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Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, M7A 2J3

Submitted via ERO Online Filing Portal

File Number: ERO - 019-6216 **Proposed Amendments to the Greenbelt Plan**

The Ontario Society of Professional Engineers (OSPE) Responds to the Proposed Amendments to the Greenbelt Plan (ERO 019-6216)

The Ontario Society of Professional Engineers (OSPE) is the advocacy body and voice of the engineering profession. Ontario currently has over 85,000 professional engineers, 250,000 engineering graduates, 6,600 engineering post-graduate students and 37,000 engineering undergraduate students. We operate with the needs and responsibilities of the engineering community at our core, advocating in professional and policy capacities.

We are pleased to respond to the Proposed Amendments to the Greenbelt Plan (ERO 019-6216) with the input of our experienced members of the Sustainable Cities Task Force, a task force dedicated to offering expert insight that will make Ontario a sustainable national leader.

The Greenbelt Impact

Ontario's Greenbelt is the heart of the Greater Golden Horseshoe and provides a stable source of clean water and air, supports local agriculture, and is home to lucrative tourism experiences. At the height of the climate crisis, it is evermore essential now to permanently protect the Greenbelt to maintain the level of climate resiliency it provides.

Since the formalization in 2005, the Greenbelt has provided economic and agricultural benefit while safeguarding precious natural resources. Economically, the Greenbelt provides ecosystem services that cleans our air and water, while providing flood protection, all of which contributes to the annual economic impact of \$9.6 billion. At a time where our economy is recovering from the effects of the ongoing pandemic, this exponential impact should not be overlooked. The Greenbelt lands support local agricultural by enabling farmers to grow essential crops on high quality soil and positive climate settings. The 750,000 acres of protected farmlands that reside on Greenbelt lands generate 68 per cent higher revenue than the average Ontario farm, which is approximately 4,782 farms.

Ontario is one of the most sustainable provinces in Canada, with investments, programs and innovations that are designed to fight the climate crisis and offset emissions. The Greenbelt contributes drastically to

the sustainability of this Province. The Ontario Greenbelt, the worlds largest protected land, is responsible for offsetting 71 million tonnes of carbon each year and slows the effects of the climate crisis by absorbing carbon dioxide in the atmosphere. An impact that cannot be ignored, especially during a time where the effects of the climate crisis is globally threatening.

The above information is provided by The Greenbelt Foundation, www.greenbelt.ca.

Professional Input

The Ontario engineering community **strongly opposes** the proposed building on protected Greenbelt lands. Engineers dedicate their innovative talents towards scientific, data-supported actions that provide solutions to global problems. The original inclusion of these lands in the Greenbelt was based on extensive research and analysis while the choice of the removal of the protected lands were not subject to an environmental and economic analysis.

One of the objectives in the proposed legislation is to mitigate the rising cost of housing, an apparent issue that negatively impact Ontarians. While a bold action must be taken to lower housing costs, there has been no data analysis conducted that indicates the removal of Greenbelt lands will fulfill that goal, a concern echoed by the Association of Municipalities of Ontario (AMO). If an analysis has been carried out, it must be available to the public. Furthermore, there is a lot of land that has already been purchased and held by developers outside the protected Greenbelt area that is already zoned and approved for housing development. In addition, there has been no legislation written that mandates that any savings given to developers through the passing of Bill 23 will be passed onto home buyers. It is feasible that these lower costs will just be added to increased profits by the home builders and developers, as housing demand is still at all time highs, and developers/home builders can charge high market values for these homes, pricing well outside the limits of young, first time home buyers.

Ontario has ambitious environmental goals. There is a level of responsibility the Province has to the people of Ontario to take action that directly fulfills those goals and does not hinder on our progress. This type of development proposed in the legislation has been shown to be costly, carbon intensive and environmentally harmful. This will take several steps backwards in making Ontario a national leader in building sustainable cities.

In recent years, the intent of provincial land use planning was to minimize urban sprawl and promote intensification as much as possible. If executed, the action of removing lands from the Greenbelt for residential development will not only work against those objectives but will make providing efficient transit services difficult. There has been little evidence to show the conversion of the Greenbelt lands will include planning for reasonable proximity to jobs for the future residents, implying substantial commuting will be necessary. Without efficient transit services reaching those areas, the residential developments on the protected lands will be a disservice to Ontario residents.



Conclusion

Converting Greenbelt lands to residential development will hinder Ontario's carbon targets without providing economic return, nor reduce the cost of buying a new home. The Greenbelt proves to be an asset to Ontario's economy through many facets, including ecosystem services, flood protections, local agriculture, and tourism. While mitigating housing costs is an important goal, the actions proposed must be supported through scientific data to provide fiscal benefit while protected Ontario's green lands. This proposed legislation will hinder Ontario's ability to meet its carbon reduction targets and will be environmentally and economically harmful. The Ontario Society of Professional Engineers (OSPE) appreciates the opportunity to consult on this matter and looks forward to participating further.

Sincerely,

A handwritten signature in black ink that reads "Sandro Perruzza".

Sandro Perruzza
Chief Executive Officer
Ontario Society of Professional Engineers

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