



17 November 2022

Clerk of the Standing Committee on Heritage, Infrastructure and Cultural Policy  
c/o Procedural Services Branch  
99 Wellesley Street West  
Room 1405, Whitney Block  
Toronto, ON  
M7A 1A2

**RE: Lake of Bays Association Comments – *More Homes Built Faster Act 2022* Bill 23 -  
Environmental Registry of Ontario Posting: 019-6172**

Thank you for the opportunity to provide comments on behalf of the Lake of Bays Association (“LOBA”) regarding Bill 23, the *More Homes Built Faster Act, 2022* posted on the Environmental Registry of Ontario Postings (ERO) 019-6172.

LOBA represents more than 1200 permanent and seasonal families living on or near Lake of Bays in Muskoka. Our mandate is to promote, sustain and enhance a clean and healthy natural environment, a well-serviced community, and a safe and peaceful Lake of Bays. The lake and its shoreline are a beautiful and treasured resource for residents and visitors. The local economy relies on tourism and recreation. Strong environmentally sensitive planning legislation is vital to protect the natural environment on which Muskoka’s economy is based.

Lake of Bays is a township municipality within the District Municipality of Muskoka. The township contains four small rural communities – Dwight, Dorset, Hillside and Baysville- all in need of affordable housing.

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Planning and development of that housing must be undertaken carefully to ensure the shoreline environment is protected, and that change occurring in those communities takes place in an environmentally sensitive manner. Bill 23 does not support this objective and indeed creates real risks to the shoreline environment itself.

**Timing of the Bill** – This bill was released as councils were dissolving and new terms were yet to begin. The changes in this bill significantly impact municipalities, their communities, and the environments in their care. Municipalities and their residents (permanent and seasonal) need sufficient time to understand and engage with the province on the proposed changes. These proposals are not short-term fixes but may be in place for decades, with effects on future generations. The ramifications need to be fully examined. **We ask that the province extend its comment period and undertake proper consultation with our municipalities and their residents.**

**Affected Lands and Protection of the Environment** – The bill applies to all lands in Ontario, regardless of their real suitability for development or their appropriateness for meeting the goals of the government for more homes faster. This is a bill more suited to large urban centres. Its broad application opens the door to development in other locations that would do nothing to further the stated goals of the bill. That can have unclear consequences if applied to the forests and shorelines of our lakes and rivers, and to small rural municipalities. For example, the proposed exemption from site plan control of any residential development of less than 10 units will remove a key means by which environmental standards are set for new development. Site plan control and control over landscaping (e.g., trees, permeable surfaces, sewage management) in Muskoka is a vital environmental protection tool and should be preserved for developments of all sizes. The bill's restrictions on the role of conservation authorities discourages watershed planning. **We ask that the ability of municipalities and their partners to protect the environment not be compromised.**

**Appeal Rights** - Organizations like LOBA do engage in municipal planning matters, providing the perspective of our members. We should be able to appeal planning decisions that push the boundaries of good planning and environmentally respectful development. The government's proposal to eliminate the right of concerned residents to appeal planning decisions removes one of the checks and balances in the system – residents holding staff and councils accountable for upholding their environmental protection policies. **We ask that third party appeal rights be retained.**

**Affordable Housing Supply** - Local context is so important. There is a housing shortage in Lake of Bays communities, but it is not the result of excessively restrictive zoning and planning. The small communities on the lake are ready to support the building of housing in appropriately zoned areas serviced by necessary infrastructure including municipal sewage systems. Residents are generally supportive of such construction including LOBA. The development charge reductions in the bill would result in less municipal revenue to fund the costs of the needed infrastructure. A wider range of development incentives and affordability supports, as well as requirements for proceeding with approved housing developments within reasonable timeframes, should be considered to discourage land speculation in Muskoka and increase the availability of truly affordable housing for lower income permanent residents of small communities. **We ask that the provisions for more housing be refocused to increase the supply of truly affordable housing in rural Ontario.**

Sincerely,



Wendy Gibson, President

copies: Graydon Smith, MPP Parry Sound - Muskoka  
John Klinck, District of Muskoka Chair  
Terry Glover, Mayor, Lake of Bays  
Nancy Alcock, Mayor-elect, Huntsville