



November 24, 2022

The Hon. Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto, ON M7A 1A1

The Hon. Steve Clark
Minister of Municipal Affairs and Housing
17th Floor - 777 Bay St.
Toronto, ON
M7A 2J3

Dear Premier Doug Ford and Minister Clark,

As Chair of Ontario's Big City Mayors (OBCM) I am writing to you today on behalf of our membership (see signatories below) regarding Bill 23, More Homes Built Faster Act, 2022. We were grateful for the opportunity to present to the Standing Committee on Heritage, Infrastructure and Cultural Policy and would like to take this opportunity to further elaborate on our comments.

OBCM is supportive of the government's goal of building 1.5 million homes over the next 10 years in Ontario. We see daily the impact of the current housing crisis in our municipalities, and we want to ensure we can work with the government to achieve our collective goal to build affordable, safe and thriving communities. There are positive components to Bill 23, however we are writing to you today to highlight our key concerns for Ontario's biggest cities.

Legislated Funding Cuts to Municipalities

The proposed amendments to development charges (DC's), including exemptions and removals for housing services and background studies will likely result in billions of dollars worth of infrastructure deficits that, without offsetting, will severely impact our ability to support the building of new homes. Municipalities have always used a "growth pays for growth" model, and without a new model put in place, the financial burden for this infrastructure will fall to the existing tax base. In line with the asset management planning that is mandated by the province for municipalities, the DC's collected are determined through background studies to meet our infrastructure needs. These funds are then allocated and put in reserve for these projects and future growth. Our municipalities will realize significant tax increases over the next several years to maintain the infrastructure needed to support these developments without offsetting and/or support from other levels of government. The impact on the proposed changes to parkland spaces could also place an additional significant financial burden on municipalities, as we do not have the funds allocated to secure public greenspace from privately held spaces to secure safe outdoor spaces for our residents.

Work With Municipalities to Get It Done, Effectively

OBCM feels that the proper place for discussions these concerns is at the Housing Supply Action Plan Implementation Table. We are committed to working through that table to find unity with all stakeholders in building the homes Ontarians need and we feel that the best timeline to accomplish this is having it coincide with the March 1st, 2023, date of pledges that municipalities are required to sign. This group is an important tool to bring together all levels of government, including partner ministries and other municipal and industry associations, to oversee important and

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impactful changes that will build more housing. At that table a full review can take place and all partners can work together to find solutions that will meet the goal of building affordable housing across the province while including a sustainable funding model to address the critical infrastructure deficits outside of the property tax base.

Accountability for All Partners

We agree accountability can be found through the pledges outlined in Bill 23. Our municipalities have been working hard to ensure we are building more affordable homes and have been making progress on meeting our targets. We are all in this together, yet there are factors outside of all our control right now that could impact outcomes. The province has already reduced the projections for housing starts for 2023 and 2024 as outlined in the Fall Economic Statement, due to the impact of the current slow down in sales, inflation and increasing interest rates as well as labour shortages and supply chain issues in the building sector. Homebuyers deserve accountability throughout the home building process and these impacts and others such as waiting on ministry approvals or incomplete applications from builders, can cause a significant delay to our municipal building targets.

We are requesting that the province require all partners, not just municipalities to sign pledges outlining the actions each partner is responsible for to ensure they are doing their part to help reach these building targets. It is important for all partners to be held accountable if targets cannot be met, and metrics put in place to measure the impacts of the unprecedented outside forces we are currently experiencing.

Building Housing for Ontarians Is Too Important to Rush

We would like to thank the government for extending the commenting period for the majority of regulatory postings that were to end tomorrow. An extra two weeks provides much needed time to assess the impacts of these proposals and allows for more municipal participation in the consultations.

November 15th was the date set by the province for new terms of councils to begin. This means most municipalities are holding their first council meetings this week, welcoming many new mayors and councillors. Due to this, it has been impossible for municipal councils and professional staff to be fully engaged in the legislative process for Bill 23, and even with appreciated extensions, still difficult for them to approve a council position in time to submit comments on all their priority areas. It is critical that the full impacts of these measures are explored before implementation, allowing municipalities to work with the province to get this right. Our cities are also facing a capacity issue throughout many departments, and with outside consultants already working on the implementation of Bill 109, our resources are limited to be able to focus on responses to this bill.

Bill 23 will forever shift the way municipalities run their planning departments which is why we are asking that the government continue consultations with the municipal sector before final reading of this legislation and to continue this approach throughout the creation of the regulations.

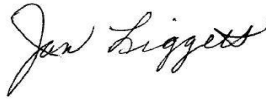
In a spirit of continued cooperation and collaboration, as you have shown through extending the commenting period, we would ask that you consider the other issues that we have brought to light. OBCM supports that your government is taking on the issue of increased housing supply, including through many of the measures found in Bill 23. We want to work together with you to get it all right.

I look forward to hearing from you on this matter and discussing further how OBCM can work with the province on building affordable, safe and thriving communities together.

Sincerely,



Mayor Cam Guthrie
Mayor of Guelph
Chair of OBCM



Mayor Jan Liggett
City of Cambridge



Mayor Berry Urbanovic
City of Kitchener



Mayor Shaun Collier
City of Ajax



Mayor Darrin Canniff
Municipality of Chatham-Kent



Mayor Josh Morgan
City of London



Mayor Alex Nuttall
City of Barrie



Mayor Adrian Foster
Municipality of Clarington



Mayor Frank Scarpitti
City of Markham



Mayor Patrick Brown
City of Brampton



Mayor Paul Lefebvre
City of Greater Sudbury



Mayor Gordon Krantz
Town of Milton



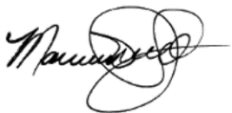
Mayor Kevin Davis
City of Brantford



Mayor Andrea Horwath
City of Hamilton



Mayor Bonnie Crombie
City of Mississauga
Vice- Chair of OBCM



Mayor Marianne Meed Ward
City of Burlington



Mayor Bryan Paterson
City of Kingston



Mayor Rob Burton
Town of Oakville



Mayor Dan Carter
City of Oshawa



Mayor Mat Siscoe
City of St.Catharines



Mayor Steven Del Duca
City of Vaughan



Mayor Kevin Ashe
City of Pickering



Mayor Ken Boshcoff
City of Thunder Bay



Mayor Dorothy McCabe
City of Waterloo



Mayor Dave West
City of Richmond Hill



Mayor John Tory
City of Toronto



Mayor Elizabeth Roy
Town of Whitby

CC:

OBCM Mayors and CAOs

Association of Municipalities of
Ontario (AMO)

Mayors and Regional Chairs of
Ontario (MARCO)