



FAITH COMMUNITIES IN
ACTION AGAINST POVERTY

To the Standing Committee on Heritage, Infrastructure and Cultural Policy

Bill 23 - More Homes Built Faster Act, 2022

Submission by:

Interfaith Social Assistance Reform Coalition (ISARC)

November 17, 2022

Standing Committee on Heritage, Infrastructure and Cultural Policy
Whitney Block
Room 1405, 99 Wellesley Street W
Toronto, ON M7A 1A2

Attention: Laurie Scott, MPP, Chair;
Isaiah Thorning, Committee Clerk

Dear Ms. Scott:

We are writing to you in response to Bill 23, the More Homes Built Faster Act which was recently announced. ISARC (Interfaith Social Assistance Reform Coalition) is a broad-based provincial multi-faith coalition which has for many years participated in government consultations and hearings that address issues of income security, livable income and the well-being of the whole community. Affordable housing is a key concern.

ISARC identifies the values of ***Mutual Responsibility*** (the obligation of communities to care and share with their people, ensuring that basic needs are met) and ***Ecological Sustainability*** (the obligation of communities to practice responsible stewardship of the earth and its environment, so that creation might be preserved for generations to come) as high priorities that are not mutually exclusive

Creating more affordable housing as quickly as possible is critically important. However, providing affordable housing need not and must not come at the expense of environmental stewardship.

We offer the following comments on Bill 23:

Provision of Affordable Housing

Affordable housing is a critical need right across our province, yet nothing in Bill 23 ensures new homes, built with public incentives, will be kept affordable.

To support the creation of long-term affordable housing, the bill would need to:

1. Link incentives directly to the provision of affordable housing;
2. Protect existing rental replacement rules;
3. Protect and enhance inclusionary zoning by maintaining existing IZ requirements and setting a minimum standard of 15% of new residential units affordable for a period of 99 years;
4. Ensure that incentives do not simply transfer costs for municipal infrastructure from developers to property tax-payers;
5. Invest financial and regulatory resources to accelerate the development of brownfield sites across Ontario

The proposed bill does none of these things.

1. Though developers stand to get hundreds of millions of public dollars in incentives and tax cuts under Bill 23, nothing in the Bill requires developers to create affordable units (80% of market rent is still deeply unaffordable) or to pass on savings to the renter or homebuyer.
2. Although current municipal rental replacement provisions ensure that, when an apartment building is redeveloped, existing rental units are replaced at affordable levels, Bill 23 allows the Minister to cancel those provisions.
3. In spite of evidence from studies across North America that has demonstrated that IZ has the potential to be an effective tool in creating more affordable rental housing, with up to 20-30% being financially viable, Bill 23 reduces and restricts Inclusionary Zoning to 5%.

4. While reducing or eliminating development charges for developers of affordable units would be a welcome assistance to creating low-cost housing, the proposed elimination of development charges for market units undermines the very funding source which creates new affordable units and supports other housing affordability programs.
5. Despite the fact that brownfield sites already have municipal servicing and are usually close to urban centres with existing transit networks, the Bill is silent about brownfields and offers no support for this housing potential.

Ecological Sustainability

Green space, clean air, and livable, walkable communities are an important part of creating and maintaining environmental stewardship.

To support this the bill would need to:

1. Respect and protect the responsibility of conservation authorities and continue to work with the existing multi-stakeholder Conservation Authorities Working Group (CAWG) to ensure there is a streamlined, consistent and scoped process for conservation authorities and municipalities to help the province achieve its housing goals;
2. Protect and improve accessible green space for physical exercise, relaxation and observing nature as well as acquiring and protecting environmentally sensitive lands that may be used for passive recreation;

3. Support and improve the ability of Conservation Authorities to act as the first line of defense in preventing and reducing the impacts of flooding, which is the leading cause of public emergency in Ontario. Wetlands play a critical role in mitigating floods and further wetland loss.
4. Support municipalities and conservation authorities during land use planning and also uphold the Planning Act requirement for developers to inform community members about development plans and the right of residents to appeal planning decisions. The housing crisis is a crisis of affordability, not a result of citizens exercising their democratic rights.

Bill 23 proposes to reduce parkland dedication requirements. It proposes to reduce or eliminate public consultation. It would also prevent Conservation Authorities from considering pollution or the conservation of land in their permitting process.

As written, Bill 23 runs roughshod over provisions designed to protect Ontario's valuable agricultural lands, wetlands and wildlife habitat. It guts the power of Conservation Authorities to regulate and refuse permits based on concerns about pollution or the conservation of land.

It also allows the Minister to amend any municipal official plan by order without recourse. It allows the Minister to impose urban sprawl.

While we support the elimination of development charges for non-profit housing providers and measures designed to allow as-of-right additions of up to 3 residential units per property to support infill housing in existing neighbourhoods, there is much in Bill 23 that causes us concern and, we believe, will not lead to improved affordable housing or a sustainable environment.

This Bill requires amendments to existing legislation that may exacerbate homelessness and contribute to environmental degradation. We urge the government to pause the passing of this Bill and allow more time for public review and consideration of the long term and unintended consequences of this legislation.

Yours Respectfully,



Rev. Dr. Susan Eagle

Chair, ISARC

Our coalition represents Christian, Jewish, Muslim and other faith communities across Ontario, including the Anglican Diocese of Toronto, the Anglican Diocese of Niagara, the Anglican Provincial Synod of Ontario, the Assembly of Catholic Bishops of Ontario, the Canadian Unitarian Council, Catholic Charities of the Archdiocese of Toronto, Congregation Darchei Noam, the Council of Imams, the Council of Canadian Hindus, the Eastern Synod of the Evangelical Lutheran Church in Canada, Holy Blossom Temple, the Islamic Humanitarian Service, Mennonite Central Committee Ontario, the Presbyterian Church in Canada, The Salvation Army, the Society of St. Vincent de Paul, the Toronto Board of Rabbis, and the United Church of Canada.