



CANADIAN INSTITUTE FOR  
ENVIRONMENTAL LAW AND POLICY

L'INSTITUT CANADIEN DU  
DROIT ET DE LA POLITIQUE  
DE L'ENVIRONNEMENT

130 Spadina Avenue Suite 305  
Toronto, Ontario M5V 2L4

Tel: (416)923-3529  
Fax: (416)923-5949  
www.cielap.org  
cielap@cielap.org

April 30, 2008

Barbara Konyi  
Manager  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay Street, Floor 14  
Toronto, Ontario M5G 2E5  
Fax: (416) 585-4245

Dear Ms Konyi,

**Re: Criteria for assessing municipal requests to expand the Greenbelt, EBR  
Registry Number 010-2866**

I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP) to provide comments on the Ministry of Municipal Affairs and Housing's proposal to develop criteria for assessing municipal requests to expand the Greenbelt. CIELAP was founded in 1970, with the mission to provide leadership in the research and development of environmental law and policy that promotes the public interest and sustainability.

CIELAP strongly supports the Ministry's proposal to develop draft criteria for public input that could be used in considering potential requests by municipalities to grow the Greenbelt. As you know, earlier this month CIELAP released a comparative study of five other greenbelts in Europe and North America, entitled *Ontario's Greenbelt in an International Context*, with a number of recommendations for the Ontario Greenbelt. The report is available on our website at [www.cielap.org](http://www.cielap.org).

One of the primary recommendations in this report was that efforts be made to grow the Greenbelt in size to respond to the threat of leapfrog development. We saw evidence in nearly every other greenbelt studied that development pressure had eroded the size and quality of those greenbelts. It is promising that there are municipalities in Ontario that want to add their land and expand the Greenbelt, and it is important to develop a process for provincial government consideration of these municipal requests.

Overall, CIELAP is in support of the draft criteria set out in the Ministry's consultation paper. We do however offer a few specific comments:

*Advancing the Environmental Agenda*

- In addition to demonstrating the specific measures council has taken to engage the public, key stakeholder organizations and Aboriginal communities about growing the Greenbelt in its municipality, the municipality should provide a summary of the input it has received as a result of these measures.
- As presented in the draft criteria, it is essential that proposed expansions protect environmentally sensitive and agricultural lands while meeting the needs of growing communities, and are consistent with the vision and goals of the Greenbelt Plan.
- Additional funding and support may be necessary to assist municipalities in meeting these criteria so that they may be considered for inclusion in the Greenbelt
- Funding and support may also be necessary to encourage municipalities to consider requesting inclusion in the Greenbelt. A lack of funding to support the regional and local planning needed to comply with requirements on Greenbelt-protected lands may be a deterrent to some municipalities wishing to expand the Greenbelt boundaries, particularly if they already fall under the jurisdiction of other plans. For example, the Town of Caledon has estimated that it will cost \$1,154,000 over about 2.5 years to implement its responsibilities under the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan and Places to Grow Plan.
- The Ministry should also consider how the provincial government may support proposed expansions by introducing further agricultural policies and programs to ensure the financial viability of farming in the Greenbelt.

Thank you for the opportunity to provide input on this proposal. Please contact me, or Maureen Carter-Whitney, CIELAP's Research Director, if you wish to discuss any of these comments further.

Yours sincerely,



Anne Mitchell  
Executive Director

Cc: Hon. Jim Watson, Minister of Municipal Affairs and Housing  
Gord Miller, Environmental Commissioner of Ontario