

GREENBELT FOUNDATION

Response to ERO Posting #019-6813

Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Ministry of Municipal Affairs and Housing



Possibility grows here.

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www.greenbelt.ca

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Introduction

The Greenbelt Foundation has been a trusted and effective partner to the Province for 18 years in unlocking the significant economic, ecological, agricultural, and social benefits of Ontario's Greenbelt, a vital component to the growth and prosperity of southern Ontario. We appreciate this partnership and look forward to continuing our work together. The Greenbelt Foundation appreciates the opportunity to provide comments in response to ERO posting #019-6813.

Because the Greenbelt Plan is a land use plan that works with other provincial plans and legislation to ensure effective and efficient growth, the Greenbelt Foundation supports smart growth efforts that allow our province to build communities in the fast-growing Greater Golden Horseshoe (GGH) region in a manner that addresses land use and housing needs, leverages existing infrastructure, protects water resources, and ensures access to green spaces and other public amenities.

Since its inception, the Greenbelt Plan has been an integral component of such a regional approach, working together with *A Place to Grow*, the *Niagara Escarpment Plan*, the *Oak Ridges Moraine Conservation Plan*, municipal Official Plan, and other guiding documents. Together, this approach was intended to facilitate anticipated population growth while also protecting and preserving essential natural and agricultural assets by directing growth to the right place and away from these resources.

We applaud the provincial government's commitment in this proposal to ensuring that the Greenbelt settlement area policies in the current Growth Plan are maintained in any new Provincial Policy Statement as well as ensuring the existing Greenbelt Plan standards and existing policy connections in the Greenbelt Plan (2017) to the PPS, 2020 and the Growth Plan remain in effect. It would be helpful for us to see the proposed amendment in order to understand how this would be implemented.

In addition, we support the very good vision statement in the proposed 2023 PPS but have certain comments and concerns as outlined in detail below about policies that do not currently align with the vision.

We recognize the administrative and policy challenges associated with having multiple plans and appreciate the provincial government's effort to reduce those burdens, especially for smaller municipalities. Nonetheless, in the effort to streamline policy documents, it is crucial not to throw out the good with the extraneous or duplicative. At minimum, the provincial government 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.

Before the introduction of the Growth Plan, over one hundred 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.

From a planning perspective, sufficient land has been designated to accommodate foreseeable growth and we encourage a focus on affordability and complete communities, and quality of life, which is best achieved through intensification in existing built-up areas and already designated greenfields. We also note that the cost to community relative to the current planning regime has not been determined. More time should be given to assess the impacts and benefits.

There is a risk that the unintended consequences of these policy changes will be to build fewer homes, not more, and to build them more expensively and in a much more environmentally destructive way. We need more efficient development and intensification rather than low-density development that houses fewer people at greater cost.

Summary and Key Recommendations

Our main comments and recommendations on the proposed 2023 PPS are summarized below at a high level. Please see the various sections in this submission for further specific advice and rationale.

We strongly support the Province's commitment in the proposed 2023 PPS to ensuring that the Greenbelt settlement area policies in the current Growth Plan are maintained in any new PPS. A number of our comments and recommendations in this submission highlight other ways the Province can ensure a continued strong connection between growth management through the PPS and Greenbelt systems and values.

We appreciate the administrative and policy challenges of having multiple land use plans and recognize the Province's effort to reduce these burdens. The Province should, however, maintain a coordinated approach to growth management in the complex and highly populated Greater Golden Horseshoe region.

Natural Heritage Systems: We are encouraged to see that no significant changes have been made to the Natural Heritage System (NHS) policies in the proposed 2023 PPS from the 2020 version. However, we note that the NHS policies from the Growth Plan have not been incorporated into the proposed 2023 PPS. Removing the NHS policies from the Growth Plan will decrease existing natural heritage protection within the GGH region at a time when protecting natural features within regional natural heritage and water resource systems has never been more critical to supporting the province's environment sustainability and climate resiliency needs. We recommend therefore that the provincial government continue to provide guidance to make sure that natural heritage systems protection is consistent across municipalities especially in the GGH region.

Water Resource Systems: The Growth Plan includes a Water Resource System that is linked to the Great Lakes and the Oak Ridges Moraine. The policies in the Growth Plan related to watersheds should be kept, as many of the watersheds and sub-watersheds within the Greenbelt extend beyond its boundaries. We recommend that municipalities continue to be required to conduct watershed planning. Also, watershed planning should be required to inform decisions about the allocation of planning and growth for water, stormwater, and wastewater infrastructure. The policies to require municipalities to consider the goals and targets of the Great Lakes Protection Act, 2015, the Great Lakes Strategy and any applicable Great Lakes agreements as part of watershed and coastal or waterfront planning initiatives should be continued and included into the proposed 2023 PPS.

