

Expanding Ontario's Greenbelt: How To Do it Right

Introduction

Recently, the Honourable Steven Clark, Minister of Municipal Affairs and Housing, publicly talked about his desire to expand the Greenbelt. This document sets out the requirements and next steps that would be most effective in achieving this goal from the perspective of the endorsing organizations and individuals who have worked to have helped create, protect and celebrate the Greenbelt.

To begin, it is important to acknowledge the vision for the Greenbelt, as set out in the province's Greenbelt Plan:

“The Greenbelt is a broad band of permanently protected land which:

- Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use;
- Gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized;
- Provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses; and;
- Builds resilience to and mitigates climate change.

The successful realization of this vision for the Greenbelt centres on effective collaboration among the Province, other levels of government, First Nations and Métis communities, residents, private and non-profit sectors across all industries and other stakeholders.”¹

Permanently protecting lands in the Greenbelt is key to maintaining and improving the resiliency of local food systems and the physical, social and economic health of Ontarians. Healthy ecosystems are the foundation of human prosperity and will become increasingly important for building a climate resilient Ontario.

The COVID-19 pandemic has made these facts clearer than ever before. Since the pandemic started, we all rely even more on Greenbelt-protected natural lands for our mental and physical health. We appreciate even more the Greenbelt-protected farmland and farmers that supply us with healthy local food and jobs. And we are profoundly grateful that Greenbelt-protected water resources provide us with a clean and secure water supply.

Collectively, people rely on Greenbelt-protected lands for over 180,000 jobs and \$9.6 billion in annual economic activity. Meanwhile, the combined activities of plants, animals, insects and microorganisms in its wetlands, forests, farmlands and rivers generate over \$3.2 billion in annual ecosystem services such as:

- fresh food and water;

¹ [GREENBELT PLAN \(2017\) \(ontario.ca\)](#), pp. 3-4.

- flood and disease control;
- spiritual, recreational, and cultural benefits²

Because of all these attributes and benefits, expansion of the Greenbelt is clearly in the public interest. Bringing more lands under its permanent protection is a necessary precondition for a more climate resilient and prosperous future and the sooner this happens, the better for all of us.

Discussions about expanding the Greenbelt have been happening since it was first established in 2005. It's important to acknowledge that at present, the Greenbelt only covers 21% of the Greater Golden Horseshoe (GGH).

Key requirements for expanding the Greenbelt.

Requirement 1: No land removals

The land currently in the Greenbelt must remain in the Greenbelt. For years, developers and land speculators have been asking the provincial government to change the Greenbelt boundary to remove their land from Greenbelt protection. In some cases they suggest that other lands elsewhere be reclassified as Greenbelt lands so that the total Greenbelt area is maintained. This is unacceptable for several reasons and would effectively destroy the Greenbelt's capacity to protect farmland and key natural areas.

The consequences of land removal would include:

- *Harming both farmers and nature.* A spider web of subdivisions, roads and factories in the Greenbelt would reduce the ability of forests, fields and wetlands to clean our air and water and absorb the rain, of wildlife to move as needed for foraging, breeding and raising their young, and of plants to be pollinated and disperse seeds. As urban development encroaches on agricultural land and buffers between agricultural and non-agricultural uses are reduced, people with no attachment to farming come into close contact with farm operations. As the Ontario Federation of Agriculture has said, this can give rise to conflict between farmers and new arrivals in the countryside, impeding normal farm practices and undermining the long-term viability of farming in affected areas.³ In addition, creating a *mechanism* to remove farmland from the Greenbelt would erode the incentive for high capital investments in farm infrastructure.
- *Creating a "Swiss-cheese" Greenbelt.* In 2017, the provincial government reviewed the current Greenbelt boundaries as part of the legislatively required 10 year Greenbelt Plan review. At that time they received over 700 requests from developer landowners to remove land from the Greenbelt.⁴ In the end, only minor adjustments were made to refine the mapping from when the Greenbelt was established in 2005. The rest of the requests were denied because approval of these requests would have resulted in islands of development within the Greenbelt. Of course these new

² Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital, 2016. Friends of the Greenbelt Foundation

³ <https://ofa.on.ca/resources/farmland-at-risk-report/>

⁴ [RequestsToRemovel_and_Allmaps.pdf \(greenbeltalliance.ca\)](#)

housing subdivisions, factories and big box stores would also have required roads, sewers and water supply. Therefore these islands of development would have needed to be linked to towns and cities outside of the Greenbelt and a spider-web of development would have begun to appear among the rest of the protected lands.

