



**Ontario**  
Home Builders' Association

---

20 Upjohn Rd., Suite 101 (416) 443-1545  
North York, Ontario Toll Free 1-800-387-0109  
M3B 2V9 Fax: (416) 443-9982  
[www.ohba.ca](http://www.ohba.ca) [info@ohba.ca](mailto:info@ohba.ca)

October 30, 2018

Ontario Growth Secretariat  
Ministry of Municipal Affairs  
777 Bay St, 17<sup>th</sup> Floor.  
Toronto ON M5G 2E5

**RE:** Growth Plan: NHS & AG System

On behalf of the Ontario Home Builders' Association (OHBA) and our 11 local home builders' associations impacted by the Growth Plan (BILD, Niagara HBA, Haldimand-Norfolk HBA, Brantford HBA, Hamilton-Halton HBA, Guelph & District HBA, Waterloo Region HBA, Dufferin County HBA, Simcoe Country HBA, Durham Region HBA and the Peterborough & the Kawarthas HBA), we appreciate the opportunity to provide comments following the workshop hosted by the Ministry on October 15<sup>th</sup>.

**OHBA Commentary:**

OHBA continues to support guiding principles that protect our most valuable environmental resources, and the creation of complete communities which are the foundation of the Growth and Greenbelt Plans. Ontario's GGH is one of Canada's economic engines containing some of Canada's best farmland and natural features. It is also one of the fastest growing regions in the country which is why it is so critical that the plans work together to provide it with a broad, long-term and comprehensive planning framework. It is equally critical to ensure that a clear, transparent and effective public policy framework exists which is able to guide and support the extensive and unwavering growth being experienced here. However, our members have some serious concerns regarding the Province's recent mapping exercise related to the creation and protection of the natural heritage system and agricultural system. We believe this overly stringent regulation will impede our ability to house this Provincially-driven growth in a manner that is both attainable and affordable for homeowners and would-be homeowners.

As stakeholders in the planning process, we are partners with the government in creating complete, transit-oriented communities, protecting the environment and ultimately implementing the PPS and Provincial Plans. Our comments are intended to assist the government in achieving sustainable growth by providing for housing supply and choice, creating complete communities, attracting employment opportunities, improving inter-plan co-ordination and balancing the Province's economic, social and environmental interests over the long-term.

**OHBA is very concerned that the mapping of the provincial NHS is not accurate, as it was never ground-truthed at a scale that is appropriate for development review.** OHBA members have expressed their concern that the mapping released is not adequate for accurate decision-making since it has been found to include features (or miss features) that should not (or sometimes, should) be included. Similarly, after listening to many municipalities during the workshop sessions, we could that their comments often align with our perspective, which is that the new mapping is inadequate as it demonstrates disregard for industry standard, science-based

(or evidence based) methodology. We believe a better NHS can be created through healthy collaboration (using a group up approach) between the development industry, municipal realm and Conservation Authorities. This collaboration already existing on the ground across much of the GH.

OHBA understands that municipalities will be able to refine provincial mapping of both the NHS and Agricultural System through the Municipal Comprehensive Review process, however this leaves a great deal of uncertainty for all stakeholders when coupled with yet-to-be-understood impacts associated with the Province's recently released Guidelines for the MCR process. Accurate, agreeable mapping of the NHS is critical to ensuring not just its protection, but also reasonable restrictions on *only* those lands where 'Core Features' actually exist. **All of the provincial mapping should be evidence based utilizing science, local knowledge, mapping and resources to ensure its accuracy.** Simply put, drawing lines on a map from a desktop computer which are not based on a detailed environmental and technical analysis is not acceptable to OHBA and its members.

The desktop exercise completed by the Province is not the right way to create an NHS. The NHS must be ground-truthed so that when areas are being investigated (or staked) all stakeholders have the ability to ensure features can be appropriately scrutinized based on science-driven merits and can then be protected (or not) where appropriate. Furthermore, the municipal refinement policy needs to provide an opportunity for re-evaluation of the NHS in instances where it can be recognized that the restoration of more valuable areas within *existing* NHS systems or the Greenbelt may be preferable to enhance the overall system instead of unnecessarily adding less valuable table land just to call it NHS. OHBA is supportive of a mitigation hierarchy and believes that there should be opportunities for NHS enhancement in exchange for the removal of artificial NHS buffers and designations where it can be demonstrated that there is a net benefit through such exchanges.