Agriculture: To support the protection of agriculture long-term, we recommend that in the proposed 2023 PPS the definition of prime agricultural lands be updated to include Class 1-6 farmland including speciality crop areas. The provincial government should continue to ensure strong protection of speciality crop areas, as this uniquely important farmland cannot be replaced if it is developed. We strongly support the Province’s decision to re-evaluate the proposed policies about lot severances on agricultural lands. We support additional residential units on existing farm operations only where they are subordinate to the principal dwelling. We do, however, request more criteria for the development of these residences. As farmland fragmentation can create land use conflicts, we recommend that Agricultural System mapping be required for municipalities. Municipalities should be allowed to create more restrictive policies to protect prime agricultural lands and prevent land use conflicts.

Settlement Area Boundary Expansions: Major changes to policies about settlement areas and settlement area boundary expansions are made in the proposed 2023 PPS. A flexible approach is proposed for municipalities to conduct settlement area boundary expansions. We strongly recommend that municipal comprehensive reviews continue to be required for settlement area boundary expansions, and municipalities should continue to be required to demonstrate the need for such expansions. In addition, those expansion lands should not include speciality crop areas and avoid prime agricultural lands unless it is absolutely necessary.

Intensification and Growth Targets: The focus on intensification and density targets in the Growth Plan is a key tool for sustainable growth, affordable communities as well as the protection of the Greenbelt and other important agricultural and natural systems over time. The proposed 2023 PPS should be strengthened to include intensification targets for large and fast-growing municipalities.

Employment Lands: A balanced approach to land use planning is necessary to ensure the availability of high-quality employment opportunities complements residential development. The proposed 2023 PPS removes existing policy requirements about separation or mitigation from sensitive land uses within employment areas that are planned for industrial and manufacturing uses. We recommend that before this policy change is made that the Province should consult with business groups about potential conflicts that may result.

Discussion

Maintain policies appropriate for the Greater Golden Horseshoe

There is potential for the government to respond to the geographically specific needs of the Greater Golden Horseshoe while still achieving policy streamlining. It could do so by transferring key policies from A Place to Grow and applying them specifically to Ecoregions 6E and 7E in the PPS, which correspond roughly to the GGH.

Polices not carried over from A Place to Grow

Natural Heritage Policies

We are pleased to see that no substantial changes have been made to the Natural Heritage policies in the proposed 2023 PPS from the 2020 version.

A Place to Grow Section 4.4.4 “Natural Heritage System” (NHS) does not appear to be carried forward into the proposed PPS 2023. The natural heritage policies and definitions in the proposed 2023 PPS seem to

be consistent with the 2020 PPS. However, by removing the natural heritage policies from the Growth Plan, this will decrease the level of natural heritage feature and systems protection within the Greater Golden Horseshoe region.

Key elements that are consequently not carried forward from the Growth Plan into the proposed 2023 PPS include:

- A requirement that municipalities incorporate the provincial NHS in official plans and apply appropriate policies to maintain, restore, or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features and areas as set out in the PPS.
- Within the Natural Heritage System there is no longer a requirement to demonstrate that:
 - There are no negative impacts on key NHS features or key hydrologic features or their functions;
 - Connectivity along the system and between key natural heritage features and key hydrologic features located within 240 metres of each other will be maintained or, where possible, enhanced for the movement of native plants and animals across the landscape;
 - The removal of other natural features not identified as key natural heritage features and key hydrologic features is avoided, where possible. Such features should be incorporated into the planning and design of the proposed use wherever possible;
 - Except for uses described in and governed by the policies in the subsection Mineral Aggregate Resources, the disturbed area, including any buildings and structures, will not exceed 25 per cent of the total developable area, and the impervious surface will not exceed 10 per cent of the total developable area;
 - With respect to golf courses, the disturbed area will not exceed 40 per cent of the total developable area;
 - At least 30 per cent of the total developable area will remain or be returned to natural self-sustaining vegetation, except where specified in accordance with the policies in the subsection Mineral Aggregate Resources; and
- the full range of existing and new agricultural uses, agriculture-related uses, on-farm diversified uses, and normal farm practices are permitted. However, new buildings or structures for agricultural uses, agriculture-related uses, or on-farm diversified uses are subject to the policies in subsections on Key Hydrologic Features, Key Hydrologic Areas and Key Natural Heritage Features and Lands Adjacent to Key Hydrologic Features and Key Natural Heritage Features.

