



December 6, 2022

The Honourable Minister Steve Clark
Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M5G 2E5

Dear Minister Clark:

RE: BILL 23 DEVELOPMENT CHARGES & HERITAGE

The Ontario BIA Association (OBIAA) has been a clear advocate for the need for affordable housing and social housing that comes with 24-hour wrap-around support. We commend the Government of Ontario for taking bold steps to address this challenge but are concerned that some of these steps are in the wrong direction for the health and welfare of our communities, especially our main streets.

We note, with interest, AMO's submission as it outlines key areas of concerns for municipal government. OBIAA shares some of AMO's concerns. AMO recommends, and OBIAA wholeheartedly agree, that a number of provisions should be removed, including those that shift the costs of growth to property taxpayers; those that undermine good planning practices and community livability; and those that increase risks to human and environmental health.

DEVELOPMENT CHARGES

Bill 23 is a heavy financial burden that will shift the cost of growth onto municipalities and property taxpayers, as well as bankrupt future infrastructure maintenance.

Bill 23 is focused on rezoning 7,400 acres of the Greenbelt. These areas do not have existing infrastructure and without being able to charge, the addition of this infrastructure will come at the detriment of current areas. This will also create more 'sprawl' and at the expense of existing main street areas that are already in need of improvements and upgrades. There is a strong body of research supporting communities needing to be built on the complete community (15-minute community). As per the Province of Ontario's "the Growth Plan promotes the development of complete communities where people can live, work, shop and access services in close proximity". We find Bill 23 contradictory to this Growth Plan.

Expanding growth, through sprawl, will not fiscally support existing, let alone increased, service level needed under the proposed changes. We agree that additional housing supply is warranted; however, housing alone does not create community.

We would like to propose that an inventory be completed of existing used and potential residential buildings and support given to property owners to ensure any vacant residential spaces become used. One of the biggest challenges in our downtowns is absentee landlords with vacant properties, by encouraging these spaces to be fully utilized it will not only add additional housing but will add vibrancy to our main streets. Our main streets have existing infrastructure, community and transportation links that tend towards complete streets.



THE HERITAGE NATURE OF MANY OF OUR MAIN STREETS

Bill 23 may fundamentally change the municipalities and communities' role and responsibilities in determining the place where they play, live and work. Without being able to protect the authenticity of a neighbourhood it limits a municipalities ability to connect to their past, interpret their history and see the benefits to the local economy by attracting both visitors and residents, in a holistic and efficient way that reflects local realities.

The very nature of an area could be destroyed if there is no local authority or consultation around the demolition and conversion of properties - residential, commercial and heritage. Additionally, this may result in the loss of thousands of heritage properties across Ontario.

There will be limited incentive to list buildings proactively unless it is anticipated that they are under threat of demolition or development. Rather than being proactive with listings, municipalities will now have to be reactive.

The loss of this nature could very well destroy the fabric of the main street community and its economic viability. It is often this heritage and unique nature that makes the area an economic and tourism draw.

One resource could be to support municipalities to implement Downtown Heritage Districts (similar to Cobourg, Collingwood, Port Hope, Cambridge and Peterborough). Or amend Bill 23 to allow the main street character to be taken into consideration as worthy of consideration in reviewing new housing site plans. As mentioned, the heritage aspects are often richest in our downtowns and by implementing Heritage Districts it will at least allow protection over these heritage attractions.

CONCLUSION

The Ontario BIA Association recognizes there is a nationwide housing affordability crisis as it is very evident in the social issues affecting our main streets.

Decisions being made today are having a direct impact on our main streets, our ability to feed our citizens, our greenspaces, and our future. These sweeping changes need to be grounded in consultation with the municipalities, BIAs, and our communities.

OBIAA, as always, looks forward to working together in creating an Ontario that is respectful, economically vibrant, sustainable, and supportive to all needs.

Sincerely,

Kay Matthews
Executive Director
Ontario BIA Association