

Champlain Park Community Association (1991 Ontario) Ont/Corp # 000923164
Re: Bill 23, More Homes Built Faster Act

November 15, 2022

Champlain Park Community Association (CPCA)
c/o Heather Pearl, Co-chair
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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

This bill proposes wide ranging changes to a multitude of laws with the apparent goal of doing one thing only: to increase the supply of housing. This single-focus means that the new laws will have a multitude of negative impacts on our ability to mitigate the increasingly severe effects of climate change, protect human health and the environment, provide affordable housing, end food insecurity and create truly liveable cities.

Bill 23 proposes to transfer a massive amount of wealth from the people of Ontario to the construction industry. Excluding energy, sustainability and climate from consideration in the planning process will result in future homes becoming less affordable and less efficient, as energy costs increase. To be a responsible corporate and world citizen, the construction industry needs to fully support cities in their implementation of High Performance Development Standards. They must pay their share of the costs of growth. Ratepayers should not be required to subsidise the construction industry.

What Bill 23 will not do is create housing for people who are homeless or housing-insecure. There is no requirement for builders to pass on the savings that will accrue to them once the Bill becomes law. There is no requirement for them to actually build much-needed affordable and especially deeply affordable housing.

The pandemic and resulting supply chain issues made it very clear that Cities must be able to feed themselves. Once farmland is built on, it is gone forever. Wetlands and floodplains are flood and carbon control factories. They hold and control the release of water into the environment and their biomass sequesters large amounts of carbon dioxide and other greenhouse gasses. Building on them guarantees flooding not only in the new subdivisions, but for homeowners downstream. Carbon dioxide not sequestered fuels climate change. Home insurance costs already are skyrocketing due to increasingly frequent wild weather events. Bill 23 benefits developers by transferring risk and associated insurance costs to homeowners.

The rush to pass this legislation is not appropriate in a democracy. And leaving the citizens of Ontario out of the development approval process entirely, by prohibiting third party appeals, is anti-democratic and punitive. Robust Planning processes include significant community consultation and engagement. Unfortunately, where development is concerned, Ontario's lot-by-lot development process promotes demolition and rebuilding on individual properties but leaves no room for viable neighbourhood planning. This has led to a fraught relationship between neighbours and a revolving door of developers. Leaving communities out entirely will not fix this problem. It may lead to more lawsuits, since builders can be cavalier about protecting neighbouring properties. The Province should focus on and fix the system, not break it completely.

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The community of Champlain Park is located near the Ottawa River, in the north end of the City, about a kilometre west of the Lemieux Island water filtration plant. We generally support intensification, urge developers to consult with us and attend Committee of Adjustment Hearings, usually to support the Applications for consent to subdivide and to build on reduced lot width and area, while retaining front, rear, side yard and height requirements. We expect new infill to contribute to residents' health and wellbeing by retaining greenspace and trees, and allow for stormwater infiltration and control. Our goal is to ensure that along with efforts to increase the number of units per lot, zoning bylaws will specify a maximum building envelope that allows room for adequate yards with soft landscaping, rather than over-filling the lots with buildings and hard surfaces. Based on our past experience, we believe that there may be limits on how many units per lot developers will deem to be marketable in inner urban areas with high land value, due to buyer expectations in these areas.

The dark side of intensification is that during the past 15 years, Champlain Park and many older communities have lived inside a construction zone; our location has been a major focus for infill developers, who bid against each other for our lots, driving property values, and taxes, ever higher.

Our streets are deteriorating. Intensification has outpaced the capacity of our stormwater system to prevent overland flooding. During the past 15 years, the greenspace and permeable surfaces surrounding homes has decreased significantly. With nowhere else to go, stormwater finds its way quickly into basements and very quickly into our drinking water, replete with all of the pollutants washed downhill from roofs and streets. Our urban tree canopy has been decimated, which has increased the heat island effect, increased air pollution and made severe weather events far more likely.

