

## **City Comments on the Province's Proposal to Return Lands to the Greenbelt**

**Date:** September 14, 2023

**To:** Planning and Housing Committee

**From:** Chief Planner and Executive Director, City Planning

**Wards:** All

### **SUMMARY**

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The Province is consulting on a proposal to return 53 hectares (133 acres) of land back into the Greenbelt Plan Area that was recently removed through Amendment 3 to the Greenbelt Plan. The Minister of Municipal Affairs and Housing has also informed municipalities of the Ministry's intention to undertake a future review of all Greenbelt lands, though details of that review have not been released at this time.

While the lands considered in this proposal are not within the City of Toronto or its watersheds, changes to the regional planning framework impact municipalities throughout the greater bioregion. A permanent Greenbelt supports the foundation for the long-term ecological integrity of the region's natural systems. A robust regional natural system supports Toronto's biodiversity and increases our resilience to the impacts of climate change. Consistent Greenbelt policies enable the agri-food sector to make long term agricultural investments and reduce speculation across a land base that includes the most productive agricultural land in the country.

On December 21, 2022, the Ministry of Municipal Affairs and Housing amended the Greenbelt Area boundary to remove or redesignate 15 parcels of land totaling 2,995 hectares (7,400 acres). City Planning prepared and submitted comments that opposed this decision following a City Council motion made on November 24, 2022 ([Item CC1.2](#)).

The City of Toronto has long supported the permanent protection of the Greenbelt, and regional planning policies that reduce the impacts of urban sprawl.

This report outlines staff comments and recommendations related to the Province's consultation on their "[Proposal to return lands to the Greenbelt](#)", as posted on the Environmental Registry of Ontario. The comment period for this consultation is open from September 5 to October 20, 2023.

## **RECOMMENDATIONS**

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The Chief Planner and Executive Director, City Planning recommends that:

1. City Council support the Province's proposal to return 53 hectares (133 acres) in the Town of Ajax back into the Greenbelt Plan Area.
2. City Council request that the Province scope their planned review of the Greenbelt to evaluate the 14 other sites removed through Amendment 3 to the Greenbelt Plan by reconsidering the outcomes of Amendment 3 to the Greenbelt Plan Area and return the remaining 14 sites to the Greenbelt Plan Area.
3. City Council encourage the Province to commit to align any future legislated reviews of the Greenbelt with the Greenbelt Plan's existing vision and goals, and not examine the potential to replace protected farmland and natural spaces with urban development.
4. City Council request that the City Clerk forward this report to the Ministry of Municipal Affairs and Housing as the City of Toronto's submission to the Province on their Proposal to return land to the Greenbelt and the ERO postings (019-7561 & 019-7562).

## **FINANCIAL IMPACT**

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There are no financial impacts arising from adoption of the recommendations in this report.

## **EQUITY IMPACT STATEMENT**

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This report provides preliminary comments on the Province's proposal to return land in Ajax into the Greenbelt. The report makes recommendations that are intended to improve the livability of the Greater Golden Horseshoe region for all current and future residents.

## **DECISION HISTORY**

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This report responds to the Minister of Municipal Affairs and Housing's September 6, 2023 letter to the City Clerk (Attachment 1) and the associated posting on the Environmental Registry (<https://ero.ontario.ca/notice/019-7561> and <https://ero.ontario.ca/notice/019-7562>). City Council has been engaged over the last 20 years in advocating for the creation and protection for the Oak Ridges Moraine and Greenbelt.

In May 2023, City Council adopted the report PH4.8 City Comments on the Proposed Provincial Planning Statement, including recommendations to the Province on the direction of regional planning in Ontario. In these comments City Council requested the

Province maintain the Growth Plan's prioritization of intensification and redevelopment to accommodate growth, over expanding urban boundaries. A copy of this report was sent to the Premier, Minister of Municipal Affairs and Housing.

<https://www.toronto.ca/legdocs/mmis/2023/ph/bgrd/backgroundfile-236614.pdf>

In November 2022, Council considered report CC1.2 Update on Bill 23, More Homes Built Faster Act, 2022, and Supplementary Report – City Staff Comments on Proposed Bill 23 – More Homes, Built Faster Act, 2022, which highlighted major changes proposed in Bill 23, potential effects on the City of Toronto, and made recommendations for Council adoption and submission to the Province. The Supplementary Report noted the proposed changes outlined in Bill 23 included changes to the boundaries of the Greenbelt Plan. Council adopted a request to the Province to rescind the proposed changes to the Greenbelt to protect environmental features sustaining resides of the Greater Toronto and Hamilton Area. <https://secure.toronto.ca/council/agenda-item.do?item=2023.CC1.2>

In March 2022, Executive Committee considered report EX31.11 on the City's review of the Provincial Housing Affordability Task Force Recommendations. On March 30, 2022, the Province introduced changes to various pieces of legislation to implement recommendations in the Task Force's report. As a result, Executive Committee referred the item to the City Manager and requested a report to Planning and Housing Committee. <https://secure.toronto.ca/council/agenda-item.do?item=2022.EX31.11>

## COMMENTS

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The following comments are in response to the Province's proposal to return lands in the Town of Ajax to the Greenbelt. This proposal has been posted on the Environmental Registry of Ontario (ERO) for comment from September 5 to October 20, 2023 ([ERO 019-7561](#) & [019-7562](#)), and was outlined in a letter received from the Minister of Municipal Affairs and Housing dated September 6, 2023 (Attachment 1). The Minister's letter introduces the proposal found on the Environmental Registry and mentions the ministry's work to prepare a future review of the Greenbelt.

