



To: Standing Committee on Heritage, Infrastructure and Cultural Policy
Re: Bill 23, More Homes Built Faster Act
Date: November 17, 2022

To the Committee,

The Ontario government says that it needs to implement Bill 23 to address the housing crisis. This Bill must be withdrawn for two reasons: it will not increase access to affordable housing and it will result in devastating losses to our non-renewable land resources - including farmland, wetlands, greenspaces and foodlands – and Ontario’s food system. **We do not need to choose between protecting the land and building affordable housing.**

Toronto Urban Growers (TUG) would like to add our voices to the many environmental, housing and social justice organizations that are deeply opposed to the proposed changes. TUG is a member-based network of urban farmers, local businesses, organizations and institutions that aims to increase the availability of healthy, organic and sustainable food produced and sold in Toronto. To scale up urban agriculture in the city, we cultivate relationships and innovations, generate and share information, link growers to land, space and resources, support emerging leaders, work for enabling policies and promote the benefits of urban-grown food.

Food Security Requires Affordable Housing

Individuals and families are increasingly needing to choose between rising costs of housing and rising costs of food. The ongoing increase in food prices shines a light on the urgent need for both affordable housing and the protection of all foodlands and farmlands in the Greenbelt and beyond as key components of our current and future food security.

When housing is not affordable, families must move further away to find housing they can afford, often in low-density communities that increase the cost of transit for municipalities and residents alike. This trend escalates urban sprawl, paves over more natural spaces and foodlands and increases carbon

emissions. Urban sprawl solutions also make it more costly environmentally and financially to access food.

Bill 23 makes housing less affordable by:

- Removing rental replacement requirements
- Reducing municipalities' capacity to pay for affordable housing through development costs
- Allowing developers to create less affordable housing, by lowering limits on inclusionary zoning (to only 5%) and using a market-based definition of "affordable" housing
- Eliminating development charges that can contribute to construction of affordable housing and the infrastructure to support it.
- Gutting green building standards, which need to be maintained and enhanced to support food production.

We need our governments to plan for housing, sustainable communities and food security together.

Food Security Requires Farmland Protection

Permanently protecting agricultural land in the province is crucial—once it's lost to development, it is gone forever. Disruptions to long food supply chains, increased transportation expenses, crop failure in other parts of the world, and the need to limit our use of carbon-based fuels, require us to increase our food security by deepening our access to sustainably-produced, locally-grown food. Relying heavily on urban sprawl as a solution, instead of densification, whittles too much of the already small share of land devoted to local agriculture.

While this legislation pays lip service to the need for farmland protection, Bill 23 will instead:

- accelerate farmland grabbing, placing more non-renewable farmland under the control of speculators and developers;
- re-zone thousands of acres of prime farmland to allow for development;
- increase land prices—something that new and young farmers cannot afford—and increase the cost of producing food locally;

- eliminate agricultural systems mapping and impact assessments, critical tools for evidence-based decision-making (<https://ontariofarmlandtrust.ca/2022/11/10/bill-23/>);
- attack regional planning efforts to control urban sprawl, and dramatically alter the long-term planning framework, the Provincial Policy Statement;
- eliminate the growth plan density requirements;
- remove key infrastructure planning elements of the Growth Plan;
- separate development approvals (municipal) from infrastructure planning (upper tier) (Planning Act changes)
- prevent public and conservation authorities from appealing sprawl proposals to the Ontario Lands Tribunal ([Proposed Amendments to the Ontario Land Tribunal Act, 2021](#))
- facilitate developer appeals of official plans by eliminating a 2-year timeout (Planning Act amendments)

Food security requires conservation

Throughout Ontario, when we say Bill 23 has a negative impact on the environment, on lands, on waters - we are identifying a negative impact on food security and on food sovereignty.

Food is grown, harvested, and processed in our communities, from the land, the waters, the forests— with our continued food security resting on us doing this in a sustainable manner.

Despite daily acknowledgements that Ontario rests on Indigenous lands, under treaty or unceded, the Indigenous principles of conservation of lands, and of sustainability for seven generations forward, are not part of this Bill.

Bill 23 will allow developers to use “offsets” to destroy natural features if they relocate them or pay a fee. This threatens watersheds, food producing lands and flood controls. Bill 23 also eliminates the ability of conservation authorities to protect watersheds and greenspaces, by reducing their mandates to flood control and hazards. Many of the duties of Conservation Authorities are being dumped into the laps of municipalities—without the resources and expertise to effectively carry out those responsibilities.

All of these issues are at the core of the foundation of the Greenbelt, which has been continuously and vigorously defended by Ontarians every time it has come under attack.

Bill 23 erodes our food sovereignty, our food security and our democratic process. It must be pulled now and re-started with guiding principles that balance the long-term mutually supportive needs for housing, ecological services and farmland protection, and adopt an inclusive, collaborative approach that targets liveable neighbourhoods, farmland protection, food security and participatory governance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rhonda Teitel-Payne', written in a cursive style.

Rhonda Teitel-Payne

Co-Coordinator, Toronto Urban Growers