Champlain Park used to be what would have been called a working class community of small older homes. Many of these homes housed multi-generations of the same family. Many had basement or upstairs apartments. During the past 15 years, these have been torn down and new, much larger dwellings built on the properties. We have lost income diversity. We have seen that more houses do not necessarily equate to more residents.

Further, it is impossible to travel anywhere in Ottawa without seeing high rise towers, either recently constructed or in various stages of construction. Residential neighbourhood streets all have at least one and usually more low-rise construction projects underway or planned. Obviously, the existing Provincial system of property development, even with its supposed "barriers", has not prevented a massive amount of new development. The construction boom is due to years of vanishingly low interest rates and ready demand for housing, including housing used as short-term investments rather than homes. In the process, the housing supply has skewed away from people with limited means.

Good City Planning would not support this scattershot approach to development. Bill 23 will codify and amplify it. We note that secondary dwelling units and coach houses already are allowed in Ottawa's R1, R2 and R3 neighbourhoods. If there is little uptake, zoning is not to blame. We maintain that smart planning and zoning would make it possible to retain green neighbourhoods with a diversity of housing stock for people of all income levels, make room for much needed green in neighbourhoods that lack it, and reclaim corridors as healthy, walkable green streetscapes. Bill 23 presupposes that one size fits all, everywhere in Ontario. It prescribes cities where cookie cutter, dense multi-unit dwellings – unlikely to be suitable for families, because developers prefer to build mostly one and, to a lesser extent, two bedroom units – dominate urban lots. Zoning studies that include neighbourhood modelling and community participation, however, would support thriving diverse neighbourhoods.

While urban intensification has provided more units, zoning bylaws are sorely needed to mitigate the negative impacts on health, infrastructure and liveability in general. Communities need dwellings with sufficient front, rear and side yard setbacks to support urban trees and gardens and create walkable, desirable streets.

We maintain that our own currently lower density communities can continue to accommodate increased density without over-building and decimating the urban tree canopy. It is not in anyone's long term interest to remove all opportunities to provide healthy, sustainable communities. Champlain Park is just barely able to retain this potential with the current high level of intensification.

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It is easy to build fast. The rush, and the competition, will be fierce, to build as much as possible before the buyer-pool dries up. The same developers and investors will bid up prices. Will these homes be built better? Will they be affordable? Will they meet the needs of the large number of people without housing or who are housing insecure? Will they help to mitigate the effects of climate change, which is the existential threat for our time? Bill 23 guarantees that the answer to these questions is "No".

Sincerely,

Heather Pearl, Co-Chair

On behalf of the ***Champlain Park Community Association (CPCA)***

c.c.:

Minister of Municipal Affairs and Housing, Steve Clark

Minister of Environment, Conservation and Parks, David Piccini

Minister of Agriculture, Food and Rural Affairs, Lisa Thompson

Member, Standing Committee on Heritage, Infrastructure and Cultural Policy, MPP Ottawa Centre, Joel Harden

c.c.: direct

Member of Parliament, Ottawa Centre, Yasir Naqvi

Mayor, City of Ottawa, Mark Sutcliffe

Kitchissippi Ward Councillor, Jeff Leiper

City of Ottawa Councillors

Champlain Park Community Association Board Members

Attachments: Appendices 1 and 2

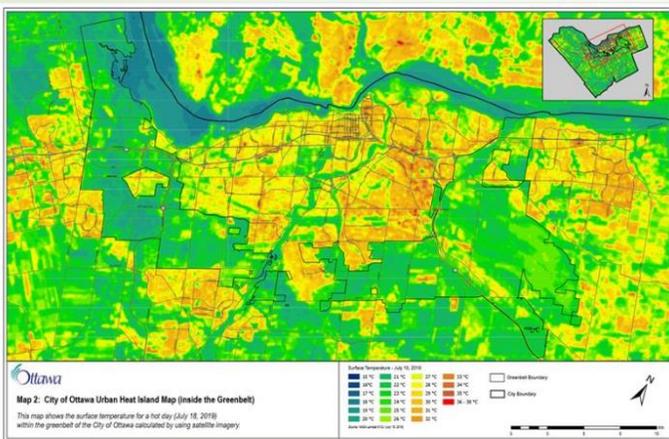
Appendix 1: Bill 23, Heat Island and Health Effects

