

Chief Executive Officer



December 19, 2022

**BY E-MAIL ONLY** ([parkwaybeltwestplan@ontario.ca](mailto:parkwaybeltwestplan@ontario.ca))

**Re: TRCA Response to Request for Comments  
Proposed Revocation of the Parkway Belt West Plan (ERO #019-6167)**

Thank you for the opportunity to comment on this posting on the Environmental Registry of Ontario (ERO) by the Ministry of Municipal Affairs and Housing (MMAH). We understand the Ontario government is seeking feedback on a proposal to revoke the Parkway Belt West Plan, 1978 (PWBWP), under the *Ontario Planning and Development Act, 1994* (OPDA). The ERO states that this revocation would support the government's commitment to streamline, reduce, and eliminate burdens and to potentially increase housing supply.

Toronto and Region Conservation Authority (TRCA) has an ongoing interest in the proposed changes given our roles as:

- A regulator under Section 28 of the *Conservation Authorities (CA) Act*;
- A public commenting body under the *Planning Act* and the *Environmental Assessment (EA) Act*;
- A delegated commenting body to represent the Provincial interest in natural hazards;
- A service provider to our municipal, provincial, and federal agency partners;
- A resource management agency operating on a local watershed basis; and
- One of the largest landowners in the Greater Toronto region including of lands within and abutting the PWBWP.

In these roles, and as stated in the "Made-in-Ontario Environment Plan", CAs work in collaboration with municipalities and stakeholders to protect people and property from flooding and other natural hazards, and to conserve natural resources. With TRCA's roles, responsibilities, and experience in mind, we offer the following comments.

#### **GENERAL COMMENTS**

TRCA appreciates the Province's important goal of addressing the housing crisis through expediting development approvals and has taken streamlining actions that help support this objective. We do not believe, however, that resolving the housing crisis needs to come at the expense of the environment. To this end, we provide the following comments.

The proposal notes four main goals upon which the Parkway Belt West Plan was created and emphasizes that it has been successful in protecting land for transportation and utility corridors and preserving the links between urban areas. Little is provided, however, in relation to evaluating the goal of providing a system of open space and recreational facilities within the Plan area – a key component of the Plan. In addition, the PWBWP has played and continues to play a vital role in protecting transportation and infrastructure corridors that are important to the North American, national, and provincial economy.

Encroachment by competing land uses can compromise these irreplaceable infrastructure corridors including sewage systems that are of vital importance to the health of TRCA managed watersheds in the GTA and this should be weighed heavily in any decision making about the potential revocation of this plan. Instead, the proposal generally notes that years of successive provincial legislation, land use policy and plans have modernized the “outdated” policy framework, however, this is not clarified in any detail.

Implications to the revocation of the PWBWP could result in negative and permanent impacts to infrastructure and the natural environment prior to ensuring core elements of the Plan are addressed elsewhere through existing and/or proposed policy. Of particular note are the ecological implications of lost open space corridors and linkages. These corridors and linkages are designed to support continuous areas of habitat and species movement. The features, functions, corridors, and linkages provided by the Parkway Belt are critical in supporting biodiversity especially within the now urban settings where they are located. Open space corridors contain natural heritage features and areas as well as natural hazards and their associated setbacks, allow for the interconnectedness of these features to be maintained to support healthy and dynamic ecosystems in the face of biodiversity loss and extreme weather events.

These open space corridors are also important for combatting the effects of climate change, supporting carbon sequestration and pollution uptake. In addition to ecological functions, the provision of these open space corridors also brings social benefits. For example, we note that portions of the PBWP comprise vital elements of the [TRCA Trail Strategy for the Greater Toronto Region](#). A multi-use inter-regional trail was part of the original PWBWP, and which should be protected so necessary active transportation connections can be achieved. In addition, open spaces in the PWBWP have been factored into watershed plans for the major river systems in our jurisdiction including the Humber, Don, and Rouge Rivers and Etobicoke Creek.

It is acknowledged that, since the PBWP’s inception, legislation, policy, and provincial plans have been introduced to provide a more up-to-date framework for infrastructure, natural heritage, agriculture, and parks and open space areas. Nevertheless, the proposal does not provide insight as to how all Plan objectives will continue to be met, or how potential policy gaps could be addressed. Moreover, legislative changes through Bill 23, proposed changes to the PPS, Growth Plan and Ontario Wetland Evaluation System may undermine protections in the existing policy framework outside of the PWBWP under the OPDA. following revocation. In the absence of a thorough and transparent analysis of the implications and opportunities to fill identified policy gaps resulting from proposed Plan revocation, core elements of the PBWP, may be lost, including the identification and protection of open space and utility corridors and linkages between intensifying communities.

Although the PPS and provincial plans contain good policies for infrastructure planning, much of infrastructure planning takes place under an environmental assessment process, which does not fall under the PPS or for which there are exemptions in the provincial plans. Further, the PBWB constitutes a connected green corridor already in majority public ownership or easement agreements. In the urban context, this form of green infrastructure is a valuable public resource, and offers many similarities or opportunities to the [Meadoway](#) project, a TRCA initiative involving Hydro One and municipalities to transform 16 kilometres of underutilized lands within a hydro corridor into one of Canada’s largest linear parks. The Meadoway concept could be successfully exported across large portions of the PWBWP as a provincial / municipal program. The PWBWP provides a useful policy framework for this plan. The Plan as it provides an important amenity, active transportation linkage opportunity, while continuing to protect vital infrastructure corridors that will come under greater pressure and that will become even more vital over time.

Therefore, TRCA recommends that the PWBWP stay in place until a more fulsome Plan review process involving public consultation is undertaken. Much greater detail must be communicated by the Province to stakeholders as to the rationale for the revocation and about what alternative planning controls or policy instruments will be put in place to address the gaps that will be created by removal. Municipalities and stakeholders need time to consider a proposed revocation and to build this into future OP and Zoning reviews and the time provided for this via an ERO posting is simply inappropriate and inadequate.

If a revocation occurs without any additional consultation, we recommend that some parts of the PWBWP including some provincially owned and TRCA owned or managed properties be considered for inclusion directly into the Greenbelt Plan. We note that this opportunity was not considered in the Greenbelt Plan ERO posting and we recommend that it should be explored in more detail through a working group. We at a minimum suggest consultation with our organization, our neighbouring CA's in the GTA including the Credit Valley Conservation Authority and Halton Conservation and all upper and lower tier municipalities within the PWBWP area. If the government still intends to revoke this plan that has achieved so many incredible benefits for the GTA and southern Ontario as a whole, prior to revocation of the PWBWP, the Province should work collaboratively with government agencies, CAs, and other stakeholders to assess policy gaps for open space and trail planning in both the development and infrastructure planning processes, and outline how they will be addressed, particularly in light of recent legislative and policy changes under Bill 23 and associated proposed regulations.

In conclusion, there are a number of risks presented by revoking this Plan without details provided on what would take its place. The PWBWP has functioned well to protect vital infrastructure and to protect greenspace and if left intact or amended, to address any potential modernization objectives, can continue to provide this function into the future. Significant funds and efforts were invested by the Robarts and Davis government and successive provincial governments to achieve the PWBWP. The proposed removal could result in risks and added costs to taxpayers in trying to achieve public objectives such as active transportation linkages and other public infrastructure and greenspace objectives within the PWBWP.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please reach out at 416.667.6290 or at [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca) at your earliest convenience.

Sincerely,

<Original signed by>

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