

MECP Conservation and Source Protection Branch  
300 Water Street North tower, 5th floor  
Peterborough, ON K9J 3C7

**Re: ERO# 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

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## THE ONTARIO HOME BUILDERS' ASSOCIATION

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario, representing 4,000 member companies organized into 28 local associations across the province, from Niagara to Thunder Bay and Windsor to Ottawa. Members include builders, developers, professional renovators, trade contractors, suppliers, and manufacturers serving the residential construction industry. In 2024, Ontario's residential construction industry directly and indirectly employed over 600,000 people, generated more than \$42 billion in wages, and contributed approximately \$90 billion in total investment value to the provincial economy. However, we caution that these economic indicators including jobs are in rapid decline across Ontario as housing starts and sales continue to fall. This sector must remain one of Ontario's largest economic drivers, playing a vital role in job creation, regional growth, and housing supply.

Please accept the below as our submission to the government's request for feedback on proposed boundaries and criteria for the regional consolidation of Ontario's 36 Conservation Authorities (CA), and proposed changes to improve the conservation authority system to free up resources for front-line service delivery to help protect communities and better align the work of CAs with provincial priorities.

This feedback is being submitted on behalf of OHBA and its 28 local associations including but not limited to the Building and Land Development Association (BILD), West End Home Builders' Association (WE HBA), Greater Ottawa Home Builders' Association (GO HBA) and London Home Builders' Association (LHBA).

## OVERVIEW

This submission is made in response to Environmental Registry of Ontario (ERO) Notice 025-1257, posted by the Ministry of the Environment, Conservation and Parks. The notice seeks public input on proposed regional consolidation boundaries and the criteria used to inform these boundaries under the *Conservation Authorities Act*, R.S.O. 1990.

Conservation authorities play a longstanding role in watershed management, natural hazard protection, and environmental stewardship, including permitting and reviews related to development activities. The Province's proposal would consolidate Ontario's 36 existing conservation authorities into seven larger regional conservation authorities, aligned primarily with watershed boundaries and governed through a future entity called the Ontario Provincial Conservation Agency.

OHBA represents a broad and diverse membership of residential builders, developers, renovators, and industry partners operating across urban, suburban, small town, and rural Ontario. Our members regularly interact with conservation authorities through planning approvals, permitting, infrastructure delivery, and hazard management processes. As a result, they bring first-hand experience with both the strengths and challenges of the current conservation authority system.

Feedback received from OHBA members reflects a wide range of perspectives on the proposed consolidation. While some members support consolidation as a pathway to improved consistency and efficiency, others raise concerns about governance, accountability, local responsiveness, and the potential for unintended consequences. Importantly, many submissions focused less on boundary changes themselves and more on broader operational, procedural, and legislative issues affecting conservation authority performance.

This submission is intended to accurately reflect that diversity of views while identifying areas of alignment, key risks, and constructive considerations that the Province should weigh as it advances reforms to Ontario's conservation authority framework.

## EXECUTIVE SUMMARY

OHBA members broadly agree that Ontario's conservation authority system faces challenges related to inconsistency, unpredictability, and process inefficiencies. These challenges affect housing delivery, infrastructure sequencing, project viability, and investment certainty across the province.

There is, however, no single industry position on whether consolidation of conservation authorities into seven regional bodies is the appropriate number or sufficient mechanism to address these issues. Members expressed divergent views on consolidation itself, while showing strong alignment on the outcomes that reform should achieve.

Key themes emerging from member feedback include:

- Broad agreement that inconsistent interpretation of policies, variable technical requirements, and unpredictable timelines across conservation authorities create delays and uncertainty for development and infrastructure projects.
- Divergence on whether consolidation will improve or exacerbate these issues, with some members seeing potential benefits from pooled expertise and standardized practices, and others expressing concern about reduced accountability, loss of local knowledge, and increased bureaucracy.
- Strong and consistent concern regarding governance, board representation, transparency, and accountability under a regionalized model.
- Widespread agreement that many of the most significant issues lie in process design, operational practices, and implementation rather than boundary configuration alone.
- Frustration that prior legislative changes intended to streamline approvals, particularly the 2022 amendments to the Conservation Authorities Act, have not been fully implemented through regulation, leaving duplicative permitting requirements in place.
- Recognition that best practices already exist within some conservation authorities and should be leveraged and scaled rather than disrupted.
- A shared view that impacts of consolidation will vary significantly by geography and that a one size fits all approach carries risk.
- Concern that the consultation timeline limits the ability to provide meaningful, detailed feedback on a proposal of this scale.

