DATE LINE

Ministry of Municipal Affairs and Housing

**RE: Consultation on growing the size of the Greenbelt,**

**Environmental Registry Number: 019-3136**

On behalf of (inset HBA name OR insert company name) we thankthe Ministry of Municipal Affairs and Housing for this opportunity to provide feedback on the province’s Grenebelt consultation.Ourassociation/company is made up of home builders, professional renovators, suppliers, trade contractors and other professionals. Annually, the residential construction sector creates 518,000 jobs for Ontarians, supports over $32.8 billion in wages and contributes $57.8 billion to Ontario’s economy annually all while delivering keys to Ontario families in pursuit of the great Canadian dream of homeownership.

It is vital that officials balance the need to protect our province’s environment with the need to build livable and sustainable communities where Ontario families now and in the future can live, work and play in a location they can afford. A long-term vision of growth that is coherent, balanced and addresses the population growth realities is what is critically needed to meet the economic and population trajectories of the Greater Golden Horseshoe and the province more broadly.

The growth projections our province is facing are very real. Ontario’s population is projected to increase by 31.5 per cent, or almost 4.6 million, over the next 27 years,[[1]](#footnote-2) and we need a place for those families to call home.In fact, according to the population forecast in the province’s most recent Growth Plan, the communities around the Paris Galt Moraine will see more than 500,000 new residents join their neighbourhoods by 2041.Understanding this real growth context is imperative to provincial and municipal growth management and meeting both current and future housing demands for growth outside of the Greater Toronto Area and into the Greater Golden Horseshoe with4.6 million new people over the next three decades. Officials must also recognize the permanent nature of the Greenbelt landas future updates to the Growth Plan will need to consider planning horizons beyond 2051.

Any expansion of the Greenbelt must be done in consideration with therequired community and infrastructure planning of the Provincial Growth Plan, the Provincial Policy Statement and the *MoreHomes, More Choice Act, 2019*. Municipalities also need to fully complete their Municipal Comprehensive Review processes already underway to achieve conformity with the updated Growth Plan before the province considers any Greenbelt additions of the Paris Galt Moraine.

Many municipalities have adopted comments as part of the current consultation that request that there be no Greenbelt study area or expansion at this time prior to the conclusion of their Municipal Comprehensive Reviews and associated long-term infrastructure and growth planning processes. We agree with this approach, and believe it is good planning and in the public interest that all requirements of comprehensive planning for the future are properly considered, and that planning processes and studies underway are completed prior to any contemplation of adding lands within the Provincial Greenbelt.

The Provincial Policy Statement and the Provincial Growth Plan require that the public interest be considered when determining the appropriate location for settlement area expansions, which include many considerations such as accommodating the housing needs of residents, creating jobs, making efficient use of infrastructure, and protecting the natural environment. Municipalities undertaking Municipal Comprehensive Review processes will be considering all requirements for good planning; this includes the protection of prime agricultural areas and natural heritage systems in the context of the extensive areas already permanently protected for agriculture and natural heritage by the current Greenbelt boundary. This process must be allowed to be completed prior to precluding the potential of any of the few remaining potential growth areas from accommodating the significant growth in the Greater Golden Horseshoe to 2051.

Finally, beyond the current Municipal Comprehensive Review process, areas around existing settlement areas should not be included within the Greenbelt. Areas surrounding existing settlements are essential in accommodating long-term prosperity through the logical and efficient extension of infrastructure and development patterns and must be protected as future growth areas.

We would expect a science-based approach and evidenceled process, with transparency and scientific grounding as the Greenbelt consultation moves forward. As the Ministry proceeds with this study area, we encourageofficials to consider the long-term implications of the growth reality Ontario is heading towards.We need flexibility for whatever the future may bring to ensure that all of Ontario is ready to accommodate the growth that is coming and thus ensure that families today and tomorrow have the housing options that they needin order to help Ontario thrive.

Thank you for your consideration.

Insert signature and title here

1. [Ontario Population Projections Update](https://www.fin.gov.on.ca/en/economy/demographics/projections/projections2019-2046.pdf), 2019–2046, Office of Economic Policy, Ministry of Finance, page 4 [↑](#footnote-ref-2)