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OPPI Comments on Proposed Changes to the Greenbelt

On behalf of the Ontario Professional Planners Institute (OPPI), I am writing to provide our commentary in response to the Proposed Amendments to the Greenbelt Plan (ERO 019-6216) and the Proposed Amendments to the Greenbelt Area Boundary Regulation (ERO 019-6217).

OPPI is the recognized voice of Ontario’s planning profession. With over 4,600 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

We strongly support the Ontario Government’s desire to address the housing crisis in our province. In fact, we submitted our first round of recommendations to the Ministry of Municipal Affairs and Housing earlier this year and continue to work with our members to develop our next set of recommendations to address this generational challenge.

Proposed Changes to the Greenbelt

The Province is consulting on changes to the Greenbelt Plan and boundary regulation that seek to remove approximately 7400 acres over 15 areas of land from the protected area. The government’s stated intent is to unlock these parcels for housing and expectation is set for quick action, including a desire to see:

- Significant progress on approvals and implementation by the end of 2023;
- Construction starting no later than 2025; and
- Upfront infrastructure funding by proponents.

If these conditions are not met, the government has stated its intention to revert these lands back to the Greenbelt.

OPPI Feedback on Proposed Changes

OPPI members are concerned with the removal of any lands at all from the protected Greenbelt area. We strongly support the original vision of the Greenbelt Plan. Section 1.2.1 of the Plan outlines the vision as “a broad band of *permanently* protected land...” with protection in perpetuity being the essence of the vision.

Site-by-site adjustments create a slippery slope that could jeopardize key benefits of the Plan, including:

- **Promoting intensification:** a permanent Greenbelt that cannot be touched serves as an effective tool to promote development within the existing urban settlement area. It supports decades of planning policy by creating a boundary to prevent sprawl and focus growth in the Greater Golden Horseshoe (GGH). Lake Ontario serves as the natural barrier on the opposite side of the Greenbelt. Within these two boundaries, layers of provincial policies guide growth to maximize the efficiency of infrastructure such as roads, water, wastewater, transit, etc.

Allowing leakage of growth into the Greenbelt removes a key tension that forces no choice other than to intensify. Once a precedent is set to remove parcels from the protected areas, developers will be enticed to pursue further parcels and divert resources from working through the complexities of intensification and increased greenfield densities.

It would also undermine key infrastructure investments made by the Government of Ontario. The Province is spending billions of dollars to expand the transit system within the GGH. Coupled with these investments, the Province is also promoting transit-oriented development as well as other policies to intensify outside of the Greenbelt. The entire provincial growth planning policy framework and infrastructure spend could be compromised by opening the Greenbelt.

- **Protecting agricultural land:** a permanent Greenbelt serves to protect prime farmland that is essential to feeding our growing population. The GGH Region is home to approximately a quarter of Canada's population, and within the area, the Greenbelt serves a critical function to support our local agri-food sector. According to a December 2021 study done by the Greenbelt Foundation entitled, "Understanding How Greenbelt Agriculture Feeds the Regional Economy", \$4.1 billion in GDP and 59,000 jobs are linked back to agriculture activity in the Greenbelt.

Many of these lands have been farmed for generations with norms and customs associated with operations in farm communities. Infringing on these lands with urban development not only displaces important farmland and jobs but also disturbs the way of life that could give rise to conflict between neighbouring farmers and new arrivals.

In addition, the continued loss of agricultural land close to urban areas will increase cost of living by increasing cost of food in these urban areas. This could negatively impact our ability to attract talent to remain competitive in an increasing global market for talent.

- **Protecting environmental features:** a permanent Greenbelt helps protect natural heritage, hydrologic or landform features that provide essential ecosystem services such as water storage and filtration, cleaner air, habitat, support for pollinators, carbon storage and resilience to climate change. This helps conserve Ontario's biodiversity and maintains ecological integrity.

Allowing site-specific removals and/or adjustments to the Greenbelt could negatively impact essential connectivity and integration of these features. Urban development such as roads and other infrastructure in and around these sensitive areas could result in fragmented habitats, introduce invasive species, disturb wildlife migration patterns, etc. Carving out a key part of this broader ecosystem and adding land area of similar size to the Greenbelt elsewhere does not solve this issue.

These risks do not outweigh the benefit of unlocking housing development within the Greenbelt, especially when our housing needs can be met within the current supply of serviced and underdeveloped lands within the existing urban areas. The government recently allowed for substantial “whitebelt” boundary expansions by approving the Official Plans of York Region, Niagara Region and Hamilton. As these lands come online, it will further increase the land available for housing development outside of the Greenbelt.

The government intends to offset removal of these 7400 acres by adding lands from the Paris Galt Moraine into the Greenbelt. Land swaps would not address the challenges previously outlined with respect to impacts to intensification, agricultural land, and the environment.

OPPI respectfully urges the government to retain the integrity of the Greenbelt and continue with its core vision of being a band of permanently protected land. Although we do not support removal of any land from the Greenbelt, if land parcel is to be removed and is intended for urban use, we strongly urge the government to conduct a thorough scientific analysis prior to any decision based on a comprehensive set of criteria that address not on the Province’s proposed criteria but the criteria in the Provincial Policy Statement and Growth Plan for settlement boundary expansions.

Please contact OPPI’s Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca if you have any questions.

Sincerely,



Susan Wiggins, CAE, Hon IDC
Executive Director
Ontario Professional Planners Institute