



April 11, 2022

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street
Toronto, ON M7A 2J3

Re: Bill 109 More Homes for Everyone Act, 2022

Dear Minister Clark,

On behalf of the Old Ottawa South Community Association, I am writing to express our community's concerns regarding Bill 109, the More Homes for Everyone Act, 2022.

We are all impacted by increasing housing costs and limitations in supply and understand the Government of Ontario's desire to introduce measures to alleviate the situation.

Proposed measures to increase the speculation tax rate by 5% for non-resident buyers and provide greater financial protections for buyers of new homes will decrease speculation and address unscrupulous practices.

Other proposed measures, however, will likely increase the time and cost of development. Penalizing municipalities that fail to meet timelines for decisions on certain development applications may lead to more refusals if issues are unresolved by the deadline, and result in more time and money spent on appeals to the Ontario Land Tribunal. Increased litigation will certainly result if the Minister is allowed to refer urban boundaries and other contentious official plan policies to the Tribunal.

Enforced delegation of site plan approval to municipal staff will also likely lead to increased litigation and undermines the authority of elected municipal councillors. It is often councillors who can, by lifting delegation of authority, help find common ground between communities and development proponents on controversial applications. If opportunities are not available to resolve issues at a community level, then the only opportunity to address them will be at the Tribunal.

Any move that increases the role of the Tribunal reduces the ability of community groups to participate in planning decisions. Most groups lack the skill, manpower and other resources to participate effectively at formal hearings. A greater diversity of voices, opinions and options can be heard at the local level to help shape decisions by elected representatives.

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The proposed Community Infrastructure and Housing Accelerator allows municipalities to request that the Minister make a zoning order allowing for exemptions from the Provincial Policy Statement, the municipality's Official Plan, permitting and other requirements. While the proposed Accelerator may expedite approvals (or not), it will be at the cost of our environment and the planning framework.

There is no guarantee that any potential development cost savings will result in greater housing supply or affordability. Indeed, our fear is that, in an evermore litigious process, the cost of litigation will result in increased prices for consumers and fewer parties at the table to make decisions affecting our communities.

Sincerely,

Richard Slowikowski
President, Old Ottawa South Community Association
Ottawa, Ontario

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