



The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

**Ontario Public Health Association**  
l'Association pour la santé publique de l'Ontario  
Established/Établi 1949

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Association of Public Health Epidemiologists in Ontario (APHEO)

Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)

Canadian Institute of Public Health Inspectors - Ontario Branch (CIPHI-O)

Community Health Nurses' Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public Health Dentistry (OAPHD)

Ontario Association of Public Health Nursing Leaders (OAPHNL)

Ontario Dietitians in Public Health (ODPH)

Ontario Public Health Libraries Association (OPHLA)

**Charitable Registration**  
Number 11924 8771 RR0001

December 2, 2022

To: [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

**RE: ERO 019-6217 – Proposed Amendments to the Greenbelt Area boundary regulation**

Thank you for the opportunity to comment on proposed changes to the Greenbelt Area boundary regulation as outlined in ERO 019-6217 and as related to the Government of Ontario's More Homes Built Faster plan. This submission reflects similar statements to our comments in ERO-6216 - *Proposed Amendment to the Greenbelt Plan*, and ERO-6218 - *Changes to the Oak Ridges Moraine Conservation Act*, recognizing the complementary nature of these three proposals as outlined on the Environmental Registry of Ontario.

As noted in our November 16<sup>th</sup> submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 23, the Ontario Public Health Association (OPHA) fully supports the need for Ontario to find more affordable housing opportunities for its residents and create healthy, equitable and climate-resilient communities. At the same time, it is vital that these processes, including legislative changes, are undertaken in a manner that reduces the risk of inadvertent harms and inequities to the health and climate resiliency of communities. Actions such as intensification and transit-oriented development can be health and equity promoting, without compromising other vital attributes required for healthy and equitable communities including access to, and protection provided by greenspace.

Public health agencies have long recognized the connections between healthy environments and population health, and thus the importance of healthy public policy across all sectors to strengthen health protection and equity. This includes policies for the protection of natural heritage systems, the preservation of ecosystem connectivity, and the implementation of nature-based solutions for climate-resiliency including mitigation and adaptation.

**OPHA urges the Government of Ontario to:**

- Maintain the integrity of conservation protections across Ontario, including the conservation of wetlands, woodlands, farmlands and other protected ecosystems

- Implement smart growth policies that truly value the benefits of natural ecosystems, including strengthening of provincial land-use planning direction to protect green spaces
- Implement the Auditor General of Ontario’s recommendations in the 2022 *Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk*, including recommendations to protect green space and wetlands
- Keep to its commitment to leave the Greenbelt intact

**OPHA does not support amendments Greenbelt Area boundary regulation (O. Reg. 59/05) that would remove or redesignate 15 areas of land from the existing Greenbelt Area** (Maps 1-11 in ERO 019-6217 supporting material). We have provided a detailed account below, as to why this amendment to the Greenbelt Plan is contrary to protecting public health and safety, including climate-resiliency.

**OPHA does support the amendment to the Greenbelt Area boundary regulation (O. Reg. 59/05) would add lands in the Paris Galt Moraine area to the Greenbelt Area.** This amendment would provide protection for this important area and allow expansion of the Greenbelt westward.

**Greater consideration of health impacts must be incorporated into the decision-making process affecting the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan (ORMCP).** The protected lands in the Greenbelt and ORMCP work together to promote the development of healthy, equitable and complete communities, protect natural heritage, water, and agricultural systems, improve air quality, help buffer against flooding and other climate-related health risks, and promote a culture of conservation. These plans help the province meet its climate change targets and communities achieve their net-zero carbon goals by providing a natural carbon sink, reducing energy usage and mitigating the urban heat island effect. As pointed out in the report *The Nature of Health: Accelerating the integration of health considerations in urban nature-based solutions*<sup>i</sup> these nature-based solutions increase climate-resiliency and can have added benefits for vulnerable populations disproportionately impacted by climate change.

