

GREENBELT FOUNDATION

Response to ERO # 019-8462
Review of proposed policies for a new provincial planning policy instrument

Ministry of Municipal Affairs and Housing



Possibility grows here.

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www.greenbelt.ca

Greenbelt Foundation Submission

Proposed Provincial Policy Statement (PPS)

ERO posting # 019-8462

Introduction

The Greenbelt Foundation appreciates the government's efforts to deliver on much needed housing across Ontario, particularly in the Greater Golden Horseshoe (GGH), an area facing the challenges associated with rapid population growth and the location of significant and finite natural and agricultural resources, including critical systems in Ontario's Greenbelt.

The Foundation strongly believes that the government's housing objectives can be accomplished in a sustainable way that protects the Greenbelt and the surrounding and interconnected natural and agricultural systems. These natural resources provide critical services that enable growth and economic prosperity while also contributing to a high quality of life, making the GGH an attractive place to live and recreate. The recommendations herein are focused on an approach whereby government objectives are achieved without the unintended consequences of jeopardizing or doing irreparable harm to critical provincial assets that provide the province's drinking water, improved air quality, access to urban and near urban greenspace for health and recreation, and a source of locally grown food and drink.

Both the Greenbelt and adjacent areas contain rich agricultural lands which are a finite source of food that sustains related agri-food sector jobs and economies in both rural and urban areas. Natural features and systems provide Ontarians with clean water and support biodiversity, and contribute to climate resilient communities that regulate temperatures, store water, and manage stormwater to avoid flooding and mitigate the effects of increasingly extreme weather events.

The Greenbelt is not an isolated geography, nor are the policies that apply to it. The current provincial policy framework for the GGH, that includes A Place to Grow, Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan, and the Provincial Policy Statement, 2020 (PPS), are carefully linked through the alignment of their policies and approaches. The Plans work together to provide a land use planning framework for managing both growth and the protection of resources. That is why the Foundation has a keen interest in any policy and legislation that applies or impacts the Greenbelt and its connections beyond.

A New Provincial Planning Policy

The proposed revocation of A Place to Grow and introduction of the proposed new provide-wide provincial planning policy (PPS) needs to be done carefully and in a way that retains the solid regional planning framework of A Place to Grow and the integrity of the Greenbelt over the long-term. Comprehensive planning in the GGH relies on coordinated, regional scale planning provided by upper tier governments across this broad landscape. The Foundation supports efforts to reduce regulatory burden but that streamlining must be undertaken without losing critical regional planning components.

Overall, the Foundation believes the proposed new provincial policy statement has not sufficiently carried over the strong policies of A Place to Grow for the GGH to adequately reflect the long-term and sustainable planning needs of this region, including protection of the Greenbelt and maintaining connectivity among important agricultural and natural systems and related economies extending throughout the GGH.

Impacts of Inefficient Growth Patterns

As an outcome, planning for growth will become more unmanageable with new settlement areas and boundary expansions being proposed and approved at any time. This will result in further loss of resources, increasing infrastructure costs, pressure on community services and likely driving land speculation for residential development on rural and prime agricultural areas.

Greenbelt Foundation's Comments and Recommendations

The Foundation's key comments and recommendations below focus on:

- 1) Proposed Consequential Administrative Greenbelt Plan Amendment**
- 2) Proposed PPS – Key Areas of Interest (A. Planning for Growth & B. Protecting Resources)**

1. Proposed Consequential Administrative Greenbelt Plan Amendment

We are pleased the Province recognizes the importance of maintaining the existing policy regime in place for the Greenbelt Plan and is proposing to continue the application of policies in the PPS, 2020 and A Place to Grow to provide strong policy direction for the Greenbelt Plan.

The Greenbelt Plan (together with the Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan) reflects the fundamental need to permanently protect critical resources that sustain growth in the GGH. Policies within these plans implement a systems approach to maintaining connectivity between agricultural, ecological, and hydrological features, essential to maintaining the long-term health of these systems and the services provided to the region and its residents and businesses. The policies also protect significant provincial industries and jobs related to agriculture, tourism, and recreation, which are the foundation of rural economies in the Greenbelt.

The Greenbelt Plan is designed to work together with the Growth Plan for the GGH and PPS to provide 'certainty and structure' to managing growth in the region. The Plans focus population growth and urban development largely outside Greenbelt boundaries, with rounding out of rural settlement areas in the Protected Countryside. The Plans also prohibit expansion into the Greenbelt natural heritage system and Speciality Crop Areas and encourage communities to avoid developing on prime agricultural lands.

This regional planning framework and vision for the GGH was reinforced in 2017, during the Coordinated Land Use Planning Process which further aligned and integrated the implementation of the provincial plans by harmonizing them (where appropriate) using common definitions, policy approaches, specific wording, and cross referencing across the provincial Plans.

