

GREENBELT FOUNDATION

Response to ERO # 019-6177

A Place to Grow, a Plan to Grow



Possibility grows here.

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www.greenbelt.ca

Response to ERO Posting # 019-6177

Review of a Place to Grow and the Provincial Policy Statement Ministry of Municipal Affairs and Housing

A Place to Grow, a Plan to Grow

The Ministry of Municipal Affairs and Housing is seeking input on how to create a streamlined province-wide policy framework that enables municipalities to approve housing faster and increase housing supply by integrating A Place to Grow (Growth Plan) with the Provincial Policy Statement (PPS).

In addition to this submission, we would also like to highlight our support for recommendations being made in a joint submission from us and the Ontario Federation of Agriculture, the Christian Farmers Federation of Ontario, the National Farmers Union - Ontario, Ontario Farmland Trust and Sustain Ontario, which contains additional agriculture-specific recommendations.

The Greenbelt Foundation strongly supports the Government's goal of improving housing supply and attainability. However, population growth and housing supply in the Greater Golden Horseshoe (GGH) is best accommodated by area-specific planning that makes efficient use of land to protect the natural and agricultural assets that make the region successful, sustainable and liveable.

It must also be done in a manner that leverages immense municipal infrastructure investments and reflects the rising risks of climate change. Finally, growth must be managed in a way that reflects the importance of alignment with employment zones, particularly commercial and industrial needs as well as management of southern Ontario's competitive advantages in an increasingly challenging global context.

The GGH is crucially important to Ontario's growth management, as it generates as much as 25% of Canadian GDP and is projected to be home to 70 per cent of the province's residents by 2046. With interconnected economic, environmental, cultural, and social systems, housing must be planned with this in mind to maintain the high quality of life Ontarians expect, along with efficient transportation systems and financial sustainability. This has been the Growth Plan's strength, as it helped to curb inefficient growth patterns and the tremendous problems they were causing for agriculture, the environment, and the economy.

The Growth Plan has demonstrated success as a tool of directing growth appropriately and providing important provincial guidance to municipalities – with a focus on larger, long-term provincial interests. It has also been subject to multiple significant revisions by the provincial government including in 2017, 2019 and 2020. It is now time to stop successive, rapid changes and allow previous ones to be incorporated and put into good effect.

The Growth Plan also complements the Greenbelt Plan, Niagara Escarpment Plan, and Oak Ridges Moraine Conservation Plan to support complete communities, connectivity of agricultural and natural systems across the region, protect rural communities, and fiscally manage growth.

The PPS provides a good policy context that allows municipalities the flexibility to create stronger policies and includes Indigenous-centric policies that benefit the GGH. But as Ontario grows, we will need more of the aspirational policies and guidance that the Greenbelt and Growth Plan provide, not less. They are critical, as we work to address Ontario's housing needs, to avoid unintended consequences that actually increase housing costs and decrease functional land availability over time.

For these reasons and other that follow, the Greenbelt Foundation has very serious concerns with the proposal to integrate the PPS and Growth Plan. We strongly recommend against elimination of a regional approach to GGH growth management and urge the Province of Ontario ensure that any potential future changes retain critical aspects of the Growth Plan.

General Comments

- **The Greenbelt Foundation supports a regional planning framework** that addresses the unique circumstances of the GGH in Ontario. Within this planning framework, the province can increase the speed and diversity of housing construction and meet provincial targets. The Growth Plan, Greenbelt Plan, and related plans are designed to *support* growth in a range of housing types, not stifle it. The intensification and density targets do this work in a fiscally responsible way while maintaining quality of life. By accommodating growth in ways that make use of existing infrastructure and resources, our province can meet its growth targets while maintaining the natural, agriculture, and water systems that make it an attractive region for investment.