Removing 7,400 acres of natural areas and farmland from Greenbelt protection will not solve the housing crisis, and will create additional problems. Healthy natural ecosystems are essential to human health. Removing protections from the Greenbelt undermine the conservation of wetlands, woodlots and farmland, jeopardize source water protection, decrease climate resiliency and contribute to more urban sprawl. Natural ecosystem services include regulating air and water pollution, flood protection, erosion control, carbon sequestration, provision of nutritious food and clean water, surface temperature regulation, and several cultural, recreational, physical and mental health benefits.<sup>ii</sup>

**Protection of green space including wetlands, and realizing their human health, environmental and economic benefits, is inextricably tied to land-use planning decisions.** The Auditor General of Ontario has acknowledged the risk of further loss of green spaces posed by Bill 23, the More Homes Built Faster Act, 2022, in relation to the increased risk of urban flooding in surrounding communities. As noted in the Auditor General’s report released on November 30, 2022, *Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk*<sup>iii</sup> the three main factors that contribute to an increased risk of urban flooding are: (1) development that results in the loss of green spaces and other pervious surfaces, (2) inadequate or aging stormwater infrastructure, and (3) climate change, which is resulting in more frequent and more intense rainfall events.

**OPHA urges the Government of Ontario to implement the Auditor General’s recommendations, including those related to protection of green space and wetlands** – tracking and reporting on percentage of area covered by pervious surfaces, natural cover, wetlands and woodlands; reviewing land-use plans and policies, and including limits on impervious surface area that results from development; and developing and implementing a strategic plan to protect, conserve and restore wetlands. As noted by the Auditor General of Ontario: *“Despite the critical role that green spaces play to reduce the risk of urban flooding (and provide other benefits), we found that weak provincial land-use planning direction to protect green spaces is resulting in the continued loss of such spaces in urban areas across southern Ontario.”* The report references a Statistics Canada analysis of 2021 satellite data that found that: *“the percentage of urban land area classified as green has declined in 31 of 33 (94%) of Ontario’s medium and large population centres over the past 20 years.”* Another significant finding of the Auditor General’s report is that nearly half of southern Ontario’s remaining wetlands are unevaluated and risk being lost – with an average loss of 1,825 hectares of wetlands every year in this area alone. The report also noted that the Province may be undermining local efforts to protect important green spaces through the increased use of Minister’s Zoning Orders (MZOs) in recent years which override municipal land-use decisions.

A 2016 report commissioned by the Greenbelt Foundation – *Ontario’s Good Fortune: Appreciating the Greenbelt’s Natural Capital*<sup>iv</sup>, estimated the total value of carbon stored in the Greenbelt’s forests, wetlands, and agriculture to be \$11.17 B, with annual carbon sequestration from forests, wetlands, and agriculture adding \$51.94 M per year. The value derived from the natural capital of the Greenbelt for recreational activities was estimated to be \$2.1 B per year with the value related to property protection by reducing flood risk estimate at \$224 M per year. The health benefit provided by air quality improvements resulting from forest cover within the Greenbelt was estimated to be \$18 M per year.

Lands within the Greenbelt Area are crucial to the protection of our drinking water resources including recharge of our groundwater to provide safe drinking water to Ontario residents. Many of the Greenbelt Areas are located in the Oak Ridges Moraine and are identified as critical areas for protection of groundwater resources. After the drinking water tragedy in 2000 in Walkerton, Justice Dennis O’Conner made 121 recommendations related to source water protection under the Clean Water Act.<sup>v</sup> Allowing development on the protected Greenbelt removes many of these vital protections as outlined in the inquiry reports. In addition, these land use changes could impact both drinking water quality and quantity for residents relying on private well water in this area.

**OPHA does not agree with the Government of Ontario ERO 019-6217 statement that** *“The anticipated regulatory impacts of the proposal are positive.”* Any loss of protected Greenbelt Area lands will disrupt these essential natural ecosystem services – reducing their ability to provide local sources of healthy, nutritious food, to control climate-related health impacts including flooding, extreme heat and other extreme weather events, to mitigate climate change, and to support equitable access to nature. Carving out portions of the Greenbelt for development removes vital protections for wetlands, woodlots and wildlife habitat. These cannot be replaced by providing protection in other areas, and sets a dangerous precedent for continued loss from the Greenbelt, Oak Ridges Moraine and other environmentally sensitive lands – posing additional risk for ecological stability and human health.

