

November 17, 2022

To the Standing Committee on Heritage, Infrastructure and Cultural Policy

Whitney Block

Room 1405

99 Wellesley Street W

Toronto, ON M7A 1A2

RE: Bill 23 (*More Homes Built Faster Act 2022*)

Dear Committee Members,

The Alta Vista Community Association and the Faircrest Heights Community Association are two associations representing residents in the Alta Vista Ward of the City of Ottawa.

We have read draft Bill 23 (*More Homes Built Faster Act 2022*) and while we appreciate the spirit of the bill to increase housing in the province, we have serious concerns with the details of the bill. We have reviewed comments from a number of different organizations in Ottawa and across the province, and we share their concerns.

We would highlight particularly the detailed concerns set out by the City of Ottawa Planning, Real Estate and Economic Development Department in their Memo to Council dated November 7, 2022. Most notably, we would point on the extensive work done by City of Ottawa Planning Staff related to population projections (in their Annex B) that we believe to be a considerably more accurate estimate of future growth in Ottawa. We fully share the City of Ottawa Planning Departments detailed concerns (in their Annex A) summarized below:

- The provincial housing target is not aligned with Ottawa's housing needs
- The limitation in Development Charges and Parkland may lead to housing delays, and will reduce the ability to support growth
- Parkland dedication changes will result in reduced livability
- Environment and rural policy changes may lead to an increased and spiralling loss of biodiversity
- Removal of exterior design review from Site Plan will not lead to better design, or more livable and attractive cities
- Removal of sustainable design review from Site Plan could erode the achievement of local greenhouse gas emission targets
- Changes to the Heritage Register could create more uncertainty and delays
- If growth will not pay for growth, existing taxpayers will (*through higher taxes and decreased services*)

Also concerning is that Bill 23 contains a provision that prohibits municipalities from zoning any lot in Ontario for less than three principal units.

In addition to the questionable need to upend the fabric of **every single neighbourhood** that even the population projections underpinning Bill 23 do not justify, a blanket approach creates a number of challenges. Certainly, there are circumstances across the Province that will require more nuanced considerations to adapt to local situations. Our concerns include the implications for heritage conservation, very small lots, neighbourhoods that are already under-serviced or rely on well water, loss of soft-scaping (trees and grass), impacts on local flooding and contribution to heat islands.

We also have serious concerns with the process around Bill 23, including the timing and speed of its movement through the legislature that do not allow time for appropriate consideration to achieve a bill that goes beyond building more housing to one that builds more quality houses in a manner that supports and sustains growth.

Our process **asks** are:

- (1) That the Standing Committee take the time needed to listen to more affected stakeholders, up to three months, if need be
- (2) That the Standing Committee hold hearings in more cities outside the GTA, including Ottawa.

Our **substantive recommendations on Bill 23** are:

- To minimize the impact on the city's ability to collect the revenues needed to support growth, the province offset the loss of Development Charges; Community Benefit Charges; Parkland Dedication fees further to Bill 23.

- Continue to allow Conservation Authorities to comment on development applications if requested by the city.
- Minimize the risk of negative impacts on renters by allowing municipal bylaws aimed at protecting evicted renters.
- Minimize risks of environmental degradation by requiring municipalities to establish criteria for development in conservation areas to better protect wetlands, natural habitat systems, woodlands, and farmlands.
- Streamline the Site Plan Control process but ensure adequate public review and appeal processes are maintained and provide an exemption to allow municipalities to retain/introduce High Performance Development Standards (HPDS).
- Contain urban sprawl. Do not permit reduced greenbelts.
- Extend permitted Inclusionary Zoning areas to include hubs and high frequency transit routes when requested by the city.
- To better address the housing affordability and homelessness crises, allow the city to develop an Inclusionary Zoning bylaw with up to 10% affordable units (or more subject to Provincial approval).
- To revisit the outright prohibition on single-family zoning to create a more balanced approach with reasoned exceptions set out in municipal zoning

Alta Vista Community Association

Faircrest Heights Community Association