- **Because of its unique geography around the Great Lakes, the rapidly growing Greater Golden Horseshoe requires specific planning policies.** With expected growth of 5 million people by 2051, and a government commitment to building 1.5 million homes across the province in ten years, it is more important than ever to support the good work of municipalities in finding planning solutions that will allow us to grow long into the future. The requirement for official plans to “conform” to the Growth Plan is central to its effectiveness.
- **Accommodating growth requires not only housing, but space for people and communities to thrive.** People and businesses already flock to the GGH, as evidenced by the growth projections. They do that because something here is working. The current plans, including the Growth Plan and Greenbelt Plan have helped attract that growth with their focus on providing greenspace, agriculture, recreation, and clean air and water. The balance achieved by the Growth Plan and Greenbelt Plan is fundamental to the region’s success. The Growth Plan needs the Greenbelt Plan’s rural communities, jobs, economies, food, and nature, and the Greenbelt Plan need the Growth Plan’s complete communities and connectivity with the agricultural and natural systems.
- **The Growth Plan fixed a problem that should not be reintroduced.** Before the introduction of the Growth Plan, 100+ municipalities in the region were all doing their own population forecasting resulting in a situation where the sum of these municipal forecasts greatly exceeded any reasonable cumulative forecast for the region. The result was not only a loss of farmland and natural areas, but also municipalities budgeting for capital works and adopting development charge frameworks that, led to a host of significant fiscal pressures that persist to this day. Given the recent changes that reduce the role of upper-tier municipalities in planning, the Growth Plan is needed more than ever.

Consolidated Recommendations

1. Maintain the Growth Plan as a provincial plan. At minimum, the Province should ensure that a regional approach to growth management and the many important system components and directional goals contained in the Growth Plan are retained.
2. Maintain the Places to Grow Act and the “conform to” standard of decision making for a legislatively enabled Growth Plan.

3. Maintain the Population/Employment Forecasts and Allocations, Intensification Targets and Density Targets in a Growth Plan.
4. Maintain the Place to Grow policies and schedules for the Natural Heritage, Water Resource and Agricultural Systems within a Growth Plan.
5. Maintain the policy framework for Key Natural and Hydrologic Features within a Growth Plan.
6. Maintain the watershed planning policies and requirements in the Growth Plan.
7. Maintain the policy framework for rural housing in a Growth Plan.
8. Maintain PPS policies that limit lot creation on agricultural land and Growth Plan policies that require Agricultural Impact Assessments for initiatives such as settlement area boundary expansions, mineral aggregate operations, and infrastructure corridors.
9. Move the Greenbelt Settlement policies in the Growth Plan back into the Greenbelt Plan.
10. Recognizing the intent to streamline planning and approval processes for municipalities, the Province should consider providing additional supports for municipalities to undertake the important work that the Growth Plan and related plans direct, rather than integrating them.
11. If the Province proceeds with an integrated PPS and Growth Plan, the above policies **at minimum** should be maintained for the GGH in the new policy.

Further Discussion

Ontario's Greenbelt is the cornerstone of Ontario's long-term strategy for the Greater Golden Horseshoe. The Growth Plan and the Greenbelt Plan are a globally recognized, award winning growth management initiative. The Plans were developed in conjunction with each other and work in an integrated fashion to provide an economically and environmentally sustainable planning framework for the region - in concert with the Regional Transportation Plan, the Lake Simcoe Protection Plan and Source Water Protection Plans as well as the Niagara Escarpment Plan and the Oak Ridges Moraine Conservation Plan.

In short, the Greenbelt provides the environmental, agricultural and water resources framework around which major urbanization is to occur. The Growth Plan then sets out the vision for Where and How to Grow – including Protecting What is Valuable for the eighty percent of the region beyond the Greenbelt. It does so by directing increasing amounts of growth to the built-up portions of our communities and creating denser urban patterns where we continue to build on greenfields – to optimize the use of existing and reduce the need for new infrastructure and to create complete communities which can support public transit. These policies are to lessen the outward expansion of the urban footprint to reduce the loss and degradation of farmland, natural areas, and water resources – while minimizing greenhouse gas emissions. They are supported by explicit policies and maps for Agricultural, Water Resource and Natural Heritage Systems.

This provincial planning framework is widely accepted and has proven to be an effective approach to providing the overarching approach for coordinating growth amongst 115 individual municipalities in one of the largest (over 9 million people in 2021) and fastest growing city-regions in North America. Forecast to grow by almost 5 million people over the next 30 years, a strong and visionary provincial planning framework is more instrumental than ever in ensuring cost and land efficient growth patterns and infrastructure as controlling conversion of the landscape to urbanization is the fundamental pathway to the protection of farmland, natural features/areas and our world-renowned water resources centered on the Great Lakes.