**More protected natural ecosystems and connected near-urban nature is needed in the Greenbelt, not less.** The Southern Ontario Nature Coalition’s *Technical Background Report: A Solution to Climate Change and*

*Biodiversity Loss*<sup>vi</sup>, points out that “some of the most ecologically important areas in Canada are the natural areas and farmland in and around our cities”. The report stresses that land-use policies and decisions must recognize the vital importance of greenspace and the particular elements of near-urban nature that “provide resilience to extreme weather, important outdoor spaces for communities and habitat for plants and animals.” The report acknowledges that nature is “central to Indigenous Ways of Knowing and culture and provides local food and essential gifts from nature or “ecosystem services” to communities. These benefits will only become more important as climate change progresses.”

**With clear evidence that climate-related heavy rainfall events will continue to increase, it is counter intuitive to remove protections that allow development to occur in these sensitive areas.** As noted in the *Independent Review of the 2019 Flood Events in Ontario*<sup>vii</sup> report commissioned by the Government of Ontario the first core component of emergency management is prevention, which includes “... actions taken to prevent flood-related emergencies or disasters from occurring, and includes land use planning and regulatory restrictions to keep development out of the floodplains and other hazardous areas. While we cannot prevent flooding from occurring, keeping people and property out of flood-prone areas helps ensure naturally occurring flood events do not result in local emergencies.”

**Failing to value the benefits of the Greenbelt is neither a balanced nor a fiscally sound way to plan for responsible growth.** To be economically-sound in the long-term, all land-use planning decisions at the provincial and local level must take into account the services that nature provides. This allows for the proactive management of natural assets for climate-resiliency and the identification of nature-related risks and opportunities that specifically recognizes the positive benefits of natural-climate solutions. As noted in the Intact Centre of Climate Adaptation’s 2022 Report, *Getting Nature on the Balance Sheet: Recognizing the Financial Value of Natural Assets in a Changing Climate*<sup>viii</sup>: “These actions will help Canada enlist and work with nature to slow climate change, increase climate resilience and reverse biodiversity loss, ultimately benefiting the wellbeing of people in Canada and beyond.”

**Evidence from expert authorities and provincially-appointed advisory groups shows that more than enough land has already been set aside to meet the demand over the coming decade for all types of housing within existing town and city boundaries, and outside Greenbelt Areas.** The 2021 *Expanding Ontario’s Greenbelt* report<sup>ix</sup> sets out key requirements for expanding the greenbelt including: “no land removal; ... work towards simultaneously improving public health, local food security, water security, biodiversity conservation and economic prosperity; ... acknowledge that there is more than enough land to grow the Greenbelt and built complete communities to handle projected population growth.”

The *Report of the Ontario Housing Affordability Task Force*<sup>x</sup> lists a number of options that the government has at its disposal to help address affordability for Ontarians and achieve the target of 1.5 million new homes built in the next ten years, without developing on protected Greenbelt Area lands. These include densification, more gentle density and more efficient use of land across Ontario including better use of existing public services and infrastructure. As pointed out in the Report: “a shortage of land isn’t the cause of the problem. Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts.”

**OPHA is concerned with the agricultural land base no longer being afforded permanent protections in the Greenbelt and ORMCP Plans.** Both greenspace and farmland provide ecological, economic, social and health

benefits for our residents, including land for growing food, access to local food, opportunities to connect with farmers and food production. The loss of agriculture land does not support other provincial policy directives namely the Local Food Act, 2013, which was created to help foster successful and resilient local food economies and systems.

Ontarians have experienced and will continue to experience the devastating impacts of extreme-weather events including flooding when greenspace is paved over, and unsustainable development is permitted in areas that require environmental protection. Moreover, the value of productive farmlands in these areas for local, healthy food production, for environmental protection including that of speciality crops (e.g., tender fruits and grapes) many residents rely on for their livelihood, and for our economy supports continued protection of the existing Greenbelt.<sup>xi</sup>

**OPHA urges the Government of Ontario to keep to its commitment to leave the Greenbelt intact and not to remove or redesignate the 15 areas of land from the existing Greenbelt Area as proposed in ERO 019-6217.** We also urge the province to maintain the integrity of all conservation protections within existing protected green spaces across Ontario and to expand the Greenbelt beyond its current area in consultation with stakeholders and by engaging with Indigenous communities.

