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## **Stakeholder engagement to inform the 10-Year Coordinated Land Use Plan Review and the future success of Ontario's Greenbelt**

### **Summary of discussion from a virtual engagement session on Communities & Regional Growth**

#### **Introduction**

On Thursday May 1, 2025, the Greenbelt Foundation hosted an engagement session to continue discussions on identifying policies for communities and regional growth related to the Greenbelt. The purpose of this session was to revisit what we heard during an in-person roundtable discussion held in November 2024, to refine key ideas, and discuss specific policy, implementation, or administrative changes in the Greenbelt Plans that would retain systems protection while continuing to support growth and complete communities.

The session is part of a series of issue-specific stakeholder engagements held by the Foundation between November 2024 and June 2025 to inform our priorities for the upcoming 10-Year Coordinated Land Use Plan Review and long-term success of the Greenbelt, ensuring it remains effective and resilient for years to come and contributes to the sustainability of Ontario.

In addition to stakeholder engagement, the Foundation is also undertaking other activities in preparation for the Review including research and mapping projects to provide insights into emerging trends and pressures and support evidence-based decision-making. This includes our recently released [Rural Housing Report](#), and the development of a map and data table showing urban growth in the Greater Toronto and Hamilton Area.

#### **Overview of Discussions**

The previous engagement session on Communities and Regional Growth explored issues related to development pressures and infrastructure, changes to provincial planning, the need for resilience to climate change and disasters, and the importance of quantifying the true cost of growth and the value of the Greenbelt. In addition, participants proposed specific policy recommendations that would improve the effectiveness of the Plans (Appendix I). Select topics requiring further discussion were carried forward to the recent virtual engagement session. The memo summarizing the previous roundtable session can be found [here](#).

The recent virtual engagement session focused on the following policy topics:

- 1) Settlement area boundary expansions
- 2) Infrastructure policies
- 3) Alignment with other plans

A total of 16 people participated in the engagement session (Appendix II). The discussion was grounded within the context of gaps created in Greenbelt protection through the repeal of the

Growth Plan for the Greater Golden Horseshoe, and the introduction of the 2024 Provincial Planning Statement (PPS).

Participants discussed opportunities to address these gaps through an amendment to the Greenbelt Plan that would embed the former direction (i.e., Amendment 4). The group also discussed the need for growth management policies that improve municipal collaboration and regional coordination to support housing objectives without undermining Greenbelt protections.

Participants emphasized that housing affordability is strongly linked to intensification and must drive decisions. Housing and environmental protection were recognized as complementary goals and the fiscal and climate risks of unmanaged growth need to be clearly identified.

It will be important to address risks and tensions arising from uncertainty in Ontario's current planning regime, which underscores the need to restore policy direction that promotes stability and coordination across the GGH region. Accommodating growth within existing urbanized areas, and on lands already set aside for development, is both possible and essential.

### **Policy Issue #1 – Settlement Area Boundary Expansions (SABE)**

Participants held a general understanding that sufficient land is already available to meet Ontario's housing supply needs. Strong support was expressed for the permanent protection of the Greenbelt and its boundaries, emphasizing that this certainty is critical to encourage investments in agricultural and support intensification and high-density development in rural communities and adjacent urban areas.

A broad discussion on Greenbelt settlement area boundary expansion (SABE) policies was results-oriented, with participants supporting clear, enforceable policy objectives. There was strong support for more detailed assessments of affordable housing solutions in rural communities that reflect appropriate housing types and tenures and reflect the needs of the local workforce.

Participants stressed the connection between density and housing affordability and the need to prioritize growth within existing service areas through intensification, rather than expanding into areas reliant on septic systems.

Participants also discussed the need to limit SABE decisions to the 10-year Review process with rigorous criteria and land quality assessments to ensure the continued protection of prime agricultural lands and the integration of ecological services into land use planning. Fiscal impacts must also be considered to manage the cost of growth.

The discussion emphasized:

- Changes to the Greenbelt boundary should be explicitly out of scope during the Review, with the sole exception of boundary additions that enhance the Greenbelt and connectivity.
- Stabilizing SABEs in Greenbelt towns and villages to the 10-Year Review process and applying rigorous criteria to support intensification and protect valuable lands. Consideration should be given to available municipal servicing vs expanding the use of communal septic systems in the Greenbelt.

- Increasing the protection of the Greenbelt’s agricultural and natural systems by:
  - Improving the mapping of prime agricultural lands (PAL) and avoiding SABEs onto these areas
  - Requiring Agriculture Impact Assessments (AIA) to minimize impacts on PALs
  - Valuing ecological services and avoiding loss and downstream impacts
- Housing Needs Assessments must consider housing tenure and type as it relates to local affordability needs in Greenbelt rural communities. Assessments should also prioritize housing needs that support local agricultural economies important to rural communities.
- Provincial reinforcement of the role of the Greenbelt in directing growth and supporting the development of complete communities within existing settlement areas, including housing and zoning policies should actively support mid-rise buildings and facilitate gentle density.
- Integrating Ontario’s updated population projections into housing targets to ensure accuracy and alignment with regional growth planning.
- Including scenario planning and full cost accounting in growth plans, including the financial savings associated with ecosystem services or their replacement costs.

