



November 17, 2022

Hon. Steve Clark
Minister of Municipal Affairs and Housing
Government of Ontario

Dear Minister Clark,

We are writing on behalf of the Old Ottawa East Community Association (OOECA) to express our deep concern about key provisions of your proposed Bill 23, the *More Homes Built Faster Act, 2022*. The OOECA is an organisation of community-minded volunteers representing the residents and businesses of Ottawa's Old Ottawa East neighbourhoods, dedicated to protecting and improving the quality of life for local residents. More information on our organisation can be found here: [About OECA | Ottawa East Community Association](#).

Bill 23 is a critically important piece of legislation, with far-reaching and long-term impacts for communities and citizens across Ontario. We have reviewed the Bill's key provisions carefully and, while we support its intent to address the need for housing, we join other concerned groups in calling for major changes to the Bill before it is rushed into law. As a community association, we are concerned, first and foremost, with the Bill's assault on the right at the local level to shape the fabric of our neighbourhoods and communities. Like others, we are also alarmed by provisions in the Bill that neuter environmental and 'green' safeguards and download the financial burden of development to existing property taxpayers. We address each of these concerns in turn below.

Our right to shape the fabric of our communities

As a community association, we are dedicated to encouraging and facilitating citizens' engagement in local planning and development issues, and to giving them a voice in shaping the built and natural character of our neighbourhoods. We are particularly concerned about the provisions in your proposed Bill that constrain this engagement at the municipal level and stifle local voices, while giving undue influence and power to developers. Although provincial and federal governments can, and should, set broad parameters for land use, it is important that citizens have a voice in shaping developments in their own communities. As citizens, we have the right to expect that decisions around development respond to our local needs and

interests, respect the built heritage and character of our neighbourhoods, and enhance our quality of life.

Provisions in your proposed Bill constrain local engagement in two key ways:

- *Reducing the City of Ottawa's authority over planning and development:* Provisions in your Bill limit the City's latitude to determine the specifics of its Official Plan, Secondary Plans, and Zoning By-laws, overriding planning and development decisions taken at the local level. These planning and development decisions are the product of complex consultations and collaboration among the City, community associations such as ours, and other interested citizens and groups. They represent the 'fruits' of our democratic processes — processes that should be respected by the provincial government.
- *Denying the right of citizens to appeal planning/development decisions:* By denying the right of citizens to influence the decisions that affect them and their local communities, this Bill strikes at the heart of our democratic processes. While we 'think global', we *act* local because we *live* local. The way that new housing and developments relate to existing neighbourhoods and to the public realm is a subject of legitimate interest to all in the community, given their impact on livability and well-being. As local residents, we should not be denied the right to influence decisions around issues such as community design, site design, sustainable design, and landscapes, and to appeal decisions that do not meet our needs and interests.

Disregard for environmental and 'green' considerations

Like many other organisations, we are also deeply concerned about the Bill's reduced environmental oversight, which will lead to negative impacts on environmental well-being and access to green space in our communities. It is well-documented that greenspace enhances the livability of our communities and plays a significant role in our physical and mental well-being. Proposed measures — such as gutting the role of Ontario's 36 regional conservation authorities, restricting municipalities' ability to promote green building standards, and reducing parkland requirements for new developments — strike at the heart of responsible, sustainable development. We urge you to read the Rideau Valley Conservation Authority's November 10th media release, which details the risks to water quality and to flooding, erosion, and drought — all of which come with both financial and human costs. In short, we believe that Bill 23's attack on environmental standards is regressive and short-sighted, at a time when we need bold action to address the climate crisis, the increasing threats to natural habitats and biodiversity, and the environmental determinants of human health.

Downloading of the financial burden of development

Growth must pay for growth. Founded upon concepts of equity, this has long been the rationale for development charges. It is unfair and unreasonable to shift the financial burden of infrastructure and services for new developments to existing property taxpayers, or to jeopardize the quality and reliability of municipal amenities and benefits for new communities. Discounting some and outrightly eliminating other development charges will force one or both

of these outcomes, while providing no guarantees that developers will pass their savings onto new home buyers and renters.

In conclusion, we acknowledge the importance of getting more homes built to house Ontario's growing population and address the challenge of affordability. However, we believe that this can be achieved while still respecting both the legitimate right of local residents to shape their communities' future and the sustainable practices required to safeguard our environment and green spaces. We call on your government to amend key articles of Bill 23 to address the concerns we have outlined herein.

Sincerely,



Robert Gordon
President
Old Ottawa East Community Association



John Dance
Chair, Planning Committee
Old Ottawa East Community Association

c.c. Hon. Doug Ford, Premier of Ontario
Joel Harden, M.P.P., Ottawa Centre
Mark Sutcliffe, Mayor, City of Ottawa
Shawn Menard, Councillor - Capital Ward, Ottawa City Council