

July 13, 2004

Greenbelt Task Force
Ministry of Municipal Affairs
14th Floor, 777 Bay St.
Toronto, Ontario
M5G 2E5

Re: Toward A Golden Horseshoe Greenbelt Discussion Paper/EBR Registry No: PF04E0002

Dear Task Force Members,

I am writing to you on behalf of the Pembina Institute in response to your May 2004 Discussion Paper, Towards a Golden Horseshoe Greenbelt.

The Pembina Institute for Appropriate Development (PIAD) is a national, independent not-for profit environmental research and education organization, with offices in Ottawa, Toronto, Edmonton, Calgary, Vancouver and Drayton Valley, Alberta.

The Institute has taken a strong interest in issues related to the environmental, economic and social sustainability of urban communities in southern Ontario over the past year, publishing two major reports, *Smart Growth in Ontario: The Promise vs. Provincial Performance* (February 2003) and *Building Sustainable Urban Communities in Ontario: Overcoming the Barriers* (December 2003) on the subject.

The golden horseshoe has been under intense development pressures, as a result of the concentration of population growth and economic activity in the region. Ninety per cent of the province's population growth during the 1996 to 2001 period was, for example, in the region. Unfortunately, the dominant development pattern has been one of low-density urban sprawl onto prime agricultural lands and ecologically significant areas.

As demonstrated by the Neptis Foundation's August 2002 analysis (the *Toronto-Related Region Futures Study*), the consequences of the continuation of these 'business-as-usual' development patterns are severe. The costs include the loss of greenspace and prime agricultural lands, increasing traffic congestion, declining air quality, and rising infrastructure construction and maintenance costs.

In this context, the establishment of a greenbelt in the golden horseshoe region has the potential to limit sprawling development patterns, protect prime agricultural, ecologically significant and source water

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lands, encourage the redevelopment and strengthening of existing communities, and the establishment of development patterns for which non-automobile based transportation modes, such as walking and public transit, are viable and attractive options.

The Task Force's discussion paper is an important first step towards the implementation of a greenbelt in the region. The Pembina Institute's comments on the directions laid out in the discussion paper are as follows.

Vision and Goals

- The Task Forces's vision and goals need to reference the goals expressed on pg.7 of the document regarding the role of the greenbelt in curtailing urban encroachment, and its role as a component of a growth management strategy that directs urban growth into existing and designated urban areas.

The Institute also takes the view that the creation of the greenbelt needs to be integrated with wider reforms of the land-use and infrastructure planning system in southern Ontario to contain urban sprawl and support the development of more environmentally, socially and economically sustainable urban communities in the golden horseshoe region. The Pembina Institute remains concerned that without these wider reforms, there is a risk that the greenbelt may result 'leapfrog' development just beyond the outer boundaries of the greenbelt. There is strong evidence that this problem is already beginning to emerge, particularly in Simcoe County. Such an outcome would defeat the underlying goals of the greenbelt initiative.

- The references to the conservation and making available of natural resources should be clarified, and focus on renewable resources.

Approach to Environmental Protection

- The Institute supports an overall approach to the development of the greenbelt through the establishment of a continuous core area, in which only very limited uses would be permitted (e.g. conservation and agriculture), surrounded by a buffer zone. A wider range of uses may be permitted in the buffer zone, provided that need and a lack of viable alternatives can be established and that the ecological and hydrological integrity of the greenbelt will not be affected.
- The Greenbelt core area should include provincially significant and major natural heritage and hydrological features and functions, and connections between these major features and functions. Regionally significant features and functions should also be included.

Agricultural lands

- The tender fruit and grape lands, the Holland Marsh, prime agricultural lands (class 1, 2, and 3) and designated agricultural reserves (e.g. the Duffins-Rouge Agricultural Reserve) in the greenbelt study region should be included within the permanently protected greenbelt area.
- The consideration of other agricultural lands within the greenbelt plan area for urban development should only be permitted to occur during formal reviews of the plan as mandated by legislation. A comprehensive review should be required, demonstrating that existing designated urban areas lack a sufficient supply of land to accommodate population growth, including consideration of

intensification, redevelopment, and the availability of land in other municipalities in the region, before agricultural lands included in the greenbelt can be considered for urban uses. In all cases, tender fruit and grape lands, the Holland Marsh, designated agricultural reserves and class 1, 2 and 3 lands should be protected from urban development.

Infrastructure

- The greenbelt should not be seen as a land reserve for future infrastructure needs.
- The Institute does not support the establishment of new infrastructure corridors across the greenbelt. New transportation corridors are of particular concern, given their direct environmental impacts, and potential to support ‘leapfrog’ development beyond the greenbelt. New infrastructure facilities should be excluded from core areas of the greenbelt, and only permitted in buffer zones on the basis of demonstrated need, a lack of viable alternatives, and the ability to ensure the protection of the ecological and hydrological integrity of the greenbelt.

More broadly, the province should review the ways in which the need for infrastructure is assessed, to ensure that proposed infrastructure is consistent the province’s overall growth management and greenbelt objectives. Consistent with the government’s proposed Growth Plan for the Greater Golden Horseshoe, infrastructure investments should be focused on supporting intensification and redevelopment of existing and emerging urban centres, not the outward expansion of urban areas.

Natural Resources

- Aggregate extraction activities should not be considered a “temporary” land use, and should be excluded from core areas of the greenbelt in a manner similar to that established through the Niagara Escarpment Plan (i.e. exclusion from the equivalent of Escarpment Natural Area and Escarpment Protection Area areas). Aggregate operations have permanent impacts on the landscape and have significant implications for the integrity of hydrogeological systems. New or expanded operations should also be excluded from specialty crop lands and prime agricultural lands, and only permitted in other locations on the basis of the establishment of need, a lack of viable alternatives, rigorous rehabilitation requirements, and protection of the ecological and hydrological integrity of the greenbelt.

As indicated in the government’s Greater Golden Horseshoe Growth Plan, the conservation of aggregate resources should be promoted through an increased focus on reuse and recycling of materials, and by reducing demand through more compact urban forms and the more efficient use of infrastructure. Such efforts will reduce the need for new extraction operations.

Administration and Implementation

- The Pembina Institute supports the creation of a legislative framework for the greenbelt plan. In the event that the plan is administered by municipalities outside of the Niagara Escarpment Commission, then municipal official plans, zoning by-laws and infrastructure plans should be required to be amended to bring them into conformance with the greenbelt plan. Future official plans, official plan amendments and other planning and infrastructure decisions should be required to conform with the greenbelt plan as well.

Similar provisions should be incorporated into the legislation requiring that provincial planning activities and approvals conform with the greenbelt plan.

- A separate appellate body from the Ontario Municipal Board should be established for the purpose of hearing appeals regarding the conformity of planning and infrastructure decisions with the greenbelt plan. This would reflect the unique status of the greenbelt.
- An independent advisory body should be established and provided with adequate resources to review and report to the public annually on the implementation of the greenbelt plan and the ecological health and integrity of the greenbelt area. The advisory body should also be authorized to make recommendations to the province and local governments and agencies regarding the maintenance and enhancement of the greenbelt, including comments on planning and infrastructure proposals that may affect the greenbelt.

I would be pleased to discuss the Pembina Institute's views on these matters with the members of the Task Force or Task Force Staff.

Yours sincerely,

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