

RE: Environmental Registry of Ontario Posting 019-6216 – Proposed

Amendments to the Greenbelt Plan

From: Steve Ganesh, Commissioner (A) – Planning, Building and Growth

Management Department, City of Brampton;

Michael Won, Commissioner (A) - Public Works & Engineering Department,

City of Brampton

To Whom It May Concern:

The City of Brampton (herein referred to as "the City") appreciates the opportunity to provide comments on the proposed changes. The City has a number of concerns with the proposed amendments to the Greenbelt Plan and have summarized comments below. Despite not having lands identified for removal, the City recognizes that this sets a precedent for future development pressures to erode protected lands.

City Comment:

- Ontario created the Greenbelt in 2005 to protect agricultural and environmentally sensitive lands from development and to contain urban sprawl within the in the Greater Golden Horseshoe area
- The Greenbelt plays a critical role in protecting the headwaters of 13 major river valleys, significant wetlands and forests and is key tool in Ontario's efforts to address climate change
- Removing 7400 ha from the Greenbelt will result in additional urban sprawl as municipal infrastructure will need to be expanded further from urban centres.
- The Province has not demonstrated the case for encroaching into the Greenbelt to
 provide more land for housing. The Province has ignored the advice of its *Housing*Affordability Task Force, which introduced 55 recommendations to increase the supply
 of market housing in Ontario that explicitly recommended against Greenbelt
 encroachment.
- A significant portion of the proposed 1:1 mitigation of encroachment into the Greenbelt relies on the inclusion of Urban River Valleys in the Greenbelt. According the Greenbelt Act, Urban River Valleys already have significant protection from development through municipal Official Plans and Conservation Authority policies. In addition the policies for the Urban River Valleys only pertain to publically owned lands. As such, adding Urban River Valleys to the Greenbelt falls short of Act's requirement to achieve a 1:1 mitigation policy.

City Recommendation:

 The City recommends that the Province repeal the proposed change to the Greenbelt Act based on the Province's inability to meet its 1:1 mitigation policy for removing 7400 ha from the Greenbelt.



• Instead the Province should focus on implementing the recommendations of the *Housing Affordability Task Force* including increasing densities within existing neighbourhoods and transit nodes.

The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments. Please let us know if you have any further questions.

Sincerely,

Steve Ganesh, MCIP, RPP

AN

Commissioner (A),

Planning, Building & Growth Management

Michael Won

Michael Won Commissioner (A),

Public Works & Engineering