Outcomes of Bill 23:

- Prevent preservation of greenspace and trees in the urban area; prevent re-greening urban neighbourhoods that lack green infrastructure; and, actively promote loss of agricultural lands, forests, wetlands, floodplains.
- Exacerbate the heat island effect, particularly in Ottawa’s denser urban areas, where day-and night-time temperatures already are consistently higher than the official temperatures reported. Hotter cities experience more extreme weather and are more likely to host novel disease pathogens. Heat disproportionately affects the health of people who cannot afford air conditioning.
- Make PM 2.5, ozone and nitrogen dioxide levels worse. Studies show that this already is a problem throughout the city; air quality plummets as the temperature and number of hot days increase.
- Increase energy use for cooling and heating and decrease outdoor activities.
- Remove the potential for robust stormwater control and infiltration. This already is a major issue due to the significant amount of intensification that has occurred during the past 15 years. Overland flooding during storms is common. This can affect the drinking water supply. House insurance costs increase.
- Put in jeopardy our ability to grow food.

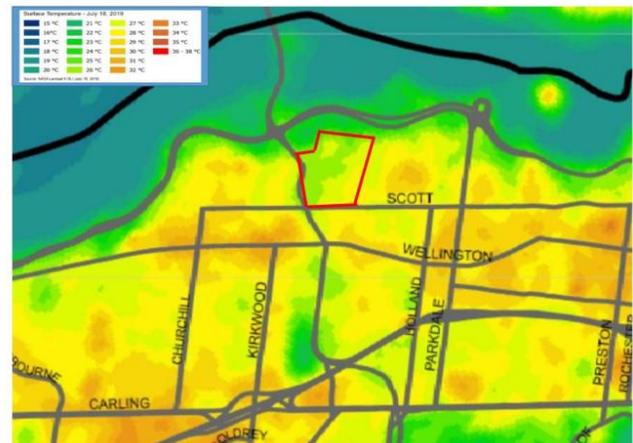
All of these factors taken together are well-known to increase the incidence of high blood pressure, heart disease, asthma, etc. and negatively impact foetal and child health. Provincial expenditures on Health Care will far outweigh any financial benefits to the construction industry derived from Bill 23.

July 18, 2019: The Urban Heat Island Effect: A Hot Day in Ottawa, → Affects neighbourhoods differently, depending on tree canopy cover



(City of Ottawa Climate Resiliency Strategy
https://engage.ottawa.ca/climate-resiliency/news_feed/urban-heat-island)

- Kitchissippi Urban Heat Island Map, focus on Champlain Park:**
- Champlain Park (approximate area outlined in red) is an Oasis of Cooler Temperatures due to (Remaining) Mature Tree Canopy.
 - Hottest part of neighbourhood (east & south) occurs where intensification has driven significant tree canopy losses since 2007.
 - Neighbourhood-adjacent cooler temps in Tunney’s Pasture due to treed berms in west-side parking lots & Northwestern Ave rear yards.



The health impacts from high temperatures are already being felt across Canada.

Reducing urban heat islands to protect health in Canada (2020-04-29)

<https://www.canada.ca/en/services/health/publications/healthy-living/reducing-urban-heat-islands-protect-health-canada.html#a1>

2.1 Extreme heat is a health risk to Canadians

- ...dehydration, fatigue, and an inability to perspire or cool the body;
- ...spectrum of heat-related illnesses, such as heat rashes, cramps, (to) heat stroke;
- ...worsen existing conditions, such as cardiovascular and respiratory diseases, lead to stroke, and increase susceptibility to infectious diseases;
- ... disrupt people’s daily activities and enjoyment of outdoor spaces.