One of the most significant policy integrations was to tie the consideration of modest expansions of settlement areas (known as towns/villages; not hamlets) in the Greenbelt Plan to the municipal comprehensive review (MCR) under A Place to Grow, so that all settlement areas in the GGH were subject to the same type of comprehensive process for considering expansion.

This was a significant shift from the original Greenbelt Plan, 2005, that allowed modest settlement area expansions at the time of the legislated review of the Plan. This change recognized regional planning context and connection of the Greenbelt within the GGH, moving away from policies being entirely contained in the Greenbelt Plan.

Looking forward, A Place to Grow and PPS, 2020 policies will need to be incorporated into the Greenbelt Plan in a way that ensures current protection standards for the Greenbelt are maintained. New PPS policies will also need to support this outcome.

The Foundation is seeking:

- A clear commitment and transparent process from the province that all existing Greenbelt protections are maintained and that the strength and integrity of these protections are not undermined by policies in the new PPS.
- Clarity on how the government will effectively communicate these changes to municipalities, such as issuing guidance or information materials to municipalities and other stakeholders and avoid any confusion.

We have highlighted key policies to carry forward from A Place to Grow and PPS, 2020 and concerns below (**not an exhaustive list**) for the province to consider in undertaking this work:

- Settlement area expansion policies
 - Use an MCR process to consider expansions in a comprehensive manner by the municipality which includes a requirement to demonstrate evidence-based need.
 - No expansions into natural heritage system (NHS) or Specialty Crop Areas and evaluation requirements to avoid prime agricultural areas.
 - Modest settlement area expansion policies that include a series of tests (e.g. specifics for size, residential coverage, servicing, etc.) and are immediately adjacent to existing settlement areas.
- Prohibition of Great Lakes-based servicing into the Greenbelt Area (applies to settlement areas) in order to continue to provide adequate protection of the Great Lakes and its water resources.
- Expansions of settlement areas outside the Greenbelt cannot expand into the Greenbelt.
- Prohibition on urban amenities that primarily support adjacent urban developments (i.e., urban parks, stormwater facilities, community servicing facilities).

- The Greenbelt Plan must also be clear and fill the void on PPS policies where it is silent or ambiguous e.g. hazard land policies, no new settlement areas, and Additional Residential Unties (ARUs) in prime agricultural areas.
- The current PPS, 2020 policy standard for the Greenbelt should not be reduced (i.e., new PPS policy change); examples where PPS, 2020 specifically applies in the Greenbelt:
 - PPS, 2020, and A Place to Grow policies apply in the Greenbelt Plan’s settlement areas.
 - PPS 2020 natural heritage features policies apply to features outside the Greenbelt Plan’s natural heritage system.

2. Proposed PPS policies – Key Areas of Interest

A. Planning for Growth:

The current PPS, 2020 and A Place to Grow Plan contain strong policies and a clear vision for Ontario communities to direct growth and protect agricultural, natural heritage and water resource systems, notably ensuring settlement boundary expansions that are justified and compact communities driven by stronger policies and targets. It is important that these are retained within the new framework.

These plans and policies also provide governments and others with the stability and certainty needed to make investments in infrastructure, community service facilities, agriculture, tourism, and other areas. We are concerned policies in the proposed PPS do not meet this standard.

Settlement areas in the proposed PPS generally continue to be the focus of growth and development in the updated PPS, however, the proposed policies that would apply to settlement area expansions have been weakened through changes in the review standard from “shall” to “shall consider” and policy tests that are less rigorous.

For example, there is no longer a requirement to demonstrate the need for expansion, sewer and water servicing capacity, alternative locations assessed, etc. A Municipal Comprehensive Review (MCR) process no longer exists to provide a land needs assessment or other assessments to be used to consider expansion within the stated planning horizon. Settlement area boundaries have recently been expanded through MCRs and provincial direction resulting in a lot of land available for development. Allowing even further expansions to occur on a continuous basis will have unforeseen outcomes and potentially deter needed investments in growth management and the economy.

Intensification and density targets are mostly encouraged in the proposed PPS, even within strategic growth areas, areas of intensification and higher-density goals for large and fast-growing municipalities. Targets are an effective, transparent, and accountable tool in planning for infrastructure and community service facilities, and need to be reinstated, at least in the GGH, where the majority of growth in Ontario is occurring. Established and mandatory targets in A Place to Grow helped to shift patterns of land use and development from previous sprawl to more compact and complete communities.

The proposed PPS should direct development to existing settlement areas that are subject to intensification and density targets. Along with prominent agricultural stakeholders, we believe the solution is to impose hard urban settlement area boundaries that prevent any further expansions, so that development occurs within existing boundaries to protect the limited supply of agricultural land.