The NHS for the Greater Golden Horseshoe (GGH) 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.

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.¹ Protecting these individual features within region-wide natural heritage and water resource systems is fundamental to the ecological integrity of the environment as well as Ontario’s biodiversity. We applaud recent announcements from the Province regarding investments in projects to protect and conserve the Great Lakes, the creation of the Monarch Point Conservation Reserve and local conservation projects to restore and enhance wetlands.² Given these recent provincial investments, we recommend that these environmental priorities are reflected in the proposed 2023 PPS.

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.

We recommend that in the absence of the Growth Plan, the Province continue to provide guidance to ensure that the protection of natural heritage systems is consistent across municipalities, in particular in areas with rapid growth pressures.

Water

The Water Resources of the Golden Horseshoe require the protections of the Growth Plan and Greenbelt in combination. These protections should be carried forward to the proposed 2023 PPS.

The Growth Plan contains a Water Resource System (wetlands, watercourses, seeps/springs, inland lakes, groundwater recharge areas and highly vulnerable aquifers) which in turn is critical to 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.

¹ David Suzuki Foundation and Ontario Nature. (2011). Biodiversity in Ontario’s Greenbelt. Retrieved August 3, 2023, from https://www.greenbelt.ca/biodiversity_in_ontario

² Ontario government. (July 5, 2023). Ontario Making Historic Investments in Wetland Restoration. Retrieved August 3, 2023, from <https://news.ontario.ca/en/release/1003241/ontario-making-historic-investments-in-wetlands-restoration>; Ontario government. (July 31, 2023). Ontario Establishes First New Conservation Reserve in Over 10 Years. Retrieved August 3, 2023, from <https://news.ontario.ca/en/release/1003337/ontario-establishes-first-new-conservation-reserve-in-over-10-years>; Ontario Government. (July 17, 2023). Ontario Supporting Local Projects to Protect Great Lakes. Retrieved August 3, 2023, from <https://news.ontario.ca/en/release/1003280/ontario-supporting-local-projects-to-protect-the-great-lakes>

Watershed Planning

Land use and resource management needs to occur on a watershed/sub-watershed 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.

The proposed “Water” section removes:

- “evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level,”
- “ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces,”
- “sensitive surface water features and sensitive ground water features” is replaced with “vulnerable surface and ground water,” which will possibly be interpreted as a reduced standard for inclusion.

Whereas the 2020 PPS mandates that “Upper-and single-tier municipalities, partnering with lower tier municipalities and conservation authorities as appropriate, will ensure that watershed planning is undertaken,” the proposed 2023 PPS seems to weaken this approach to require only that “Municipalities are encouraged to undertake watershed planning.” We recommend that this proposed change be reversed to require municipalities to undertake watershed planning.

The proposal includes a requirement for planning authorities to use the watershed as the “ecologically meaningful scale for integrated and long-term planning,” but this term is not defined and may therefore be ambiguous. “Watershed planning,” on the other hand, is defined in the Definitions section and therefore provides clearer direction and should continue to be required.

Watershed planning in the proposed policy seems no longer to be required to inform decisions on allocation of growth and planning for water, wastewater, and stormwater infrastructure. We recommend that this requirement should be carried forward into the final PPS policy.

The new policy removes any reference to subwatersheds, including in planning for large-scale development in designated greenfield areas. This change can be expected to weaken protections in downstream areas and recommend that it should be reversed.

Finally, the proposed 2023 PPS would no longer require municipalities to consider the Great Lakes Strategy, the targets, and goals of the Great Lakes Protection Act, 2015, and any applicable Great Lakes agreements as part of watershed planning and coastal or waterfront planning initiatives. These policies exist to protect one of the world’s great natural resources and should be continued.

Agriculture

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.³ This is concentrated in the Golden Horseshoe region given its massive urban growth as evidenced in the region’s loss of 485,134 acres of total farm area from 2006 to 2021.⁴ 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 2020.⁵

For these reasons, the Growth Plan 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 Natural Heritage System, but which play a vital role in the overall ecological health and biodiversity of the region.

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.

