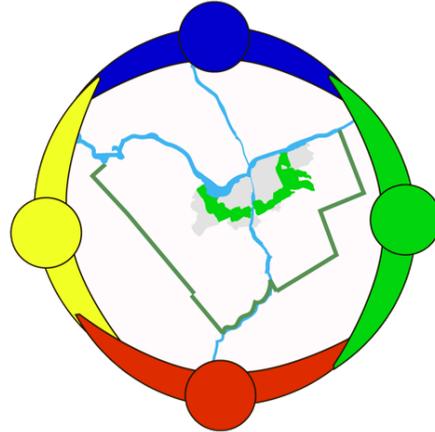


**The People's Official Plan
Le Plan Officiel Populaire**



**To the Standing Committee on Heritage, Infrastructure and Cultural Policy
Re: Bill 23, the “More Homes, Built Faster Act”**

Whitney Block
Room 1405
99 Wellesley Street W
Toronto, ON M7A 1A2

Cc:
Premier Doug Ford
Minister of Municipal Affairs & Housing
Minister of the Environment, Conservation and Parks
Minister of Agriculture, Food and Rural Affairs
Ottawa MPPs
Mayor of Ottawa
Ottawa City Council

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Leading environmental, community and social justice groups from across Ottawa stand resolutely with the City of Ottawa Council and Staff in rejecting Bill 23. Civil society groups from the People's Official Plan coalition call on Doug Ford, his Ministers, and his Conservative government to do away with this harmful legislation. This new omnibus housing legislation is a threat to environmental, social, and economic well-being - so it needs to be withdrawn.

The groups reject Bill 23 on the basis that it will not meaningfully increase affordable housing nor take into account environmental and food security impacts while also contributing to costly expanding sprawl. The proposal will lead to environmental destruction during a climate emergency, when we need to be protecting the green space, watersheds and foodlands we have left. The host of policies proposed in Bill 23 are detrimental to legitimate and pressing concerns, including homelessness and core housing needs, food security, climate risk, affordability, urban trees and parks and public engagement in the planning process.

Environment and climate change concerns

Bill 23 raises a number of environmental concerns, including jeopardizing the protection of habitats, ecosystems, wetlands, urban parklands, and other greenspaces. It also effectively scraps Ottawa's green building standard, in an incredible lack of foresight, missing climate targets while ultimately costing homeowners and renters. Ottawa is facing frequent extreme heat and more intense storms; unless buildings are designed to handle these, threats to life, health, building structures and insurance costs will multiply rapidly and Ottawa's urban developments will become unsafe, costly and uncomfortable places to live. Our communities need to foster smart development that takes these "new normal" conditions into account.

Critically, a renewed attack on Conservation Authorities deprives Ontario of their ecosystem and habitat protection, moving this specialized land use decision-making to the 444 municipalities across Ontario, most of which simply do not have the necessary expertise. The Bill's significant changes to how wetlands are evaluated and protected will also leave many of our greenspaces at risk of losing their designation and therefore protection. Urban parkland is also jeopardized by cutting in half the amount of park land that developers have to give the City in new developments, meaning that essential livability of our neighbourhoods will be slashed.

Ottawa's green building standard (High Performance Development Standard), introduced earlier this year to help us meet our climate change targets in terms of energy and carbon efficiency for new builds, is effectively scrapped by this legislation, ultimately costing residents. This demonstrates an incredible lack of foresight as the cost of energy-retrofitting (or alternatively ever-rising utility costs) for both new homeowners and renters will be many times more than the cost of building better in the first place.

Social concerns

The Bill raises critical social concerns, with significant impacts on housing for residents experiencing housing stress or homelessness, while also penalizing renters and cutting regulations to protect tenants from renovictions. It threatens to lead to fewer municipal services, parks, neighbourhood liveability, and community benefits while also raising the likelihood of significant increases in property taxes and user fees, all at a time when household costs are rising and food security programs are stretched. Densification of urban areas and an increase in housing are sorely needed, and the coalition supports the move to allow three units per lot as of right. However, in realizing densification and housing, we need to do so in a smart and sustainable way that does not cause undue environmental, health, social and municipal fiscal damage.

