

# JOINT LETTER TO THE ONTARIO GOVERNMENT ABOUT BILL 23 THE “MORE HOMES BUILT FASTER ACT”

To: *Hon. Doug Ford, Premier*  
*Hon. Steve Clark, Minister of Municipal Affairs and Housing*  
*Hon. Michael Parsa, Associate Minister of Housing*

November 15, 2022

The new provincial housing legislation is a lengthy and complex bill. While we welcome provincial efforts to grapple with the affordable housing crisis, and this bill does offer some areas of progress for affordable housing, it unfortunately also includes areas of considerable concern.

The bill definitely takes important steps that will help expand supply and also create new units of affordable housing. Reduced taxes on nonprofit development and on affordable housing could lower costs and make more projects viable. As-of-right permissions for secondary suites should remove some barriers to new, more affordable homes.

However, the bill also includes policies that have a negative impact on affordability. Unaddressed, the issues outlined in this letter will undermine the goals of this legislation, threatening its ability to create any net affordability in Ontario.

## **The bill undermines municipal programs that create affordable housing**

The bill, as it is currently written, would eliminate the charges that developers currently pay toward housing. This will, according to recent estimates, eliminate hundreds of millions of dollars that municipalities rely on for housing programs, and dramatically reduce municipal affordable housing efforts.

The bill also constrains municipal efforts to require affordable housing in new developments. The new limits on Inclusionary Zoning are well below the targets in bylaws that local governments have already passed - bylaws that were based on the local economic feasibility studies the Ministry required. It is worth underscoring that these bylaws are one of the only tools that municipalities have to create the much-needed affordable housing for people experiencing homelessness across Ontario.

These aspects of the bill will cut hundreds of millions of dollars from municipal investments in affordable housing and cancel plans that would have built thousands of new, permanently affordable homes.

## **The bill will speed up the loss of existing affordable homes**

The bill gives the Minister the power to cancel rental housing protection programs that ensure that when apartment buildings are redeveloped, the affordable units are replaced at affordable prices. Those programs have saved over 4,000 affordable homes, and their loss would put more pressure on affordable housing. Losing those protections would accelerate the already rapid loss of affordable rental units and undermine efforts to increase the supply of affordable homes.

### **The bill risks undermining affordability for families**

The bill cuts taxes and fees on developers, eliminating millions in funding that is used to build roads and sewers, as well as parks and other amenities. But those roads and sewers are still needed, and funding them will now put significant pressure on the property tax base, even though tax increases would be difficult for families to afford in these tough times. Municipalities have expressed grave concerns about the impact of these changes on their ability to balance budgets and keep property taxes in line.

### **Nothing in the bill ensures that new homes, built with public incentives, are affordable**

Though developers will benefit from hundreds of millions in tax cuts and incentives under this bill, there is nothing that requires them to build affordable units or pass any of their savings on to renters or homebuyers. While lower taxes and reduced regulatory requirements may lead developers to offer homes at less than the current market rates, there is nothing in the bill that prevents them from continuing to charge what buyers are willing to pay.

### **The bill ignores the most important task in creating affordable housing: new investment**

While regulatory reform is useful, and more supply is warranted, virtually everyone in the sector agrees that, without new investment in affordable and deeply affordable housing, we will not successfully address the housing crisis. Although this is the government's third legislative initiative on housing, there is still no coherent investment plan that can enable the public, private, or nonprofit sectors to build the amount of affordable and deeply affordable housing needed.

Housing legislation should center the housing needs of the people who call Ontario home. Deregulating development will not address the housing needs of those most at risk of not having adequate housing.

We urge you to reassess the current legislation, amend the provisions identified here, and move quickly to focus on investing in affordable and deeply affordable housing.

