My Response to Ontario Bill 23 The More Homes Built Faster Act 2022

1. Postpone implementation until City and Town Councils have time to respond to this new Omnibus Bill. This must be done to respect local initiatives and the dignity of elected Councils.
2. Respect Local Democracy - Hamilton and Halton, whose citizens and City Council representatives voted to keep the city boundaries as they are and build on adequate space within their boundaries, had that reversed by Minister of Municipal Affairs and Housing Steve Clark on a Friday afternoon. This action by Minister Clark represents a complete disrespect of local democracy. His action should be reversed.
3. There are already enough building permits waiting to be commenced inside present city and town boundaries to take care of all new housing needs. There is no need to build on the Greenbelt that represents remaining local farm land as well as natural areas that should be kept natural as a heritage for species at risk that live there as well as for our children and grandchildren and future generations.
4. I agree with increasing Inclusionary Zoning and gentle density increases in “Yellow Zones” - present detached and semi-detached as in Toronto, with “missing middle” low rise apartment buildings in the Yellow Zones as well as the triplexes, multiple apartments incomes (previously occupied by one family), basement apartments and “lane homes’ and increasing density higher at transit nodes and along transit corridors that are allowed by Bill 23. However it has been determined by those examining Bill 23 that the rules for creating greater density in cities have very few teeth to enforce that happening. In fact is has been suggested that only about 50,000 units of housing will be created in the cities, giving an excuse for housing development on greenfield land and even on the Greenbelt, which should not be happening. A major problem with Bill 23 is that it removes the requirements for development fees to provide for schools, parks, roads in the neighbourhoods of new development. This means that municipalities will have to raise taxes to pay for needed services that developers used to pay for.
5. I am interested in having built “deeply affordable housing”, meaning that the rent cannot be more than 30% of a person’s or family’s income, as per ACORN. Bill 23 actually makes it worse than what we already have in Toronto. Bill 23 only asks for 5% of new builds to be affordable and this means market rate affordable or about 80% of market price. Toronto already suggests that 15% of new builds be market affordable.
6. Bill 23 removes rental replacement bylaws. Through rental replacement by-laws, municipalities can require developers or landlords to replace rental units impacted by renovation or redevelopment at a similar affordable rent. This is an important policy tool that allows municipalities to **[maintain the existing stock of affordable rental housing](https://right2housingto.ca/wp-content/uploads/2022/10/R2HTO-Rights-Review-Protecting-Affordable-Rental-Housing-July2022.pdf)**, and in doing so, protect renters from displacement. Rental Replacement bylaws should be included in Bill 23.
7. Bill 23 scraps the requirement for Green Building Standards. This should not be allowed to happen. The climate crisis with more heat and more heavy rain storms requires that Green Building standards be maintained, or the new builds without the Green Building Standards will be unaffordable to heat in the winter or cool in the summer. New homes without Green Standards will soon be undesirable for purchasers because of the high cost of maintaining these homes.
8. Conservation Authorities - Under Bill 23, “Conservation Authority (CA) permits (e.g., regarding water-taking, interference with rivers, creeks, streams, watercourses, wetlands, flood or erosion control) would no longer be required for development projects approved under the Planning Act. In other words, the power of CAs to regulate or prohibit development that negatively impacts wetlands, rivers or streams would be undermined.

* CAs would no longer be able to consider pollution or the conservation of lands when issuing or refusing to issue permits.
* CAs would be prevented from entering into agreements with municipalities regarding the review of planning proposals or applications. CAs would in effect be prohibited from providing municipalities with the expert advice and information they need on environmental and natural heritage matters.
* CAs would be required to identify conservation authority owned or controlled lands that could support housing development.
* Watershed planning, the hallmark of Ontario’s CAs, would be severely diminished, to be replaced with piecemeal planning by over 400 individual municipalities.”

