



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 info@ohba.ca

Monday, April 19th, 2021

Ministry of Municipal Affairs & Housing
College Park, 777 Bay St, Toronto, ON M7A 2J3
& via: greenbeltconsultation@ontario.ca

RE: OHBA Submission to the Provincial Consultation on growing the size of the Greenbelt - Environmental Registry of Ontario # 019-3136

The Ontario Home Builders' Association (OHBA) is the voice of the building, land development and professional renovation industry in Ontario. OHBA represents over 4,000 member companies organized into 27 local associations across the province. Our membership provides over 518,000 jobs to Ontarians, supporting over \$32.8 billion in wages and contributing \$57.8 billion to Ontario's economy annually.¹ The OHBA thanks the Provincial Government and the Ministry of Municipal Affairs and Housing, for providing this consultation opportunity on growing the size of the Greenbelt through the proposed study area. Several of our affiliated local associations including the Building Industry and Land Development Association, West End HBA, Guelph & District HBA, Waterloo Region HBA, Brantford HBA, Haldimand-Norfolk HBA and the Greater Dufferin HBA are also actively involved this consultation. OHBA endorses the comments made by our local associations.

Since the beginning of the global COVID-19 pandemic, our sector has managed and navigated an uncertain economic and home building environment. This new economic environment has forced our sector to dramatically shift the traditional planning, supply chain, sales, construction and home closing processes that our industry has typically used. These challenges, along with new housing market demands, have significantly increased the prices of homes across the province. Even markets outside the Greater Toronto Area (GTA), and Greater Golden Horseshoe (GGH) have become increasingly unaffordable and further separating new provincial residents, first time homebuyers and Ontarians at all stages of life from finding attainable housing. OHBA strongly emphasizes that our provincial housing system can only deliver the needed quantity and variety of supply when all levels of government work collaboratively with the private sector to ensure sufficient housing supply and choice is available to Ontarians at all stages of life.

OHBA continues to support protecting our province's most valuable environmental resources, while balancing that with the need to build livable and sustainable communities. A long-term vision of growth that is coherent, balanced and addresses the population growth realities is what is critically needed to meet the economic and population trajectories of the GGH and the province. The OHBA continues to support the Greenbelt, while at the same time recognizing that further expansion of the Greenbelt needs to follow a science-based approach and evidence-led process.

Growth Reality for the Greater Golden Horseshoe

The reality is that the population of the Greater Golden Horseshoe and the Greater Toronto Area continue to grow. The GGH continues to attract new residents that are bringing with them, their employable skills and talents, new investment, and business opportunities. Based on the Ministry of Finance's population schedule and forecasting, the Greater Golden Horseshoe (GTA and Central) has grown from 2011 to 2021 by almost 1.8 million people and projected to grow by almost 4 million people by 2046.² These future Ontario families need an affordable place to call home.

¹ Canadian Home Builders' Association, [Ontario Data](#), Information and Housing, 2019.

² [Ontario Population Projections, 2019–2046 — Table 4 \(gov.on.ca\)](#) Ontario Population Projections, 2019–2046 - Table 4: Historical and projected population by census division, selected years — reference scenario.



There are also important economic considerations to couple with the growth reality of the GGH. Within the GGH, the GTA continues to be identified as the fastest growing region in North America with its population increasing by 2.6 million, or 36.7 per cent, from 7.0 million in 2019 to over 9.5 million by 2046.³ The GTA's share of provincial population is projected to rise from 47.9 per cent in 2019 to 49.8 per cent in 2046.⁴ The facts show we are living in a growing region, but also one that is an economic giant. According to the province's Growth Plan, the GGH has one of the world's most vibrant and diverse economies – generating upwards of 25 per cent of Canada's entire Gross Domestic Product (GDP).⁵ In fact, the GTA alone generates up to 1/5 of Canada's GDP.⁶ Furthermore, as evidenced by the chart below, it should be noted that Ontario's population growth as a trajectory has accelerated over the past 5 years, further amplifying economic activity, but also immediate housing needs.