In the proposed 2023 PPS, it states that “As part of the agricultural land base, prime agricultural areas, including speciality crop areas, shall be designated and protected for long term use for agriculture.” To support long-term agriculture, we recommend that the definition of prime agricultural lands within the proposed 2023 PPS be revised to include Class 1 to 6 farmland including specialty crop areas. Class 4 to 6 farmland supports agricultural activities including growing crops for biofuels and grazing for livestock, and the productivity of this land can be improved. The Province must continue to protect speciality crop areas because these areas are unique and cannot be reproduced if lost to development.

Despite the goal of the long-term protection of agriculture, specific policies in the proposed 2023 PPS and their potential implications could undermine this objective.

Lot creation and additional residential units on agricultural land

We strongly support the provincial government’s reconsideration of the initially proposed 2023 PPS policies on agricultural lot severances. In the final version of the PPS, section 4.3.3.1 as outlined in the

³ Ontario Federation of Agriculture. (June 10, 2022). Ontario Farmland Under Intense Pressure. Retrieved from <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure/>

⁴ Statistics Canada. (2021). [Census of Agriculture](#).

⁵ SUMMIT72 Advisory Services. (2021). Understanding How Greenbelt Agriculture Feeds the Regional Economy. Retrieved from https://www.greenbelt.ca/gb_agriculture_economic_impact

proposed PPS should not be included. In addition, we support additional residential units on existing farm operations only where they are subordinate to the principal dwelling to support the agri-food sector (i.e., section 4.3.2.5). We do not, however, support additional severances on these parcels as contemplated in section 4.3.2.5. This approach with additional residential units 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. It is important to provide opportunities for housing for families during farm succession planning and could help transition a farm to new operators. While the Foundation is supportive of additional residential units, we ask for further clarification on this policy. For example, more criteria for additional residential units, increased consideration for onsite infrastructure and servicing and clarification if these policies are applicable to both farm and rural lots.

Agricultural Systems Mapping

The provincial government's Agricultural Systems mapping has been an effective tool for municipalities to identify their most productive farmland and the businesses supporting the agricultural industry. Agriculture needs to be mapped 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.

By not requiring agricultural system mapping, there is concern that the variety of approaches municipalities may choose to designate prime agricultural areas could lead to further fragmentation of farmland, in particular between municipal boundaries. Farmland fragmentation makes farmland practices more challenges and creates land use conflicts. Therefore, we recommend that Agricultural Systems mapping be required for all municipalities, rather than "encouraged" as outlined in proposed policy 4.3.1.1. Also, the proposed 2023 PPS should include a requirement that municipalities use guidelines developed by the provincial government to designate specialty crop areas and prime agricultural areas.

Municipalities are limited in their ability to include more restrictive provisions to protect their farmland

Municipalities should be allowed to create additional restrictions to assist with protecting prime agricultural areas and mitigate potential land use conflicts. The proposed 2023 PPS policy 4.3.3.2 prevents municipalities from being able to be more restrictive and prevents these types of conflicts. In addition, it prevents municipalities from using their local knowledge based on their community's needs, in particular for rural communities with a strong focus on agricultural production. We recommend that proposed 2023 PPS policy 4.3.3.2 be removed to allow rural and agricultural communities the greater ability to protect their agricultural system and rural character in their official plans and zoning by-laws.

Growth Plan references in the Greenbelt Plan

Some Greenbelt Plan policies refer to the Growth Plan, and it is unclear if these connections are among those that will be maintained in the proposed 2023 PPS. For example, Section 3.2.3.4 requires that "Decisions on allocation of growth and planning for water, wastewater, and stormwater infrastructure shall be informed by applicable watershed planning in accordance with the Growth Plan." Similarly, Section 3.4.2.5 says that "Municipalities shall integrate climate change considerations into planning and managing growth in settlement areas in accordance with the policies in subsection 4.2.10 of the Growth Plan." It

should be made clear if these types of connections will be simply deleted or carried forward. The list of references includes at least:

- 3.2.3.4 Key Hydrologic Areas
- 3.4.2.5. General Settlement Area Policies
- 3.4.3.3 Town/Village Policies
- 4.1.3 Developed Shoreline Area Policies
- 4.2.1.2 (c) General Infrastructure Policies
- 4.2.2.1 Sewage and Water Infrastructure Policies
- 4.2.3.1 Stormwater Management and Resilient Infrastructure Policies
- 4.2.3.2 Stormwater Management and Resilient Infrastructure Policies
- 4.2.3.4 (d) Stormwater Management and Resilient Infrastructure Policies

Climate change

The proposed 2023 PPS removes the references to land use and development patterns from the Energy Conservation, Air Quality and Climate Change section. It is widely known, as the Canadian Institute of Planners has said, that “land use planning is identified as one of the most effective processes to facilitate local adaptation to climate change.”⁶ Removing this requirement sends the wrong signal and the existing related policies should be carried forward. The policies in the proposed 2023 PPS should be enhanced to ensure that climate change is considered through initiatives beyond greenhouse gas emissions, including long-term climate planning and stormwater management.

