

2022-12-09

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
Member of Provincial Parliament (Leeds-Grenville-Thousand Islands and Rideau Lakes)
Main Legislative Building, Queen's Park
Toronto, ON M7A 1A5
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Good afternoon Minister Clark,

Congratulations on the bold vision you and your team are providing for Ontarians. The changes adopted in Bill 23 will create a brighter future for Ontarians – one where everyone can access range of housing options to meet their needs.

REALPAC and its members support the vast majority of the Proposed Planning Act and City of Toronto Act Changes (Schedules 9 and 1 of Bill 23 - the proposed More Homes Built Faster Act, 2022)¹

We agree Ontario Residents need more housing and they need it now. Addressing “As-of-right” (without the need to apply for a rezoning) up to 3 units per lot in many existing residential areas will help break down some of the community barriers to more housing supply. Every resident should be empowered to do their part.

Addressing higher density around transit through “as of right” zoning will help to incentivize development around key infrastructure and infrastructure investment.

Changes to Third Party Appeals is also welcomed. Too often projects are hung up due to third party appeals on inconsequential matters rooted in NIMBYISM, driving up costs and creating cost uncertainty.

While there are many positive aspects to Bill 23, amendments around Site Planning can be perceived as a step backwards for sustainable design and green construction in the province.

¹ <https://ero.ontario.ca/notice/019-6163>

As an example, the Bill would remove the City of Toronto's ability to secure sustainable design elements through the Site Plan approval process, which the City of Toronto currently does through the Toronto Green Standard. This covers matters such as energy efficiency, street trees, mitigating urban heat island effects, and deterrence of bird collisions, to name a few. These matters are important to our members and are a key priority over the coming years.

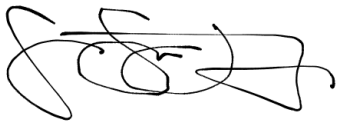
REALPAC understands the province doesn't like municipalities using the site plan control tool in a way that it was never originally intended - to deal with the environmental attributes of the building to be constructed, thereby somehow contradicting legislative turf granted to provinces and the building code regime.

We do, however, encourage the province to consider an exception related to Green Standards, which can be applied to ensure buildings are designed with a strong focus on de-carbonization and positioned to meet the net zero targets required to transition to the low carbon economy of the future. An exemption period would allow the Province to act to pass something equivalent in the Building Code regime to replace the power that is being taken away from municipalities.

Finally, in the same way that the Province has incentivized affordable housing development, we encourage the Province to demonstrate similar leadership to provide stronger incentives around building green.

REALPAC would be pleased to meet with the Province to co-develop an approach that maintains the hard-earned progress municipalities have made around green design standards, while moving to a Province wide approach.

Respectfully submitted.

A handwritten signature in black ink, appearing to be 'S. Sinclair', written in a cursive style.

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