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November 17, 2022

To: The Standing Committee of Bill 23, *More Homes Built Faster Act, 2022*  
and the following EROs:

<b>ERO #</b>	<b>Ministry</b>	<b>Topic</b>
<u>019-6160</u>	Ministry of Natural Resources and Forestry	Wetland Evaluation System
<u>019-6161</u>	Ministry of Natural Resources and Forestry	Natural Heritage
<u>019-6163</u>	Ministry of Municipal Affairs and Housing	Planning Act & City of Toronto Act
<u>019-6172</u>	Ministry of Municipal Affairs and Housing	Planning & Development Charges Act
<u>019-6141</u>	Ministry of Natural Resources and Forestry	Conservation authorities
<u>019-2927</u>	Ministry of Natural Resources and Forestry	Natural hazards
<u>019-6173</u>	Ministry of Municipal Affairs and Housing	Inclusionary zoning
<u>019-6197</u>	Ministry of Municipal Affairs and Housing	Additional residential units

We are providing comments on Bill 23, *More Homes Built Faster Act, 2022*, and the specific EROs that are listed above. Although we agree that the Government of Ontario needs to address the housing crisis in Ontario, we believe that Bill 23, *More Homes Built Faster Act, 2022*, is not the most prudent way to proceed and will have numerous negative impacts and consequences on the environment and fragile ecosystems which should be avoided. We believe the provisions of Bill 23 should only apply to urban areas in Southern Ontario with serviced land, and that unserviced lands and Northern Ontario should be excluded.

We also confirm our agreement and support for the attached November 15, 2022 submission from the Canadian Environmental Law Association to the Bill 23 Standing Committee.

The Georgian Bay Association (GBA) is an umbrella organization for 18 community associations along the east and north shores of Georgian Bay, representing approximately 3,000 families. We have been advocating on behalf of our land-owning members for over 100 years and estimate that we reach and influence around 30,000 residents of this Georgian Bay area. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

Georgian Bay, in particular the eastern and northern shores, has the following features which makes it unique within the Great Lakes system and emphasizes why this area needs careful protection:

- The eastern shore is a UNESCO designated Biosphere Reserve recognized as having international significance.
- Together, the eastern and northern shores and waters (including the eastern end of the North Channel of Lake Huron, known as the Bay of Islands) contain the largest global freshwater archipelago (~35,000 islands).
- This area has the largest biodiversity of amphibians and reptiles in Canada and one of the largest in the world.
- In addition, there is a substantive biodiversity of other aquatic biota, land-based fauna, birds, insects and flora.
- The islands and shore of this area have a collective shoreline of 10,000 kms, which is longer than the collective shoreline of all the other Great Lakes combined.
- In this area 53 of Ontario's species at risk and endangered species are in fact thriving;
- The ~19,000 wetlands in this area and the nearby watershed is more extensive, more biologically significant and more diverse than all of the wetlands in all of the other Great Lakes;
- These wetlands, and the extent to which they filter water, are a vital component in maintaining good water quality both in Georgian Bay, Lakes Huron and Michigan and downstream through the Great Lakes system and are recognized as one of the most ecologically important wetlands systems in Canada and internationally; and
- Communities around Georgian Bay, including the 12 First Nations, all share a passionate devotion to protecting the environment.

Our primary concerns are as follows:

***Removal of third party appeals at the Ontario Land Tribunal***

GBA opposes the proposal to remove third party appeals at the Ontario Land Tribunal. Removing third party appeals limits / removes the voice of concerned neighbours and members of the community and their right to uphold planning regulations and comment on development applications. Both municipalities and developers need to be held accountable for compliance with planning and land use regulations and concerned citizens have the right to contribute in helping achieve that.

### ***Changes to the Ontario Land Tribunal procedures***

GBA opposes the proposed changes to the Ontario Land Tribunal procedures which are aimed at discouraging municipalities from opposing developers at the OLT by potentially adding significantly to the costs of doing so and imposing challenging time constraints. Our member associations and their members reside in the five coastal municipalities along the north and east coasts of Georgian Bay. These municipalities are low density in nature and are committed to upholding planning regulations that promote the protection of the Georgian Bay environment. These municipalities are small and have limited staff and resources. We are concerned that these changes may harm their ability to properly uphold planning regulations and maintain their local planning principles, which could lead to environmental impacts and impair the natural land and waterscapes, including the Biosphere Reserve.

