



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

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Growing the Greenbelt — Glenorchy Lands and Urban River Valleys
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto, ON, M5G 2E5

Re: Growing the Greenbelt — Glenorchy Lands and Urban River Valleys (EBR 011-6331)

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario with a membership base of 4,000 companies, organized into a network of 30 local associations across the province. OHBA supports efforts by the province to preserve environmentally sensitive and natural heritage features for future generations of Ontarians. With respect to the provincially owned Glenorchy Lands, OHBA notes that the provincial government should be free to determine the best use of the public asset.

While OHBA is not opposed to growing the Greenbelt through the addition of existing publicly-owned lands, OHBA has a number of broad implementation concerns with respect to the proposed new Urban River Valley designation and is unclear on the need for the designation as these areas are already protected by municipal regulatory policy. These issues should be examined through an urban lense and clarified prior to the provincial government proceeding with the newly proposed designation.

Urban River Valley

An Urban River Valley (URV) designation must, in no way, impact the long-term urban structure and required supporting infrastructure for the Greater Toronto and Hamilton Areas. Recognizing that growth (employment and residential) will continue and that 2031 is only 19 years away, the Minister of Infrastructure is proposing an amendment to the Growth Plan to update the growth forecasts for the extended horizon to 2041. The Proposed Amendment 2 to the Growth Plan forecasts an additional 3.3 million people to reside in the Greater Toronto and Hamilton Area by 2041. While a minimum of 40% of this new growth will be accommodated through intensification, because of the magnitude of growth that is forecast, the Ministry of Infrastructure has stated that it will be necessary to bring new lands from the "whitebelt" into the urban envelope. Growing the Greenbelt through a URV designation south from the existing Greenbelt towards Lake Ontario may be an opportunity to connect existing natural heritage features to the Greenbelt. A potential URV system would likely pass between two broad areas – the existing built-up urban envelope as well as the future urban reserve between the Greenbelt and designated urban area often referred to as the "whitebelt". A new URV designation must not impact, directly or indirectly, the future and necessary development of the "whitebelt".

Buffers and Setbacks

Reducing potential development lands in the "whitebelt" would ultimately place long-term pressure on the Greenbelt. OHBA's support in principle, for the government's proposal is strictly predicated on only existing publicly-owned lands being eligible for inclusion in a new URV designation. OHBA is opposed to any further encroachment of the Greenbelt onto future urban reserve "whitebelt" lands.

Furthermore, OHBA notes that a URV designation within existing built-up urban areas would result in a wide variety of buffer and set-back conditions. The existing urban area has evolved through decades of differing planning practices and therefore, different approaches to set-backs and environmental protection. A new URV designation through the existing urban area should only include publicly-owned lands and not result in any additional buffer or set-back requirements on private property abutting the URV systems. A new URV designation must recognize and respect that older communities did not approach natural heritage features or hazard lands in the same way that we do today.

Infrastructure

A new URV designation must not impact either existing infrastructure, projects approved by way of an Environmental Assessment, or planned/additional strategic infrastructure required to service the growing region. Urban river valleys contain significant amounts of infrastructure ranging from storm water management features, water and waste water infrastructure as well as roads, bridges and highways. Many of these existing features require regular maintenance, replacement or expansion. Furthermore as the Province continues to forecast population and employment growth in the Greater Toronto and Hamilton Area, such growth will require new infrastructure to cross urban river valleys. OHBA strongly recommends that a new URV designation not contain any additional planning, permit, environmental assessment or construction-related constraints for new or existing infrastructure.

Following the Growing the Greenbelt Criteria

The robust criteria that the Ministry of Municipal Affairs and Housing established to provide an opportunity for municipalities to identify areas that could be included in the Greenbelt should be followed. OHBA therefore, believes it is important for the provincial government to be transparent and accountable to the six criteria of the Growing the Greenbelt process established in 2008. The consultation document notes that should a municipality be interested in the future in having the Urban River Valley designation (if the designation is approved) apply to publicly-owned lands within their jurisdiction, the municipality would submit a request to the Ministry based on *Growing the Greenbelt* criteria, developed in 2008. OHBA recommends that the potential addition of the publicly-owned Glenorchy Lands in Oakville also follow the *Growing the Greenbelt* criteria, beginning with a municipal request, passed by a Council resolution.

For reference, the six criteria include: begins with a municipal request, passed by a council resolution; identifies an area either adjacent to, or having a functional relationship to the Greenbelt; embraces the Greenbelt purpose; connects to Greenbelt systems; complements the Growth Plan for the Greater Golden Horseshoe; and timing and relationship to other provincial initiatives.

Other Issues

OHBA notes that the Ministry of Municipal Affairs stated that the new URV designation would rely on municipal Official Plans for direction. The proposed new designation should not allow for municipal policies to be more restrictive than the Greenbelt Plan. OHBA would appreciate clarification with respect to this issue, especially as it relates to our previously noted concerns regarding infrastructure, buffers and setbacks and limiting newly protected lands to those already under public ownership or already captured within existing buffer and setback requirements.

OHBA is not opposed to the addition of publicly-owned lands to the Greenbelt or the concept of a new Urban River Valley designation. However, if this policy were to result in permissive rules that would allow the MNR, municipalities, Conservation Authorities or other "authorities" to impose setbacks, additional buffers or create connectivity across whitebelt lands, OHBA would strongly oppose such efforts. Furthermore, it is critical that municipalities and the provincial government be accountable and follow the Growing the Greenbelt process established in 2008 for both the Glenorchy Lands as well as any potential urban river valley additions.

OHBA is concerned with increasing planning policy complexity and ensuring that municipal Official Plans remain in conformity with provincial policy. Lastly, OHBA remains concerned that some lands that were not included in the original proposed boundaries were subsequently included in the final Greenbelt without consulting affected land owners. OHBA looks forward to the 2015 review of the Greenbelt and the opportunity to review these and other affected lands.

OHBA supports balanced growth initiatives that do not compromise affordability and recognize the need for the Greenbelt plan and growth plan to work in a harmonious fashion in support Ontario's economic, social and environmental priorities.

Sincerely,



Joe Vaccaro, C.O.O.
Ontario Home Builders' Association