Ontario Population Growth – Comparing 2010-15 to 2015-20

Sources of Pop Growth	2010-15	2015-20	Change
Natural	236,040	174,539	-61,501
Net Immigration	387,916	532,607	144,691
Net Non-Permanent	68,135	290,784	222,649
Net Interprovincial	-51,778	39,395	91,173
Net Intraprovincial	0	0	0
Residual Deviation	-68,973	-10,429	58,544
Total	571,340	1,026,896	455,556

Source: Ontarians on the Move - Michael Moffatt: Senior Director Policy & Innovation, Smart Prosperity Institute, Assistant Professor, Business, Economics and Public Policy Group, Ivey Business School, University of Western Ontario.

Fundamentally, housing supply is a critical part of maintaining and growing the GGH and GTA economic engines. With trends toward remote work, housing demand is being driven outside of the GTA into broader portions of the GGH, where smaller municipalities are seeing a significant jump in housing demand and municipal desires for growth to address that demand. Added to this context are calls for the Federal Government's new intent to attract 1.2 million new immigrants to Canada over the next 3 years, with 60 per cent coming through the economic immigration pathway.⁷ In the past, the majority of those new immigrants make their home in the GTA, adding to the economic expansion and opportunities in the GGH.

Furthermore, the province's consultation notes that infrastructure needs are critical to meeting growth targets and housing needs. For instance, the Town of Pickering recently made important considerations on not only how growth is real, but the needs to service that growth must be taken into account while considering a Greenbelt expansion,

“in its March 22nd report to Council, the Town of Pickering states that “all lands within Pickering are covered by the policies of A Place to Grow and the Greenbelt Plan, which were further strengthened through the most recent updates to the provincial plans, and the Provincial Policy Statement, and which together provide the highest level of protection for natural heritage and hydrologic features and areas, as well as agricultural areas...” The report goes on to say that “the detailed Land Needs Assessment criteria established by the

³ [Ontario Population Projections, 2019–2046 \(gov.on.ca\)](https://www.gov.on.ca) Ontario Population Projections Update, 2019–2046, Highlights

⁴ Ibid.

⁵ [A Place to Grow Growth Plan for the Greater Golden Horseshoe](#), 2020, Introduction, Page 1.

⁶ [The Greater Toronto Area \(GTA\): Canada's Primary Economic Locomotive in Need of Repairs](#), TD Economic Special Report.

⁷ [Government of Canada announces plan to support economic recovery through immigration](#), Government of Canada, October 30, 2020.



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Province, considers and balances matters of provincial interest including natural heritage and water resource systems, agricultural systems, and infrastructure. Due to its location, existing and planned infrastructure, and other conditions, the City of Pickering is well suited to accommodate growth. Any decision to expand the Greenbelt within the City of Pickering should not compromise the municipality's ability to accommodate future growth.”

Infrastructure needs to service growth must continue to be a part of the ongoing dialogue as officials balance the priorities noted in the consultation.

Understanding the complete real growth context and supplemental infrastructure needs is imperative to provincial and municipal growth management and meeting both current and future housing demands for growth outside of the GTA and into the GGH. As Ontario prepares to welcome 4.6 million new people over the in the next three decades, any consultation on Greenbelt expansion must recognize the growth realities, understand the permanent nature of the Greenbelt designation and address Growth Plan needs beyond the 2051 planning horizon.

Provincial Context – ERO 019-3136

The Greenbelt Plan and the Growth Plan for the GGH have worked together for over 15 years to provide a framework for where and how growth should be accommodated in southern Ontario. The Greenbelt Area includes lands covered by the policies of the Greenbelt Plan, as well as the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. Collectively, these plans identify where urbanization should not occur. The plans are intended to work together with A Place to Grow, which provides the overarching strategy for where and how growth can be accommodated.

