



9 December 2022

The Honorable Steve Clark  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, Ontario  
M7A 2J3

Regarding:

**ERO 019-6172 Proposed Planning Act and Development Charges Act, 1997 Changes: Providing Greater Cost Certainty for Municipal Development-related Charges**

Dear Minister Clark,

Birds Canada is a non-profit charity that aims to drive action to better understand, appreciate, and conserve birds in Canada. We are writing to express our concern regarding ERO 019-6172 of Bill 23 or the More Homes Built Faster Act, 2022. We believe the proposed changes do a disservice to Ontarians by reducing opportunities to spend time in nature, and by decreasing contributions to biodiversity conservation. We urge the Government of Ontario to provide cities, towns, and rural communities with a mix of ownership and rental housing types that meet the needs of all Ontarians *without* implementing the changes in ERO 019-6172. *We oppose nearly all of the changes under ERO 019-6172 for the reasons summarized below.*

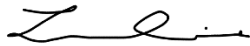
ERO 019-6172 limits the power and ability of city councils and municipalities to ensure adequate greenspace, such as parks in new developments, and it includes measures to decrease the amount of greenspace per unit area compared to current thresholds. We think this is a mistake because it is well known that exposure to nature in urban greenspaces is important for human well-being (Jimenez et al., 2021. Associations between nature exposure and health: a review of the evidence. International Journal of Environmental Research and Public Health 18, 4790). Urban greenspaces also make meaningful contributions to biodiversity conservation despite the threats that urban land use poses for most species (Soanes et al., 2019. Correcting common misconceptions to inspire conservation action in urban environments. Conservation Biology 33, 300–306). We urge the Government of Ontario to increase the power and ability of city councils and municipalities to ensure adequate greenspace in new developments and to increase the amount of greenspace per person per unit area compared to current thresholds. *The Government of Ontario should not decrease the amount of greenspace as is the case in ERO 019-6172.*

Birds Canada is concerned that ERO 019-6172 moves Ontario backwards and not forwards with respect to housing and biodiversity conservation. We urge the Ontario Government to repeal ERO 019-6172 to increase, not limit, the power and ability of city councils and municipalities to ensure adequate

greenspace in new developments and increase, not decrease, the amount of greenspace per person per unit area compared to current thresholds.

Thank you for the opportunity to provide feedback on ERO 019-6172.

Sincerely,



Laura Irvine  
Director, Ontario Programs



Douglas C. Tozer, PhD  
Director, Waterbirds and Wetlands

c.c. Gregor Beck, Senior Strategist