My family lived near a Conservation Authority for more than thirty years - The Hamilton Wentworth Conservation Authority - residing largely in the Dundas Valley as well as at Christie Lake Conservation Area. My kids were educated about nature by Conservation Authority programs. At Christie Lake, I was involved in providing Hamilton school children with programs to educate, have fun and appreciate all that nature has to offer us. Ontario Conservation Authorities were created for flood control, especially after the death toll of Hurricane Hazel. In the 19th century settlers cut the forests along creeks and rivers such as Spencer Creek in Dundas, Ontario, allowing spring run-off to flood the creek and the town of Dundas. So a couple of dams were built (one older and a newer one creating Christie Lake) on Spencer Creek above the Niagara Escarpment, controlling the water flow and preventing spring flooding. CA’s are unique to Southern Ontario. No other province has them. CA’s are reservoirs of wildlife, bird sanctuaries, unique plant species and all kinds of animals from deer to coyotes to Black Bears. It seems a great tragedy that the government of Ontario would see fit to remove CA prevention of building on floodplains and landslide prone lands, plus assistance to municipalities that depend on them for sound land and water management advice. Reverse Bill 23’s decimation of our beloved Conservation Authorities.

1. The Greenbelt - Most recently on a Friday afternoon an announcement was made by Ontario Minister Steve Clark that 7400 acres of designated Greenbelt land was to be removed from the Greenbelt and zoned for housing development. It was to be replaced by 9400 acres in another part of Southern Ontario, which is already protected land. While this does not specifically fall under Bill 23, it follows the trend of Bill 23. It removes natural heritage lands, with all the biodiversity and farm lands that have been protected from development since they were designated as part of the Greenbelt in 2005 encompassing the Niagara Escarpment, the Oak Ridges Moraine, and nearly one million acres of prime farmland. The purpose of creating the Greenbelt was to safeguard the vital resources that clean our air and water, reduce our flood risks, provide a home for wildlife, and ensure that our communities have green space to explore. It is also true that Greenbelt land is not needed for housing development. Development planning indicates that there is more than enough land, some of it even green fields lands, applied for and ready for development without touching the Greenbelt. So why is Greenbelt land being opened up for development? Toronto Star articles, Letters to the editor and Twitter commenters seem to know. Those land speculators/developers have been given a gift of $billions by the present government. Is it because they made lavish donations at election time and for this they are being handsomely rewarded? That seems to be the only reason since Greenbelt land is definitely not needed for housing under Bill 23. The consequences of going ahead with this is that it sets a precedent - all of the Greenbelt lands will now be asked for by the land speculators/developers to put housing on. Another consequence of course of development on the Greenbelt will be the loss of biodiversity (wildlife) and farm land for growing food that is close to markets for food in Southern Ontario. We need to preserve our own farm land because the climate related weather patterns are drying up the food crops of California which we have depended on for so long. California food producers are actually looking at southern Canada as a new place to grow the vegetables and fruits that will no longer arrive from California.
2. The Climate Crisis/Catastrophe - COP 27 climate meetings are going on in Sharm El Sheikh, Egypt as I write this. It turns out that Canada is a laggard when it comes to meeting its promises to reduce greenhouse gas emissions. We are near the bottom of the list of nations when it comes to our failures to keep even what we have promised. European countries and even the United States are ahead of us. Why is that? Part of it is our oil and gas production such as the Tar Sands in Alberta. And our emissions have only grown with each decade over the past thirty years, rather than declined. We have a lifestyle problem that Bill 23 will definitely exacerbate. In the 60’s and 70’s the average home had a footprint of about 1000 square feet. And families of four and more lived successfully in these homes. Now the average footprint of new built homes in Ontario is 3,000 square feet and more. And there may be only two or three people living there. Bill 23 has been described as a trojan horse. Rather than encourage more dense building within city boundaries, Bill 23 is encouraging development on natural heritage and farm lands. These will require services such as roads and highways and more. And since planned developments beyond city boundaries as has been mandated by the present government, more cars, often gas guzzling SUV’s, will be driven on roads that are gridlocked, causing the present government to plan to build more roads such as highway 413 and the Bradford Bypass. We are already living beyond our means in terms of what we are demanding from the earth in forestry, aggregate, mineral and energy resources to carry the profligate lifestyles that we are allowing. Bill 23 plays right into this unsustainable lifestyle which cannot and will not continue. No, we need to develop “main streets” that densify in present suburbs, making public transit viable and affordable, that have shops that provide every need with a 15 minute walk or bicycle trip. All urban planning points to the need for “main street” development which is impossible under Bill 23’s requirements.
3. Bill 23 should be repealed and rewritten with principles that get us to a place of reducing greenhouse gas emissions, less deforestation, more natural areas, adequate local farmland and “main street” settlements in cities and towns with firm boundaries.