Settlement Area Boundary Expansions

The proposed 2023 PPS makes major changes to policies related to settlement areas and settlement area boundary expansions (SABE). The municipal comprehensive review of official plans required by the Growth Plan has not been carried forward into the proposed 2023 PPS. In addition, the concept of a delineated built-up area contained within the Growth Plan has not been incorporated into the proposed 2023 PPS. These policies are critical for planning complete communities, optimizing land development and infrastructure services, and preventing the fragmentation and loss of agricultural land.

The proposed 2023 PPS provides a simplified and flexible approach for municipalities to undertake settlement area boundary expansions. Given that there will be no requirement for municipal comprehensive reviews, municipalities can consider settlement boundary expansions or identify a new settlement area at any time. The tests to be applied to consider these requests will not be as strict as they were in the past. The proposed 2023 PPS states in policy 2.3.4 that in identifying a new settlement area or allowing for a settlement boundary expansion, planning authorities should consider issues such as existing and planned infrastructure capacity, compliance with minimum distance separation and avoid or minimize impacts on agricultural lands. In the Growth Plan, a settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that it meets a list of criteria. This approach ensures that the boundary expansion is truly necessary to accommodate growth and is properly

⁶ Canadian Institute of Planners. (n.d.). Climate Change and Land Use Planning. Retrieved July 31, 2023 from https://www.cip-icu.ca/getattachment/ca4806bb-0c53-4ad6-a4c6-47fe0c9e0d51/Climate-Brief_Land-Use-Planning-bm.pdf.aspx

planned for and serviced. It also ensures that the cumulative impact of SABEs is considered, so that we do not consume more land overall than is necessary.

We strongly recommend that the Province require municipal comprehensive reviews for settlement area boundary expansions and that municipal planning authorities should continue to be required to demonstrate the need for expansion. Also, the Province should revise the proposed PPS policy 2.3.4 to ensure that the applicable lands to not include speciality crop areas and that prime agricultural lands are avoided unless absolutely necessary. Further to that, we would recommend that the Agricultural Impact Assessment policies related to settlement area boundary expansions from the Growth Plan (policy 2.2.8.3 h) are incorporated directly into the proposed 2023 PPS. Policy 2.2.8.3 h in the Growth Plan on settlement boundary expansions is more comprehensive and goes beyond impacts to agricultural land to include adverse impacts to the agri-food network including agricultural operations.

Intensification and density targets have been eliminated

The Growth Plan included intensification and density targets for municipalities to plan for specific amounts of growth within built boundaries. The proposed 2023 PPS removes mandatory intensification and density targets. Instead, the proposed 2023 PPS in general supports intensification to achieve complete communities. Municipalities are encouraged to create density targets for new settlement areas or settlement area expansion lands, as appropriate, based on that location's conditions. Large and fast-growing municipalities are encouraged, but not required, to plan for a minimum density target of 50 residents and jobs per gross hectare. That is the most recent density target from the Growth Plan. In addition, major transit station areas will still include the minimum density targets from the Growth Plan, which are:

- 200 residents and jobs combined per hectare for those areas served by subways,
- 160 residents and jobs combined per hectare for those areas served by light rail or bus rapid transit, and 150 residents and jobs combined per hectare for those served by commuter or regional inter-city rail.

This focus on intensification and density is a crucial tool in protecting the Greenbelt permanently. Without it, low-density development will inevitably push up against the Greenbelt boundaries as so-called white belt land is rapidly consumed. We recommend that the proposed 2023 PPS be strengthened to include intensification targets for large and fast-growing municipalities building on existing provincial intensification approaches such as around Major Transit Station Areas. In addition, municipalities should have to establish an intensification strategy, which was a requirement under the Growth Plan.

Employment Lands

How and where Ontario grows has very significant implications to our success as a province and to the Greater Golden Horseshoe region— an area which generates approximately two-thirds of Ontario's GDP and where 72% of Ontarians live.⁷

⁷ Ontario Auditor General. (December 2021). Summary: Land Use Planning in the Greater Golden Horseshoe 2021 Value-for-Money Audit. Retrieved July 31, 2023, from https://www.auditor.on.ca/en/content/news/21_summaries/2021_summary_AR_LandUse.pdf

The long-term costs of growth must fully be considered in growth planning decisions so that the planning and development process would not only be more efficient from a land use perspective, but more financially efficient as well.