## Discussion Highlights

### *Responding to Housing Needs*

Participants highlighted the shift to a permissive planning framework for housing in Ontario and underlined the need for the Province to clearly communicate the Greenbelt’s role in protecting significant agricultural, water and natural systems that enable growth, directing development to existing settlement areas and supporting the creation of complete, well-serviced communities.

Discussions identified key opportunities to strengthen this direction by prioritizing growth in areas with existing and available servicing or where infrastructure investments are strategic, efficient, and avoid generating additional growth pressures in agricultural or rural areas. Expansion requests should be prohibited between the statutory 10-Year Review process. Moreover, any potential expansions must avoid PALs (according to the Canada Land Inventory Soil Classification) and valuable ecosystem services.

### *The Need for Data and Evidence*

With strong mayor powers, uncertainty following the repeal of the Growth Plan and the absence of a requirement for a Municipal Comprehensive Review (MCR) process, SABEs should not be arbitrary but based on demonstrated need. This should include future projections of housing needs to meet affordability based on local assessments of housing type and tenure, labour needs of the local economy and other criteria. The cost of growth also needs to be considered, whereas currently, some proposals are put forward and approved without a business case, or full cost accounting. The value of ecosystem services (e.g., flood mitigation) and the cost of their loss (e.g., insurance claims, infrastructure upgrades) should be presented and considered in land use decisions.

## Resources/ Follow Up

- [FCM Making Canada’s Growth a Success](#)
- [Environmental Defence Mid Rise Manual](#)

- [School of Cities Missing Middle Resources](#)
- Greenbelt Foundation Urban Growth Map
- Research updated regional [Ministry of Finance population projections](#)

## **Policy Issue #2 – Infrastructure Policies**

With the loss of the Growth Plan, participants expressed concern that development and infrastructure decisions will likely not fully account for watershed capacity limits and groundwater resources, leading to environmental degradation and climate risks. Participants supported maintaining policies that promote watershed-scale informed planning and cross-jurisdiction collaboration and serve housing, Greenbelt protection and climate risks goals.

Growth Plan policy related to Great Lakes servicing further supports these goals and sustainable fiscal management by supporting density within existing communities. Uncertainty about the future of development charges, infrastructure funding and decision-making responsibilities could have implications for urban growth boundaries and the location of infrastructure projects in the Greenbelt. Participants noted:

- Watershed-scale planning and resource management provide a stronger foundation for guiding development and infrastructure decisions. This approach supports an ecosystem-scale perspective, improves cross-jurisdictional collaboration, and advances sustainable growth and the protection of ecosystem services and farmland.
- Maintaining the Great Lakes water and wastewater servicing policy from the former Growth Plan supports affordable housing goals by promoting density and cost-efficient infrastructure.
- Aligning transportation infrastructure decisions with land use goals support intensification and avoids fragmentation of Greenbelt systems.

## **Discussion Highlights**

### ***The Need for New Funding Models***

Participants raised concerns that municipalities may need to increase taxes on existing residents to fund the infrastructure for new development. This approach will likely be politically unpopular and risks eroding public support for continued growth. The resulting fiscal strain creates tension between the Province’s housing directives and municipal responsibilities, often placing the two at odds with each other. Increased provincial and federal funding for infrastructure is needed, along with guidance and policies to ensure growth is fiscally responsible and addresses local needs.

### ***The Value of Natural Assets***

Infrastructure policies in the Greenbelt should reflect Ontario’s requirement to include natural infrastructure in their asset management plans (O.Reg 588/17). The Province can enhance existing guidance documents to help municipalities invest in natural infrastructure – wetlands, forests, river valleys, and deliver critical ecosystem services, reduce infrastructure costs, and enhance community sustainability and resilience. As part of these efforts, participants emphasized the need for municipalities to formally recognize the fiscal and climate risks of different growth scenarios, including opportunities for enhancement of natural assets or loss of existing services. Growth that

disregards natural systems can impose significant long-term costs on municipalities and potentially impede growth.

Decisions that protect and integrate natural assets also safeguard people, property, and public infrastructure from climate-related hazards such as flooding, erosion, and extreme heat. Embedding natural assets into infrastructure policy is essential for building adaptive, fiscally responsible, and resilient communities.

### Resources/ Follow Up

- Intact Centre on Climate Adaptation resources:
  - [Getting Nature into Financial Reporting: Natural Asset Disclosures for Local Governments](#)
  - [Natural Infrastructure: The Win Win Win approach to reducing flooding and erosion](#)
  - [Climate Ready Infographics for Nature](#)
  - [Integrating Climate Risk Infographic](#)
- Greenbelt Foundation [Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital](#)

### Policy Issue #3 – Alignment with Other Plans

Participants agreed that the Review must address alignment with other regional and provincial plans to support planning stability for the Greenbelt and avoid siloed or ad-hoc decisions. Beyond the Review and the Greenbelt, there is a broader need to align housing priorities with other key provincial objectives, including protecting employment lands, supporting transit-oriented planning, and promoting natural heritage connectivity.

