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Regional Chair & CEO

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February 9, 2023

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Dear Minister Clark:

Re: Greenbelt Amendments and Revocation of the Central Pickering Development Plan and O.Reg. 154/03

On behalf of Regional Council, I am writing to express the Region of Peel's significant concern with the Province's recent decision to amend the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Greenbelt Plan boundary regulation to remove or redesignate approximately 3,000 hectares of land for housing development. The Region recognizes the Province's commitment to facilitate the building of 1.5 million homes over the next 10 years; however, the removal of lands from the protected Greenbelt Plan Area is not a recommended approach to advance this goal.

The Greenbelt was created in 2005 to identify where urbanization should not occur and to provide permanent protection to the agricultural land base, water resources and natural areas. These protected lands within the Greenbelt provide crucial ecosystem functions including reducing greenhouse gas emissions and mitigating the impacts of downstream flooding. Removal of these previously protected lands undermines the integrity and permanence intended for the Greenbelt.

Allowing for development in the Greenbelt encourages urban sprawl and inefficient development patterns. This type of growth is discouraged through the Province's own policies in the Planning Act, Provincial Policy Statement, Growth Plan and Greenbelt Plan. Through its recent Regional Official Plan Review, the Region has shown leadership by inserting new policies into its updated Regional Official Plan, which are consistent with Provincial policy direction to protect agricultural lands, enhance natural systems, and preserve cultural heritage, while providing a balanced approach to accommodate growth based on comprehensive analysis. These policies protect, enhance and restore natural systems including their long-term ecological integrity and support Peel's resiliency and ability to adapt to a changing climate.

The permanently protected lands in the Greenbelt are a component of Ontario's solution to build resilience and mitigate climate change. The removal of lands undermines 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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Removal of 3,000 hectares of land from the Greenbelt further accelerates farmland loss. According to the Ontario Farmland Trust in the past 35 years, Ontario has lost 2.8 million acres (18%) of its farmland to non-agricultural land uses.

The Province has not provided evidence to support the conclusion that Greenbelt lands are required for housing development and further, the Housing Affordability Task Force report, dated February 8, 2022, clearly 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.*”(p. 10).

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.

Removal of lands from the Greenbelt sets a negative precedent and undermines the permanent protection and overall integrity of the protected lands. The Region does not generally support any further lands being removed from the Greenbelt and strongly recommends that the Province take a comprehensive approach to identifying the most appropriate lands for housing based on an integrated consideration of environmental, economic and social criteria and comprehensive analysis.

Kindest personal regards,

Nando Iannicca
Regional Chair & Chief Executive Officer
Region of Peel

cc: Peel MPPs
City of Mississauga
City of Brampton
Town of Caledon