

ERO 025-1133 Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area Nov 9/25 deadline

Summary of Concern: Caution and Need for Continued Oversight on Greenbelt Land

The Greenbelt is essential for Ontario's climate resilience, biodiversity, food security, and economy, making permanent, legislated protection critical for present and future generations.

Since 2018, the Ontario government's approach to Greenbelt lands has drawn public scrutiny, particularly following the 2022 decision to remove certain areas for housing development. While the current proposal to release lands no longer required for electricity infrastructure may appear practical, questions remain about the long-term use of these lands. Given ongoing development pressures in the Greater Toronto Area and the province's previous land-swap decisions, there is potential for repurposing if safeguards are not explicit. Although Bill 136 now requires legislative approval for changes to the Greenbelt, clear management and transparency are essential to ensure that any lands released from the NAI are permanently protected and not made available for future development.

Strict oversight and transparency are crucial to maintain public trust and ensure the government is accountable and acting in good faith.

Input on the proposed refinement of the NAI.

While Climate Action Newmarket Aurora appreciates the attempt to more narrowly target only lands truly needed for transmission infrastructure and to reduce unnecessary impact through the Narrowed Area of Interest, we would recommend explicitly stating the following in the amendment:

1. Freed lands should be returned to the Greenbelt

When lands currently under protection in the NAI are determined not to be required for transmission infrastructure, it should be ensured that the lands are "released" **back into the Greenbelt**. This ensures those lands remain permanently protected and continue to deliver environmental, agricultural, hydrological, and ecological benefits.

2. No future development or boundary loosening without legislative action

The mechanism for that reintegration should include a legal safeguard: once lands are returned to the Greenbelt, they must not be eligible for any future removal, boundary adjustments, or development proposals except through full legislative amendment of the Greenbelt Act (or equivalent). In other words, the "return" must be irrevocable under regulation.

3. Greenbelt Statute Law Amendment Act, 2023 (Bill 136)

Ontario's **Greenbelt Statute Law Amendment Act, 2023** (Bill 136) has already embedded key protections and therefore releasing lands from the NAI for non-transmission purposes (e.g. for housing or other development) would run counter to the spirit and letter of the statute's protections.

4. Precaution against “land-swapping” or loopholes

Any “release” from the NAI should not create precedent or a legal pathway for later development. The reintegration must be absolute and permanent. The North Gwillimbury Forest illustrates why: though the Province announced its addition to the Greenbelt in 2021, parts remain in procedural limbo. Only transparent, legislated inclusion and conservation authority oversight can guarantee lasting protection.

5. Transition provisions and clarity

The consultation and final decision should clearly specify:

- The precise parcels to be returned to the Greenbelt (with mapping and survey reference).
- The timing of that return (e.g. immediately upon determination that transmission is not needed).
- The removal of any regulatory protections tied to NAI that might conflict with Greenbelt status.
- That if, in the future, transmission infrastructure is never built, no portion of those lands may ever be treated as “releaseable” for development.

6. Rationale – public interest, environmental integrity, climate resilience

- The Greenbelt is an irreplaceable environmental asset supporting biodiversity, water resources, carbon sequestration, local agriculture, and climate adaptation.
- Given the many pressures for urban growth in the GTA, preserving as much Greenbelt land as possible is crucial.
- Because the NAI was initially drawn broadly (as a buffer or “reservation”) rather than being based on exact engineering needs, it is reasonable and responsible to scale it back but the default status of the surplus should be permanent protection.

Conclusion / Requested Outcomes

Climate Action Newmarket Aurora supports the proposal’s principle that only lands strictly needed for transmission should remain in the NAI. We urge that freed lands be immediately and irrevocably returned to the Greenbelt, under the full force of the Greenbelt Statute Law Amendment Act, 2023 (Bill 136). We request that the Ministry include in its final regulation or plan amendment explicit language to that effect, accompanied by maps and legal definitions, and commit to no future removal except via legislative amendment.