Certain populations, including young children, people with chronic illnesses, occupational groups such as construction workers, physically active people, Indigenous Canadians, the marginally housed or homeless, and socially isolated seniors, are particularly at risk;

2.2 What is the urban heat island effect?

Various factors can magnify the health impacts of extreme heat events, including poorly designed buildings that heat up in summer, high numbers of people vulnerable to heat, and neighbourhoods with low tree canopy and high percentages of built surfaces.

Cities must be authorised to implement High Performance Development (green building) Standards and focus on providing green infrastructure to help mitigate these impacts. Developers must step up, be good corporate citizens and champion this effort.

Appendix 2: Bill 23, Drinking Water and Ecosystem Effects

Champlain Park is located on the shore of the Ottawa River in Intake protection Zone 2, where flowing water and pollutants will enter the drinking water intake pipe in under 2 hours.

High Performance Development standards and the power to impose other climate change mitigation measures on developers are critical to Ottawa being able to meet its obligation to protect the drinking water supply and preserve the health of its residents.

Geological Survey of Canada Map: Inner Urban Transect Geology

PALEOTIC

- 18 CARLETON FORMATION: grey shale, sandy shales, some dolomitic shales
- 17 BELLINGS FORMATION: black shales with some brown shales
- 16 EASTVIEW FORMATION: dark grey almost black limestone
- 15 OTTAWA FORMATION: limestone with some grey partings; some sandstone or dolomite
- 14 ST. MARTIN FORMATION: shale, sandstone, siltstone, limestone
- 13 ROCKCLIFFE FORMATION: shale with lenses of sandstone
- 12 ONTARIO FORMATION: dolomite and limestone

Typical Champlain Park Excavation

The Inner Urban Transect overlies Drinking Water Intake Protection Zone IPZ-2 (Score 8.1)

Intake Protection Zone / Zone de protection de prise d'eau

- IPZ-1 / ZPPE-1 (Score 9)
- IPZ-2 / ZPPE-2 (Score 8.1)

Intake Protection Zone / Zone de protection de prise d'eau

- IPZ-1 (Score 9)
- IPZ-2 (Score 8.1)

IPZ-2 includes the on and offshore areas where flowing water and any pollution would reach the intake pipe within two hours.

Vulnerability is measured on a 10-point scale and shows how quickly water (and pollutants) move from the surface to the aquifer. A high vulnerability area has a score of 8 or 10

<https://documents.ottawa.ca/sites/documents/files/Drinking%20Water%20Source%20Protection%20in%20Ottawa.pdf>

Ottawa Intake Protection Zones

The Current Transect / Overlay Approach: Impact on Wastewater and Stormwater Control

Everyone lives on a watershed. Problems with water start with the land.

Naturally limited permeability, climate change induced summer and winter extreme rain events that overwhelm storm sewers, volume of large-footprint intensification since 2007, make storm water runoff an ongoing problem for all property owners, their neighbours and Ottawa River water quality.

Important Bird Area: Lac Deschenes – Ottawa River, Ottawa, Ontario

The IBA Program is an international conservation initiative coordinated by BirdLife International. The Canadian co-partners for the IBA Program are Birds Canada and Nature Canada. <https://www.ibacanada.org/site.jsp?siteID=ON112>

This is deemed a "Globally Significant" area. The threat level is already too high. Protecting ecosystems also protects human health.

High Performance Development Standards and the power to impose other climate change mitigation and wildlife protection measures are critical to Ottawa being able to meet its international obligations to protect this Globally Significant Area.

Protecting ecosystems protects human health.

Bill 23 stands in the way of Cities meeting their obligations to their residents. There are cases where this legislation will interfere with the ability of Cities to uphold their international obligations.