

November 28, 2023

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
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Via email: greenbeltconsultation@ontario.ca

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To whom it may concern:

Re ERO # 019 -7739 Proposal to return lands to the Greenbelt – Greenbelt Statute Law Amendment Act, 2023

In February 2023, Peel Region Chair Nando Iannicca wrote to former Minister Clark expressing Regional Council's significant concern with the Province's December 2022 decision to amend the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Greenbelt Plan boundary regulation. This was to remove or redesignate approximately 3,000 hectares of land for housing development. (Greenbelt Amendments and Revocation of the Central Pickering Development Plan and the associated Minister's Zoning Order (O. Reg. 154/03)).

Although no lands in Peel were impacted by the previous provincial decision to amend the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Greenbelt Plan boundary regulation to remove or redesignate the lands previously removed, Region staff is supportive of the provisions in the Proposal to return lands to the Greenbelt – Greenbelt Statute Law Amendment Act, 2023 (ERO # 019 – 7739). In his February 2023 letter to the Minister, Chair Iannicca identified reasons for maintaining lands within the Greenbelt and Oak Ridges Moraine Conservation Plans, which continue to apply:

1. The protected lands within the Greenbelt provide crucial ecosystem functions including reducing greenhouse gas emissions and mitigating the impacts of downstream flooding. Return of these previously protected lands would enhance the integrity and permanence intended for the Greenbelt.
2. Removal of development in the Greenbelt would discourage urban sprawl and inefficient development patterns. This type of growth is discouraged through the Province's policies in the Planning Act, Provincial Policy Statement, Growth Plan and Greenbelt Plan.
3. The permanently protected lands in the Greenbelt are a component of Ontario's solution to build resilience and mitigate climate change. The return of lands to the Greenbelt would bolster and support the Greenbelt Plan's goal *"to improve resilience and protect carbon sequestration potential recognizing that the Natural Heritage System is also a component of green infrastructure..."*

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4. The return of 3,000 hectares of land to the Greenbelt will significantly reduce farmland loss to non-agricultural use, a concern which has been well documented through the Ontario Farmland Trust.

As currently proposed, incorporating the description of the Greenbelt Area and Oak Ridges Moraine Area boundaries directly into the legislation will ensure that in the future the authority to add or remove lands from the Greenbelt Area and Oak Ridges Moraine Area would require legislative changes to the Greenbelt Act or the Oak ridges Moraine Conservation Act as opposed to changes to the respective Regulations.

Importantly the amendments, if passed would maintain the lands added to the Greenbelt in 2022, which includes a total of 3,804 ha (13 additions of Urban River Valley areas and lands in the Paris Galt Moraine area).

While the Region shares the Province's commitment to increase housing supply and improve affordability, the Region did not support the previous removal of lands from the protected Greenbelt Plan Area to advance this goal. Region staff are of the view that land is available for housing both inside the existing built-up areas and on developed lands outside of the Greenbelt.

Conclusion

We trust that these comments are helpful to the Province. Region staff would be pleased to provide any clarifications or further comments as needed. Should the need arise in the future please contact:

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Sincerely,



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