

**Submission to the Minister of Municipal Affairs and Housing
Regarding
Draft Criteria to Accommodate Requests to Grow the Greenbelt**

Residential and Civil Construction Alliance of Ontario

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On behalf of its members and stakeholders in the wider construction and infrastructure sector, the Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to make a submission to the Minister of Municipal Affairs and Housing responding to the *Growing the Greenbelt Consultation Paper* and the draft Criteria to Accommodate Requests to Grow the Greenbelt.

The RCCAO was formed in 2005 as an alliance composed of management and labour groups that represent all facets of the construction industry. Our members include companies and workers who build both low-rise and high-rise homes as well as roads, sewers and watermains, bridges and other infrastructure.

The RCCAO consults with governments, the private sector and the construction industry to devise solutions to issues related to public infrastructure and advocate for adequate investment in public transit, roads and highway, water and sewer systems and other public infrastructure essential to economic growth and quality of life. We provide research and reports, and make recommendations on how to realistically ensure adequate infrastructure for the province.

The RCCAO members are:

- Metro Toronto Apartment Builders Association (MTABA)
- Toronto Residential Construction Labour Bureau (TRCLB)
- Heavy Construction Association of Toronto
- Greater Toronto Sewer and Watermain Contractors Association
- Residential Low-rise Forming Contractors Association of Metro Toronto & Vicinity
- LIUNA Local 183
- Residential Carpentry Contractors Association
- Carpenters' Union
- Ontario Concrete & Drain Contractors Association
- Toronto and Area Road Builders Association

Growing the Greenbelt: A Premature Consideration

RCCAO supported the establishment of the original Greenbelt. While we raised concerns around some specific aspects of the Plan, and continue to monitor implementation issues, as an organization we endorse the principle of protecting countryside and concentrating a significant portion of growth within the existing urban envelopes of the Greater Golden Horseshoe (GGH.)

However, it must be remembered at all times what the Greenbelt is, and what it is not, notably:

- ***It is not intended to be a barrier to all growth.*** Those who warn against the dangers of development leapfrogging the Greenbelt ignore that provincial policy has always recognized it would be impossible to concentrate all future growth within the currently defined urban boundaries. The purpose of the Greenbelt was, in part, to encourage more growth there than might otherwise occur, while recognizing that there would be a need to expand the population bases of numerous municipalities beyond the Greenbelt. Barrie, Guelph, Cambridge and Brantford, among others, are designated urban growth centres “outside” the Greenbelt. Moreover, government documents note that urban growth centres will take “a significant portion” of all population and employment growth, not all growth, and make it equally clear that smaller towns and villages are not locked into permanent stasis.
- ***It is not a plan in isolation.*** The Greenbelt and the Places to Grow Plan for the GGH are complementary policies which must be viewed in tandem. Together they direct where the bulk of growth should and should not occur. They seek to direct and manage growth, not prevent it. In order to accommodate population growth of over 3.5 million people by 2031, provincial plans require a greater concentration on intensification within existing urban areas, enhanced development of new urban growth centres and modest population growth in smaller centres.

The Greenbelt and the Places to Grow Plan are both very new and far from fully implemented. Municipalities are in the process of updating Official Plans to conform with these new Acts. Developers and homeowners are still discovering the consequences for housing markets. Farmers are rightly concerned that the promises made to them at the time the Greenbelt was introduced have not been fulfilled.

Ontario should not consider *growing* the Greenbelt before we have *lived with it* and *learned from it*.

Specifically, there are three reasons why RCCAO believes it would be premature to consider any expansion of the Greenbelt:

- 1) In recent years, municipalities and stakeholders, including the construction and infrastructure sectors, have needed to adjust to many changes within the business environment, stemming from:
 - Amendments to the *Planning Act* and the reform of the Ontario Municipal Board;
 - The approval of *Places to Grow: The Growth Plan for the Greater Golden Horseshoe* in 2006; and
 - The passage of the *Clean Water Act*, the *Greenbelt Act* and the publication of the *Greenbelt Plan* in 2005.

Ontario's construction and infrastructure sector remains committed to working with all levels of government to develop solutions to manage growth in a sustainable way, including through the expansion, extension, operation and maintenance of approved infrastructure within the Greenbelt.

However, we believe that all levels of government and stakeholder representatives from a variety of sectors would be well served by waiting until the changes brought about by these legislative and regulatory reforms have been digested and the lessons learned.

2) The *Greenbelt Act, 2005* and the Greenbelt Plan propose a 10-year review of the Greenbelt and state that early amendments to the areas of the plan designated as Protected Countryside could be considered outside the 10-year review under the following circumstances:

1. There are major unforeseen circumstances, or major new provincial policy, legislation or regulation that create the need for an amendment;
2. The overall effectiveness and integrity of the Plan would be threatened if the amendment were deferred to the next 10-year review; or
3. The effectiveness and/or relevance of the Plan's policies would be improved through an amendment.

RCCAO does not believe that any of these three conditions currently exist.

While RCCAO would support the consideration of draft Criteria to Accommodate Requests to Grow the Greenbelt as part of the mandatory 10-year review, we believe that at present it would be premature to consider expanding the Greenbelt, especially when none of the criteria for doing so have been met.