Sincerely,

Abrigo Centre  
Advocacy Centre for Tenants Ontario  
Affordable Housing Coalition of York Region  
Agincourt Community Services Association  
Anglican Diocese of Toronto  
ARCH Disability Law Centre  
Autistics for Autistics, Canada  
Basis Income Waterloo Region  
Black Legal Action Centre  
Bridges to Belonging  
Cambridge Council on Aging  
Canadian Environmental Law Association  
CAYR Community Connections  
CHASEO

Chatham-Kent Legal Clinic  
Chinese and Southeast Asian Legal Clinic  
Citizens With Disabilities - Ontario  
Clinique juridique Roy McMurtry Legal Clinic  
(Stormont, Dundas & Glengarry)  
Community Advocacy & Legal Centre  
Community Legal Assistance Sarnia  
Community Legal Clinic of York Region  
Community Legal Services of Ottawa / Services  
juridiques communautaires d'Ottawa  
Davenport Perth Neighbourhood and Community  
Health Centre  
Debra Dynes Family House  
Dixie Bloor Neighbourhood Centre  
Durham Community Legal Clinic

Elgin-Oxford Legal Clinic  
Equitable Action For Change  
Family Service Toronto  
Fred Victor Centre  
Grand(m)others Act to Save the Planet (GASP)  
Green Thumbs Growing Kids  
Green Thumbs Growing Kids  
Grey-Bruce Community Legal Clinic  
GTA Disability Coalition  
Guelph & Wellington Task Force for Poverty Elimination  
Halton Community Legal Services  
Hamilton Community Legal Clinic  
Handicapped Action Group Incorporated  
Health Justice Program  
HIV & AIDS Legal Clinic Ontario (HALCO)  
Homeless Connect Toronto  
Huron Perth Community Legal Clinic  
I'm Here Foundation  
Income Security Advocacy Centre  
Injured Workers Community Legal Clinic  
Interval House of Ottawa  
John Howard Society of Peel-Halton-Dufferin  
John Howard Society Peel Halton Dufferin  
Keewaytinok Native Legal Services  
Kensington Market Community Land Trust  
Lake Country Community Legal Clinic  
Landlord's Self-Help Centre  
Legal Clinic of Guelph and Wellington County  
Mississauga Community Legal Services  
Native Child and Family Services of Toronto  
Neighbourhood Legal Services  
Neighbourhood Legal Services  
Neighbourhood Legal Services (London & Middlesex) Inc.  
Nepean Rideau Osgoode Community Resource Centre (NROCRC)  
Niagara Community Legal Clinic  
Nigerians in the Region of Waterloo  
OCASI-Ontario Council of Agencies Serving Immigrants  
ODSP Action Coalition  
One City Peterborough  
Ontario ACORN  
Ontario Alliance to End Homelessness  
Ontario Campaign 2000: End Child and Family Poverty

Ontario for All  
Ontario Nonprofit Network  
Ottawa Salus  
Our Place Peel  
Out of the Box Counselling & Collaborations  
PARC  
PARC Advocacy Committee  
Peel Alliance to End Homelessness  
Pinecrest Terrace Community House  
Planned Parenthood Toronto  
Ralph Thornton Community Centre  
Renfrew County Legal Clinic  
Right to Housing Toronto (R2HTO)  
Rochester Heights community House  
Roots Community Services Inc.  
Russell Heights Community House  
S.E.A.S. Centre  
Salus Ottawa  
Scarborough Civic Action Network  
Scarborough Food Security Initiative  
Social Development Centre Waterloo Region  
Social Planning Council of Oxford County  
Social Planning Council of York Region  
Social Planning Network of Ontario  
Somali Women and Children's Support Network  
South Etobicoke Community Legal Services  
St. George Pickering Village  
the Alliance to End Homelessness Ottawa  
The Mississauga Food Bank  
The Neighbourhood Group Community Services  
The Sudanese Canadian Association of Waterloo Region and Wellington County  
Toronto Alliance to End Homelessness  
Toronto Community Benefits Network  
Toronto Seniors Forum  
Toronto Seniors Forum  
United Way Niagara  
United Way of Haldimand and Norfolk  
Unity Non-Profit Housing Corporation Ottawa  
West Neighbourhood House  
West Scarborough Community Legal Services  
West Toronto Community Legal Services  
Windsor- Essex Bilingual Legal Clinic  
Working for Change  
Yonge Street Mission  
YWCA Toronto