**It is vital that all smart growth policies truly value the benefits of natural ecosystems and not undermine the conservation of wetlands, woodlands, farmlands and other protected ecosystems.** We encourage the province to heed the recommendations of its advisory groups and expert authorities, protect the existing Greenbelt, build in existing designated development areas and increase density to expand housing stock more effectively with co-benefits for health, the environment and the economy.

Thank you for considering our concerns and recommendations with respect to proposed amendments to the Greenbelt Plan as outlined in ERO 019-6217. We would welcome the opportunity to meet with the government to discuss the proposed changes and solutions that address concerns related to this proposed legislative change.

Sincerely



John Atkinson

Executive Director

Ontario Public Health Association

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<sup>i</sup> Twigg, M. 2021. The Nature of Health: Accelerating the integration of health considerations in urban nature-based solutions. Smart Prosperity Institute. [https://institute.smartprosperity.ca/sites/default/files/EN\\_Report\\_NBS\\_Final.pdf](https://institute.smartprosperity.ca/sites/default/files/EN_Report_NBS_Final.pdf)

<sup>ii</sup> EcoHealth Ontario resources. <https://www.ecohealthontario.ca/resources>

<sup>iii</sup> Office of the Auditor General of Ontario. November 2022. Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk. [https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV\\_CCurbFlooding\\_en22.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_CCurbFlooding_en22.pdf)

<sup>iv</sup> Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. 2016. Prepared for the Friends of the Greenbelt Foundation by Green Analytics

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[https://www.greenbelt.ca/ontarios\\_good\\_fortune\\_greenbelt\\_natural\\_capital](https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital)

<sup>v</sup> Report of the Walkerton Inquiry. 2002. The Events of May 2000 and Related Issues. The Honourable Dennis R. O'Connor, Commissioner. [http://www.archives.gov.on.ca/en/e\\_records/walkerton/index.html](http://www.archives.gov.on.ca/en/e_records/walkerton/index.html)

<sup>vi</sup> Technical Background Report: A Solution to Climate Change and Biodiversity Loss: Conserving Our Near-Urban Nature. Prepared by the Southern Ontario Nature Coalition (SONC) 2021. ISBN 978-1-927075-20-3 [https://s3.ca-central-1.amazonaws.com/greenbelt.ca/Resources/GB\\_SONC\\_technical\\_report\\_E-ver.pdf](https://s3.ca-central-1.amazonaws.com/greenbelt.ca/Resources/GB_SONC_technical_report_E-ver.pdf)  
[https://www.greenbelt.ca/near\\_urban\\_nature\\_project](https://www.greenbelt.ca/near_urban_nature_project)

<sup>vii</sup> **Independent review of the 2019 flood events in Ontario**

<https://www.ontario.ca/document/independent-review-2019-flood-events-ontario>

<sup>viii</sup> Eyquem, J. L, Church, B. Brooke, R and Molnar, M. 2022. Getting Nature on the Balance Sheet: Recognizing the Financial Value of Natural Assets in a Changing Climate. Intact Centre on Climate Adaptation, University of Waterloo.

[https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2022/10/UoW\\_ICCA\\_2022\\_10\\_Nature-on-the-Balance-Sheet.pdf](https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2022/10/UoW_ICCA_2022_10_Nature-on-the-Balance-Sheet.pdf)

<sup>ix</sup> Expanding Ontario's Greenbelt. 2021. <https://www.burlingtongreen.org/wp-content/uploads/2022/10/expanding-ontarios-greenbelt-report-feb-2021-min-1.pdf>

<sup>x</sup> Report of the Ontario Housing Affordability Task Force. 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>

<sup>xi</sup> Golden Horseshoe Food and Farming Alliance <https://foodandfarming.ca/new-reports-and-case-studies-show-impact-and-value-of-our-agri-food-sector/>

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### **More about the Ontario Public Health Association**

OPHA has established a strong record of success as the voice of public health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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