The Growth Plan is therefore critical and integral to the Greenbelt and vice versa. This region is not like other parts of Ontario and should not be woven into a province wide policy document. It needs and warrants its own specific growth management framework as that provides the most strategic long-term economic plan.

Standard of Decision Making – “Conformity” vs. “Consistency”

Given the specificity of the Growth Plan – in terms of both its geography and its key policies – the Places to Grow Act and the Planning Act establish a standard of “conformity” – that is, all decisions must conform with the Growth Plan. This is clearly higher than the standard of “consistency” the Planning Act establishes for the Provincial Policy Statement (PPS) - as the courts have recognized.

Explicit Policies

While the Growth Plan has many important and effective policies, there are a series of very explicit and/or geographic specific policies, definitions, maps, and requirements that provide the detailed and fundamental policy framework for the region. Accordingly, while there may be opportunities to merge some of the Growth Plan’s more general policies

into the PPS – a number of which mirror or closely resemble PPS policies – the explicit policy matters discussed below need to be maintained in the Growth Plan.

Where and How to Grow

The most explicit and important elements of the Growth Plan that deal with managing the quantitative and spatial dimensions of urban growth are found in the population / employment forecasts and allocation (Schedule 3), the intensification target and the density target policy frameworks. These policies are meant to encourage and allow municipalities to accommodate projected growth.

Population/Employment Forecasts and Allocations

The population/employment forecasts are essential to ensuring that growth is directed to those municipalities which have the greatest ability to accommodate growth by virtue of, first and foremost, existing infrastructure – and secondly by planned infrastructure – and in particular the Regional Transportation Plan. Secondly, they ensure growth is directed to those watersheds which can sustainably provide for water and sewage disposal – particularly for those relying on groundwater and inland rivers and lakes for effluent discharge. Third, they allow growth to be directed to where it will have the least impact on farmland and agricultural production. Fourth, they ensure that municipalities don't over subscribe for growth.

The forecasting/allocation policy framework was originally developed to address the situation where the 100+ municipalities in the region were all doing their own population forecasting resulting in a situation where the sum of these municipal forecasts greatly exceeded any reasonable overall Golden Horseshoe forecast. This led to the unnecessary conversion of farmland and natural areas while also leading to the municipalities budgeting for capital works and adopting development charge frameworks that, for many, were divorced from reality as there was never enough growth to enable all these forecasts to be realized. This led to a host of significant fiscal issues.

Intensification Targets

The intensification targets are instrumental in directing increasing amounts of growth to currently built-up areas. The benefits include reduced need for conversion of farmland and natural areas, lower energy consumption and GHG emissions, greater transit ridership, and a healthier population through more walkable communities. It also enables reuse of vast tracts of underutilized land which make more efficient use of existing infrastructure and community facilities while also providing massive economic opportunities in both the construction of these communities and vast new local business opportunities created by an increased population base.

Density Targets

The density targets are equally important for where greenfield land is still being developed, the targets will ensure it is used more efficiently. Again, this will result in less needed infrastructure, more revenue per hectare to pay for it over its lifecycle, lower GHG emissions, higher potential for transit and less conversion of natural areas and farmland. The density targets for urban growth centers and major transit station areas do all of the above as well while all of these Growth Plan elements are critical to reducing the economic costs arising from the increase in chronic diseases linked to car dependent development patterns and lost productivity from traffic congestion.

Protecting What is Valuable

During the Coordinated Review of the Growth Plan and Greenbelt Plan, the data, evidence and submissions from many sectors led to strong recommendations to move forward with and enhance the 2006 Growth Plan policies for Protecting What is Valuable. The driving force of these enhancements was the recognition that the Greenbelt - and the agricultural, natural and water resources systems within it - was not and could not be treated as an island and that its systems were directly and integrally linked, connected and supportive of the agricultural, natural and water resource systems within the broader region. This led to major new, more explicit and/or significantly strengthened policies in the Growth Plan, 2017 which remain in the Growth Plan, 2020.