This consultation includes a study area of lands focused on the Paris Galt Moraine, which is home to critical groundwater resources and ideas for adding, expanding and further protecting Urban River Valleys.⁸ This is further underscored by several principles outlined below,

Ministry Established Principles for Growing the Greenbelt Expansions

1. No consideration of removal requests or land exchanges
2. No consideration of policy changes
3. Supports Greenbelt Plan objectives, vision and goals
4. Follows Existing Amendment Process
5. Connects physically and/or functionally to the current Greenbelt
6. Considers impacts on existing provincial priorities

Process for Growing the Greenbelt

Both the Provincial Government and the Ministry of Municipal Affairs and Housing (MMAH) have made it explicitly clear that this consultation is not a proposed boundary, but rather a study area. Based on this understanding, deviations from the proposed Paris Galt Moraine or Urban River Valley study area should not occur, in order to ensure the integrity of the proposed consultation is upheld. As the Ministry moves forward with the consultation, it is vital that technical mapping, scientific data and “ground truthing” be fundamental to how boundaries are proposed. Stakeholder engagement throughout this process is just as vital as it is now, during this ERO consultation. Furthermore, lessons learned from the legacy of the existing Greenbelt should be considered. Including the subsequent 17 boundary

⁸ [Consultation on growing the size of the Greenbelt](#), Environmental Registry of Ontario # 019-3136, Ministry of Municipal Affairs & Housing.



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adjustments to the 2005 Greenbelt made by the previous government as part of the 2017 review.⁹ This is an important example of how Greenbelt decisions have to be thoughtfully considered, science based with an evidence led approach to ensure the integrity of those decisions.

Consultation Question

Question 1: What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?

- OHBA recognizes that the Paris Galt Moraine is an important feature that merits additional study for potential inclusion in a Greenbelt expansion. Similar to the Oak Ridges Moraine, it is an area of rolling, hilly terrain that is the headwaters for many rivers and streams. Comprised of sand and gravel deposits, it helps to protect and recharge the groundwater aquifers include drinking water supply for some communities.
- OHBA notes however that not all areas in the land base captured in the study area actually meet these criteria. While moraines allow rain and snowmelt to soak into the ground more rapidly than the surrounding, less permeable areas, the mapped study area does not consistently feature permeable moraine features throughout. Before any Greenbelt boundaries can be outlined, a detailed study to establish what moraine features must be present needs to be undertaken.
- OHBA further recognizes that the lands surrounding Highway 401 from Wellington to Cambridge, are lands which are prime for strategic and organized development in the coming decades.
- There already are existing protections for lands within the Paris Galt Moraine through local and provincial planning policies. Furthermore, the study area is now causing a “pause” in some of the municipal lead planning work in those areas.

Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?

- OHBA questions whether the process of adding Greenbelt lands in areas with moraine features is necessary given that they are already protected through source water protection legislation. From an environmental protection perspective, this process is needlessly duplicative and adds further layers of complexity to local planning processes, land-use and land-management options.
- Municipal considerations on adding Greenbelt lands are mixed at best with some positions being in opposition to the process,
 - In its March 23 report to the County of Brant Council, the County’s planning department advised the growth planning realities of the region are significantly impacted by the proposed Greenbelt process “The biggest implication if approved, appears to be that associated with not permitting the expansion of the settlement areas of Paris, Brantford/Brant Annexation, and the south part of Glen Morris into the Greenbelt Plan area.”¹⁰
 - On April 6, the City of Guelph’s staff report to Council noted that, “Inclusion of settlement areas intended to accommodate growth within the Greenbelt is not appropriate..... The entirety of the City

⁹ Statement from the Friends of the Greenbelt Foundation Regarding Provincial Announcement on Proposed Minor Changes to the Greenbelt Boundary, January 11, 2017.

¹⁰ Provincial Legislative changes on Growing the Greenbelt - summary and recommendations for comments to the Provincial ERO posting, Brant County Council Report, March 23, 2021.