3) In determining the areas to be included as part of the Greenbelt, the Government followed the recommendations of the Greenbelt Task Force. The Task Force's recommendations to the Minister of Municipal Affairs and Housing, which served as the foundation of the Greenbelt Plan, were based in part on measurable scientific factors.

The Government then employed a systems approach to identify both a natural heritage system and an agricultural system which form the Greenbelt's Protected Countryside. A systems approach considers that the health of plants, animals - including people - and natural features are related and connected to each other and to our own well-being.

Any proposals to consider ad hoc additions to the Greenbelt at this time on the basis of municipal applications would defeat the emphasis on scientific decision-making inherent in the original Greenbelt considerations. There has been far too little time with the Greenbelt restrictions in place to evaluate the impact on agricultural production, integrity of natural systems, municipal growth requirements and other relevant factors. The very purpose of the 10-

year review was, in part, to allow for careful and systematic evaluation of the success or failure of the Greenbelt to adequately meet these objectives before considering whether the land base was adequate.

Moreover, municipalities have little expertise or fiscal capacity to perform such scientific studies. As a result, it can be expected that municipal requests to add lands to the Greenbelt will be based on little more than “good intentions” to preserve countryside or natural features not currently within the Greenbelt boundaries, without any real study of the justification for such additions.

For all of these reasons, RCCAO believes strongly that any consideration of “growing the Greenbelt” should be reserved until the 10-year review in 2015.

Alternative Comment: Adequacy of the Six Criteria

In the alternative, if the Government determines to proceed with a policy of entertaining municipal requests for expanding the Greenbelt despite the clear arguments for waiting until the 10-year review, RCCAO holds that it is essential that strict criteria be published and followed. For this reason, we comment below on the six criteria outlined in the Ministry discussion paper. However, it cannot be emphasized too strongly that RCCAO and virtually all organizations involved in development and construction, from residential housing to major civil projects like highways and bridges, believe that consideration of expansion at this time is unwarranted and ill-considered.

1. Municipal Request

We strongly support the position that no consideration should be given to requests for additions to the Greenbelt without municipal support. Advocacy groups or individuals should not be eligible to propose additions which would go against the interests and wishes of the elected councils in the area.

Where a single municipality within a county or region makes a request for designation that is not supported by the other municipalities, or the higher level of government, the lack of consensus among municipal levels should be a significant factor for the province weighing against designating such lands.

2. Embraces Greenbelt Purpose

RCCAO supports this criterion. In this context it must be recognized that in ensuring that proposed expansions balance environmental and agricultural concerns with the needs of growing communities, the latter includes not just necessary expansion for housing and employment, but transportation and

core infrastructure needs as well as adequate access to aggregates and other resources necessary for growth.

3. Additions to the Greenbelt

Absolutely, additions should be logical extensions abutting the existing Greenbelt. The creation of isolated “islands” not directly connected to the current Greenbelt would serve no purpose.

Some municipalities appear to be entertaining the idea of requesting that conservation lands and natural heritage systems within the existing urban envelope should be absorbed into the Greenbelt. This changes the very model of the Greenbelt and would result in a fractured system with thin slivers of “greenbelt” extending into urban centres.

The Greenbelt is not a catch all that needs to subsume all green space in the GGH, including lands already well protected as part of municipal parkland or Conservation Authority lands.

4. Connections to the Greenbelt

RCCAO likewise supports the conditions outlined under point 4 with respect to a “systems approach.” For the sake of consistency, RCCAO believes that the draft Criteria to Accommodate Requests to Grow the Greenbelt must take into account the same scientific considerations that were used when determining the areas that were included as part of the original Greenbelt.

5. Complement Greater Golden Horseshoe Growth Plan

In our view, this is the single most important criterion on the list. The GGH Growth Plan and the Greenbelt must be viewed together. Plans to expand the latter cannot be considered without reviewing the impact on municipal and regional growth priorities under the Places to Grow Plan.

Reconciliation between the two should not be left to closed door Cabinet discussions alone. The public deserves the right to hear about the impact of any potential additions to the Greenbelt on the goals of the Growth Plan and related transportation and infrastructure expansion. To that end, a Growth Plan impact assessment should be conducted by the applicant municipality, with annotated comment by the Ministry of Public Infrastructure Renewal and made available for public discussion prior to provincial decision on any application for expansion.

6. Timing/Relationship to Other Provincial Initiatives

We agree on the importance of evaluating any proposed additions relative to other provincial initiatives, including source water protection and transportation planning. This reinforces the fact that consideration of additions is premature, since the transportation plans for the region have not yet been fully determined (e.g. Metrolinx studies) and Source Water Protection Committees have barely begun exercising their new duties. At this time, the broad swath of new regulations all municipalities are confronting, including the need to integrate Official Plans with the *Greenbelt Act* and GGH Growth Plan, should logically dictate no major additions to the Greenbelt until a later date.

The RCCAO appreciates the opportunity to comment on the *Growing the Greenbelt Consultation Paper* and Draft Criteria to Accommodate Requests to Grow the Greenbelt. We trust the Minister of Municipal Affairs and Housing will weigh carefully the concerns of our industry, along with those of municipalities, farmers and other concerned stakeholders, when considering the next steps.

The Greenbelt is an historic achievement. It would be unfortunate if the many benefits of the greenbelt concept were to be undermined by a precipitous rush to expand the boundaries before the affected communities have fully incorporated and adjusted to the impact of the original designation and the myriad of other planning changes of recent years.