### ***Changes to site plan controls***

In our area every island and lot are unique, almost all consist of one residential unit, and careful location of buildings, septic systems etc. is essential to avoid impacting sensitive habitat. Site plan control is therefore important for municipalities to preserve the integrity of planning regulations, ensure compliance with those regulations and avoid potential negative environmental impacts. GBA is concerned that the changes to site plan controls that would exempt developments of up to 10 residential units from site plan control, and the removal of architectural details and landscape design aesthetics from the scope of site plan control, would remove this essential oversight for our area and lead to negative environmental impacts.

### ***Changes to subdivisions approvals***

GBA opposes changes that remove the public meetings requirement from applications for approval of a draft plan of subdivision for the same reasons as set out in our comments above on *Removal of third party appeals at the Ontario Land Tribunal*. Public and community participation in planning regulations and decisions is a central tenet of the principles of the Planning Act and ensure that the community's wishes for the character and future of their community are heard. Public consultations are critical in this respect and should not be abandoned.

### ***Allowance of multiple residential units per lot***

GBA opposes permitting of up to three residential units per lot (two in the main building and one in an accessory building) as of right, with no minimum unit sizes. It is not clear whether that proposal only applies to areas with municipal services in place. Limiting the number of residential units (main buildings and accessory buildings) helps prevent over development and undue pressure on low/minimal services that exist in the Georgian Bay area, which is environmentally sensitive, sparsely populated and predominantly consists of unserviced land. We seek confirmation that this provision will only apply to serviced land, as it is completely inappropriate and unworkable on unserviced land.

### ***Changes to the Natural Heritage planning***

We believe language on the “net positive impact” that might allow for wetlands, and other natural areas, to be developed is unclear and allows for excessive uncertainty on wetlands protection. This is very concerning because of the Georgian Bay environments' extensive wetland system and other sensitive habitat that provides countless ecosystem benefits to all sentient things - including people.

### ***Removal of Conservation Authorities' powers***

GBA is concerned with restricting the powers of Conservation Authorities and limiting them to erosion and flooding control. Conservation Authorities have an important role to play in source water protection and wetlands that should remain as a key priority. Removing their ability to provide comments beyond natural hazards and flooding would under-utilize their expertise and dispose of much needed and necessary oversight that could lead to problems with water quality.

### ***Changes to Ontario Wetland Evaluation System***

GBA opposes the proposed changes to the Ontario Wetland Evaluation System. The Georgian Bay ecosystem has significantly important coastal wetlands that contribute to the biodiversity of the area and provide varying ecosystem services, as summarized above. We are concerned that these changes will diminish the ecological value of wetland systems, in particular:

- No longer recognizing or considering wetland complexes (hydrological connections)
- No longer recognizing species at risk in the evaluation process
- Removing provincial government oversight of the evaluation process

As set out above, Georgian Bay is home to ~19,000 wetlands and 53 species at risk and endangered species and provides extensive ecosystem services, which must be protected, particularly as part of the Biosphere Reserve.

### ***Addresses Southern Ontario (urban centers) not Northern Ontario (rural)***

We believe that the provisions of Bill 23, *More Homes Built Faster Act*, are primarily aimed at urban centres in Southern Ontario, and should therefore be confined to Southern Ontario and not apply in Northern Ontario and/or rural unserved land areas.

### ***Timeline for public consultation***

The timeline for public consultation is short relative to the substance and ramifications of the proposed changes. The Government of Ontario should allow for reasonable periods for comment that allows for effective public comment and consultation. This process is essential to gathering useful input from the public and hearing public concerns. The current process undermines the effectiveness of the process for obtaining the input of the public. Accordingly, strong consideration should be given to extending the public consultation timelines.

We would like to thank you for the opportunity to comment on Bill 23, *More Homes Built Faster Act*, and taking the time to read and understand our concerns. We would be pleased to discuss our concerns and answer any questions.

Yours sincerely,

A handwritten signature in blue ink that reads "Rupert Kindersley". The signature is written in a cursive style with a horizontal line underneath the name.

**Rupert Kindersley**  
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