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of Guelph is designated as a settlement area. The expansion of the Greenbelt Plan should not include settlement areas where growth has been directed under A Place to Grow, including Guelph.... It is unclear if there is any additional benefit or protection for the Paris Galt Moraine and the Province should clarify its intended study purpose and approach.”¹¹

- In its April 13 report to the Waterloo Region Council, staff note that “While staff appreciate the intent and overall objectives of the Greenbelt Plan, we believe the risk of it weakening some of the Regional Official Plan’s current policy protections outweigh its potential benefits. The Province has indicated it will not make any policy changes to the Greenbelt Plan. Consequently, staff are opposed to expanding the Greenbelt farther into Waterloo Region as proposed.”¹²
- On April 13, Cambridge City Council voted to oppose the Greenbelt expansion into Cambridge citing that “City staff told council at a meeting Tuesday night that the province’s Greenbelt expansion plan, currently in the early stages of public consultation, does not prohibit mineral aggregate extraction while Cambridge’s official plan does. If Cambridge were to accept the province’s plan, it would be forced to loosen its own stringent regulations around mining and groundwater protection in the northeast part of Cambridge, where expansion is proposed.”¹³
- If moving to a further defined boundary, it is imperative that a process is in place that confirms the provincial natural heritage features of the Paris Galt Moraine and confirms the environmental features of a moraine, and not simply a geodetic contour. It should also include underlying scientific and environmental studies to this effect and any impacted landowners should have a formal engagement process to review and confirm the features and information.
- A shift from a study area to a formal boundary designation cannot be done from Toronto and must involve the active participation of local residents, stakeholders and scientific experts.
- If the Government sees merit in moving ahead quickly with defining the boundary, elements of flexibility need to be built-in to allow for the essential scientific studies to refine the boundary.

Question 3: What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?

- OHBA and Environmental Defence publicly supported the creation of the Urban River Valley (URV) designation back in 2013, as an appropriate way to grow the greenbelt.¹⁴
- OHBA, the networks for local HBAs, our members and impacted landowners require greater clarity of how expansion will happen, whether that be through municipal request to the province/MMAH or through direct provincial action. Once again, it is vital that stakeholders, local residents, and land use/planning experts be consulted on further adding, expanding or protecting Urban River Valleys.
- OHBA further notes that greater clarity is needed on the URV designation. Based on the consultations with the Ministry, it was explained that the URV designation does not apply to any private lands but that the public

¹¹ City of Guelph response to Provincial Consultation on Growing the Size of the Greenbelt, Staff Report, April 6, 2021.

¹² Regional Response – Consultation on Growing the Size of the Greenbelt – Environmental Registry of Ontario Posting 019-3136, Region of Waterloo Planning, Development and Legislative Services Report, April 13, 2021.

¹³ [Council opposes Greenbelt expansion into Cambridge](#), Cambridge Times, Anam Latif, April 13, 2021.

¹⁴ [Home Builders and Environmentalists Welcome New Greenbelt Designation](#), OHBA & Environmental Defence, Jan 10, 2013.



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mapping will capture these lands. The Ministry needs to be absolutely clear that private lands are not designated within the Greenbelt, so that the public and local planning officials do not apply Greenbelt requirements or any existing land-use or land management decisions on those private lands.

- OHBA questions URV implications for planning applications across Ontario. Does the process continue through the Planning Act and would “Greenbelt buffering requirements and set-backs” apply?

Question 4: Do you have suggestions for other potential areas to grow the Greenbelt?

- The province should remain focused on the established study area for this consultation and the URV designation process. Growing the Greenbelt in any new area requires the appropriate consultation and notification to the impacted communities, and this consultation process does not satisfy those requirements.
- As required by the Provincial Government, many impacted regional and municipal governments are currently working towards the 2051 growth plan conformity process, and while this process is underway it would undermine the important and necessary objectives outlined in the province’s Housing Supply Action Plan to invite any Greenbelt discussion into this process. For instance, The Town of Halton Hills, in its recent report to Council among others, has noted that,

