



Ontario
Home Builders'
Association

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April 21st, 2022

Submitted to: greenbeltconsultation@ontario.ca

Attention: Ms. Sara Reed

Re: Ideas for Adding More Urban River Valleys (ERO # 019-4803)

Dear Ms. Reed:

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members organized into a network of 27 local associations including builders, professional renovators, suppliers, trade contractors and many others within the residential construction sector. Increasing the supply and choice of new homes is central to our Association's purpose and the values of our membership.

OHBA's comments regarding the *Environmental Registry of Ontario (ERO)* posting # 019-4803 requesting ideas for adding more Urban River Valleys (URVs) are provided below. The OHBA understands that this request is part of the Phase 2 consultation taking place with two other related *ERO* postings dealing with the province's *Greenbelt Plan (ERO # 019-4483 and # 019-4485)*.

The OHBA recognizes that the URV designation in the *Greenbelt Plan* applies to lands in river valleys within an urban context connecting the Greenbelt's countryside lands to the Great Lakes and inland lakes while protecting natural and water features. This will expand the size of the Greenbelt. In addition, the URVs will provide for recreation, tourism, and cultural opportunities in natural settings. The Greenbelt presents a firm boundary for the protection of lands including any lands added as URVs.

The OHBA continues to support in principle the creation of the URV designation as an appropriate way to grow the Greenbelt and has previously advised the province through *ERO # 019-3136* of its position. The OHBA is focused on the implications and impacts of the URV designations contemplated by the province. In this regard, further clarification is required as to how the URV boundaries will be determined particularly in areas where an URV interfaces with an urban area on the one hand and a rural area on the other and within urban areas.

Clarity is necessary for our industry members and other stakeholders to understand that the URVs identified by the province do not exceed the size of those river valleys already designated in approved municipal official plans. In addition, the OHBA strongly recommends that any designation of URV now or in the future does not compromise any as-of-right associated with privately owned lands in particular those that are developable and designated accordingly.

As indicated, the OHBA does feel that this initiative has merit. However, our Association and members want to prevent the situation arising where any implications that may result from the use of various approaches to define URV limits produces different results. The OHBA strongly believes that such a situation be avoided to ensure that the individual rights of private landowners are protected and not jeopardized.



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The OHBA is appreciative of the opportunity to comment on this provincial initiative. Further, the OHBA looks forward to receiving the clarifications requested and further discussions with *Ministry of Municipal Affairs and Housing* staff regarding the designation of URVs being contemplated.