



Possibility grows here.

Greenbelt Foundation

#404 – 720 Bathurst Street
Toronto, Ontario, M5S 2R4
(416) 960-0001

www.greenbelt.ca

Response to York Region Proposal re: Greenbelt Fingers (ROPA 7)

27 October 2021

Chair Emmerson and Regional Council
Regional Municipality of York
17250 Yonge Street
Newmarket ON L3Y 6Z1

Re: Proposed York Region Official Plan Amendment No. 7

The Greenbelt Foundation stewards Ontario's Greenbelt – more than two million acres that provide clean air, fresh water, climate resilience, and a reliable local food source for Ontario. We are a charitable organization solely dedicated to the health and prosperity of Ontario's Greenbelt, working with governments, industry partners, and community organizations across the Greater Golden Horseshoe, including those in York Region.

The Foundation specifically seeks to maximize the benefits of the Greenbelt to Ontario as well as to the communities and sectors within it. The Greenbelt safeguards the vital resources that clean our air and water, reduces our flood risks, provides a home for wildlife, and ensures our communities have greenspace to explore.

With some of the highest quality soils in the country, favourable climate conditions, and proximity to Canada's largest market, Greenbelt farms and businesses deliver an immense diversity of local food and drink. Farmland is disappearing at an alarming rate in Southern Ontario – with more than 450,000 acres of farmland lost since 1991 - a permanently protected Greenbelt is essential to sustain a reliable source of food close to home.

The Greenbelt's forests, wetlands, and soils slow the impact of climate change by absorbing carbon dioxide in the atmosphere. The importance of the Greenbelt has never been clearer and ensuring its appropriate preservation and realization will be key to the long-term social, economic and environmental success of the region.

The Greenbelt Foundation respects the role of both local and regional planning and generally avoids commenting on individual planning decisions. However, we feel compelled to do so in instances where local decisions may establish precedents that undermine or weaken the Greenbelt, and negatively impact its natural and agricultural systems. When it comes to land use planning, we encourage decisions that support the highest-value uses in the Greenbelt and significantly interconnected adjacent areas, including those that contribute to climate resilience, local food production, nature conservation, healthy water systems, and robust rural economies.

RECOMMENDATION AND RATIONALE

We urge the Region to not adopt ROPA 7, consistent with staff recommendations.

The staff report indicates that ROPA 7 will change the designation of Greenbelt lands from Agricultural to Rural to “allow opportunities for park land, trails, serviced playing fields, golf courses, and recreational uses” as well as “additional non-agricultural uses such as rural residential, commercial, or industrial uses rather than limiting the uses to complementary open spaces uses that meet the intent of the Provincial *Greenbelt Plan*, the 2010 York Region Official Plan and local Official Plans.”

ROPA 7 is a local planning issue that may have region-wide consequences of two types across the Greater Golden Horseshoe. The first is simply that it may serve as an unfortunate precedent for similar applications across that Geography, particularly where appeals are made. The second is in the interpretation of the *Greenbelt Plan* when local decisions are made, the cumulative impact of which may be far more concerning than any single decision in isolation.

The Provincial government has repeatedly demonstrated its commitment to maintain existing Greenbelt boundaries and announced its commitment to enhance the scope and quality of its natural and agricultural systems. In our opinion, ROPA 7 runs contrary to this Provincial policy commitment. The additional range of permitted uses and development would erode the integrity and function of sensitive and valuable lands in a near-urban setting. Active uses and their associated infrastructure are more disruptive than passive uses and allowing them would contribute to degrading the Greenbelt protections.

The Greenbelt “fingers” are important components of the natural and agricultural systems and were included in the Greenbelt in order to provide them permanent protection. These elements of the Greenbelt inevitably come under pressure as urban development reaches Greenbelt boundaries. It is therefore important that provincial, regional and municipal planning decisions remain consistent in their commitment to the goals and intent of the *Greenbelt Plan* in order to preserve the Greenbelt’s long-term integrity and success. The permissions granted by the ROPA 7 proposed designation are not compatible with that commitment.