“At this time, and consistent with what was set out in ADMIN-2018-0017, staff has similar concerns regarding whether additional lands should be incorporated into the Greenbelt. Such a course of action would pre-empt the on-going Regional Official Plan review and could not be informed by robust consultation within the allotted commenting deadline. To that end, consideration for growing the Greenbelt in Halton Hills should wait until the completion of the ROPR, after which a more fulsome review can be undertaken with appropriate time and resources for public consultation.”¹⁵

- Recognizing that Ontario will continue to welcome new people to the province beyond 2051, it becomes ever clearer that the 2005 Growth Plan policy decision to create “whitebelt” lands needs to be maintained for future planning cycles.
 - Consistent with that approach would be for the province to designate “whitebelt” lands formally as urban reserve lands, so that if/when planning determinations can be made to create livable and sustainable communities in line with the “live, work, play principles” of the Growth Plan.
- As part of the 5-year review undertaken by the previous government, it was acknowledged in their review document that future urban expansion to support population growth will be required. Providing additional support for the 2005 whitebelt policy decision. Below is language from the 2011 review document noting that,

“A significant supply of land is already designated for future urban development in the Greater Golden Horseshoe. Through increased intensification, higher densities and more mixed-use development, the Growth Plan will ensure these lands are available to accommodate growth long into the future. Because of the magnitude of growth that is forecast, it will be necessary to bring new lands into the urban envelope. The Growth Plan outlines a series of tests and criteria to ensure that expansions occur when necessary and where most appropriate, and in a way that ensures that infrastructure is in place and the natural environment is protected. Beyond the lands that are currently designated for urban

¹⁵ Provincial Consultation on Growing the Greenbelt, Report, Town of Halton Hills, March 17, 2021.



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uses, these municipalities also have approximately 55,000 hectares of rural and agricultural lands within their boundaries (that are not part of the Greenbelt). In order to accommodate urban growth over the next 20 years, it is expected that some of these agricultural and rural lands outside of the Greenbelt will be re-designated for urban uses. Municipalities are permitted to re-designate rural or agricultural lands for future urban uses provided the redesignation meets the tests and policies of the Growth Plan and the Provincial Policy Statement, and is in accordance with the processes established in the Planning Act¹⁶

- Expansions of the Greenbelt should not be permitted in the “whitebelt” areas, instead, they should be accessed as part of any future urban expansion process with the appropriate protections and designations, creating greenspaces, protecting natural heritage features, addressing flood hazards, building new infrastructure and creating the housing supply and employment centres needed beyond 2051 as Ontario’s population continues to grow.
- Creating “whitebelt”/urban reserve lands should be a required exercise of every municipality that has the provincial Greenbelt in their municipal boundaries. It enables them to identify in advance where growth should be accommodated if/when needed and avoids any confusion or uncertainty if future Greenbelt consultations come forward, like this one is causing.

Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?

- It is vital that MMAH have a full understanding of the current municipal planning work being undertaken in regions, cities, towns and hamlets that are currently impacted by the study area. Those communities are welcoming and receiving new neighbours through the appropriate process, however this study area approach has created some confusion as a result.
- Growth Plan principles require the efficient use of land, optimization of infrastructure, such as Highway 401, and the need for new infrastructure, including new highways (GTA West Corridor for example), water and wastewater systems. The impact on these provincial priorities must be taken into consideration before any Greenbelt additions can move forward.
- Further consideration should be made to ensure that sustainable community building is not impeded or undermined by any Greenbelt additions.
- It is important that MMAH review the regional and municipal official plans, understand how those plans need to move forward, including with infrastructure needs.
- It would be fundamentally misguided from a Growth Plan perspective to Greenbelt lands connected to Highway 401, a major economic corridor, outside of some significant provincial natural feature.

Question 6: Are there other priorities that should be considered?

- OHBA reasserts that the priority of fairness is always important. Fundamentally, and essentially permanently altering the protected, legal and environmental nature of privately owned land is a significant step for

¹⁶ Places to Grow, 5-Year Review, Government of Ontario.



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government to take. Therefore, the province should not be using its legislative authority to add Greenbelt lands without some sort of landowner engagement process to appeal the designation.