The new provincial NHS boundary should not be treated as the starting point where there continues to be additional features and buffers added, at a later date on an ad-hoc basis. Any buffers should be based on environmental and technical analysis and determined as part of the planning and development approvals process. Through the refinement process, municipalities should be provided with the latitude to exempt features that do not require protection.

The minimum 500m (computer generated) linkage features remain OHBA's primary concern, which was strongly voiced during the public consultation sessions we participated in back in 2017. While OHBA recognizes that in some cases linkage features can be a valuable environmental planning tool to connect and protect corridors between "core" natural heritage features, the methods and mapping of a network of NHS connected by these linkages are a "blunt" policy instrument. OHBA notes that many municipalities and CAs already have their own mapping and protection tools for local NHS linkages, which should remain the accepted mapping standard(s). OHBA is very concerned that many of the linkages provide high-level protections on lands that are "working landscapes" including agricultural uses, private businesses, infrastructure ROWs and even homes that may contain low natural heritage values.

The reality is that in many cases, a 500m NHS linkage may traverse through, and protect lands that do not inherently have a higher ecological and environmental value than immediately adjacent lands on either side of the linkage. We note that often times those lands may have simply been protected based on the model suggesting it was the "best route" between two core areas of NHS protection. OHBA is very concerned that the linkages are to be afforded high level provincial policy protections despite a lack of scientific evidence or rationale to do so. **OHBA therefore strongly recommends that the linkage features be eliminated entirely from the provincial Natural Heritage System.**

OHBA's primary recommendation to support the implementation of an NHS and Agricultural System into the Growth Plan is that these systems should NOT be applied to the Whitebelt lands. OHBA is supportive of formalizing the Whitebelt for long-term population and employment growth beyond the current Growth Plan planning horizon given their strategic locations adjacent to existing and planned infrastructure and to existing settlement areas. As the Whitebelt is the long-term urban reserve to accommodate future growth in the decades

beyond the current Growth Plan horizon all Whitebelt lands should be considered off-limits. The effect of these policies will further diminish and place more strain on an already severely constrained housing supply. There should be no additional barriers or restrictive designations that will add uncertainty, while frustrating and delaying an already cumbersome planning process. The province should also recognize that as any application or settlement boundary expansion proposal moves through the planning process, it will ultimately be required that any significant natural heritage features or environmentally sensitive lands will be protected. **OHBA therefore recommends that the Whitebelt should be defined and designated as an urban reserve in the Growth Plan and be exempted from the NHS and Agricultural System mapping.**

OHBA questions the rationale for an NHS that so heavily overlaps with an Agricultural System, when each system has different attributes and policies. **OHBA recommends the proposed methodology be refined to omit agricultural property with no significant natural heritage features.** Furthermore, the provincial mapping has largely been based on LIO, and agricultural mapping, however it should be rooted in the MCR analysis and/or historic local-level NHS analysis. As suggested previously, OHBA believes that it is better to apply a bottom-up process rather than the current top-down exercise and encourages the Province to consider changing the manner in which NHS mapping is created, evaluated and ultimately applied.

Lastly, it is important for the Province to consider a range of uses and flexibility for NHS core areas. OHBA's submission regarding the Greenbelt within the Coordinated Review (EBR #012-7195) recommended that the Province should consider partnership programs and strategic investments to enhance recreational opportunities throughout the existing Greenbelt Plan as well as allowing for public stormwater management facilities. OHBA reiterates this recommendation for the NHS, as the Province should consider supporting a range of provincial goals and objectives (i.e. parkland, stormwater management facilities and recreational designations). Further, OHBA supports the Province allowing for the opportunity to incorporate additional permitted uses in the NHS, outside of the key protected key features, based on their ability to enhance other Provincial objectives and where environmental protection has been balanced.

On behalf of our 4,000 member companies and 11 local associations within the Growth Plan area, we look forward to ongoing dialogue and consultation with respect to growth, environmental and infrastructure planning across the Greater Golden Horseshoe and the Province

Sincerely,



Michael Collins-Williams, MCIP, RPP  
Director, Policy  
Ontario Home Builders' Association