



**Mailing Address: PO Box 48525 Long Branch
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December 9, 2022

RE: Comment on Bill 23 More Homes Build Faster Act 2022

Dear Minister Clark

We are writing again to be on the record expressing our serious concerns with content and progress of Bill 23. With Bill 23 receiving Royal Assent on November 28, 2022 this government has unfairly removed the right of third party appeal while still accepting comments until today. It has left us to question if any comments or changes will be even considered by this government.

Residents are already feeling the impact one week after this lopsided Bill was passed. We are aware of Appeals that are being denied to residents based on the in force environmental policies of the Official Plan, specifically to the removal of healthy and protected sized native trees. Other residents are considering taking on huge personal expense in hiring planners and lawyers to represent their interests at upcoming Committee of Adjustment Public Hearings as now they feel they do not have the ability to self represent. To be clear, none of these Appeals were to stop affordable housing which is in short supply in Toronto, but to oversized and expensive homes that were replacing the older, more affordable and perfectly livable housing. The repercussions of Bill 23 are already being felt by residents that are merely trying to protect their Assets and the enjoyment of their home and neighbourhood.

In Long Branch, third party appeals are not a barrier to building homes. In the last 7 years we have 19 applications (8 consents and 2 minor variance applications) where the applicant has gotten everything they wanted and have still not broken ground. This is speculation contributing nothing to the housing targets.

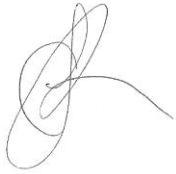
Long Branch still is a target for consent applications. In 2018, this small community owned 10% of the consent appeals in all of Toronto. In 2022, that number remains at 9.6%. At TLAB, only 37% consent appeals have been refused. 50% of these refusals have been in Long Branch.

In the last 4 years, 17 consent appeals were filed in Long Branch. Out of those 17 appeals, 16 were refused because they were proven to be bad planning under the scrutiny of a TLAB hearing. Despite these refusals, Long Branch population grew 13.3% (2022 Census) through utilization of a Growth Plan with site and area specific plans and encouraging growth along the Avenues.

In our experience, a consent application is never a minor variance in an established Neighbourhood. Long Branch has seen the devastating impacts of intensification on the existing Tree Canopy due to intensification. Data from 40 lots that underwent intensification redevelopment using a consent application prior to 2018 resulted in a 55.7% tree canopy loss. And the tree canopy loss on the **adjacent properties** to those that were redeveloped with a consent resulted in a 24% tree canopy loss on those properties.ⁱ Allowing more as-of- right intensification within the urban area without strong, corresponding tree protection policies in place will result in the incremental dissemination of the City's mature Tree Canopy, leaving behind increasingly barren, sterile neighbourhoods.

If only one change could be considered to this Bill, we hope that the Minister will consider the importance of mature trees for what they are, an asset to homeowners and a natural resource to the urban neighbourhood. Considering the devastating impact to the tree canopy, protection of assets and quality of life for neighbouring properties. Third Party appeals in the case of a consent application, should still be permitted.

Respectfully submitted



Christine
Mercado Chair,
Long Branch Neighbourhood Association

cc: Councillor Amber Morley
Mayor John Tory
MPP Christine Hogarth
Premier Doug Ford

ⁱ De Santis, J. (2020). Impact of Residential Intensification on Urban Forest in the Long Branch Neighbourhood, Toronto. *University of Toronto*

