



Ontario
Home Builders'
Association

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Ministry of Municipal Affairs and Housing
777 Bay St, Toronto, ON M7A 2J3

Proposal Number: ERO # 019-6217 & 019-6216

RE: Proposed amendments to the Greenbelt Area boundary regulation & Proposed Amendments to the Greenbelt Plan

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, professional renovators, trade contractors and many others within the residential construction sector who build the complete communities needed by current and future Ontarians.

The OHBA strongly supports the Greenbelt. We also support the government's Greenbelt modernization initiatives noting the expansion of the size of environmentally protected areas, while taking parallel steps to increase housing supply. True environmentally sensitive and natural heritage lands must be protected, and the measures being proposed will continue to ensure this principle is met, while expanding the Greenbelt.

The proposed changes to the Greenbelt address one of its greatest weaknesses – that it not only protected environmentally sensitive lands and farmland, but it captured and froze lands with access to publicly funded infrastructure and services, either adjacent to, within or close to existing communities, where people want to live and need to work. Some of these lands proposed for removal from the Greenbelt had been previously designated for growth, because they were well positioned to accommodate the needs of growing populations in close proximity to well planned communities.

Changes to the Greenbelt are not new. Since the introduction of the Greenbelt Plan in 2005, updates and boundary amendments have been made to reflect the environmental reality of preserving and protecting sensitive and natural heritage spaces and removing lands that should not be included. Previous updates occurred in 2017 and 2013 to ensure the Greenbelt remained protected space for both the short and long terms.

OHBA's members are not just professionals in the residential sector, but they are also community builders that work with provincial and municipal governments in partnership to plan and build the places people want to live, work and play. The province has set a goal of building 1.5 million by 2031, to support the population growth coming to Ontario, mostly in the Greater Toronto Area. We know that there is a desperate need and a growing demand for a variety of housing types that people can afford, within reasonable proximity of where people are needed for work. This isn't a short-term problem. It is a growing challenge, as the population is increasing rapidly. To accommodate the growth in population, higher density offers one solution, but it's not enough. Not everyone can or wants to live in a high-rise, so a variety of housing types will still be needed to meet the varying needs of individuals and families.



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Building attainable and affordable communities is not just about land, it's about infrastructure, services, and location. One of the best ways to build homes quickly and cost effectively is to leverage existing infrastructure and services - water, sewer, electricity, gas, roads, transit, schools, healthcare. The proposed Greenbelt removals responsibly reclaim some lands that are well suited for cost-effective development of homes, as they are within, immediately adjacent to, or close to existing developments and, most importantly, have access to publicly funded and necessary infrastructure and servicing. This means the lands can be ready to be built upon quickly, and with the strict timelines for building to commence put forward by the province, will enable the timely addition of desperately needed housing supply.

It is also important to note that building on lands with access to existing infrastructure and services reduces the need to build new infrastructure in other greenfield areas, including environmental lands or prime farmland not protected by the Greenbelt. Greenfields farther from built up areas are often better suited for farming, as there are fewer conflicts between farming and settlement communities. Additionally, building new and well-planned complete communities in these areas affords the opportunity to use the most up to date and best practices to create resilient and environmentally responsible communities.

The proposed changes to the Greenbelt are prudent, as they strike a considered balance between protection and growth. Expanding the Greenbelt, with the addition of the environmentally sensitive Paris Galt Moraine and all Urban River Valleys in the GTHA, will protect additional sensitive lands, while at the same time releasing lands better suited for community development. Further, it will allow for the expedited development of much needed and well-planned communities in the most rapidly growing area of the province and country.

The members of the OHBA work with all levels of government and other partners in building the communities in which people can live, work, and thrive. We all need to work together to ease the housing crisis, so people in the GTA and Ontario can have better quality of life.

OHBA thanks the Ministry for the opportunity to comment on this important proposal.