- *Setting an irreversible, dangerous precedent.* Once a developer or a municipality is allowed to remove land from Greenbelt protection what would stop the next proposal from being approved? Once this happens the Greenbelt ceases to be a meaningful, permanent protection mechanism.
- *Making Farmland less affordable:* If Greenbelt protection is not permanent and farmland is seen as open for development, there will be a significant impact on its value. Permanent protection keeps farmland more affordable for the purpose of farming.
- *Harming those who followed the rules:* Landowners or developers who have played by the rules and worked with the municipal planning system to get their land approved for development would be competing with someone who had sidestepped this public process and secured a development approval in the Greenbelt.
- *Breaking the Law:* It is contrary to the fundamental purpose of the Greenbelt Act and Plan to protect it in perpetuity and is contrary to the Greenbelt Act which says while the Greenbelt Plan may be amended, no amendment shall reduce the total land area contained within the Greenbelt Plan.

In summary, allowing land inside the Greenbelt to be approved for development would make the Greenbelt no more protected than the lands outside of it. Therefore any credible and viable plan to expand the boundaries of the Greenbelt cannot allow land removals.

Requirement 2: Build on What's Already been Done (don't reinvent the wheel)

Discussions about growing the Greenbelt have occurred since 2005. In 2017 lands in 21 urban river valleys around the GGH and 7 coastal wetlands were added to the Greenbelt. As well, the Province launched an extensive consultation process⁵ to get feedback on adding land in 7 areas across the GGH to the Greenbelt.

As part of that consultation process, member groups of the Ontario Greenbelt Alliance submitted [a map](#) containing additional lands to be added to the Greenbelt, known as the "Bluebelt Expansion Area"⁶. The proposed Bluebelt Expansion Area involved extending the Greenbelt to protect areas of high ecological and hydrological value such as moraines, wetlands, headwater areas and coldwater streams.

The work done in 2017, including the Bluebelt proposal, should form the basis of new plans to expand the Greenbelt.

Requirement 3: Work towards simultaneously improving public health, local food security, water security, climate resilience, biodiversity conservation and economic prosperity.

⁵ [Ontario Consulting on Greenbelt Expansion | Ontario Newsroom](#)

⁶ [Greenbelt Bluebelt VS Prov FINAL_03 \(d3n8a8pro7vhmx.cloudfront.net\)](#)

The COVID-19 crisis has made it abundantly clear that governments have a duty to protect the public interest. This is equally true for issues that require long term action, like the protection of key natural infrastructure, including the Greenbelt. The huge economic, social and ecological benefits provided by the Greenbelt demonstrate the value of its protection today and the promise of even greater value in the future.

The Province *can* act to simultaneously improve public health, help farmers create a more secure local food supply, better protect our water resources, and build climate resilience in ways that create economic prosperity for Ontarians by expanding the Greenbelt.

Requirement 4: Acknowledge that there is more than enough land to grow the Greenbelt and build complete communities to handle projected population growth.

Discussions about expanding the Greenbelt will once again ignite debate around how much new land is needed to house and employ Ontario’s projected population growth. The evidence is clear. There is more than enough land already set aside for development within existing town and city boundaries to meet the demand for all types of housing and businesses until far past 2031. This is because each municipality is required by law to identify and zone enough land for these uses up to at least 2031..

In fact for all municipal regions except Toronto and Peel growth has been less than projected and there are existing large surpluses of land available for development. The Neptis Foundation estimated in 2017 that the total supply of unbuilt land to accommodate housing and employment to 2031 and beyond across the GGH is 125,560 hectares⁷. Given decades of low density development patterns, suburban municipalities will find they have a capacity to provide housing and employment within their Built Up Area (BUA) if they undertake an analysis. According to a recent report by Malone Given Parsons, approximately 70% of land within both the Built Up Area and Designated Greenfield Area in the GTHA is within a low-density designation, and the population and employment densities across the region are generally at or below 50 residents and jobs per hectare, which is on the low end of recommended targets for communities specified in the Growth Plan⁸.

Municipalities should require increased density in these areas before expanding their boundaries. Appendix 1 at the end of this report provides a summary of the multiple reasons why the housing needs of communities in the GGH can be met within lands already designated for development. So instead of developing in the sensitive farmland and natural areas of the Greenbelt, it is clear that we can, and should, build complete communities (gentle density, people friendly, walkable, jobs close by, climate resilient) inside the boundaries of our existing towns and cities. As for commercial and industrial development, brownfields close to existing infrastructure should be the priority for siting.

Requirement 5: Consult with Indigenous Communities.