City Planning staff support the Province's proposal, as outlined in the ERO posting, to amend O. Reg 59/05 and the Greenbelt Plan, to return 53 hectares (133 acres) of land in the Town of Ajax to the Greenbelt. Staff also recommend that the Province scope their planned review of the Greenbelt to evaluate the 14 other sites removed through Amendment 3 to the Greenbelt Plan.

### **Support for a Permanent Greenbelt**

For more than two decades, the City of Toronto has supported a regional planning approach that minimizes the environmental and social impacts related to urban sprawl. This support included advocacy related to the creation and maintenance of permanent protection for the Oak Ridges Moraine and Greenbelt. While the lands considered in this proposal are not within the City of Toronto or its watersheds, changes to the regional planning framework can impact municipalities throughout the greater bioregion. A permanent Greenbelt supports the foundation for the long-term ecological integrity of

the region's natural systems. A robust regional natural system supports Toronto's biodiversity and increases our resilience to the impacts of climate change. Consistent Greenbelt policies enable the agri-food sector to make long term agricultural investments and reduce speculation across a land base that includes the most productive agricultural land in the country.

City Council most recently noted their opposition to the Province's initial proposal to remove these and other lands from the Greenbelt, with the following motion on November 24, 2022:

"City Council request the Province of Ontario to rescind the proposed changes to the Greenbelt to protect environmental features that support biodiversity, natural spaces, recreation trails, agricultural land, and watersheds that sustain all residents of the Greater Toronto and Hamilton Area." ([Item CC1.2](#))

City Planning submitted comments that elaborated on this position on December 2, 2022 through the Environmental Registry (ERO 019-6217). These comments outlined staff's opposition to removing 15 areas, making up 2,995 hectares (7,400 acres) from the Greenbelt and Oak Ridges Moraine (Attachment 2). As noted in that submission City Planning does not agree with removing lands from the Greenbelt as a strategy to address the housing crisis within this region. Sufficient lands remain within municipal boundaries to address the anticipated growth.

### **Future Greenbelt Review**

In his September 6, 2023 letter to the City Clerk, the Minister of Municipal Affairs and Housing noted his Ministry is working to prepare a review of the Greenbelt to "ensure that it is appropriately accommodating Ontario's significant growth, as is mandated in provincial legislation".

City Planning does not believe any future review of the Greenbelt should consider the Greenbelt Plan Area's ability to accommodate growth. This premise runs counter to the vision and goals of the Greenbelt, including to: "protect against the loss and fragmentation of the agricultural land base"; and give "permanent protection to the natural heritage and water resource systems that sustain ecological and human health".

Staff believe the Greenbelt Plan Area should remain protected from development and does not need to be examined at this time for its potential to accommodate anticipated growth. The Province's 2022 Housing Task Force reinforced the position that a "shortage of land isn't the cause of the [housing affordability] problem", and that there is enough land within municipal boundaries to achieve the Province's goal of building 1.5 million homes in ten years ([Housing Affordability Task Force Report, 2022](#)). The Task Force supported the ongoing protection of the Greenbelt, environmentally sensitive areas and farmland, noting they "must be protected" ([Housing Affordability Task Force Report, 2022](#)).

The Province is currently reviewing A Place to Grow and the Provincial Policy Statement to form a new provincial planning policy instrument (ERO 019-6813). As the region continues to experience high population growth and a growing housing

affordability crisis, effective regional planning must prioritize infill development and intensification within settlement boundaries. A focus on efficient use of land and resources, achieved through infill and intensification, reduce the financial strain on municipalities related to outward expansion of infrastructure to support growth. Land use planning, infrastructure investment and community services need to be closely aligned to ensure the needs of the region's growing population will be met, while reducing the financial and environmental costs related to urban sprawl.

## **Conclusion**

- Staff support returning 53 hectares (133 acres) in the Town of Ajax back into the Greenbelt Plan Area.
- Staff request that the Province reconsider the outcomes of Amendment 3 to the Greenbelt Plan and return the remaining 14 site to the Greenbelt Plan Area.
- Staff caution that any future reviews of the Greenbelt Plan should align with the visions and goals outlined in that Plan. The Greenbelt Plan's vision is of a "broad band of **permanently** protected land" which protects the agricultural land base, natural heritage and water resources systems, provides a range of economic and social opportunities, and builds resilience to and mitigates climate change. The Greenbelt Plan Area should not be subject to a review examining the potential to replace protected farmland and natural spaces with urban growth.

## **CONTACT**

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## **SIGNATURE**

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Chief Planner and Executive Director  
City Planning Division

## **ATTACHMENTS**

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Attachment 1: Letter from the MMAH to Clerk - re. Proposal to return lands in Ajax to the Greenbelt (dated September 6, 2023)

Attachment 2: City Planning submitted comments - re. Proposed amendments to the Greenbelt Area boundary regulation (ERO 019- 6217)