OHBA encourages the Province to consider consolidation as one potential tool among several and to place equal, if not greater, emphasis on governance clarity, process modernization, regulatory implementation, and continued stakeholder engagement.

## **OHBA RESPONSE**

OHBA's consultation with members on ERO 025-1257 revealed a high degree of engagement and a wide diversity of perspectives, reflecting the range of geographies, market contexts, and regulatory environments in which members operate. Feedback was received from builders, developers, engineers, planners, and consultants working across the Greater Golden Horseshoe, eastern Ontario, southwestern Ontario, and rural regions of the province.

A consistent theme throughout the feedback is that members carefully distinguish between the *objectives* of conservation authority reform and the *mechanisms* proposed to achieve those objectives. While there is broad alignment around the need for greater consistency, predictability, and efficiency in conservation authority processes, there is no uniform view that boundary consolidation alone will deliver these outcomes.

Many members emphasized that their day-to-day challenges with conservation authorities arise not from the number of authorities or the configuration of their boundaries, but from how policies are interpreted, how files are reviewed, how timelines are managed, and how duplication between agencies is addressed. Others see consolidation as a necessary structural reform that could enable improvements in these areas if implemented thoughtfully and with appropriate safeguards.

This divergence of views does not reflect disagreement on environmental protection or public safety. Rather, it reflects differing assessments of institutional risk, governance effectiveness, and the likelihood that consolidation will meaningfully improve outcomes without introducing new challenges.

### **1. Consistency, Predictability, and the Development Approvals Context**

Across all submissions, members consistently identified inconsistency and unpredictability as central challenges in the current conservation authority system. Even where projects involve comparable site conditions and are governed by the same provincial policy framework, members report significant variation in technical requirements, interpretation of guidelines, modeling expectations, and review timelines between conservation authorities.

This inconsistency has tangible consequences. Projects often require redesign, additional studies, or extended review cycles, even where the underlying environmental issues are well understood and previously addressed. These outcomes introduce uncertainty into land valuation, infrastructure planning, financing arrangements, and construction scheduling.

Evidence from conservation authority process analysis reinforces these concerns. Case study analysis of conservation authority review processes demonstrates that review timelines commonly range from approximately four to eight months depending on project scale, *before* municipal approvals are completed. Importantly, a substantial portion of this time is attributable not to substantive technical analysis, but to administrative sequencing, iterative commenting, and coordination issues. In larger and more complex applications, iterative review cycles alone can account for more than forty percent of total review time.

This evidence suggests that while environmental review is essential, current processes do not consistently align review effort with risk or complexity, and that predictability remains a significant challenge for proponents and municipalities alike.

### **2. Divergent Views on Consolidation as a Tool for Reform**

Members who support consolidation view it as an opportunity to address these consistency challenges through shared expertise, standardized technical guidance, and more efficient allocation of resources. From this perspective, regional conservation authorities could reduce duplication across neighboring

watersheds, improve access to specialized technical staff, and create more predictable permitting environments for builders and municipalities operating across multiple jurisdictions.

Supportive members often point to regions where a single municipality is currently divided among multiple conservation authorities, requiring proponents to navigate different policies and processes within the same market area. In these cases, consolidation is seen as a means to rationalize oversight and reduce unnecessary complexity.

At the same time, a substantial number of members expressed concern that consolidation may not resolve, and could potentially exacerbate, existing challenges. These members caution that larger organizations can become more bureaucratic, less transparent, and less responsive to local conditions. There is concern that regional authorities may adopt the most restrictive standards from predecessor organizations in an effort to manage risk across broad and diverse geographies, rather than tailoring approaches to local context.