Natural Heritage System

Today, the Growth Plan provides a significantly strengthened and more detailed set of policies together with a schedule of a Natural Heritage System (NHS) for the Greater Golden Horseshoe. This system was designed specifically to connect to the Natural Heritage System within the Greenbelt. There is seamless connectivity of the Greenbelt and Growth Plan Natural Heritage Systems at Greenbelt boundary just as there are at the boundaries of the Greenbelt Protected Countryside and the Oak Ridges Moraine and Niagara Escarpment Natural Heritage Systems. The design builds on decades of field work by provincial ministries and conservation authorities. These Natural Heritage Systems contain the vast majority of the most significant natural features (wetlands, woodlands, valleylands) on the landscape and provide the connectivity to allow the perpetual movement of flora and fauna – including the species most at risk - which is fundamental to biodiversity – especially in a changing climate where species are migrating in response to shifting climatic conditions.

Southern Ontario has lost 72% of its wetlands – including 8,600 acres of large wetlands (10ha or greater) every year between 1982-2002, 15,195 acres between 2001-2011 and

18,000+ acres between 2011-2015 – revealing a much higher rate of loss.¹ Conservation Authority Report Cards have rated Woodlands in the urbanizing portions of the region as Very Poor or Poor². These losses are highest and conditions worse in the urbanizing portions of the Golden Horseshoe not protected by the Greenbelt Plan. Natural capital or ecological goods and services are estimated at \$2.8 billion annually in the Greenbelt and \$84 billion annually in southern Ontario³. Clearly, the protections the Growth Plan provides are essential to stemming the loss and degradation of the natural environment while optimizing the economic benefits nature provides.

Water Resource System

The Growth Plan also now contains a Water Resource System (wetlands, watercourses, seeps/springs, inland lakes, groundwater recharge areas and highly vulnerable aquifers) which in turn are the lifeblood of the globally significant Great Lakes – Ontario’s most valuable resource and economic advantage. The elements of the Growth Plan Water Resource System are inextricably linked to the Greenbelt as the Oak Ridges Moraine is home to the aquifers and headwaters that feed the majority of rivers flowing south to Lake Ontario and north to Georgian Bay and the Kawartha Lakes. Similarly, the Niagara Escarpment is the major recharge and headwaters of the region’s rivers running south to Lake Erie.

Given the rate and amount of growth, it is not surprising that Conservation Authority Report Cards have documented that surface waters in urbanized portions of GGH are rated as being in “Very Poor” or “Poor” shape, while watershed plans reveal assimilative capacity of inland rivers/lakes to receive sewage are virtually maxed out and modelling predicting water quality is expected to worsen with increased growth in the Lake Simcoe Watershed.⁴ Maintenance of the Growth Plan Water Resource System is critical to sustainable management of the regions water resources.

The Water Resources of the Golden Horseshoe require the protections of the Growth Plan and Greenbelt in combination.

¹ Ontario Biodiversity Council. (August 25, 2022). State of Ontario’s Biodiversity. Extent of Wetland Cover and Wetland Loss. Retrieved from <https://sobr.ca/indicator/loss-of-wetlands/>

² Conservation Ontario. (2022). Conservation Authorities monitor the health of natural resources in their watershed. Retrieved from <https://conservationontario.ca/policy-priorities/science-and-information-management/watershed-reporting>

³ Clean Air Partnership, Clean Air Council. (October 2014). Natural Capital and Why It Matters. Retrieved from <https://www.cleanairpartnership.org/wp-content/uploads/2016/06/Natural-Capital-and-Why-it-Matters2.pdf>, pp. 17

⁴ Conservation Ontario. (2022). Conservation Authorities monitor the health of natural resources in their watershed. Retrieved from <https://conservationontario.ca/policy-priorities/science-and-information-management/watershed-reporting>

Agricultural System

Ontario has some of the best farmland in Canada including 50% of Class 1 soils. Yet it is undergoing continued annual loss with the 2021 Census of Agriculture revealing Ontario is losing an average of 319 acres per day – primarily to urbanization and its attendant infrastructure.⁵ This is concentrated in the Golden Horseshoe given its massive urban growth as evidenced in the region’s loss of 485,134 acres of total farm area from 2006 to 2021.⁶ This has a substantial economic impact on Ontario’s agri-food sector which contributes \$4.1 billion in GDP and supports close to 59,000 jobs as of 2020.⁷

For these reasons, the Growth Plan now includes detailed policies together with a schedule of an Agricultural System for the Greater Golden Horseshoe. This complements the Greenbelt in major ways as the region’s agricultural systems do not stop at the Greenbelt’s boundaries but rather are contiguous to the boundary and emanate outward to the exterior boundaries of the region as a whole. Agriculture needs to be considered in this sub-provincial spatial context both from a farmland perspective as well as the supportive agri-food network (e.g., regional infrastructure and transportation systems, processing, services, distribution facilities etc.).

