



ERO# 019-6216

# Growing the Greenbelt

Increasing Community Resilience Through Thoughtful Land Use Planning



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FOR: TRANSITION TO LESS WASTE (TTLW)

Directed to the Honourable Doug Ford, Premier of Ontario  
Steve Clark, Minister for Housing and Municipal Affairs  
Ernie Hardeman, Chair, Standing Committee on Finance and  
Economic Affairs, MPP- Oxford County  
The Greenbelt Consultation Coordinators



**Re: Recommendations to Grow the Greenbelt and Increase Housing Density in Existing Urban Areas**

Dear Greenbelt Consultation Coordinators,

Transition to Less Waste (TTLW) is an Ingersoll based nonprofit organization that encourages environmental sustainability within Ontario and beyond. We promote the principles of a conserver society and key concepts of the worldwide Transition movement. We thank you for the opportunity to comment on plans to open over 7000 acres of the Greenbelt for development.

TTLW believes that in order for the Greenbelt’s natural heritage features to function properly, prudent plans should be in place to protect and grow it, and that housing needs should be met through an increase in middle density and multigenerational housing in existing urban areas.

Ontario’s wetlands, woodlands and grasslands are becoming increasingly fragmented and unable to support biodiversity. It is imperative that we work now to retain the natural heritage features that we still have.

***“The loss of species, ecosystems and genetic diversity is already a global and generational threat to human well-being. Protecting the invaluable contributions of nature to people will be the defining challenge of decades to come<sup>1</sup>.”***

—Sir Robert Watson, Chair, IPBES

The Ontario Ministry of Natural Resources and Forestry noted in 2016 that ***“Loss of habitat is the biggest threat to Ontario’s biodiversity. The most serious habitat loss is happening in Southern Ontario. The habitat loss is mostly the result of: new homes, communities, and roads being built.”<sup>2</sup>***

The Environmental Commissioner of Ontario shared that:

***Habitat loss and degradation is the single greatest threat to biodiversity – it is the primary reason that most species become extinct or locally extirpated. There are many causes of habitat loss, including: land use change (e.g., converting natural areas to new subdivisions or farm land), resource extraction (e.g., logging or mining), fragmentation (e.g., roads, hydro corridors), pollution, invasive species, and changing climatic conditions.***

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<sup>1</sup> IPBES Global Assessment Preview. Ipb.es.net, 2019

<sup>2</sup> Conserving biodiversity, Ontario.ca

The Environmental Commissioner also shared information in their 2018 report, Back to Basics, on the benefits Ontario receives from our remaining wetlands:

***Wetlands provide Ontario with an amazing number of benefits. Wetlands can store water, acting like a sponge during wet periods and gradually recharging groundwater, which in turn replenishes soils and streams across the larger landscape. Wetlands provide critical reservoirs during storms and heavy rains, protecting us from the worst impacts of floods. Wetlands can stabilize shorelines and control erosion, protecting both the land and water quality. They purify water by filtering out nutrients, sediments and pollutants from groundwater and surface runoff before discharging it to other water bodies. Wetlands also provide habitat for many species of plants and animals, including an estimated 20% of Ontario's species at risk... Wetland services are becoming even more essential as our climate changes. Intact wetlands help to maintain water flow patterns and reduce some of the impacts of extreme weather events. Even a wetland as small as 2 hectares can retain water runoff from an area 70 times its size, buffering against flooding. Wetland conservation can also contribute to climate change mitigation, as undisturbed wetlands can store large quantities of carbon.***

Despite the many benefits retaining wetlands provide, including “\$14 billion in annual economic benefits, [and a reduction in] the costs of flood damage from severe storms by up to 38%”, over 72%<sup>3</sup> of southern Ontario’s wetland cover has been destroyed. It is imperative that we retain Ontario’s remaining wetlands, for economic reasons, and also because retaining them supports biodiversity and provides beautiful natural areas that increase the mental and physical health and well-being of Ontarians.

Ontario’s forests are on the front lines of climate change, and provide homes to many of our province’s species of concern: ***Over half of the 690 species of conservation concern in Ontario use habitat in southern Ontario forests. Forests and trees are also indispensable for climate change adaptation. They cushion the effects of warming temperatures and changing precipitation patterns by retaining moisture, filtering increased stormwater, cooling the area around them, and providing refuge for species stressed by the rapidly changing climactic conditions***<sup>4</sup>.

Natural heritage areas support climate resiliency – providing \$3.2 billion in ecosystem services per year<sup>5</sup>; wetlands manage stormwater, absorb rainwater and help to prevent flooding; tree cover reduces air temperature and river valleys cool urban areas; forests, wetlands and soils absorb carbon dioxide.

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<sup>3</sup> Environmental Commissioner of Ontario, Back to Basics, Southern Ontario’s Wetlands and Forests, 2018, Greenbelt Foundation t

<sup>4</sup> Environmental Commissioner of Ontario, Back to Basics, Southern Ontario’s Wetlands and Forests, 2018

<sup>5</sup> Greenbelt Foundation

Inappropriate development can lead to soil erosion, loss of land to grow local food, reduction in specialty crop & tender fruit and grape growing areas, and threaten local food security. The Greenbelt reduces Ontario's reliance on imported food and additionally offers craft beers and ciders, farmers markets, and culinary tourism, which help to contribute to the positive \$9.6<sup>6</sup> billion economic contribution the protected Greenbelt provides yearly.

In 2019, the Environmental Commissioner provided solutions for providing more equitable and environmentally sustainable housing in the report, A Happy, Healthy, Prosperous Ontario: ***The province's Growth Plan for the Greater Golden Horseshoe claims it will accommodate the rapidly growing population in compact, complete communities that give residents a better quality of life. Instead, the Plan increases costly urban sprawl, by directing hundreds of thousands of people to new, distant suburbs with high servicing costs, few employment opportunities, and too little density to support public transit. Proposed amendments to the Growth Plan will spread new suburbs over more agricultural land, forests and wetlands. This will drive up climate and air pollution, reduce resilience to floods, increase costs for municipalities, and lock future residents into long, difficult, expensive and congested commutes.***

***Ontario can and should accommodate its growing population (a 30% increase by 2041) without creating further urban sprawl and gridlock. There is room to add the right housing supply in the right locations – creating compact, complete communities with access to jobs and transit, while revitalizing the inner suburbs and other built-up areas that today are stagnant or losing population. Building a greater mix of housing in existing areas can shorten commutes, reduce fossil fuel use, help address high living costs, and protect natural areas and farmland.***

Thank you for your consideration of our comments.

Transition to Less Waste also endorses Ontario Nature's comments on ERO# 019-6216.

Sincerely,

Michael Farlow, President,  
Suzanne Crellin, Special Projects Director, Transition to Less Waste

*These comments are submitted in good faith regarding ERO# 019-6216 and related matters. The opinions and beliefs contained are those of the commenting organization, Transition to Less Waste (TTLW) on proposals we believe may impact the natural environment and public health and wellbeing.*

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<sup>6</sup> Greenbelt Foundation