



# Environmental Defence Canada

## Land swaps would be the death of the Greenbelt

November 4, 2022

### Introduction

Today, the Honourable Steven Clark, Minister of Municipal Affairs and Housing, tabled a proposal to remove lands from the Greenbelt and designate a mix of lands, some which are already protected, as Greenbelt lands in their place. Allowing land swaps will be the death of the Greenbelt.

To begin, it is important to acknowledge the vision for the Greenbelt, as set out in the 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.

**Permanently protecting lands in the Greenbelt is key to maintaining and improving 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.**

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 and rivers generate over \$3.2 billion in annual ecosystem services such as:

- fresh food and water;
- regulating services such as flood and disease control;
- cultural services such as spiritual, recreational, and cultural benefits; and
- supporting services such as nutrient cycling.



## Key requirements for protecting the Greenbelt

### 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. At first glance this can seem reasonable, but there are several reasons why such a move would effectively destroy the Greenbelt's capacity to protect farmland and key natural areas.

The consequences of land removal include:

- **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 650 requests from developer landowners to remove land from the Greenbelt. In the end, only minor adjustments were made to correct mapping errors made 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 housing subdivisions, factories and big box stores would also need roads, sewers and water supply. Therefore these islands of development would need to be linked to towns and cities outside of the Greenbelt and a spider-web of development would begin to appear among the rest of the protected lands
- **Islands in a sea of development:** If the provincial government were to propose to ensure the Greenbelt does not get smaller in total area when new development is allowed within it, they would have to designate new lands outside as new Greenbelt lands. These sites would not necessarily be contiguous with the existing protected Greenbelt lands and in that case would be islands surrounded by the growing impacts and pressures of development.
- **Harm to both farm communities and ecosystems:** A spider web of subdivisions, roads and factories in the Greenbelt would reduce the ability of wild animals to migrate and interbreed, plant seeds to disperse and for forests and fields to clean our air and water and absorb the rain. As urban development encroaches on agricultural land, people with no attachment to farming come into close contact with farm operations. This is the case when the urban envelope expands onto farmland without adequate buffers or when non-agricultural uses are permitted in rural areas. These 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.
- **Once you start you can't go back:** 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.

- ***It's not fair:*** 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. This could undermine investor confidence in Ontario's planning system and lead development to locate in other jurisdictions.

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

**The Greenbelt is not needed to build homes. Acknowledge that there is more than enough land to grow the Greenbelt and build complete communities to handle projected population growth.**

Ontario government efforts to take land out of the Greenbelt are premised on an assertion that this land is urgently needed to address the housing affordability crisis. This is untrue. 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 2040. This is because each municipality is required by law to identify and zone enough land for these uses up to at least 2031 and are now required to update these projections for the period up to 2051 by the end of 2022. York, Durham and Peel have identified at least 17,000 ha. of farmland not on the Greenbelt where they want to expand their boundaries. Hamilton, Waterloo and Halton have developed plans to meet all of their projected growth needs inside their existing boundaries with little or no expansion onto farms, forests and wetlands.

In fact, for all municipal regions except Toronto and Hamilton, growth has been less than projected and there are existing large surpluses of land available for development. For example, the City of Mississauga has more than 20,000 units of housing that is approved and waiting for developers to proceed within its urban boundaries.

The proposal to allow development in the Greenbelt is about rewarding land speculators wanting to get rich quick at all of our expense.

**Consult with Indigenous Communities.**

The Province must consult with Indigenous communities about taking land out of 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. Their age-old commitment to



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protecting land needs to be honoured by ensuring their voices are key to any discussions involving expanding the Greenbelt.

### **About Environmental Defence Canada**

Environmental Defence Canada is a leading Canadian environmental advocacy organization that works with government, industry and individuals to defend clean water, a safe climate and healthy communities.