
REPORT TITLE: Region of Peel Comments on the Greenbelt Amendments

FROM: Kealy Dedman, Commissioner of Public Works

RECOMMENDATION

- 1. That the draft letter to the Minister of Municipal Affairs and Housing communicating the importance of permanently protecting the Greenbelt attached as Appendix II to the report of the Commissioner of Public Works, listed on the February 9, 2023 Regional Council agenda titled “Region of Peel Comments on the Greenbelt Amendments” be endorsed, signed by the Chair and forwarded to the Minister; and**
- 2. That a copy of the correspondence be forwarded to the Peel Area Members of Provincial Parliament, the City of Brampton, the Town of Caledon and the City of Mississauga.**

REPORT HIGHLIGHTS

- The Ministry of Municipal Affairs and Housing has amended the Greenbelt Plan, Greenbelt Area boundary regulation and Oak Ridges Moraine Conservation Plan, to remove 3,000 hectares of land in 15 areas outside of Peel Region.
- The Greenbelt was established in 2005 to protect agricultural lands, water resources and natural areas, support the achievement of complete compact communities and help reduce greenhouse gas emissions.
- The removal of lands undermines the integrity and permanence intended for the Greenbelt Plan Area.
- Regional staff have prepared a letter to be sent to the Minister of Municipal Affairs and Housing expressing significant concern with the Province’s decision to remove lands from Greenbelt Plan protection.

DISCUSSION

1. Background

At the January 12, 2023, Regional Council meeting staff were requested to prepare a letter to be sent by the Regional Chair to the Province that communicates the Region’s concerns regarding removal of lands from Greenbelt protection. The purpose of this report is to provide an overview of the recent changes, the implications of the changes and a Regional response.

The Ministry of Municipal Affairs and Housing (MMAH) has amended the Greenbelt Plan, Greenbelt Area boundary regulation (O. Reg. 59/05) and Oak Ridges Moraine Conservation Plan, to remove 3,000 hectares of lands in 15 areas. This decision was posted on the Environmental Registry of Ontario on December 21, 2022, following a 30-day consultation

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period from November 4 to December 4, 2022. In a letter dated December 16, 2022, Minister Clark confirmed that the government had also revoked the Central Pickering Development Plan and associated Minister's Zoning Order (January 12, 2023 Regional Council agenda, Item 16.2). This change corresponds with the removal of lands from the Greenbelt in Durham Region and the repeal of the Duffins Rouge Agricultural Act through *Bill 39, Better Municipal Governance Act, 2022*.

Other amendments to the Greenbelt Plan included adding to the Greenbelt 13 new Urban River Valley areas and adding lands in the Paris Galt Moraine in Wellington County, totaling 3,800 hectares.

The stated purpose of the changes to the Greenbelt is to accommodate growth and support the building of housing. An overview map showing the location of the additions, removals and redesignations of land is attached as Appendix I. The lands are generally located near the edge of the Greenbelt Area, are either serviced or adjacent to services and determined by the Province to be appropriate to build housing in the near term. None of the lands added or removed are located in Peel Region.

The Province has indicated the lands would result in the construction of approximately 50,000 or more new homes with the expectation that planning approvals would be significantly advanced in 2023 and construction would begin by no later than 2025. The Province indicates that if these conditions are not met, the government will begin the process to return the properties back to the Greenbelt.

2. Purpose and Importance of the Greenbelt

The Greenbelt was introduced in 2005 as a component of an overarching strategy to provide clarity and certainty about urban structure, where and how future growth should be accommodated and to protect agricultural lands and natural areas for the long-term. As stated in the Greenbelt Plan:

The Greenbelt Plan, together with the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan, identifies where urbanization should not occur in order to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape. These plans work in concert with Ontario's Climate Change Strategy, 2015, the government's commitment to meet its long-term targets to reduce greenhouse gas emissions. Protecting agricultural lands, water resources and natural areas, supporting the achievement of complete communities that are compact, walkable and, where appropriate, transit-supportive will help reduce greenhouse gas emissions and work towards low-carbon communities, and the long-term goal of net-zero communities. Greenhouse gas emissions can be offset by carbon sinks found in the Greenbelt, which can include agricultural lands, green infrastructure and other natural areas.

The successful realization of the vision for the Greenbelt depends on the certainty and integrity of its boundary to provide permanent protection of its agricultural land base and natural systems.

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3. Implications of Removing Lands from the Greenbelt

a) Comprehensive Growth Management

The framework of environmental and watershed planning in Ontario relies on a systems approach. The systems approach to environmental management considers the inter-relationships among environmental, economic and social factors and the importance of a comprehensive and integrated approach to land use planning.

The Greenbelt Plan and Growth Plan policies allow for modest rural settlement area expansions subject to criteria in keeping with the purpose and intent of the Plan. The Greenbelt Plan's policy directs municipalities to consider natural heritage system connections when considering expansions. Implementing the policy direction requires analysis which is typically undertaken through a Municipal Comprehensive Review. Land removal, without comprehensive analysis, undermines the integrity and permanence intended for the Greenbelt, especially elements of the landscape that form part of the Greenbelt's Agricultural and Natural Heritage Systems. Allowing lands outside of settlement areas to be removed and considered for urban development is not consistent with the policies of the Growth Plan that provides direction for an urban form that optimizes efficient use of infrastructure; supports the achievement of complete communities through a more compact built form; and supports environmental and agricultural protection and conservation objectives of the Growth Plan in conjunction with the Greenbelt Plan.