For most municipalities, only about a quarter or third of their population works within their Census subdivision; for some, half or more of their population commutes out of their Census division for work.⁸ At the same time, in some municipalities, there are residents from elsewhere who are commuting into their municipalities for work.

Our research shows that rural Greenbelt municipalities want to provide and retain more local jobs so that more of their residents can live and work in the community. There are existing, viable economies in rural Greenbelt municipalities, which have potential for economic growth. The economies of rural Greenbelt municipalities are largely characterized by the agriculture, tourism, retail, construction, arts and culture, and manufacturing industries. Settlement areas within rural Greenbelt municipalities also offer jobs in healthcare, education, social services, and personal services.⁹

While the development of housing supply is necessary for improving affordability and attracting and retaining workers, a balanced approach to land use planning is needed to also ensure the availability of quality employment opportunities that complement residential development.

The proposed 2023 PPS would remove the existing policy requiring separation or mitigation from sensitive land uses within employment areas planned for industrial and manufacturing uses “to maintain the long-term operational and economic viability of the planned uses and function of these areas.” We caution that before this change is made, the provincial government should consult with business groups about the potential for conflict this measure may give rise to.

In addition, section 2.8.2.4 in the proposed 2023 PPS would modify the existing employment conversion policies by permitting planning authorities to remove lands from employment areas at any time (rather than through a comprehensive review) in some circumstances. We caution that this measure could seriously compromise the benefits of coordinated planning.

We recommend that the provincial government:

1. Include a confirmed framework that protects employment lands.
2. Define the need for critical employment lands in official plans while maintaining and protecting the existing volume of employment lands in the pursuit of residential zoning.
3. Maintain the current timeframe for when a conversion of employment lands can be considered: only when municipalities are undertaking their 5-year Official Plan review, absent the Municipal Comprehensive Review concept.
4. Require municipalities to determine that sensitive land uses proposed near manufacturing, warehousing, and other major facilities are compatible or can be made compatible prior to permitting a sensitive land use.

⁸ Statistics Canada, 2017

⁹ Greenbelt Foundation. (2020). Growing Close to Home: Creating Complete Rural Communities. Retrieved July 24, 2023, from https://www.greenbelt.ca/complete_communities#:~:text=Prepared%20by%20the%20Foundation's%20Anna,make%20their%20communities%20more%20complete.

5. Retain the existing Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail, and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing, or other major facilities.

Conclusion

In its proposal to issue a new Provincial Policy Statement, the provincial government should take great care to ensure the crucial elements of the Growth Plan that guide development in a way that not only facilitates population sustainable growth and housing supply but also protects important natural and agricultural systems remain in place – particularly in the Greater Golden Horseshoe. Key aspects from the Growth Plan have been omitted from the proposed 2023 PPS and should be re-introduced back into the final version of the PPS including the policies on the natural heritage systems, agricultural systems mapping, municipal comprehensive reviews, and intensification targets. For close to two decades, the Greenbelt Plan has worked effectively together with Ontario’s Growth Plan to support the achievement of complete communities while protecting the region’s agricultural and natural systems. We have outlined above some omissions of concern and remain available as a resource to the Province at any time.

About The Greenbelt Foundation

The Greenbelt Foundation is a charitable organization dedicated to ensuring Ontario’s Greenbelt remains permanent, protected, and prosperous. Our work centres on protecting and investing in near-urban nature, natural infrastructure, and climate resilience; supporting local Greenbelt farmers and the rural agricultural sector and economy; promoting the vast and varied tourism and recreation opportunities that the Greenbelt offers; and engaging Ontarians in enjoying and helping to keep the Greenbelt thriving.

The Greenbelt

The 2.1 million acres of protected lands of the Greenbelt support \$9.6 billion in provincial GDP and nearly 180,000 full time jobs. The Greenbelt is home to 78 species at risk and 721,000 acres of wetlands, grasslands and forests that provide \$3.2 billion in annual ecosystem services --- which includes \$224 million of flood protection services and 71 million tonnes of carbon storage.

The Greenbelt’s forests, lakes, rivers, and wetlands also provide essential recreational opportunities for the GGH’s growing population. It is home to over half of the large parks in the region, has a network of biking and hiking trails including the 475 km Greenbelt cycle route and numerous cultural and historical sites that are all with easy access of our urban centres.