

Letter of Concern and Calls to Action Responding to Bill 23 from Faith Climate Justice Waterloo Region

To Whom It May Concern:

We are writing to you as an elected representative here in Waterloo Region to draw your attention to the Province of Ontario's recently introduced Bill 23, the so-called "More Homes Built Faster" bill. If Bill 23 passes as is, it will have major negative effects on climate, community wellbeing and the environment, while not solving the province-wide housing crisis. There are many signs that Bill 23 will undermine the authority of municipal / regional councils to promote more sustainable development and holistic communities – the very leadership we need to respond to the real housing and environmental challenges we face.

This letter is written collectively by local residents on behalf of Faith Climate Justice Waterloo Region (www.faithclimatejustice.ca), a grassroots collective of faith communities and citizens concerned for a just response to the climate crisis. We share grave concerns about Bill 23's clear disregard for both climate action and social justice, and are united in opposition to the bill as it currently exists.

Because there is only a short time period available to oppose Bill 23 we request that the Region of Waterloo, elected councillors and all concerned citizens submit responses to the Standing Committee by the deadline of 7 p.m. on November 17, 2022 (details below).

Bill 23 is a 175-page omnibus bill that amends 10 acts and is being expedited through parliament with limited public consultation. It consists of massive legislative and regulatory proposals. Cumulatively, the changes seek to, among other concerns: redefine the scope of municipal planning; reduce democratic norms for both public participation in planning and legal recourse through the Ontario Land Tribunal; offer weak support for affordable housing; and, prevent the pursuit of green development standards at a time when we need to address the climate crisis by building complete, compact, and low-carbon communities.

As you may know, the Region of Waterloo has already taken smart steps to build more sustainable, climate-ready communities, including through recently passed measures such as the TransformWR Climate Action Strategy; the 50% by 2030 emissions reduction target; and a Regional Official Plan that promotes densification, complete communities, and protection of our countryside line. If passed as-is, **Bill 23 would undermine all these efforts and the significant community and regional support behind them, making it virtually impossible for the Region to meet its own current sustainability and climate commitments.** We cannot allow this to happen.

We call on you to:

- *Demand that the Minister of Municipal Affairs and Housing either **withdraw Bill 23 and its aligned initiatives** OR **ensure a lengthy period of public engagement**. Also, to emphasize to the Minister of Municipal Affairs and Housing, and to the Ford Government, that **the economy,***

***environment and democracy are all interdependent.** Hence, each of these must be given due respect in any development process, including respecting regional authority and influence over shaping development within its own boundaries.*

- *Communicate to the Minister of Municipal Affairs and Housing, and to the Ford Government, that such an attempt to undermine regional authority and planning processes via a major omnibus bill is unacceptable.*
- *Submit Regional / municipal concerns in writing to the Standing Committee before 7 p.m. on November 17th here: <https://www.ola.org/en/apply-committees>*
- *Call/meet with our Regional MPPs telling them to oppose Bill 23. MPP contact information can be found here: <https://www.ola.org/en/members#findtrouwer>*
- *With others in local government, create an in-depth communication strategy to help inform as many citizens as possible about Bill 23 and its likely impacts on our communities, while also sharing ways for citizens to communicate their opinions on Bill 23 with government.*

Bill 23 constitutes an attack on the very democratic processes and expertise needed to inform more sustainable development and improve the wellbeing of our communities. Adequate democratic processes and decision-making are being sacrificed along with our local environment and community wellbeing in favour of urban sprawl that will primarily benefit private developers, not communities.

As people of faith, we believe we share a responsibility to take care of all of God's creation along with caring for the many diverse people who make up our wonderful communities. We affirm that building more homes is needed in our Region and province-wide, yet numerous experts and reports point to major flaws with this bill, which promotes urban sprawl over healthy, sustainable communities. Far from being a solution, Bill 23 is a brazen assault on the municipal planning process, conservation authorities, and democratic processes that we need to properly address future housing needs, and to care for our climate and environment.

As people of faith, **we call on you to speak out boldly against Bill 23**, and for the real solutions to housing that our communities and environment deserve. We look forward to supporting you in this effort, and in co-developing meaningful solutions. Please find more details about this bill below.