Experience with other public sector amalgamations has informed this skepticism. Members point to examples where consolidation increased administrative burden, reduced staff morale, and lengthened decision-making timelines, rather than delivering promised efficiencies.

### **3. Governance, Accountability, and Local Representation**

Regardless of their position on consolidation, members consistently raised questions about how governance would function under a regional conservation authority model. There is uncertainty around board composition, municipal representation, accountability mechanisms, and decision-making authority.

Many members emphasized the importance of local representation on conservation authority boards, noting that accessible and accountable governance has historically facilitated pragmatic problem solving and dispute resolution. There is concern that regional boards covering large geographic areas could dilute local voices, particularly in smaller or rural municipalities, and shift focus toward larger population centres.

Members also raised broader questions about how regional conservation authorities would remain aligned with provincial priorities related to housing supply and infrastructure delivery, particularly under future political leadership. These concerns underscore the importance of clearly defined mandates, transparency, and oversight structures if consolidation proceeds.

### **4. Process and Operational Issues Independent of Boundary Configuration**

A dominant theme throughout member feedback is that many of the most significant challenges associated with conservation authorities are operational rather than structural. Members consistently cited issues related to how applications are reviewed, coordinated, and managed.

Concerns include limited conservation authority involvement during early pre-consultation stages, resulting in new requirements being introduced late in the process; uncoordinated or contradictory internal comments; acceptance of incomplete applications that lead to prolonged iterative review; and the absence of clear, enforceable service standards.

Even where projects involve comparable site conditions and are governed by the same provincial policy framework, members reported materially different technical requirements, modeling expectations, and review timelines between conservation authorities.

These concerns are supported by conservation authority process analysis. Case study data demonstrates that conservation authority review timelines alone commonly range from approximately 94 business days on average for all sizes of infill development, 136 business days for small greenfield

development, and 161 business days for medium and large greenfield development, prior to the completion of municipal planning approvals. In practical terms, this equates to between four and eight months of review time attributable solely to conservation authority processes.

Members emphasized that this level of variability introduces significant uncertainty into land valuation, infrastructure sequencing, financing arrangements, and construction scheduling. Importantly, these delays occur upstream in the approvals process and compound with municipal and other agency reviews, amplifying their impact on housing delivery and infrastructure timing.

Review timelines are often driven by administrative sequencing and repeated information exchanges rather than substantive environmental analysis. The adoption of centralized digital permitting platforms, standardized submission requirements, and complete application standards has been shown to materially reduce review timelines, particularly for complex applications where delays compound over multiple cycles.

Members repeatedly stressed that delays are often not the result of unresolved environmental risk, but rather the structure and sequencing of review processes. In larger greenfield applications, more than 40 percent of total review time is attributable to iterative exchanges, administrative circulation, and coordination issues, while substantive technical review accounts for a much smaller share of the overall timeline.

For example, in the large greenfield case study, approximately 50 business days were consumed by back-and-forth iterations and clarification cycles, compared to roughly 20 business days of technical review and one to three days for final decision issuance. These findings align closely with member feedback describing repeated requests for clarification, uncoordinated internal comments, and late-stage scope expansion.

Members consistently noted that such process inefficiencies increase carrying costs and financing risk and undermine confidence in project schedules, even where environmental issues are well understood and appropriately addressed. It is emphasized that addressing these process issues would deliver meaningful improvements regardless of whether consolidation proceeds and should therefore be prioritized.

## **6. Cost Implications and Housing Affordability Considerations**

Members also highlighted the financial implications of extended and unpredictable conservation authority review. Using conservative assumptions of professional review costs, process analysis estimates conservation authority review costs of approximately \$140,000 for small infill projects, \$204,000 for medium greenfield projects, and \$241,500 for large greenfield projects.

These costs are incurred early in the development process and must be financed long before units are delivered or infrastructure is constructed. Members emphasized that these costs ultimately flow through to housing prices, infrastructure funding pressures, and project feasibility, particularly in marginal markets.

From an industry perspective, the issue is not the presence of environmental review, but the accumulation of delay, duplication, and administrative cost that arises from inconsistent and inefficient processes.