The Agricultural System also plays a crucial role in the Water Resource System – providing much of the groundwater recharge function that supports the vast series of aquifers which, together with the network of intermittent streams across virtually all agricultural land, feed the regions water courses – while also replenishing moisture in farm fields. The Agricultural System also contains countless natural features not within the NHS but which play a vital role in the overall ecological health and biodiversity of the region.

Agriculture therefore needs to be subject of management policies and mapping at the Golden Horseshoe scale because of the rate and size of growth. This will support, build on and augment the agricultural protections in the Greenbelt which in turn will make agriculture more viable throughout the region and continue to support the broader agri-food sector as a key economic driver. It is therefore imperative that the Growth Plan Agricultural System be maintained within a statutory provincial plan with a conform to standard.

⁵ Ontario Federation of Agriculture. (June 10, 2022). Ontario Farmland Under Intense Pressure. Retrieved from <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure/>

⁶ Statistics Canada. (2021). [Census of Agriculture](#).

⁷ SUMMIT72 Advisory Services. (2021). Understanding How Greenbelt Agriculture Feeds the Regional Economy. Retrieved from https://www.greenbelt.ca/gb_agriculture_economic_impact

The PPS and Greenbelt Plan provide for limited lot creation in a prime agricultural area in order to prevent loss of productivity and degradation of the agricultural system. Current planning regulations allow farmers flexibility to construct second homes and annexes to properties within existing lots. This approach preserves land parcels of a size appropriate to farming operations, prevents continued fragmentation of the agricultural system and allows owners to construct new buildings to provide accommodation for family members, and should be maintained in the PPS.

Across the GGH, the nature of the rural countryside is changing through the encroachment of settlement areas, the influx of non-farm rural residents, and the expansion of farming into larger, more intensified operations. These changes are generating more opportunities for conflict between farmers and non-farmers, both in the open countryside and at the urban-rural fringe.

A sustainable approach to this matter is a policy framework that prevents conflict from arising in the first place. In the case of livestock farming, existing minimum distance standards (MDS) take this approach—regulations set out formulae to prevent encroachment on livestock farms by neighbouring uses, providing sufficient separation between the two. The existing MDS polices of the PPS should be maintained to protect the viability of farming in the GGH.⁸

The Agricultural, Natural Heritage and Water Resource Systems of the Growth Plan are inextricably linked and interdependent with one another and with their counterpart systems within the Greenbelt and are therefore critical to the ecological integrity and agricultural viability of the Golden Horseshoe.

Key Natural and Hydrologic Features

Features such as woodlands, valleylands, wetlands, watercourses, recharge and discharge areas and lakes are the building blocks of natural heritage and water resource systems and provide the most important habitat for all species and particularly endangered and threatened species. Habitat loss and fragmentation – primarily due to urbanization - threaten close to 90% of species at risk in Ontario – including 97% of Greenbelt species at risk.⁹ Protecting these individual features within region-wide natural heritage and water

⁸ Ontario Federation of Agriculture, Environmental Defence. (2015). Farmland at risk: Why land-use planning needs improvements for a healthy agricultural future in the Greater Golden Horseshoe. Greenbelt Foundation. Retrieved from https://www.greenbelt.ca/farmland_at_risk, pp. 48

⁹ David Suzuki Foundation and Ontario Nature. (November 2011). Biodiversity in Ontario's Greenbelt. Greenbelt Foundation. Retrieved from https://d3n8a8pro7vhmx.cloudfront.net/greenbelt/pages/14658/attachments/original/1615495165/Biodiversity_in_Ontario's_Greenbelt.pdf?1615495165

resource systems is fundamental to the ecological integrity of the environment as well as Ontario's biodiversity.