⁷ Neptis Foundation: [Microsoft Word - An update on the total land supply_even more land available for homes and jobs in the ggh.docx \(neptis.org\)](#), 2017

⁸ Malone Given Parsons, 2018 [2018_11_20_MGP_GTHA_SBO_Land_Supply_Analysis_web.pdf \(syncusercontent.com\)](#)

The Province must meaningfully consult with Indigenous communities about expanding the Greenbelt within their traditional territories. The duty to consult is a constitutional obligation that arises from s.35 of the Constitution Act, 1982, which recognizes and affirms Indigenous and Treaty rights. Indigenous traditional practices, responsibilities and knowledge systems must be honoured by ensuring Indigenous voices are key to any discussions involving expanding the Greenbelt.

Next Steps

Based on the above information and requirements, the Province can best move forward to expand the Greenbelt by taking the following immediate actions and developing a longer term process to complete the expansion:

Immediate Actions

1. Commit to the continued permanent protection of **all the lands within the existing Greenbelt area** and the expansion of the Greenbelt.
2. Cancel the planned GTA West (Highway 413) and Bradford Bypass. These highways are expensive, not necessary and will permanently damage existing lands within the Greenbelt while also generating significant pressure by developers and municipalities to allow development along them. There are many other options available to manage the transportation needs of Ontarians that do not require sacrificing vital farmland, natural spaces and water resources.
3. Bring forward [Bill 71, the Paris Galt Moraine Conservation Act, 2019](#) to provide protection for this important area and allow expansion of the Greenbelt westward.
4. Release the results (including maps) of the 2017 public consultations on Greenbelt expansion. This information, including the Bluebelt proposal, is a treasure trove of information and data that can guide future discussions about where to expand the Greenbelt based on the views of Ontarians.

Developing a Longer Term Expansion Process

We suggest that the following principles shape the development of a new process to bring more agricultural lands, natural areas and water resources under the protection offered by the Greenbelt Act:

1. Consult with the public, community groups and farm organizations to get feedback on the criteria to be used and the lands to be considered.
2. Honour Canada's constitutional and Treaty obligations to Indigenous peoples.
3. Use the rich material from previous consultations, such as the Bluebelt proposal.
4. Ensure expansion criteria follow science-based ecological, hydrological, and conservation best practices.
5. Ensure that the economic viability of farming as a predominant land use is a key consideration.
6. Ensure expansion criteria help address structural injustices and inequities facing marginalized groups.

7. Analyse the impact of other government policies on existing and proposed Greenbelt-protected lands and develop recommendations to mitigate negative impacts.

Appendix 1

Summary of Facts about Ground Related Housing Supplies⁹:

- As of Dec 2016 Upwards of 125,000 ha of land in the GGH (308,000 acres) have been approved for urban use to accommodate projected growth to 2031.
- As of Dec 2016 of this only 20% has been used - despite being 40% (10 years) through the Growth Plan's 25 year planning horizon - reflecting drastically lower land consumption trends than in prior decades (e.g. from 1991-2001 the urban footprint expanded by about 26% to accommodate 1.1 million people whereas between 2001-2011 it only expanded about 9% to accommodate 1 million people).
- About 800,000 ground related units (single detached, semi-detached and row houses - all of which typically have 3 bedrooms and a yard) and hundreds of thousands of apartments were planned on this land supply – with about 500,000 of these in the GTHA. Of these, about 540,000 are single-detached houses.
- As of the end of 2016, about 288,000 of these ground related units had been built GGH wide.
- This means there were over 500,000 (half million) ground related units still in the planned supply in the GGH.
- These 800,000 units can accommodate about 2.45 million people (using a conservative assumption of 3 persons/unit) or about 83% of all planned population growth to 2031 (excluding the City of Toronto).
- In addition, as of 2006, there were 700,000 single, semi-detached and row houses owned by people 55 or older. Of these, 370,000 were owned by those 65+ - the youngest of which will be 90 years old in 2031 meaning virtually all these units will come to market by that time. Of the remaining 330,000 owned by those 55+, the youngest of those will be 90 in 2041 such that all those houses will come to market as well. Collectively, these units could accommodate at least another 2.1 million people.
- Combined, the planned supply and existing supply of ground related homes that will come to market by 2041 can accommodate about 4.6 million people whereas the total growth projected to 2041 is only 4 million (excluding Toronto).

⁹ Greater Golden Horseshoe Ground-related Housing Supplies (2018) V. Doyle, OPPI Journal 33(6)

· The overall mix of ground related vs apartment units will barely shift between 2006 and 2031.

Neptis Foundation Map showing lands available for growth in the Greater Golden Horsehoe.

