



# AMO's Submission to ERO 019-6216: Consultation on Proposed Amendments to the Greenbelt Plan

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Comments to the Ministry of Municipal Affairs and Housing  
on ERO 019-6216

December 2, 2022

## Preamble

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that represents municipal governments across Ontario. Together with our members, we address common challenges facing our residents and provide advice to the government about solutions to them. AMO has been actively involved in housing and homelessness advocacy for years, as Ontario's 444 municipal governments are responsible for building strong, complete communities, of which housing – both home ownership and rentals – is a key component.

Housing affordability and building supply is a challenge all Ontarians share. There is much that can be done collectively by working together to increase housing supply, diversify the mix and increase affordability. Solving the housing crisis will require an all-of-government approach by all three orders of government.

## Introduction

Municipal governments are committed to working with the Government to increase the supply of housing and to improve housing affordability in Ontario. That is why we provided a written submission to the [More Homes for Everyone Plan](#) in the Spring, and [Bill 23](#), despite not being selected to speak at the Standing Committee on Heritage, Infrastructure and Cultural Policy.

Then on November 4, 2022, the province announced a 30-day consultation on proposed amendments to the Greenbelt Plan, Greenbelt Area boundary regulation, and Oak Ridges Moraine Conservation Plan. This brings the total number of housing-related consultations to now over 20, which are all due by the end of December 2022.

AMO does not typically comment on regional issues given its mandate to work on behalf of all municipal governments across Ontario. However, our members are concerned that these changes will have province-wide environmental impacts. The logic that Greenbelt lands are needed to increase the supply of housing is also being questioned.

AMO encourages the Ministry to consider this feedback and extend the deadline for comments to 45 days to provide Councils the opportunity to meet. Swearing-in ceremonies of new municipal Councils only began on November 15, 2022.

## Proposed Amendments to the Greenbelt Plan (ERO 019-6216)

Overall AMO agrees with the province's Housing Affordability Task Force report that, "a shortage of land isn't the cause of the problem," and that "land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts." (p. 10).

The Ontario Greenbelt Alliance estimates that there are 88,000 acres across the Greater Toronto Hamilton Area that are already designated and ready for development in communities close to existing transit and services. In addition,

Ontario Regional and Single-Tier Treasurers have identified over 285,000 housing units across 19 large municipalities where approvals have been granted but developers have delayed building – in some instances for years.

Instead of developing environmentally sensitive lands critical to safeguarding drinking water and agricultural production, the focus should be on making better use of the land that is ready for housing now.

## **Recommendations**

AMO is requesting that the province rethink its proposal given the strong opposition from various stakeholders and the fact that the province's own Housing Affordability Task Force and member municipalities' statistics show that the availability of land is not an issue.

If the province does not delay the consultation and continues with its proposal to use these environmentally sensitive lands for development, AMO recommends that the province:

1. Consult with member municipalities affected by these amendments to the Greenbelt Plan before any development proceeds.
2. Engage with Indigenous communities before proposed changes to the Greenbelt proceed any further. The government must meaningfully engage with affected Indigenous communities to ensure that their interests and concerns are addressed. Consideration of the Crown's Duty to Consult must be part of the province's consultation.
3. Work with the development industry to understand why the over 285,000 housing approved housing units across 19 large municipalities and others across the province have not begun construction.
4. Finalize membership and begin meeting with the municipal co-chaired Housing Supply Action Plan Implementation Team announced in August 2022 to move forward on housing in collaboration with municipalities. This forum was originally intended to assist in Bill 109 implementation and believe it will be critical to expand the scope of its work to Bill 23.

AMO believes that without amendment, the Greenbelt proposals are a solution without a problem. We encourage the Ministry to strongly consider these recommendations and to take the time to get this right, especially in the context of Bill 109 and Bill 23 changes.

## **Conclusion**

On behalf of municipal governments across Ontario, thank you for your consideration of the comments provided in this submission.