Capping inclusionary zoning at 5% and limiting it to transit areas is to effectively refuse to use a regulatory tool that can create deeply affordable housing. Removing protections for renters from renovictions and demovictions will lead to increased homelessness. The proposals redefine “affordable residential unit” as being a unit that is priced at 80% of market rent, a measure that will create housing that is nowhere near affordable for those on low and very low incomes and which has no relationship to individual income and ability to pay. In contrast, “affordable” is defined by Canada Mortgage and Housing Corporation as 30% of an individual’s pre-tax income.

The proposal to significantly limit Development Charges which can be levied by municipalities to pay for essential infrastructure means that neighbourhoods are likely to have fewer municipal services, parks and community benefits. Neighbourhood liveability is likely to be negatively impacted, with municipalities no longer having any say over the look and feel of designs beyond health and safety impacts for both residential and commercial developments, changes to the Heritage Register, and the removal of community input into the Ontario Land Tribunal.

Economic Concerns

Growth should pay for the cost of growth, regardless of where it occurs. Ottawa has a huge land area. The cost of developing infrastructure and services to far-flung suburbs is high. Focusing Ottawa's development towards becoming a compact urban city (as per Provincial Policy Statement) would help solve the fiscal inequity and high cost of development. It would also respond to climate change and affordable housing and equity issues.

Ottawa already has one of the highest property tax rates in Ontario. Thus, the City has limited ability to increase property taxes to cover the shortfall in revenue from not collecting enough

development charges and having to build and service developments on lands a long way out. The shortfall (estimated at over \$30 million per year) will put Ottawa in a fiscally precarious position. The Provincial Government must commit to cover this financial gap.

The Bill ignores the most important task in creating deeply affordable housing: new investment. Without new investment in affordable and deeply affordable housing, we will not successfully address the housing crisis. Although this is the government's third legislative initiative on housing, there is still no coherent investment plan that can enable the public, private, or non-profit sectors to build the amount of affordable and deeply affordable housing needed.

Accountability

This Bill was introduced after the municipal election, with minimalistic GTA consultations and a comment submission deadline two days after the new municipal governments are sworn in. This makes it impossible for any exercise in democracy or accountability. The consultation period must be extended and public input solicited from outside GTA as well. Municipalities must be provided with the opportunity to solicit community input, bring considerations through committees and elected City Councils.

The Bill also completely fails to set any targets for achieving the creation of market affordable and deeply affordable housing. If the intention of this Bill is to address homelessness and housing unaffordability, it should specifically set targets for the annual number of affordable housing units produced, as well as for purpose-built, non-profit or social housing. The lack of affordability targets in the More Homes Built Faster sends a signal that this is not a key priority of the Provincial Government, despite it being top of mind for residents and candidates in our municipal election.

The population growth projections used for Bill 23 (a housing target of 151,000 new homes from 2021 to 2031) and resulting municipal assignments are approximately double of Statistics Canada estimates and the Province has provided no basis for these projections.

About the People's Official Plan coalition

The People's Official Plan (POP) coalition of environmental, community and social justice organizations works towards policy outcomes in the direction of greater economic, social and climate justice through the City of Ottawa Official Plan and its implementation. We stand with the City of Ottawa in rejecting Bill 23 for the future benefit and well-being of the environment and people. The organizations that make up the POP coalition and support the call to reject Bill 23 include:

- ACORN
- Alliance to End Homelessness Ottawa
- Beechwood Market
- Bike Ottawa
- Citizen Climate Counsel (C3)
- City for All Women Initiative (CAWI)
- Coalition of Community Health and Resource Centres
- Community Associations for Environmental Sustainability (CAFES)
- Council of Canadians - Ottawa Chapter
- Ecology Ottawa
- Energy Mix
- Federation of Citizens' Associations (FCA)
- For Our Kids Ottawa/Gatineau
- Greenspace Alliance of Canada's Capital
- Healthy Transportation Coalition
- Heritage Ottawa
- Just Food
- Ottawa Eco-Talent Network
- Ottawa Renewable Energy Cooperative/CoEnergy
- Ottawa Transit Riders
- Relmagine Ottawa
- The Ottawa Carleton Wildlife Centre
- Walkable Ottawa
- Waste Watch Ottawa