Recommendations:

Settlement Areas (Policy 2.3.2)

- Reinstatement requirement for *settlement area* expansions to occur through a *municipal comprehensive review* and include policy tests of existing PPS (e.g. demonstrate that new growth cannot be reasonably accommodated within the existing settlement area).
- At a minimum strengthen the review language to “shall” and not the lesser “shall consider:”
- Prohibit expansions into Specialty Crop Areas (as currently worded this is not clear).
- Require that intensification/density targets be met for new settlement area expansions, of at least 50 residents and jobs per hectare for the GGH region (see below).
- Prohibit the creation of new settlement areas (particularly in southern Ontario, and the GGH region).

Intensification and Density targets:

- Require minimum intensification and density targets for designated growth areas, strategic growth areas, and around all transit stations and frequent transit corridors.
- Require, not “encourage”, large and fast-growing municipalities to plan for a minimum of 50 residents and jobs per hectare.

B. Resource Protection

Agriculture

We commend the province for reversing the proposed lot creation policies and residential development in prime agricultural areas from the 2023 version of the PPS.

Agricultural land is a finite resource that needs to be protected for the long term. There are still major concerns for the loss and fragmentation of farmland and the resulting impact on agriculture productivity and its continued economic success, especially in southern Ontario, as a result of proposed changes to the PPS that promote inefficient growth and incompatible commercial and industrial siting at the expense of agricultural protection. As was the case prior to the Greenbelt and A Place to Grow, increased uncertainty in land use planning (i.e., under the proposed PPS) will undermine investment in agriculture and agri-food, a top industry in the province that contributes \$47 billion in annually to Ontario’s GDP, supports 750,000 jobs and forms the foundation of many rural economies.

The current PPS, 2020 and A Place to Grow Plan contain policies to protect agriculture, notably ensuring settlement boundary expansions were justified and compact communities driven by stronger policies and targets.

As such, it is important that agriculture be protected and supported through strong policies/requirements for:

- considering the need and location of settlement area expansions (see **comments above under A. Planning for Growth**);
- determining appropriate ARUs in agricultural areas;
- protection of agricultural system using mapping for the GGH to better inform where appropriate growth could be located; and,
- determining the compatibility, impact, and mitigation of non-agricultural uses on agriculture through Agricultural Impact Assessments (AIAs) and minimum distance separation (MDS) formulae.

Recommendations:

- To reduce the impact on agricultural land/operations and future pressures to sever a lot for an ARU:
 - Limit ARUs in prime agricultural areas to units attached to the principle dwelling.
 - Prohibit ARUs in Specialty Crops Areas.
- Add A Place to Grow's agricultural system maps into the PPS and update OMAFRA's associated guidance document ([Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe](#)) as appropriate.
- Clarify that AIAs require mitigation measures to be incorporated as part of the non-agricultural uses (as appropriate), within the area being developed, and is not the responsibility of the agricultural use.

Natural Heritage

We are pleased that most of the current PPS, 2020, natural heritage system (NHS) policies have been retained, except for the requirement to protect for an NHS.

We are concerned that the policies and mapping of a Place to Grow for NHS are not included in the proposed PPS and are important in informing municipalities and proponents to plan appropriate and sustainable growth. The absence of requiring a systems approach to natural heritage protection is even more concerning since the current PPS requirement to protect an NHS would no longer be required under the proposed PPS.

Removing the NHS policies from A Place to Grow 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. Reduced protections will also lead to greater loss of biodiversity in the region and a potential increase in species-at-risk. The loss of natural areas will also reduce the potential to create more publicly accessible greenspaces and parks, an asset that is already diminishing across the region.

A 2022 report on large parks shows that the GGH region needs to create 32,000 hectares of parkland over the next 30 years to maintain the current provision of parkland for residents, based on population growth projections.¹ In addition, two million people in the GGH are living in neighborhoods with low accessibility to parks as distribution within the region is not equitable. Thirty percent of visible minority and low-income neighborhoods and fifty-five percent of neighborhoods with high ratios of Indigenous populations have low access to large parkland.

Recommendations:

- Add the A Place to Grow Plan's natural heritage system map into the proposed PPS.
- At a minimum, require (i.e., shall, not should) an NHS be identified and protected in Section 4.1.2 of proposed PPS.

Conclusion

As a result of the many of the proposed PPS policies and additional proposals in Bill 185, *Cutting Red Tape and Building Homes Faster Act, 2024*, planning for growth and development in Ontario will become more difficult to manage, with new settlement areas and settlement boundary expansions being proposed and approved at any time. The impacts of inefficient growth patterns will result in the degradation of natural resources, rising infrastructure costs, pressure on local services and land speculation for residential development in rural and agricultural areas.

We must balance housing needs with the protection of critical agricultural and natural assets. We look forward to continuing to work with the provincial government on protecting and enhancing the Greenbelt as an important asset for Ontario's residents.

¹ Green Infrastructure Ontario Coalition (GIO) and Re:Public Urbanism. (2022). Improving Access to Large Parks in Ontario's Golden Horseshoe. Policy, Planning and Funding Strategies. Greenbelt Foundation. Retrieved from https://www.greenbelt.ca/improving_large_parks_access