Uses that support the intent of the *Greenbelt Plan* should be prioritized, and planning decisions should be made that respect the protected status of these lands without degrading them. Active recreation can be moved and accommodated in various places; existing natural and agricultural resources cannot. The better approach would be to invest in what exists and realize the potential of the land and the benefits of well managed natural and agricultural lands.

AGRICULTURE

The ROPA 7 lands are located entirely within the Protected Countryside of the Greenbelt, are within the Greenbelt Natural Heritage System, and are designated as prime agricultural areas within the broader provincial Agricultural System.

One of the benefits of Agricultural designation of lands is that it provides certainty for farmers and other agri-food operators, which gives them confidence to invest for the long term, which in turn helps to sustain not only agriculture, but food-related businesses in York Region. Removing this designation will



contribute to undermining confidence not only on the ROPA 7 lands, but on similar lands throughout the Greenbelt geography. This is likely to erode the viability of near urban agriculture over the long-term despite its importance and strong public support.

The York Federation of Agriculture, in its submission to you, has made it clear that the ROPA 7 lands are suitable for viable farm businesses, both for traditional and smaller and urban scales.

Greenbelt-dependent economic activity in York Region from primary sectors including agriculture creates 44,521 FTE jobs, \$1.4 billion in wages \$2.03 billion in economic activity (Ernst and Young, 2020).

Agriculture is a key contributor to York Region's economy. You would also be aware of the data from York Region Economic Development:

- With a \$2.7 billion annual GDP, York Region is home to a vibrant and thriving agriculture and agri-food sector, and is the fourth-largest food and beverage processing hub in Canada.
- The agriculture and agri-food sector supports 57,000 jobs in York Region
- York Region is home to over 270 food and beverage manufacturers and processors
 - More than 700 farm-based business call York Region home, spread over 140,000 acres of farmland
 - York Region's gross farm revenue ranks #1 per acre in the Greater Toronto Area, with \$1,000 higher gross farm revenue per acre than the provincial average
 - York Region is the fourth-largest food and beverage processing hub in Canada.

Particularly now we should be seeking to support agri-food opportunities and avoid making decisions that make farming more difficult in the Greenbelt.

NATURAL AND HEADWATERS/RIVER SYSTEMS

The Greenbelt "fingers" have been protected because they generally trace river systems and headwaters. Headwater geography is not consistent with active recreation and its related infrastructure and should therefore remain limited to passive recreation opportunities. Increased development and impervious surface permitted by the proposed redesignation within these sensitive areas would be disruptive to the natural functions of these lands.

Where vulnerable natural systems exist, active uses and their associated infrastructure and hard surfaces undermine the potential for future re-naturalization. Passive recreation is generally more consistent with the intent of the *Greenbelt Plan* to:

Protect against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use;

Give permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in southcentral Ontario will be organized;

... Build resilience to and mitigates climate change.

Passive recreation is also more consistent with the following Protected Countryside Goals:



Protection of prime agricultural areas by preventing further fragmentation and loss of the agricultural land base caused by lot creation and the redesignation of prime agricultural areas;

Provision of the appropriate flexibility to allow for agricultural, agriculture-related and on-farm diversified uses, normal farm practices and an evolving agricultural and rural economy;

Enhancing the strengths of the Agricultural System, including through consideration for the impacts of development on agriculture and planning for local food and near-urban agriculture;

Protection, maintenance and enhancement of natural heritage, hydrologic and landform features, areas and functions, including protection of habitat for flora and fauna and particularly species at risk;

Protection, improvement or restoration of the quality and quantity of ground and surface water and the hydrological integrity of watersheds; and

Provision of a wide range of publicly accessible built and natural settings for recreation, including facilities, parklands, open space areas, trails and water-based/shoreline uses that support hiking, angling and other recreational activities;

We note that in their excellent submission to you, the Toronto and Region Conservation Authority has indicated that in their *Humber River Watershed Scenario Modelling and Analysis Report* (2008), “All the impacts were determined including the assumption that the GNHS (including the lands identified in ROPA 7) would be restored and conserved. Without restoration, the watershed plan conclusions and management strategies require revisiting. This could impact the timing for development as stormwater criteria will need to be updated.” If ROPA 7 establishes a precedent that will be observed by future decision makers including the Ontario Land Tribunal, its cumulative impact could be significant.

