

April 11, 2022

Re: Bill 109 The More Homes for Everyone Act

To the Chair and Members of the Standing Committee of the Legislative Assembly,

We are writing to you as members of the Huron-Sussex Residents Organization (HSRO), a community group which has been advocating since 1968 to keep Huron-Sussex as a vibrant, inclusive and viable residential neighbourhood in downtown Toronto. We are located in the middle of the University of Toronto's St George campus, and have participated in dozens of development meetings with private developers as well as the University and other public institutions. We have been involved in formal and informal community planning exercises. As well as meeting with our own board and neighbourhood residents, we regularly meet with other residents associations, our elected officials, and with University staff to discuss specific and overarching community needs and policies.

We are writing both to outline three priorities of the HSRO in regards to increasing housing, and to express our reservations about how the new legislation will support development of the kind of housing that we believe is needed.

The HSRO is mindful that much of the new housing under development across the City may not be accessible to a range of residents, including those who rent and those with low and moderate incomes. We have a long commitment to advocating for more housing—specifically, at many development meetings we have spoken out for affordable, liveable housing. Simply increasing housing supply without other kinds of regulations will not in and of itself guarantee that housing is affordable nor that it is built to a scale that allows people to put down roots and remain in place as their family units grow or change.

In the course of the development meetings we have attended, we have become very familiar with who is and isn't in the room, and who does and does not have a say in community decisions. It is our experience that as it is, developers' interests often dominate planning processes at the expense of the creation of livable communities. Curtailing the time allowed for planning housing developments will exacerbate this.

In particular, where we live there are several important and thriving Indigenous organizations and communities, and yet we have seen that Indigenous engagement is rarely undertaken by private and institutional developers. HSRO is committed to rethinking community-development meetings so that we are fulfilling the relevant calls to action of the Truth and Reconciliation Commission, and the United Nations Declarations on the Rights of Indigenous Peoples enshrined in Bill C15. Indigenous engagement and decision-making must be centred in planning and new development, not undermined in the rush to build more, faster.

As a community, we are very concerned about climate change mitigation. Addressing climate change is an urgent demand that requires that all construction must be viewed through the lens of how it can have a minimum of further negative environmental impact, and how new development can offset its impacts. A related commitment for the HSRO is to take action to ensure green and liveable communities where there is space for community gardens as well as public outdoor space to gather and play. This means we cannot simply build 'more' without careful stewardship.

Given the above priorities, we are very concerned about what we see as a push for more housing supply without accompanying attention to affordability, liveability, community participation, and strong environmental standards. In fact, what we have seen in Bill 109 is that its emphasis on 'cutting red tape' and speeding up timelines will very much hurt our efforts to hold space for Indigenous engagement and participation by other marginalized groups. For example, we see Schedule 5 changes to the Planning Act as working against many of our priorities. Such changes interfere with local decision-making by allowing the Minister to either defer decisions on official plans, or refer them to the Ontario Land Tribunal (OLT). This creates opportunities for developers and donors to be given undue influence. The new "Community Infrastructure and Housing Accelerator" involves more Ministerial control, with less notice, input, and transparency for the public, and less local control including input by conservation authorities or adherence to existing official plans, including those of the Province. Measures in the Bill that increase pressure on City staff to approve completed applications—even if they are unacceptable—would likely have a similarly negative impact on environmental assessments and planning.

We also note that the requirement to review community benefits charges by-laws every 5 years puts the practice at risk, thus interfering with the ability of

municipalities to ensure that development advances rather than impeding community benefits. Further, this is not a fix recommended by the Housing Task force, so we ask what problem this seeks to correct.

With regards to building liveable housing, we note that a provision for gentle density, to allow for modest in-fill and 4-5-6 storey housing as-of-right, is missing from the Province's legislation.

Finally, if indeed the goal of Bill 109 is to ensure 'more homes for everyone,' we submit that the refund process proposed for rezoning applications is counter-productive. It creates an incentive for City staff to reject applications and send the matter to the OLT, where existing backlogs would actually mean longer lag time for approvals.

Sincerely,

The Board of Directors of the HSRO

cc MPP Jessica Bell