



BUILDING A GREATER GTA  
Building Industry and Land  
Development Association

May 15, 2015

Mayor Maurizio Bevilacqua and Members of Council  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, Ontario  
L6A 1T1

C	<u>12</u>
Item #	<u>5</u>
Report No.	<u>20 (cw)</u>
<u>Council - May 19/15</u>	

Dear Mayor Bevilacqua,

**RE: BILD Comments – 2015 Co-ordinated Review of Provincial Plans**  
*May 19<sup>th</sup> Council Meeting*

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The Building Industry and Land Development Association (BILD) would like to acknowledge and thank the City of Vaughan for the opportunity to provide comments to your municipality as we embark on the 2015 co-ordinated review of provincial plans, including the Greenbelt and Growth Plan.

Together with the Ontario Home Builders' Association and members of the other impacted local home building associations, BILD's members have been significantly impacted by the Greenbelt and have expressed interest since the enactment of this legislation, going back to 2005 conversations with municipal and provincial levels of government.

We trust that the City will continue with public consultation and engagement, in an effort to discuss the current impacts and potential changes to the Greenbelt Plan. We also hope that the City will provide specific recommendations, similar to those put forward last year by Durham and Niagara Regions, that will be included as part of the formal provincial review. These Regions recommended the establishment of a set of quantifiable criteria for landowners and municipal governments by which existing and proposed Greenbelt designations can be assessed and measured to determine its appropriateness.

From the industry's perspective, in terms of the resulting Greenbelt boundaries, a transparent, accountable, fair and evidence-based criteria was never clearly established or articulated to stakeholders. The process for creating the Greenbelt Plan maps still remains unclear today. Particularly, the Province has not disclosed to the public, how the boundaries were established and against what measures – whether they were scientific, politically motivated, based on expert opinion, and/or community request based.

In addition, the industry believes that the final Schedule 1 of the Greenbelt Plan was unfairly adjusted, when comparing it to the Draft Greenbelt Plan mapping originally posted on the

Environmental Bill of Rights Registry. From the Draft to the Final Plan, there was a significant increase of Greenbelt designation, without a clear rationale or criteria to justify these lands being included in the Plan. Considering the significant amount of changes without clear criteria or evidence, added consultation should have been provided for the municipalities and affected landowners. This would have created more confidence in the Final Plan.

A review of the Greenbelt Plan must be carefully considered in conjunction with the reviews of other provincial policies such as the Oak Ridges Moraine Conservation Plan, the Niagara Escarpment Plan and the Growth Plan for the Greater Golden Horseshoe. A coordinated effort of these reviews will be important for the GTA Region's critical and required long-term infrastructure planning and investments. It is in the City of Vaughan's own best interests for its long-term Official Plan, transportation and infrastructure goals and objectives that reassessment and re-designation criteria be created.

Also, as reiterated by our colleagues at the Ontario Home Builders' Association, the home building and land development industry has no intention of fighting the Greenbelt. On the contrary, we are of the view that now is the opportunity to look at potential ways to improve the Greenbelt – its character and overall integrity, in areas where it makes sense to do so. With a view to improving our current Greenbelt, we are also looking forward to a creative, collaborative and progressive conversation about potential additional land use options to expand public access and public use on greenbelt and related lands.

With our colleagues at the OHBA, the industry will be pleased to offer insight into the successes and challenges that have arisen over the past decade through the implementation of the Growth Plan, which is also being reviewed at the same time, and is equally important to this conversation. As we move through the review process, the industry looks forward to being able to present evidence-based recommendations to support new housing supply and employment opportunities while protecting significant environmental features.

