



November 21, 2022

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Sylwia Przedziecki

RE CC1.2 Update on Bill 23, More Homes Built Faster Act, 2022 (Ward All)

Dear Mayor Tory and Members of City Council,

Congratulations to the Mayor, and both returning, and new Members of Council at this the first meeting of a new Council, and also the first Council business meeting since July. During that interregnum the Province introduced Bill 23, More Homes Built Faster Act, on October 25, the day after the municipal election.

The Interim City Manager's Briefing Note on Bill 23 identifies nine significant impacts of the Bill:

- 1) Reduces Municipal Revenues Needed to Fund Growth-Related Infrastructure
- 2) Diminishes Housing Affordability and Rental Housing Replacement Protection
- 3) Erodes Sustainable and Resilient Development Practices
- 4) Overrides Council's Decisions on Official Plan Matters
- 5) Decreases Parkland Amount and Quality that the City can Secure
- 6) Threatens the City's Ability to Protect Built and Natural Heritage
- 7) Requires the Up-zoning of Neighbourhoods and Lands around Transit Stations
- 8) Introduces Further Changes to the Development Review Process
- 9) Limits Appeals to the Ontario Land Tribunal and Toronto Local Appeal Body

The Federation of North Toronto Residents Associations (FoNTRA) previously raised many of the same impacts – called “ten points of concern”, in its submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy¹ (attached). FoNTRA requested the Standing Committee to recommend that Bill 23 be withdrawn to allow for a proper consultation and analysis.

The legislation does many regressive things, but one of the items of most concern is to prohibit any third party (ie. citizen/resident or community association) appeals of development

¹ FoNTRA Submission to Standing Committee on Bill 23, More Homes Built Faster Act, 2022
(<https://fontra.com/fontra-open-letter-in-opposition-to-bill-2>)

applications to the Ontario Land Tribunal (OLT). The Bill also proposes increased powers of the OLT to order costs against the party who loses at a hearing, which is intended to inflict substantial costs on parties to chill their participation. These measures are fundamentally undemocratic, vindictive, and represent an unacceptable diminution of citizens' rights.

In addition, FoNTRA raised a fundamental concern about the assumptions behind Bill 23 – that due to flawed assumptions, it will not result in more of the needed housing - housing that is part of complete communities, with adequate transit, needed parkland, etc. Instead it will greatly damage the current democratic planning system that has been working to provide the housing we need. Bill 23 focuses solely on creating more supply, does not contemplate demand measures like vacancy control. Even if more units are approved it will not ensure more housing is actually built. Toronto has a pipeline of many units approved but not built. Speculators are withdrawing due to increased interest rates. Who will buy new units? And for truly affordable housing, more government funding is needed. Impacts of land speculation, location of jobs etc. must be addressed. Bill 23, if passed, will not only affect housing, but will significantly affect current homeowners and tenants with higher taxes and rents, (and loss of citizens' rights) while developers and speculators continue to profit.

The City Manager's Briefing Note, together with multiple submissions and presentations from residents, municipalities and organizations across the province to the Standing Committee, have documented the serious negative impacts of Bill 23 on Toronto, and Ontario's communities and environment. In addition, in FoNTRA's view, the Bill is fundamentally flawed, and will harm the City irrevocably.

We recommend that:

- 1. City Council request the Ontario Government to immediately withdraw Bill 23 to allow for proper consultation and analysis.**
- 2. The Mayor and Members of City Council take a strong stand in opposition to Bill 23, and speak out loudly and publicly against the legislation.**

Yours truly,

Geoff Kettel

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Co-Chair, FoNTRA

Cathie Macdonald

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Cc: Tracey Cook, Interim City Manager
Gregg Lintern, Chief Planner and Executive Director, City Planning
Karen Jones, A/Director, Intergovernmental and Agency Relations
Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City Planning

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal..