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May 14, 2026

Ministry of Municipal Affairs and Housing Provincial Planning Branch  
13th Floor, 777 Bay Street  
Toronto, ON M7A 2J3

**Re: Changes to Ontario's planning framework proposed by Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026**

Dear Ministry Staff,

The Greenbelt Foundation welcomes the opportunity to provide feedback regarding various policy proposals introduced through Bill 98.

Established in 2005, the Greenbelt Foundation is the only charitable organization dedicated to ensuring the integrity and success of Ontario's Greenbelt. For over twenty years, the Greenbelt has functioned as a strategic provincial asset and beloved set of systems and landscapes, providing enduring and irreplaceable agricultural, ecological, hydrological, and economic benefits to the people of Ontario. These benefits are enabled by the protection of interconnected natural heritage systems, prime agricultural lands, and water resources.

Together, with the Provincial Planning Statement (PPS), the Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan and Greenbelt Plan (the 'Plans'), protect critical natural resource systems which are fundamental to successful growth and thriving communities. They also provide certainty as to where and how growth should be organized in the Greater Golden Horseshoe Region to maximize the efficient use of land and infrastructure and maintain broader system connectivity. The permanence of Ontario's Greenbelt land use designations is essential to providing economic certainty for long-term investments – whether in conservation, agriculture or green space amenities – and ensures that communities can rely on ecosystem services now and into the future.

Municipalities are the implementers of Greenbelt policies through their official plans. Section 9(1) of the *Greenbelt Act, 2005* requires official plans to conform with the Greenbelt Plan. Regional planning ensures co-ordination between municipalities regarding matters that cross jurisdictional boundaries, such as the Greenbelt. This approach reflects the importance of the Greenbelt as a matter of provincial interest.



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### **Official Plan Standardization (ERO #026-0300)**

Standardization of elements of municipal Official Plans should be undertaken in a manner that maintains existing protections of the Greenbelt generally as well as its specific systems and economies. The *Greenbelt Act, 2005* requires municipal Official Plans (OP) to conform with policies in the Greenbelt Plans and overarching vision and goals, including the Greenbelt boundary and systems-based approach to maintaining intact agricultural and natural systems across the regional landscape.

Conformity with the provincial Greenbelt Plans also requires OPs to incorporate Plan schedules including the Natural Heritage System, which provide an important one-time opportunity for municipal refinement, while the province continues to direct mapping of the Agricultural System. To be effective, OPs also need to map key natural heritage and hydrological features in the Greenbelt and associated minimum vegetation protection zones. Other land use designation maps must also continue to be included in OPs, such as Oak Ridges Moraine Core and Natural Linkage Areas and Countryside and Settlement Areas. Niagara Escarpment land use designations established through the Niagara Escarpment Plan must also continue to be recognized and incorporated.

Any standard list of land use designations for municipal OPs must align with the Greenbelt Plans and other applicable provincial plans. Similarly, the standardization of key planning terms and definitions must recognize and maintain Greenbelt-specific terminology and policy intent or strengthen it to support greater harmonization and protection outcomes. In some cases, existing definitions in the Provincial Planning Statement (PPS) could weaken Greenbelt protections if applied uniformly, whereas definitions used in source water protection legislation may provide stronger and more appropriate safeguards for these critical and ecologically and hydrologically sensitive lands.

While there are benefits in standardizing elements of municipal OPs, these efforts must also recognize the unique features, functions and policy requirements associated with the Greenbelt and other provincial plans. Standardization must continue to direct municipalities to make land use planning decisions that conform with the Greenbelt Plans and maintain the integrity of the Greenbelt's agricultural and natural systems.

### **Communal drinking water and wastewater system municipal consent requirements (ERO #026-0302)**

Decisions about planning and growth should be based on water capacity, infrastructure servicing, and fiscal sustainability. Municipalities should not be required to consent to non-municipal



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communal water and wastewater systems that are not efficient or sustainable. Localized impacts from these systems can strain existing capacity and may not be immediately captured through monitoring activities. Stresses on groundwater aquifers may be compounded through the proliferation of communal water servicing. Source water protection also needs to be considered.

Municipalities and regional governments should have a full understanding of the cumulative effects of approving multiple systems on water budgets and existing water users. The Province should fund conservation authorities to update water budgets every 5 years to help assess cumulative impacts and identify mitigation measures. Risks to source water protection must also be understood and monitored.

Any consent criteria or conditions should include specific mechanisms that avoid impacts on agricultural operations and the contamination of source water or environmental systems. Criteria should also clarify system ownership, funding, and oversight to avoid downloading costs to municipalities or residents for replacement, mitigation, or emergency repairs in the event of system failure.

The Province should also clarify that the policy and regulatory framework for protecting source water and drinking water applies to non-municipal systems and ensure there is regular testing and inspection.