## **7. Consolidation as One Possible Mechanism, not a Guaranteed Outcome**

Members supportive of consolidation view regionalization as a potential mechanism to address these issues by enabling shared expertise, standardized technical guidance, and more efficient allocation of resources. In theory, consolidation could reduce duplication and improve turnaround times, particularly

where smaller or under-resourced conservation authorities struggle to maintain specialized technical capacity.

However, members opposing consolidation cautioned that structural change alone does not guarantee improved performance. They noted that larger organizations can become more bureaucratic and risk defaulting to the most restrictive standards to manage perceived liability across diverse geographies. Members drew parallels to other public sector amalgamations where consolidation increased administrative complexity rather than reducing it.

Process evidence supports a cautious approach. As noted, the data shows that measurable performance gains are most strongly associated with process improvements, such as standardized submission requirements, coordinated review, and digital permitting platforms, rather than organizational scale alone. For example, the introduction of standardized submission requirements and centralized digital tools is estimated to reduce review timelines by weeks rather than days on complex applications, independent of boundary configuration.

## **8. Geographic Variation, Governance, and Local Responsiveness**

Feedback consistently emphasized that the impacts of conservation authority consolidation will vary significantly across Ontario and that governance design will play a critical role in determining whether a regional model enhances or undermines effectiveness. Members acknowledged that consolidation may offer benefits in certain rural or under-resourced areas where staffing levels, technical capacity, and access to specialized expertise are constrained. In these contexts, shared resources and regional coordination could improve service delivery and consistency.

Conversely, members expressed concern that in complex and high-growth urban regions, consolidation may introduce administrative complexity and governance challenges that outweigh potential benefits. In such environments, large volumes of development applications, infrastructure coordination, and municipal servicing requirements demand highly responsive and locally informed decision-making. Members cautioned that regional authorities spanning diverse growth contexts could struggle to balance competing priorities, potentially leading to delays, rigid interpretation of standards, or disproportionate focus on larger population centres.

While watershed-based planning remains a foundational principle for conservation authorities, members emphasized that watershed boundaries alone do not capture critical differences in growth pressure, municipal capacity, infrastructure complexity, or local planning frameworks. A uniform province-wide consolidation model risks overlooking these distinctions unless governance structures are explicitly designed to preserve local knowledge, accountability, and responsiveness.

Regardless of their position on consolidation, members consistently raised concerns about governance and accountability under a regional model. Local representation on conservation authority boards was identified as an important mechanism for ensuring transparency, facilitating dispute resolution, and achieving pragmatic, site-specific outcomes. Members expressed concern that larger regional authorities could reduce accessibility to decision-makers and weaken the ability of local municipalities and stakeholders to influence outcomes.

These concerns are reinforced by process evidence indicating that review delays are already driven largely by internal coordination and administrative sequencing rather than substantive technical analysis. Members cautioned that increasing organizational scale without clear governance safeguards, defined service standards, and transparent accountability mechanisms could exacerbate existing inefficiencies rather than resolve them.

From an industry perspective, predictability and accountability are as critical as technical competence. Members stressed that any consolidated governance model must clearly align conservation authority mandates with provincial housing and infrastructure objectives, while preserving meaningful local engagement and ensuring that decision-making remains responsive to regional and site-specific conditions.

### **9. Legislative Intent, Regulatory Implementation, and Immediate Opportunities for Improvement**

Several submissions emphasized that many of the challenges identified through this consultation could be addressed through the full implementation of legislative reforms that have already been enacted but not yet operationalized. Amendments to the Conservation Authorities Act in 2022 were intended to clarify and limit conservation authority jurisdiction to flooding and erosion hazards and to eliminate duplicative permitting requirements where developments have already received approval under the Planning Act.

However, because the regulations necessary to give effect to these statutory changes have not been enacted, proponents continue to be required to obtain conservation authority permits even after securing municipal planning approvals. Members consistently identified this as a source of unnecessary duplication that increases costs, extends approval timelines, and undermines the intent of the legislative amendments. From an approvals process perspective, this results in parallel review streams that assess similar technical information, despite municipal planning approvals already requiring comprehensive studies addressing natural hazards and related impacts.

