



# Diocese of Toronto

## Anglican Church of Canada

Submission to the Standing Committee on Heritage, Infrastructure and Cultural  
Policy

On Bill 23, “More Homes Built Faster Act, 2022”

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## Introduction

The Anglican Diocese of Toronto extends over 26,000 square kilometres of south-central Ontario, from Mississauga to Brighton in the south, and from Collingwood to Haliburton in the north. This area includes not only the City of Toronto but the regions of Peel, York, and Durham as well as the cities of Barrie, Orillia, Peterborough and a multitude of smaller communities. Within the Diocese, nearly 200 parishes serve the spiritual and physical needs of hundreds of thousands of Ontarians. As a Diocese, our key social justice priorities include reducing poverty, working to end homelessness by creating affordable housing, and safeguarding the integrity of God’s creation – the land, water and air that sustains us all. Our faith calls us to do what we can, not only to help meet the needs of the vulnerable in our communities, and to protect and preserve the earth from which we live, but also to use our voice and influence in public witness for the common good. It is out of these deeply held values that we must address our concerns regarding Bill 23, the “More Homes Built Faster Act, 2022.”

### **Bill 23 Limits Housing Affordability**

Bill 23 was introduced as a “bold action to address the housing crisis” in Ontario, containing proposals to “ensure that cities, towns and rural communities grow with a mix of ownership and rental housing types that meet the needs of all Ontarians, from single family homes to townhomes and mid-rise apartments.”

While we agree that more housing is desperately needed in Ontario, we see the housing crisis not merely as a crisis of supply, but primarily as a crisis of affordability. Bill 23 does not go far enough to preserve housing affordability for Ontarians, and in several key respects, attacks existing measures that help keep housing affordable:

- **The Bill allows the Minister to cancel provisions that preserve affordable units.** Municipal rental replacement provisions ensure that, when an apartment building is redeveloped, existing rental units are replaced at affordable levels. These provisions have already saved over 4,000 affordable homes in Toronto alone.<sup>1</sup> Losing these affordable units would put pressure on remaining affordable housing and would result in more Ontario tenants becoming homeless.
- **The Bill waters down existing Inclusionary Zoning (IZ) provisions, resulting in fewer affordable units available for a much shorter period.** Several municipalities have already created more robust IZ plans based on independent analysis of what their local markets can afford. These plans would ensure that up to 15% of new units would be set aside as affordable for 99 years. Bill 23 would restrict those set-aside rates to 5% across the board, and also limit the affordability period to a mere 25 years, ensuring an even bigger affordability crisis for the next generation of Ontarians. Evidence from studies across North America has demonstrated that IZ has the potential to be an effective tool in creating more affordable rental housing, with set-aside rates up to 20-30% being financially viable. The province’s decision to weaken this tool will create fewer affordable units in markets where tenants are already paying far too much of their income on rent.
- **The Bill cuts funding for housing services.** Bill 23 proposes substantial changes to the existing system of development charges. While we welcome reducing or eliminating development charges for non-profit developers and the development of affordable units, we are concerned about the financial impact on municipalities from the elimination or reduction of development

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<sup>1</sup> <https://www.toronto.ca/legdocs/mmis/2020/ph/bgrd/backgroundfile-156420.pdf>

charges on market units. Of particular concern is the fact that Bill 23 will eliminate development charges for housing services, which are the funds used by municipalities to create new affordable homes and support other housing affordability programs.

Municipalities already face heavy financial burdens with limited means to generate revenue.

These provisions of Bill 23 shift that heavy financial burden off developers of market units – who are already making substantial profits - and onto municipal governments and individual taxpayers.

- **Nothing in this Bill ensures that new homes, built with public incentives, will be – or remain - affordable.** 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 (even at 80% of market rent, still deeply unaffordable for many renters) or to pass on their savings to the renter or homebuyer.

Moreover, none of the new rental units created would be subject to rent control. We have long advocated for the re-introduction of rent control and the introduction of vacancy controls in Ontario. With the rampant financialization of housing, housing costs continue to soar beyond the reach of low-to-middle income Ontarians. We will never be able to build our way out of the housing crisis without stopping the loss of affordability.