The Province did not provide any evidence to support the need for Greenbelt lands being required for housing development and further, the Ontario Housing Affordability Task Force report of February 8, 2022, stated that *"... a shortage of land isn't the cause of the problem. Land is available, both inside the existing built-up areas and on developed land outside of the greenbelts"*.

Most Regional municipalities have completed their Municipal Comprehensive Reviews for settlement area boundary expansions to conform to the Growth Plan to accommodate growth to the year 2051. In November 2022, the Province approved settlement area boundary expansions in several official plans including in Peel, York, Halton, and Niagara Regions and the City of Hamilton. As such, the supporting rationale for the Province approving additional removals and redesignation of land from the Greenbelt is unclear.

b) Climate Change

The Greenbelt's natural systems, features and areas directly support climate change related biodiversity, water management, including mitigating flooding and stormwater runoff, and greenhouse gas emissions reduction objectives. Although the effects of climate change are felt locally, the solutions cross regional boundaries and require cooperation and coordination from multiple levels of government. As stated in the vision statement for the Greenbelt Plan, the Greenbelt is a broad band of permanently protected lands which builds resilience to and mitigates climate change. The removal of lands undermines the Greenbelt Plan's goal to *"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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c) Protecting Environmental Features

The Greenbelt in Peel covers 57,600 hectares of land. These lands contain key natural heritage features, such as woodlands and wildlife habitat, and key hydrological features that collect store and filter rainwater. The Greenbelt Plan protects the lands so that ecological features, areas and functions can be sustained on the landscape for the long term. To avoid negatively impacting ecological connectivity and integration of these features, it is critical that no further removals from the Greenbelt occur. Results can include fragmentation, which can lead to degradation of the overall system. This approach of removing lands from the Greenbelt is not consistent with the intent and policies of the Greenbelt Plan.

d) Protecting Agricultural Lands

The Greenbelt is intended to protect against loss and fragmentation of the agricultural land base and support agriculture as the predominant land use. The Protected Countryside policies of the Greenbelt Plan protect prime agricultural areas and rural lands by preventing further fragmentation and loss of the agricultural land base caused by lot creation and the redesignation of prime agricultural areas.

There is a total agricultural land base of approximately 54,400 hectares in Peel, of which 18,066 hectares are Prime Agricultural Area. The Prime Agricultural Area in Peel represents approximately 35 percent of the total agricultural land base, the majority of which is located in the Greenbelt Plan Area. The incremental and cumulative loss of agricultural lands in the Greenbelt undermines the purposes of the Plan. As such the Region does not support any further agricultural lands being removed from the Greenbelt.

4. Proposed Direction

In previous submissions to the Province on Greenbelt consultations in 2021 and 2022, the Region voiced the importance of protecting and maintaining the Greenbelt. The comments in the Region's submission also expressed support for increasing the size of the Greenbelt and the importance of the continued protection of the Greenbelt in Peel as it provides for the permanent protection of the agricultural land base, as well as its significant landscapes and ecosystems. In Peel, all of the major river valleys connecting the Greenbelt to Lake Ontario have already been designated as Urban River Valleys. Further, they are also subject to strong valley and stream corridor protection policies in the Regional and local municipal official plans.

Through the recent Regional Official Plan Review, Peel 2051, policies and mapping in the Regional Official Plan were updated to protect agricultural lands, enhance natural features and areas, and preserve cultural heritage. New mapping was introduced to reflect updates to the provincial plans including policies to conform to the Greenbelt Plan. The Region's Official Plan contains a strong environment framework that protects, enhances and restores natural heritage including enhancing the long-term ecological integrity of the Greenlands System within the Greenbelt and its resiliency and ability to adapt to a changing climate.

While the Region shares the Province's commitment to increase housing supply and improve affordability, with the exception of modest expansions of rural settlement areas or minor technical corrections to the Greenbelt boundary, the Region does not support the removal of lands from the protected Greenbelt Plan Area to advance this goal.

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RISK CONSIDERATIONS

While there is no immediate direct risk to the Region of Peel, the removal of lands from the Greenbelt without a comprehensive review process undermines the integrity of the Greenbelt. A precedence is being set for potential future removal of lands in other municipalities

CONCLUSION

The removal of lands from the Greenbelt sets a negative precedent and undermines the permanent protection and overall integrity of the Greenbelt. The Region does not support any further lands being removed from the Greenbelt.

In response to the Province's decision to amend the Greenbelt Plan and remove 3,000 hectares of land, Regional staff have prepared the attached letter (Appendix II) addressed to the Province to communicate the importance of permanently protecting and enhancing the Greenbelt throughout the Greater Golden Horseshoe Area.

APPENDICES

Appendix I - Location Maps of Greenbelt Additions and Removals

Appendix II – Draft Letter to the Minister of Municipal Affairs and Housing



Kealy Dedman, Commissioner of Public Works

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