For this reason, the Growth Plan now prohibits development, outside settlement areas, in *key natural features* within the Natural Heritage System and *key hydrologic features* anywhere in the region. These policies are augmented by policies regulating use on land adjacent to such features. Collectively, the Growth Plan now extends the natural and hydrologic features protection framework found in the Greenbelt Plan to the entirety of the Golden Horseshoe.

This again reflects a seamless, region-wide approach to environmental management which is fundamental to the ecological integrity of the Greenbelt and the region as a whole.

Watershed Planning

Land use and resource management needs to occur on a watershed/subwatershed basis as they form the most logical spatial framework for managing how to accommodate urban growth while ensuring the ecological functions are maintained. This is because they follow natural as opposed to anthropogenic boundaries. Watershed planning has a long and rich history through the work of Conservation Authorities and is supported by numerous provincial technical guidance documents and standards. It is for this reason that both the Growth Plan and Greenbelt Plan contain policies requiring watershed planning as a prerequisite to urban growth and associated sewage and water infrastructure. The watershed planning policies of the Growth Plan need to be maintained as many of the watersheds/subwatersheds found within the Greenbelt extend to the landscape beyond it. Otherwise, this would lead to a fragmented and incremental analysis and management approaches and undermine the ability to ensure the ecological integrity of the water resource and natural systems within the regions watersheds.

Rural Housing

Rural communities have their own unique needs and should not become "bedroom communities" for employment areas in urban centres. Protecting our existing agri-food economy and realizing opportunities in the agri-food and tourism sectors are dependent on providing affordable housing options for people working locally. A recent report by the Greenbelt Foundation finds that "The lack of affordable housing makes it difficult to attract and retain employees with lower incomes working in manufacturing, retail, and service industries that support tourism. This has created situations in some municipalities where local jobs are unfilled, or where the majority of local workers commute to the

municipality because they cannot afford to live there while those who live in the municipality commute outside of it for higher paying jobs.”¹⁰

However, rural housing (outside of towns and villages with full municipal services) can be an inefficient use of land given the need for large lots to accommodate septic systems and private wells. It is entirely car dependent given the lack of transit in rural areas and requires significant commuting because of the lack of employment opportunities, services, community facilities and shopping venues. For these reasons, both the Growth Plan and Greenbelt Plan restrict growth in un-serviced hamlets, prohibit estate residential subdivisions and, in the Greenbelt, limit the growth of fully serviced towns and villages.

Policies on settlement area boundary expansions that limit growth within the Greenbelt are found within the Growth Plan. If the Growth Plan is merged with the PPS, these policies need to be moved back into the Greenbelt Plan. Rural housing has also been proven to significantly restrict various forms of new and/or expanded agricultural operations – particularly livestock – with the inefficient lot sizing unnecessarily removing agricultural land while the car dependency creates conflicts with agricultural equipment movements.

The Ministry is contemplating allowing increased rural housing. Ontario is very large, and southern Ontario and the Golden Horseshoe make up extremely small portions of the province and yet are disproportionately home to the vast majority of the population. The landscape of the region is finite and fragile. Rural housing will not be advantageous in achieving the housing needs of the region such that the negative impacts associated with it far outweigh any arguments to loosen rules around or promote it.

Municipal Infrastructure Deficits

The spatial pattern of growth is directly connected to the fiscal sustainability of infrastructure. Numerous studies have shown that low density development – be it residential, commercial or industrial – simply does not pay for itself over the lifecycle of that infrastructure (capital, operation, maintenance and replacement). Low density development creates a structural deficit. The Financial Accountability Office of Ontario estimates that 34.7% of the Province’s assets (valued at \$92.1 billion) are not in a state of good repair.¹¹ The capital spending required to bring eligible assets up to a state of good

¹⁰ Shortly, A. (2020). Growing Close to Home: Creating Complete Rural Communities. Greenbelt Foundation. Retrieved from <https://www.greenbelt.ca/complete-communities>, pp. 18.

