

coughlanhomes

2700 Audley Rd North
Ajax, Ontario, L1Z 1T7
Tel: (905) 427-7703
Fax: (905) 427-1611

Ian McCullough, P. Eng.
Direct: (905) 619-4614
E-mail: ian@coughlanhomes.com

November 17, 2022

Honorable Minister Steve Clark
Ministry of Municipal Affairs and Housing
College Park 17th Flr,
777 Bay St, Toronto, ON
M7A 2J3

via email: greenbeltconsultation@ontario.ca

Honorable Minister Steve Clark

Dear Minister Clark:

SUBJECT: ERO # 019-6216

Comment & Support on Proposed Amendments to the Greenbelt

This comment is being submitted in response to the above noted ERO posting regarding the Government's Proposed Amendments to the Greenbelt Plan.

We are in support of the Government's review of the Greenbelt plan and removing appropriate lands that should not have been included in the its original mapping. The original inclusion of lands adjacent to existing communities and available servicing was never logical or reasonable. Their removal is a positive step in moving towards the Government's goal of providing 1.5 million new homes over the next 10 years.

In 2005 when the Greenbelt Plan and Act were introduced and when the consultations were taking place, there were multiple requests from landowners and interested parties for the Government to release its methodology as to why certain lands were included in the Greenbelt and others were not. The mapping and line work had no rationale in most instances, and this current exercise can be an overall positive improvement to a broad-brush policy that was instituted without any basis in science. Re-opening the Greenbelt for review of lands that do not have ecological value and are appropriate for development is a very positive and encouraging step towards helping solve this Province's housing crisis.

The inclusion of land within the Greenbelt that was immediately adjacent to existing developed areas and/or existing services was not well thought out and is not in keeping with the current Provincial Policy Statement (PPS) which encourages development that would efficiently use land adjacent to settlement areas. The PPS also includes policy goals to achieve cost-efficient development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs. Development in areas with available municipal servicing and adjacent to other developed lands would help achieve this Provincial goal.

The exchange of land from the Greenbelt plan by removing lands that would allow the minimization of requirements for new infrastructure and to efficiently use existing infrastructure to develop and replacing them with land that has ecological benefit is a positive and worthy goal.

Our support for the inclusion of these lands come with a cautionary note with regards to the timing restrictions identified in the Greenbelt announcements. Given the lands slated for removal have been designated as greenbelt for several years, appropriate planning, servicing and environmental studies will have to be undertaken to ensure efficiency of development and allocation of services. These studies are quite time consuming and can take months to years to prepare. The requirements that significant progress on approvals happen by 2023 and that new home construction begin no later than 2025, are unrealistic. Land should not be automatically returned to the Greenbelt if these two short milestones are not reached. Permanent removal of the lands from the Greenbelt without these timing restrictions will allow the appropriate resources to be put into the lands and ensure they are efficiently developed as quickly as possible without the risk of being put back into the plan.

Removal of the lands from the Greenbelt now without unrealistic timing restrictions on approvals and building is a logical and sensible plan that will only assist and ensure the

government is on track to tackle the housing crisis and build towards its goal of providing 1.5 million new homes over the next 10 years.

Thank you.

Yours truly,
Cougs Investments Ltd.

A handwritten signature in black ink, appearing to read 'I. McCullough', written over the company name.

Ian McCullough, P. Eng.
Vice President of Land Development