### **Draft Projection Methodology Guideline (ERO #026-0304)**

Population and employment forecasts, developed through the proposed Projection Methodology Guidelines, help municipalities estimate future population growth and assess housing and employment needs. These forecasts form the foundation for long-term planning decisions, including future growth patterns and land uses, infrastructure and service costs and community character and quality of life.

In practical terms, the guidelines and resulting forecasts provide key inputs into the municipal land needs assessment process, the development of infrastructure capital programs, and development charge calculations. These decisions inform intensification rates, settlement area expansions, housing types, employment areas, and the prioritization of infrastructure and public service investments.

Population projection methodologies can reinforce or undermine provincial priorities - the development of organized and cost-efficient complete communities, housing affordability outcomes, and protection of agricultural and natural systems. The proposed guidelines should not only support implementation of the 2024 PPS but also align with objectives in the Greenbelt



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Plans and other provincial objectives including asset management, by continuing to limit unnecessary outward urban expansion.

In this regard, the Foundation supports population methodology guidelines grounded in the following principles:

- Ensuring the optimization of intensification and infrastructure to protect agricultural and environmental lands and functions.
- Creating complete live-work communities.
- Building a diverse housing mix that meets affordability needs.
- Supporting climate resilience, such as transit-friendly land use patterns.

Additionally, population projection methodologies should:

- Use reliable data to respond to changing demographics and economic conditions.
- Encourage the use of growth scenarios and sensitivity testing to account for fluctuations in migration trends, demographics, housing market uncertainties, and economic shifts.
- Integrate with local housing, employment, servicing, and transportation objectives and priorities.
- Avoid creating development pressures on agricultural and natural systems, including those in the Greenbelt.
- Support fiscal sustainability in municipal financing.

Failure to follow sound population forecasting guidelines can result in significant consequences including higher infrastructure costs, fiscal challenges, environmental impacts, and adverse impact on social wellbeing. Over estimation of population growth forecasts also lead to agricultural conversion and/or eliminate opportunities for high-value agriculture and/or disrupt agricultural system functioning. These outcomes can undermine provincial planning objectives and lead to inefficient or unsustainable growth.

Key consequences include:

- Misalignment between land use and infrastructure planning.
- Premature or unnecessary settlement area expansions.
- Incomplete communities and inefficient growth patterns.
- Increased municipal and provincial costs.
- Housing market distortions, supply mismatches and affordability challenges.
- Impacts on agricultural and natural systems.



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- Reduced climate resilience.
- Erosion of public confidence and planning certainty.
- Inconsistent planning outcomes Across municipalities.
- Challenges with ensuring provincial plan conformity.

Higher-than-realistic forecasts lead to over-designation of land for urban uses and threaten the long-term financial stability of municipalities. It remains unclear how the proposed methodology enables municipalities to adjust their land needs assessment if growth is lower than forecasted. The Province should require regular validation of forecasts that compares actual growth versus forecasted growth, and there should be a mechanism to adjust land needs accordingly.

There is currently an oversupply of development areas. Recent research completed by the Foundation shows that 79% of gross designated growth areas in the Greater Toronto and Hamilton Area are still available for residential and commercial development. This represents about 63,000 hectares of gross DGAs that are sitting unused. To curb land speculation and spur development, municipalities should be enabled and encouraged to place expiration dates or conditions on building permit approvals to reallocate lands that are already available for development.

No new lands should be set aside for development until there has been substantial progress on available land. This will help ensure a critical mass exists to support the extension of services and infrastructure in a phased manner that is fiscally responsible and environmentally sustainable. Further, the revised methodology should set more ambitious targets for density and intensification that should be demonstrably met before additional lands are approved.

### **Standardizing Parkland Requirements (ERO #026-0312)**

The Greenbelt Plans support the creation of complete communities that offer affordable housing, social services, employment opportunities, and equitable access to greenspace. We recognize that the demand for greenspace and outdoor recreation is increasing, and inequality exists in access to these spaces across the region.

The Greenbelt Plans promote a regionally connected system of parks, open space and trails accessible to residents across the region. Policies ensure recreation spaces avoid impacting agricultural lands and operations, including prohibiting activities in Specialty Crop Areas and within prime agricultural areas. As a critical and finite resource that strengthens Ontario's food security and economy, the province should consider supporting protection for agricultural lands in the regulation beyond the Greenbelt.



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It is also important to ensure that protections are maintained for sensitive natural heritage and key hydrological features and functions in the Greenbelt and connectivity within its natural systems. Greenbelt policies further encourage stewardship to enhance conservation, environmental protection of sensitive features including groundwater recharge areas, along with strengthening biodiversity and climate resilience.

Further, increased demand for greenspace can lead to overcrowding of recreational areas and degradation of natural systems. However, well-established sustainable recreational principles and practices exist, which should be embedded in any standardized parkland provisions.