### **Bill 23 Accelerates Environmental Destruction**

Along with housing affordability, protection of the environment is one of our key justice priorities as a Diocese. We understand our duty to care for the earth as a sacred trust, as we all rely on the land, water, and air to sustain us. As written, Bill 23 runs roughshod over provisions designed to protect Ontario's valuable agricultural lands, wetlands and wildlife habitat.

- **Bill 23 mandates urban sprawl.** In the past year, municipalities including Hamilton, Halton, and Waterloo have adopted official plans that would deliver housing density in existing neighbourhoods and built-up areas, rather than expanding into the Greenbelt. Not only do such plans preserve agricultural and environmentally sensitive land, but the cost of infrastructure to create infill development is much cheaper than that required for new subdivisions.<sup>2</sup> Densification also helps to create greener communities that can be served by active and public transportation, while new subdivisions extended past existing boundaries tend to be heavily car-reliant. However, Bill 23 allows the Minister to amend any municipal official plan by order without recourse. This allows the Minister to impose urban sprawl – as indicated in the recent announcement about opening up the Greenbelt to development – on municipalities which have already planned fiscally and environmentally responsible development within existing boundaries. By opening up the Greenbelt, Bill 23 proposes to allow development in currently protected wetlands, woodlands and wildlife habitat, as well as on prime agricultural land.
- **Bill 23 guts the power of Conservation Authorities.** The Bill exempts projects approved under the Planning Act from Conservation Authority regulations on water-taking and interference with rivers, watercourses, and wetlands, controlling flooding and erosion, or on the conservation of land. It further removes the power of Conservation Authorities to regulate and refuse permits based on concerns about pollution or the conservation of land and removes the obligation of the Minister to consider such matters on appeal. Further, the Bill prohibits Conservation

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<sup>2</sup> <https://www.cbc.ca/news/canada/ottawa/urban-expansion-costs-menard-memo-1.6193429>

Authorities from providing municipalities with the information they need to build land and water protections into planning approvals. With this inhibition of Conservation Authorities it is unclear who is to protect our lands and waters from pollution, to preserve habitat for Ontario's species at risk, or to protect the ecological function and viability of wetlands – or whether they will be protected at all.

At a time when Ontario is already losing 319 acres of farmland every day<sup>3</sup>, when we are already losing protections for species at risk<sup>4</sup>, and when the need to fight climate change is greater than ever, Bill 23 takes us backward. Its provisions compromise our local food supply, the health of our watersheds, the ability of wetlands and floodplains to mitigate flooding from extreme weather events, and the viability of the habitat which Ontario's iconic plant and wildlife species depend.

### **Bill 23 – Where we Agree and What is Still Needed**

As serious as our concerns are, we want to stress that there are some welcome provisions in the new Bill. As mentioned above, we welcome the elimination of development charges for nonprofit housing providers. We particularly appreciate measures designed to allow as-of-right additions of up to 3 residential units per property, which will help decrease costs and prevent NIMBY opposition to infill housing in existing neighbourhoods. We also welcome provisions to ensure minimum density around transit hubs. All these are provisions for which we have advocated for some time, and we are glad to see these in the new Bill.

At the same time, we must continue to stress that addressing Ontario's housing crisis must focus on affordability at least as much as on supply. We also maintain that more housing created at the expense of a healthy environment will only serve to render Ontario uninhabitable, to human beings as well as to wildlife.

We strongly urge this Standing Committee to amend those provisions of Bill 23 which compromise existing housing affordability measures and environmental protections. We further urge the provincial government to put forward complementary legislation that will enhance the preservation both of the existing supply of affordable housing and the land and water on which we all depend.

Respectfully submitted,

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For: Social Justice & Advocacy Committee, Diocese of Toronto  
Housing Advocacy Subcommittee, Diocese of Toronto  
Poverty Reduction Subcommittee, Diocese of Toronto  
Bishop's Committee on Creation Care, Diocese of Toronto

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<sup>3</sup> <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure/>

<sup>4</sup> <https://www.cbc.ca/news/canada/toronto/ontario-environment-ministry-not-protecting-species-at-risk-wildlife-loss-environmental-groups-1.6260350>