In the five-year anniversary update of the Growth Plan, the province noted that, ***"because of the magnitude of growth that is forecast, it will be necessary to bring new lands in to the urban envelope. The Growth Plan outlines a series of tests and criteria to ensure that expansions occur when necessary and where most appropriate, and in a way that ensures that infrastructure is in place and the natural environment is protected."*** The province has established how critically important the "white-belt" lands in the GTA are in supporting the long-term future demographic and economic growth when rational planning requires and permits urban expansion to occur. We hope that the City of Vaughan will echo our sentiment that any reductions to the "white-belt" to accommodate future growth will have an impact on population/employment allocations, and the associated and necessary designated housing supply needed to support it, which will ultimately challenge housing affordability and the GTA's economic competitiveness.

BILD supports balanced growth initiatives for new communities that do not compromise affordability and competitiveness while utilizing Growth Plan principles to create complete, liveable and sustainable neighbourhoods where we all live, work and play. We look forward to working with our municipal and provincial colleagues during the review to improve the quality of life and affordability for families living in the GTA.

## **BILD RECOMMENDATIONS:**

**BILD recommends that the City of Vaughan request that the Province consult with all stakeholders and establish a process and a set of quantifiable criteria by which municipal governments and landowners have the opportunity to have existing and proposed designations in the land area of the Greenbelt Plan assessed and measured to determine its appropriateness.**

This mirrors a recommendation that has been issued to the Province by The Regional Municipality of Durham in the September 2, 2014 Report titled *Durham Greenbelt Plan Review Final Report – Directions and Recommendations, File D07-69-03*. Recommendation 18 states:

*“Create a clearly defined process to allow municipalities to request minor revisions or rounding out of the Plan areas as part of each Plan review. These revisions should not be permitted to result in a net loss of protected area; should clearly demonstrate that they achieve efficient use of land that advances municipal and Plan objectives; should comply with natural heritage and agricultural protection policies; and should require Regional and area municipal council support.”*

A similar recommendation was issued in the Urban Strategies Inc. report for the Niagara Region in August 2013 titled *Niagara Region’s Greenbelt Plan Review – Summary Report*. Recommendation 7 and 20 states:

*“The 2015 Provincial Greenbelt Plan review needs to be transparent, informed, diligent and genuinely open to exploring way the Plan can be improved to better meet its objectives. Ensure clarity in the process by which Greenbelt boundaries will be refined in the 2015 Provincial Greenbelt Plan review.”*

**With a view to improving the Greenbelt, BILD also recommends that the City of Vaughan engage all stakeholders in a creative, collaborative and progressive conversation about broadening the permitted land uses within the Greenbelt and related lands. For example, in order to expand public access and public use, active parkland dedication could be permitted, or where Greenbelt lands are abutting urban development, the opportunity may exist to use such land for storm water management ponds, while still maintaining the Greenbelt’s integrity and significance.**

Equally as important to the greenbelt discussion, is one of accommodating for future growth and preserving the whitebelt.

**BILD recommends that the City echo our sentiments that the whitebelt is necessary to bring new lands in to the urban envelope and that any reductions to the "white-belt" to accommodate future growth will have an impact on population/employment allocations, and the associated and necessary designated housing supply needed to support it. This will ultimately challenge housing affordability and the GTA's economic competitiveness.**

We are confident that now is the time to bring all of the conversations together that we have been having over the years on transportation, infrastructure, ecological preservation, and the so many related land use planning and development pieces in an effort to preserve our significant

environmental features, and to accommodate growth and employment in the appropriate places. We look forward to our continued conversations about being your partner in community building in Vaughan.

Once again, BILD thanks the City of Vaughan for the opportunity to provide preliminary comments related to the 2015 Provincial Greenbelt Review. The industry will be fully engaged with municipal and provincial colleagues now that the formal review is launched and we look forward to providing more extensive comments as we move together through this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paula J. Tenuta', with a stylized, cursive script.

Paula J. Tenuta, MCIP, RPP  
Vice President, Policy & Government Relations

cc: *John Mackenzie, Commissioner, Planning, City of Vaughan*  
*Michael Pozzebon, BILD York Chapter Chair*