Members emphasized that completing the regulatory framework contemplated by the statute represents a clear, low-risk, and high-impact opportunity for immediate improvement. Advancing the necessary regulations would reduce duplication, improve predictability, and shorten approval timelines without compromising environmental protection or public safety. Importantly, this reform could deliver tangible benefits regardless of whether conservation authority consolidation proceeds and should be viewed as a foundational step in any broader effort to modernize conservation authority operations and service delivery.

### **10. Best Practices, Modernization, and Risk Management**

Members consistently noted that performance across conservation authorities varies widely and that some authorities already demonstrate high levels of efficiency, predictability, and technical competence. Examples were cited of conservation authorities achieving near-complete compliance with service standards, including permit decision timelines averaging approximately eleven days, supported by the use of modern digital permitting platforms, clear and consistently applied technical guidance, transparent service standards, and effective coordination with municipal partners and industry.

These examples were frequently referenced as evidence that the challenges facing the conservation authority system are not universal or inherent, but rather reflect differences in governance, resourcing, systems, and operational practices. Members emphasized that where conservation authorities have invested in digital tools, standardized processes, and clear expectations, review timelines are shorter, outcomes are more predictable, and working relationships are more constructive.

At the same time, there is concern that consolidation, if not carefully designed and sequenced, could disrupt these high-performing systems. Members cautioned that structural change alone does not guarantee improved outcomes and that amalgamation carries the risk of introducing administrative complexity, transitional disruption, and the loss of institutional knowledge that underpins existing efficiencies. From this perspective, there is a risk that consolidation could slow systems that are already functioning effectively.

Process analysis supports this view, demonstrating that the most significant performance gains are associated with modernization initiatives rather than organizational scale. Evidence shows that digital coordination, standardized submission requirements, complete application standards, and coordinated internal review processes deliver the greatest time savings, particularly for large and complex developments where delays compound over multiple review cycles. These improvements can reduce review timelines by weeks rather than days and can be implemented independently of boundary changes.

As a result, some members recommended that provincial coordination, standard setting, and digital modernization be advanced through centralized leadership before, or in parallel with, any structural consolidation. This approach would allow the Province to mitigate risk, protect high-performing systems, and ensure that consolidation, if pursued, builds upon proven best practices rather than resetting processes that are already delivering strong outcomes.

## **11. Concluding Observations and Recommendations**

OHBA recognizes the Province's objective of improving conservation authority performance, consistency, and service delivery. Based on member feedback, OHBA encourages the Province to consider the following as it advances reforms:

- Clearly articulate how consolidation would improve governance, accountability, and operational performance beyond what could be achieved through modernization and standardization alone.
- Prioritize process improvements, digital modernization, and implementation of existing legislative intent as foundational reforms.
- Ensure local technical knowledge and municipal representation are preserved within any regional governance model.
- Avoid disruption to high-performing conservation authorities and leverage existing best practices.
- Recognize regional and geographic differences in implementation.
- Provide additional consultation opportunities, including region-specific engagement and industry working sessions, to address issues that extend beyond boundary configuration.

OHBA would welcome the opportunity to work collaboratively with the Province to convene further discussions focused on practical, evidence-based solutions that support environmental protection while enabling timely housing and infrastructure delivery.

## **CONCLUSION**

In closing, OHBA appreciates the opportunity to provide input on the Province's proposed approach to the regional consolidation of Ontario's conservation authorities. Feedback from our members reflects a broad range of perspectives on consolidation itself, but clear alignment on the need for improved consistency, predictability, and efficiency in conservation authority governance, processes, and service delivery. As outlined in this submission, many of the challenges identified by industry relate not only to structural considerations, but also to process design, operational practices, governance clarity, and the implementation of existing legislative reforms.

OHBA would like to note that the timing and scope of the current consultation present challenges for meaningful engagement on a proposal of this scale and complexity. Given the significance of the issues raised and the regional variability in potential impacts, OHBA respectfully encourages the Province to provide additional opportunities for engagement as this work advances, including region-specific discussions and focused roundtables that could be convened in partnership with industry stakeholders.