre. At that value, given there are upwards of 3,900 acres of land owned by developers in the Duffin’s Preserve, this would equate to about $1.75 billion.

As such, the removal of the DRAP results in an astronomical surrender and transfer of the public investment in the DRAP to private interests. This is land that Ontarians purchased the permanent protection of, not just until a new government comes in and breaks promises. The government of Mike Harris gave up massive monetary value it could have realized for Ontarians by selling this land to developers at agricultural rather than development land prices. But Ontarians accepted this foregone value to secure the broader public good of protecting the DRAP as agricultural and natural land - forever.

The repeal of the DRAP Act and removal of the DRAP from the Greenbelt is a complete betrayal of this historic promise to Ontarians and an utter dereliction of fiscal oversight and management of our collective public assets. Indeed, the City of Pickering’s initial attempt to sell the easements is direct evidence that the easements have a monetary value. Further, the ensuing outrage over giving away this public asset was a central theme of the Committee hearings leading to the passing of the Durham Rouge Agricultural Preserve Act, 2005 (see pages 10 and 13 in the link to the Hansard for but a couple of examples). The surrender of this massive public asset to private interests is completely inappropriate and unacceptable and simply should not and cannot proceed.

<https://www.ola.org/sites/default/files/node-files/hansard/document/pdf/2005/2005-12/committee-transcript-2-EN-2005-12-08_pdfM004.pdf>

The Ford government’s proposal to remove land from the Greenbelt is a secretive effort that would benefit a privileged few.

This is not for the people. It is fatally flawed.

The proposal should be withdrawn in its entirety and any future effort to expand the Greenbelt should involve a transparent, comprehensive, science-based approach with appropriate public/municipal consultation – and which is not linked to trade-offs involving the removal of land from the Greenbelt.

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