Further, there is a deficit of natural cover across the TRCA, and the protected lands of the Greenbelt have been assumed to assist in mitigating it. Existing natural assets like these are much easier and more cost-effective to protect than to restore in future.

CLIMATE CHANGE

In its *Environment Plan* and *A Place to Grow*, the province has emphasized the importance of planning for climate resilience. *A Place to Grow* makes clear that “Building compact and complete communities, and protecting agricultural lands, water resources and natural areas will help reduce greenhouse gas emissions and ensure communities are more resilient to the impacts of a changing climate. Ontario has recently affirmed its commitment to reduce greenhouse gas emissions by 30 per cent below 2005 levels by 2030 in Preserving and Protecting our *Environment for Future Generations: A Made-in-Ontario Environment Plan*”.

Further, the Protected Countryside Goals of the *Greenbelt Plan* include “building compact and complete communities, and protecting agricultural lands, water resources and natural areas will help reduce



greenhouse gas emissions and ensure communities are more resilient to the impacts of a changing climate.” Moreover, leading organizations such as the Intact Centre for Climate Adaptation advise that “land use changes and intensification rates: areas where significant urbanization and growth has occurred, and where natural capacity to absorb rain water has diminished (e.g., as a result of losing permeable areas to development), are at a higher risk of flooding.”

Degrading existing Greenbelt functions through downgraded protections is not consistent with this commitment, or the Province’s intention to grow the size and *quality* of the Greenbelt.

PUBLIC BENEFIT

The protected systems of the Greenbelt are a clear existing public benefit that should not be compromised by downgrading them. Doing so would undermine an important principle of growth planning: that development should provide locally accessible infrastructure including recreational space.

Rather than creating new green space and recreational opportunities that should come with new development, the proposed changes will allow developers to avoid the requirement to include these within new residential areas. The creation of complete communities should include recreational land and facilities *within* the urban boundary that is nearby and accessible, and therefore more equitable for all residents.

Good public policy demands that consideration be given to the sustainability of planned communities. The City of Toronto’s Park Land Strategy provides an example. It identifies that historic decisions have created deficiencies of parkland and therefore extremely expensive property acquisition is the only real solution. York Region should avoid this future scenario as it intensifies by ensuring that parkland dedication will be provided to new communities, in addition to the benefit of existing Greenbelt lands.

Parks and green spaces should be provided within the Settlement Area Boundary (SAB). The provincial Growth Plan, *A Place to Grow*, provides that: “Municipalities are encouraged to establish an open space system within settlement areas, which may include opportunities for urban agriculture, rooftop gardens, communal courtyards, and public parks”. It is questionable whether locating them outside the SAB is appropriate and serves the community as intended. Community infrastructure including parks and green space that contributes to complete communities should be in the community.

PROCESS

We feel strongly that despite any good intentions and promises from property developers about what they will not build, the permissions granted by the new designation are what matters in the long run. These lands are meant to be protected permanently, not just in the short term.

The Province’s intentions seemed clear when they declined to remove these lands from the Greenbelt as part of the adjacent Minister’s Zoning Order on Block 41. These lands were clearly not intended to be part of the development. Despite the fact that the sites will retain their Greenbelt designation in the proposal, the new uses appear to us to be in conflict with the spirit of provincial intent.

Moreover, there is no evidence that approving ROPA 7 will contribute to housing affordability. In the case of Vaughan Block 41, the existing MZO already permits development in the adjacent non-Greenbelt



area. Housing is already permitted and will be built, if the effect of the MZO is realized. The question is simply how much, where, and of what type.

CONCLUSION

The ROPA 7 lands and systems should benefit from strong municipal and provincial policies that protect nature and agriculture. These policies should not be downgraded to major recreational uses that are contrary to the spirit and intent of the *Greenbelt Plan* and may set a negative precedent region wide.

We look forward to continuing our shared work with York Region to protect the Greenbelt and ensure its sustainability as a shared, permanent resource that provides resilience for its communities.

Sincerely,



Edward McDonnell
Chief Executive Officer
Greenbelt Foundation