The discussion emphasized that:

- Coordinating the mapping of regional natural heritage and agricultural systems to maintain connectivity with the Greenbelt and support food production, healthy ecosystems and climate resilience for communities in the GGH.
- The critical need to plan for economic growth and jobs by continuing to identify and protect employment lands, including lands for Ontario's significant industrial and logistical sectors such as food processing.
- Prioritizing growth in existing built-up areas to support affordability and infrastructure investments in creating transit-oriented communities.

### Discussion Highlights

#### *The Need for Stability and Certainty*

The repeal of the Growth Plan and MRC process have created uncertainty over land use decisions in the Greenbelt. Embedding key Growth Plan policies into the Greenbelt plans will help restore stability, future-proof protections, and re-establish provincial oversight of regional growth. This is important to rebuild public trust and confidence in the future of the Greenbelt and investments in related economies and jobs such as agriculture.

### ***Key Areas in Need of Alignment***

Improved alignment of provincial plans can reinforce the link between housing affordability, intensification and transit-oriented communities and enable the province to more clearly articulate policy priorities and infrastructure investments. Provincial leadership is needed on securing and protecting employment lands to ensure a balance with housing and protect Ontario's economy. Greenbelt policies protecting agricultural and natural systems should influence planning in adjacent communities to support consistency in implementation and realization of the Greenbelt objectives for supporting sustainability growth in the region.

### ***The Need for Provincial Leadership***

The Province should facilitate plan alignment to ensure that PPS policies support the Greenbelt Plan. The PPS should clearly state that Greenbelt policies take precedence, unless otherwise noted. Plan interpretation and implementation should be facilitated through training and resources for municipal planning staff, such as an OPPI guidance document. The Province should create mechanisms that promote coordination (e.g., multi-stakeholder working groups, a regular summit to coordinate planning for GGH) and provide assurances that changes to the plans will only be made through the 10-year Review.

### **Resources/ Follow Up:**

- Find or create maps of GB ecological corridors in need of protection

### **Next steps**

The Foundation would like to extend our appreciation for participants' time in attending the virtual engagement session and sharing your views and experiences. If you have more information or feedback for us, please contact us by July 17, 2025.

The Foundation has completed a total of ten issue-specific discussions on the upcoming 10-year Review with a broad group of stakeholders across the region. We are currently developing a comprehensive summary of key policy positions and recommendations. The summary will include input from roundtables held in November 2024 and the virtual sessions held this spring. Memos from both sessions will be available [here](#).

We look forward to continuing to engage with you to confirm alignment, agreement and support with our key areas of focus for the upcoming Review.

## Appendix I. List of policy recommendations discussed at the November 2024 roundtable.

Participants agreed that the Greenbelt effectively supports a strong rural economy and sustains the character of the countryside while promoting complete, low-carbon communities that enhance human health, social well-being, and environmental sustainability. To enhance the effectiveness of the Plans and address emerging challenges, several key recommendations were proposed, including:

- Refine Greenbelt Plans by assessing opportunities to develop shared rules and definitions to improve coordination and management while preserving the unique intent of each plan, ensuring streamlined decision-making doesn't weaken critical protections.
- Reinforce alignment of Greenbelt plans with other provincial plans (e.g., Metrolinx, Growth Plan and Provincial Planning Statement, and watershed-specific plans like the Lake Simcoe Protection Plan) to ensure consistency.
- Identify opportunities to accommodate growth while maintaining the overarching objectives of the Greenbelt Plans.
- Strengthen protections for water systems by leveraging existing source water protection legislation and developing policy frameworks to address water quality issues, such as road salt contamination and stormwater management, which are inadequately addressed in current updates prioritizing quantity.
- Incorporate climate projections for Southern Ontario, including map(s) showing the increase in temperatures (number of very hot days over 30°C, and warmest maximum temperature) by mid-century.
- Incorporate hazard management policies to address risks associated with changes to the Conservation Authorities Act.
- Expand the Greenbelt to include additional high-value lands near development pressures to enhance its role in managing growth and protecting natural resources.
- Enhance performance monitoring by developing and implementing consistent evaluation frameworks across all Greenbelt Plan areas to evaluate policy effectiveness and track progress on key objectives.
- Develop guidance documents to clarify and align policies, ensuring easier implementation and greater clarity among plan users.
- Address gaps in tools and capacity to evaluate cumulative impacts of development on natural systems, including large homes on prime agricultural lands, groundwater extraction, and infrastructure projects.
- Scale ecosystem compensation protocols (e.g., TRCA's framework) to formalize them within Provincial Plans and Environmental Assessment commitments, such as 400-series highways.

**Appendix II. List of participating organizations in the Communities and Regional Growth virtual engagement session.**

- Niagara Escarpment Commission
- Ontario Federation of Agriculture
- Toronto Region Conservation Authority
- Ontario Professional Planners Institute
- Intact Centre for Climate Adaption
- York University
- Invasive Species Centre
- Environmental Defence
- Toronto Region Board of Trade
- Ontario Chamber of Commerce
- Ontario Home Builders Association
- Urban Land Institute
- Municipal and regional representatives from Durham, Niagara, and Hamilton