¹¹ Financial Accountability Office of Ontario. (November 26, 2020). Provincial Infrastructure. Retrieved from <https://www.fao-on.org/en/Blog/Publications/provincial-infrastructure-2020>

repair totals \$16.8 billion. The number is higher for municipal infrastructure at estimated \$52 billion as of 2021.¹²

These elements of the Growth Plan are therefore essential to maintain while also integral to supporting the \$60 billion Regional Transportation Plan.

Existing Land Designation

We are confident that the government's housing goals can be achieved under the existing policy structure, including there being more than enough land currently designated to accommodate forecasted growth.

Many estimates exist regarding the amount of available land and existing housing unit approvals in the Greater Golden Horseshoe region, but all such estimates indicate that more land designation is not the solution. For example, one estimate identifies that there are over 35,000 hectares of land designated to 2051 that are currently unbuilt in Durham, Halton, Peel, York Regions and Hamilton alone¹³. Assuming a low rate of 17 homes per hectare¹⁴, this land would provide almost 600,000 homes, even before accounting for the 50 per cent intensification required by the Growth Plan, which could increase the number to over 1.2 million homes. Additionally, the City of Toronto's 2022 Land Needs Assessment reports that almost seventy years' worth of housing supply exists there, with 1,138,907 units:

The potential housing supply in the city is more than double the amount of housing required to accommodate the forecasted population growth between 2016 and 2051. The surplus potential housing stock after accommodating the population growth forecasted by the Growth Plan at 2051 is equivalent to almost forty years of potential housing supply.¹⁵

While there are likely measures the province and municipalities can and should pursue to streamline housing approvals, merging the Growth Plan with a province wide Provincial Policy Statement is not one of them - particularly in relation to the elements discussed above.

¹² Financial Accountability Office of Ontario. (November 26, 2020). Provincial Infrastructure. Retrieved from <https://www.fao-on.org/en/Blog/Publications/provincial-infrastructure-2020>

¹³ Canadian Architect. (November 28, 2022). Architects respond to Ontario's Bill 23. Retrieved from <https://www.canadianarchitect.com/architects-respond-to-ontarios-proposed-bill-23/>

¹⁴ 50,000 units distributed across 7,400 gross acres (2,995 ha) proposed for removal = 16.69 units/ha

¹⁵ City of Toronto. (June 20, 2022). Report to the Planning and Housing Committee. Our Plan Toronto: Land Needs Assessment. Retrieved from <https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-227744.pdf> pp. 1-2.

Ontario's Greenbelt

The Greenbelt is an extraordinary and irreplaceable resource for Ontario, supported by an overwhelming majority of the public who take great pride in it. It is an economic powerhouse for Ontario, provides a source of clean drinking water and clean air for millions of Ontarians, helps build climate resilience and attract businesses, jobs, and families to the Greater Golden Horseshoe region.

In addition to providing us with fresh air, clean water, fantastic local food and drink, as well as world-class outdoor recreation and tourism experiences, the Greenbelt today provides more than \$9.6 billion in contributions to provincial GDP and directly supports 177,700 full-time jobs. It protects over 4,500 farms that earn 68 per cent more revenue per acre than the average Ontario farm.

The 2.1 million acres of protected lands of the Greenbelt is home to 78 species at risk and includes 721,000 acres of wetlands, grasslands and forests that provide \$3.2 billion in ecosystem services, \$224 million per year in flood protection, and offsets 71 million tonnes of carbon. Greenbelt protections are based on a systems approach that supports these benefits. Removing lands may result in unintended consequences that compromise these protections, which are key to a thriving and prosperous region.

About The Greenbelt Foundation

The Greenbelt Foundation is a charitable organization dedicated to ensuring Ontario's Greenbelt remains permanent, protected, and prosperous. The Foundation has undertaken extensive work over the past 17 years on land use planning, "smart growth," and the effective interrelationship between the Growth Plan and the Greenbelt Plan. We have recently completed work on how to support revitalization of rural communities ("[Growing Close to Home: Creating Complete Rural Communities](#)"), published an extensive report in conjunction with provincial experts on municipal finance and provincial growth objectives ("[Municipal Finances and Growth Management in the Greater Golden Horseshoe: Opportunities for Better Integration to Support Smart Growth](#)"), as well as submitted recommendations earlier this year to the Ontario Affordability Task Force.