



Ontario
Home Builders'
Association

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March 18th, 2022

Ms. Jessica Isaac
Ministry of Environment Conservation and Parks
Environmental Policy Branch
40 St Clair Avenue West, 10th Floor
Toronto ON

RE: Proposed Subwatershed Planning Guide (ERO # 019-4978)

The Ontario Home Builders' Association (OHBA) is pleased to provide the *Ministry of the Environment, Conservation and Parks (MECP)* with comments in response to the proposed Subwatershed Planning Guide recently posted on the *Environmental Registry of Ontario ERO # 019-4978*. The OHBA understands that the proposed planning guide is being considered by the *Ministry of Environment Conservation and Parks (MECP)* to update provincial guidance regarding the integration of watershed and subwatershed planning with land use planning to support the implementation of provincial policies for example the *Provincial Policy Statement (PPS)* and the *Growth Plan* approved by the province.

The OHBA has been supportive of measures and initiatives implemented by the *MECP* which while protecting our watersheds significantly recognize the need to reduce the 'red tape' associated with so many approval processes under the Ministry's jurisdiction. Unless the objective of reducing 'red tape' is achieved, the associated unnecessary delays will certainly have an impact on housing supply and the provision of housing options for Ontarians. The OHBA together with many of its members have been engaged with the *MECP* through various similar consultations during the past several years while keeping similar objectives front of mind.

The OHBA comments are attached and highlighted in 'red' in the draft Subwatershed Planning Guide (January 2022) prepared by the *MECP*. The key areas of concern are summarized as follows.

- Subwatershed plans should not be required for Individual site-specific development applications to support for example an individual draft plan of subdivision.
- Subwatershed plans should be used to inform larger development areas which contain site specific development applications.
- Subwatershed plans should consider existing conditions and topographies and not pre-development conditions as their basis.
- Subwatershed plans should provide a balanced approach and acknowledge land use planning requirements such as the necessary transportation servicing infrastructure, and overall growth objectives with appropriate mitigation measures.
- Subwatershed plans should be inclusive and provide for the participation of landowners as members of the steering committees established.
- Subwatershed plans should not require update every 10 years in particular where multiple levels of environmental study have been undertaken.



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Further, a number of additions, deletions, and other suggestions for change are referenced in the draft planning guide attached. In particular concerns are expressed regarding the duration of baseline monitoring timelines that would delay the related planning processes contained in Section 3.3.3.

The OHBA has been supportive of the various initiatives recently introduced by the *MECP*. However, the proposed guide in our view is a work in progress that requires further discussion. OHBA would appreciate the opportunity to review our comments with staff in order to implement the key suggestions and amendments provided in this submission in response to *ERO # 019-4978*. OHBA appreciates the opportunity to provide comments on this important matter.