



AMO's Submission to ERO 019-6160: Consultation Related to Bill 23 – *More Homes Built Faster Act,* *2022*

Comments to the Ministry of Municipal Affairs and Housing,
Ministry of Natural Resources and Forestry on ERO 019-6160

November 24, 2022

Preamble

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that represents municipal governments across Ontario. Together with our members, we address common challenges facing our residents and provide advice to the government about solutions to them. AMO has been actively involved in housing and homelessness advocacy for years, as Ontario's 444 municipal governments are responsible for building strong, complete communities, of which housing – both home ownership and rentals – is a key component.

Housing affordability and building supply is a challenge all Ontarians share. There is much that can be done collectively by working together to increase housing supply, diversify the mix and increase affordability. Solving the housing crisis will require an all-of-government approach by all three orders of government.

Introduction

The Association of Municipalities of Ontario (AMO) appreciates the opportunity to provide comments on consultations related to Bill 23 – *More Homes Built Faster Act, 2022*.

Municipal governments are committed to working with the Government to increase the supply of housing and to improve housing affordability in Ontario. That is why we provided a written submission to Bill 23 despite not being selected to speak at the Standing Committee on Heritage, Infrastructure and Cultural Policy.

Overall AMO is concerned with the timing of the bill being introduced the day after municipal elections. This has significantly curtailed the ability for municipal councils to provide comments on what will undoubtedly change the development and approvals process in Ontario.

Preliminary analysis of the Bill indicates the transfer of up to \$1 billion a year in costs from private sector developers to property taxpayers without any likelihood of improved housing affordability. Similarly, the bill's provisions designed to reduce environmental protection will benefit developers in the short term, with costs to the public and homeowners that cannot be calculated. By doing so, the government is effectively socializing the costs of new housing development.

We are appealing to the provincial government that solutions to the housing crisis can be found in collaboration, cooperation, and innovation. It is time for Ontario to work with all of its housing partners towards advancing in land use planning and taking an integrated approach to environmental, social and economic policy that allows Ontario to take its place ahead of competing jurisdictions.

Proposed Updates to the Ontario Wetland Evaluation System (ERO 019-6160)

The Ministry of Natural Resources and Forestry's proposed changes to the Ontario Wetland Evaluation System (OWES) include but are not limited to: changes to how wetlands are re-evaluated and how wetland boundaries are updated, the ability to evaluate wetland complexes, changes in scoring criteria and attributes, and administration of the OWES.

AMO shares concerns from conservation authorities (CAs) and other stakeholders that many of these proposals will result in fewer wetlands being evaluated and designated as provincially significant. Further, that they would allow for wetlands previously designated as provincially significant to be re-evaluated (particularly those part of previously identified wetland complexes), which may result in a gradual fragmentation and loss of provincially significant wetlands across Ontario.

Wetlands provide a number of benefits and ecosystem services such as: flood control/attenuation, drought control, shoreline stabilization, water purification, groundwater recharge and discharge areas, carbon sequestration and habitat for diverse species (including endangered or threatened species). When protected in a connected natural heritage system, wetlands are a natural and cost-effective tool to mitigate impacts of flooding, erosion and drought, particularly in the face of a changing climate, which put people, property and built infrastructure at risk. For all these reasons, the protection of wetlands remains critical in Ontario.

Without amendment, these changes will significantly impact the municipal resources required to fill the gaps in natural heritage planning services currently provided by the CAs. Therefore, AMO recommends that key stakeholders including municipalities be consulted on how these changes will impact their communities from a liability perspective and be given sufficient time to adapt to the proposed changes to the *Conservation Authorities Act* that are made under Schedule 2 of Bill 23.

Conclusion

On behalf of municipal governments across Ontario, thank you for your consideration of the comments provided in this submission.