

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
Agingcourt 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