Sincerely,

Members of Faith Climate Justice Waterloo Region



If Bill 23 is passed as is:

- Of special concern to regional councillors is the **destruction of coordinated regional planning**, which will produce development that is more scattered and thus much more environmentally harmful, and also more uncoordinated and expensive. In addition, CBC further outlined four ways in which Bill 23 could override city powers, including by:
 - Reducing the development charges payable to cities to allow for investment in city infrastructure – raising questions on how this shortfall will be paid;
 - Providing less money for parks in urban boundaries to accompany development, further reducing the ability to secure adequate urban green space;
 - Overriding exclusionary R1 zoning; and
 - Removing the ability of cities to have a say in the outside design of a building, by reducing city involvement from site plan control so that city officials are no longer able to regulate issues like “architecture, scale, appearance or sustainable design features or environmental design rules” (CBC News, October 29, 2022; article link below).
- Critical and hard won **municipal green standards will be gutted** disrupting the ability to meet essential emissions targets (including the Region of Waterloo’s commitment to a 50% emissions reduction by 2030).
- The bill will wipe out multiple measures used by municipalities to enable development while protecting social and environmental concerns, including **eliminating the requirement for rental unit replacement** when old buildings are replaced, **destroying inherent protections for tenants** against rent increases (leading to descriptions of this bill as “a devastating attack on renters”, CBC News, November 2nd, and certainly not a solution for those currently priced out of the market and those who are unhoused).
- The **powers of the Conservation Authorities will be decimated** creating high risks of flooding, rampant sprawl, destruction of precious farmland, wetlands and natural habitats. These are critical to secure our stable, livable futures.
- **Sale of sensitive and previously protected conservation lands will be handed over** to the government with NO requirement to consult with the Conservation Authority.
- **Coordinated regional planning will be destroyed** in favour of uncoordinated lower tier planning promoting disorganized expensive sprawl. Urban boundary decisions recently made using a democratic municipal process after deliberation, and citizen and expert input, stand to be overturned with provincial authorities unilaterally imposing opposing mandates.

- Contrary to provincial government claims for Bill 23, the resulting **rampant sprawl is not the solution to the current crises of housing shortages, affordability and the combined climate and health crisis**. Sprawl produces a smaller number of larger, less affordable, isolated and car-dependent housing units than planned walkable development within existing urban boundaries served by public transit. This will escalate dangerous greenhouse gas emissions, deadly air pollution, multiple human health harms and hugely escalate the costs borne by municipalities and taxpayers.

For more details on the above, please see the resources below. We also encourage all citizens and elected representatives to do their own research, and to push back on Bill 23! For the health of our democracies, our environment, our climate and our communities, we must stand united against Bill 23.

Further Resources:

Contacting the Minister of Municipal Affairs and Housing, Hon. Steve Clark: Steve.Clark@pc.ola.org (613) 342-9522 and <https://www.ola.org/en/members/all/steve-clark>

Full Text of Bill 23: <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-23>

“Ontario’s Housing Bill is Actually a Trojan Horse for Environmentally Catastrophic Rural Sprawl” Environmental Defence Press Release <https://environmentaldefence.ca/2022/10/31/ontarios-housing-bill-is-actually-a-trojan-horse-for-environmentally-catastrophic-rural-sprawl/>

“Ontario Must Withdraw Bill 23 and Shift to Sustainable Planning” Ontario Headwaters Institute <https://act.newmode.net/action/ontario-headwaters-institute/ontario-must-withdraw-bill-23-and-shift-sustainable-planning>

“Unpacking Bill 23 – More Homes Built Faster Act, 2022” Association of Municipalities Ontario <https://www.amo.on.ca/advocacy/health-human-services/unpacking-bill-23-more-homes-built-faster-act-2022>

“Forget everything you thought you knew about planning approvals in Ontario” Osler Law Firm <https://www.osler.com/en/resources/regulations/2022/forget-everything-you-thought-you-knew-about-planning-approvals-in-ontario%E2%80%A6>

“4 ways the PC government's new housing bill could override city powers” CBC News, October 29th <https://www.cbc.ca/news/canada/ottawa/ontario-housing-bill-override-city-powers-1.6633897>

“Bill 23 destroys existing affordable housing and builds more luxury condos. Scrap it now!” ACORN Canada <https://acorncanada.org/take-action/doug-fords-bill-23-destroys-existing-affordable-housing-builds-more-luxury-condos-scrap-it-now/>