While the Greenbelt Plans do encourage the provision of recreational opportunities, it is important to ensure that protections are maintained for the Greenbelt's agricultural lands, sensitive natural heritage features, and ecosystem connectivity. In particular, recreation infrastructure should avoid prime agricultural lands, as they are a finite resource that cannot be replaced.

Large indoor recreation or sports facilities should be located within existing settlement areas to support complete communities, with an understanding that the Greenbelt offers unique opportunities for compatible nature-based recreation and tourism.

## **Conclusion**

For more than 20 years, the Greenbelt has been a critical resource for Ontario, providing clean air and water, a sustainable source of locally grown food, access to Greenspace and strong rural economies. As Ontario continues to grow, we will need more of what the Greenbelt provides, and the effective implementation of the provincial Greenbelt Plans can ensure long-term protection of its benefits and contributions.

We look forward to continuing to work with the Ministry to protect Ontario's Greenbelt as a critical asset that enables prosperity and fosters resilience.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward McDonnell". The signature is fluid and cursive.

Edward McDonnell  
Chief Executive Officer



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## Summary of Primary Considerations and Critical Requirements

### 1. Official Plan Standardization

- Ensure the requirement that municipal Official Plans conform with the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan remains clear.
- Require Official Plans to continue mapping Greenbelt Natural Heritage Systems, Agricultural Systems, key hydrological and natural heritage features, and associated protection zones.
- Ensure standardized land use designations and planning definitions align with Greenbelt policy intent and do not unintentionally weaken existing protections.
- Retain the ability for municipalities to reflect local environmental, agricultural, hydrological, and infrastructure conditions within provincially established planning frameworks.
- Continue regional planning coordination for matters crossing municipal boundaries, including agricultural systems, watershed management, infrastructure planning, and natural heritage connectivity.

### 2. Communal Drinking Water and Wastewater Systems

- Maintain municipal and regional authority to assess and consent to communal servicing systems.
- Require cumulative impact assessments for groundwater, source water protection, and watershed capacity before approvals are granted.
- Ensure non-municipal systems are subject to equivalent source water protection, testing, inspection, and enforcement requirements as municipal systems.
- Require clear long-term ownership, financial accountability, maintenance, and replacement obligations for communal systems.
- Prevent downloading of infrastructure risks, repair liabilities, or emergency response costs onto municipalities or homeowners.
- Provide provincial funding support for updated watershed and water budget studies at regular intervals.



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### **3. Population and Employment Forecasting Methodology**

- Require forecasting methodologies to prioritize intensification, infrastructure optimization, complete communities, and fiscal sustainability.
- Align forecasting methodologies with Greenbelt Plan objectives and broader provincial goals related to climate resilience, agricultural protection, and efficient growth management.
- Require regular validation of forecasts against actual growth trends and provide mechanisms to adjust land needs where growth does not materialize.
- Require municipalities to demonstrate substantial progress on existing designated lands before approving additional settlement area expansions.
- Encourage scenario analysis and sensitivity testing to account for economic uncertainty, demographic change, migration fluctuations, and housing market conditions.
- Establish stronger density and intensification expectations before new greenfield lands are designated.
- Enable municipalities to impose conditions or timelines on development approvals to reduce land speculation and encourage timely construction.

### **4. Standardized Parkland Requirements**

- Maintain strong protections for prime agricultural lands, specialty crop areas, key hydrological features, and sensitive natural heritage systems.
- Require parkland and recreational planning approaches that support ecological integrity, biodiversity, climate resilience, and watershed protection.
- Direct large indoor recreational and sports facilities to existing settlement areas with appropriate infrastructure and transit access.
- Support compatible nature-based recreation and tourism opportunities that align with Greenbelt protection objectives.
- Incorporate sustainable recreation management principles into standardized parkland policies to reduce environmental degradation and overcrowding impacts.
- Ensure recreation and parkland policies recognize the Greenbelt as a regionally connected system of agricultural, natural, and recreational landscapes.



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## 5. Cross-Cutting Provincial Recommendations

- Maintain the permanence, integrity, and regional coordination objectives of the Greenbelt and associated provincial plans.
- Ensure planning reforms support fiscally sustainable growth, infrastructure efficiency, and complete communities.
- Avoid policy changes that create additional pressure for outward urban expansion into agricultural and natural systems.
- Ensure provincial planning reforms continue to support long-term water security, food security, biodiversity protection, and climate resilience.
- Continue to recognize the Greenbelt as a strategic provincial asset that provides long-term economic, environmental, agricultural, and public health benefits to Ontario.
- Engage municipalities, Indigenous communities, conservation authorities, agricultural organizations, and environmental stakeholders in the implementation of planning reforms.