- OHBA continues to hear from agricultural stakeholders that there is no support from the farming community for Greenbelt land additions in the Paris Galt Moraine. The agricultural community is well aware of the impact on farm management and land management the Greenbelt designation would have on them.
- The County of Brant has taken the position that the province should commit to an enhanced consultation process with the appropriate technical working groups to ensure the best technical information is used, and that there should be a consolidation of plans and documents merging the Provincial Policy Statement, Growth Plan and Greenbelt Plan.
- The Waterloo Region continues to maintain the position that the Protected Countryside Designation is better than the province's Greenbelt and gives them the flexibility in the future.

Conclusion

OHBA continues to support the Growth Plan and Greenbelt Plan, however we remain concerned and caution that expansion of the Greenbelt is duplicative and may be in conflict with the existing robust public policy framework that balances protection of important hydrological resources, natural heritage systems, agricultural systems and the approximately 4.6 million additional people that will live in the GGH by 2051.

Because of the complex nature of the provincial planning system, there already exists a significant degree of duplication and overlap, particularly with regards to water use resources. Restricting land use through broad Greenbelt land additions is a disservice to local planning and ignores growth realities previously mentioned. OHBA therefore recommends that emphasis be placed upon meaningful engagement with local municipalities, and efforts be placed towards helping them realize their own growth targets. A balanced approach must be used here to address both environmental protection policy goals with that of population growth and housing needs.

Realizing targets set out through the Growth Plan for municipalities should not be undermined by a Greenbelt addition process, OHBA therefore strongly recommends that the province enable municipalities to complete their municipal comprehensive reviews processes already underway to conform to the updated Growth Plan before finalizing any Greenbelt additions of the Paris Galt Moraine. Finally, it is important that OHBA underscore the significance of "whitebelt lands" otherwise referred to as "urban reserve lands". These lands are based around existing settlement areas in order to provide long-term flexibility that recognizes both population and employment growth will continue beyond the 2051 Growth Plan planning horizon.¹⁷

As this consultation proceeds, OHBA expects a science-based approach and evidence led process. Transparency and scientific grounding are essential to the Greenbelt consultation moving forward. As MMAH proceeds with this study area, OHBA encourages officials to consider the long-term implications of the growth reality which Ontario is heading towards. OHBA thanks the Provincial Government and MMAH for this consultation opportunity.

CC: The Honourable Steve Clark, Minister of Municipal Affairs & Housing

¹⁷ See Appendix A.



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Appendices
Appendix A

Distribution of Population and Employment for the Greater Golden Horseshoe to 2051		
	POPULATION	EMPLOYMENT
	2051	2051
Region of Durham	1,300,000	460,000
Region of York	2,020,000	990,000
City of Toronto	3,650,000	1,980,000
Region of Peel	2,280,000	1,070,000
Region of Halton	1,100,000	500,000
City of Hamilton	820,000	360,000
GTHA TOTAL*	11,170,000	5,360,000
County of Northumberland	122,000	44,000
County of Peterborough	82,000	26,000
City of Peterborough	125,000	63,000
City of Kawartha Lakes	117,000	39,000
County of Simcoe	555,000	198,000
City of Barrie	298,000	150,000
City of Orillia	49,000	26,000
County of Dufferin	95,000	39,000
County of Wellington	160,000	70,000
City of Guelph	203,000	116,000
Region of Waterloo	923,000	470,000
County of Brant	59,000	26,000
City of Brantford	165,000	80,000
County of Haldimand	75,000	29,000
Region of Niagara	674,000	272,000
OUTER RING TOTAL*	3,700,000	1,650,000
TOTAL GGH*	14,870,000	7,010,000

Note: Numbers rounded off to nearest 10,000 for GTA/H municipalities, GTA/H Total and Outer Ring Total, and to nearest 1,000 for outer ring municipalities.

*Total may not add up due to rounding



SCHEDULE 3

Distribution of Population and Employment
for the Greater Golden Horseshoe to 2051