

November 17, 2022

MPP Laurie Scott, Chair  
c/o Isaiah Thorning, Committee Clerk  
Standing Committee on Heritage, Infrastructure & Cultural Policy  
Whitney Block, Room 1405  
Toronto, ON M7A 1A2

***OPPI's Initial Comments on Bill 23, More Homes Built Faster Act, 2022***

Dear Chair Scott,

On behalf of the Ontario Professional Planners Institute (OPPI), I am writing to provide our initial correspondence on *Bill 23, More Homes Built Faster Act, 2022*.

As you may know, OPPI is the recognized voice of Ontario's planning profession. With over 4,600 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

OPPI supports the government's policy objective of addressing housing affordability. This issue is shaping up to be one of the most important public policy challenges of our generation. It is complex with multiple dimensions that involve all orders of government. We continue to work with our members to develop recommendations aimed at addressing this challenge, including our recent [Top 10 Housing Supply and Affordability Recommendations](#) from earlier in the year.

Bill 23 proposes one of the most significant transformations of Ontario's planning system in decades. Accordingly, OPPI is actively working with Council Directors and internal policy committee members to conduct an exhaustive review of the proposed legislation and regulatory postings. We intend to provide comments through the various postings on the Environmental Registry of Ontario including ones related to the legislative provisions within Bill 23.

However, we must note to the Committee that many members have raised significant concerns citing potential unintended consequences associated with some of the measures in Bill 23.

Examples include:

1. ***Role of Regional Planning*** – the government's intent appears to be to remove duplication in development approvals in a two-tiered scenario. However, the proposed change is much broader and removes the role of regional planning in its entirety within certain upper-tier municipalities. This could result in significant challenges with getting new housing development to market due to misalignment between regional servicing for water and wastewater with local development approvals. There continues to be a role for Regional Planning in managing growth across a Region. This includes identifying both new greenfield growth areas and Strategic Growth Area and aligning transportation, transit, and infrastructure planning with those growth

areas. Removing Regions from the development approval process by maintaining their role in Regional growth planning can ensure that future areas are planned in a coordinated, fiscal, and timely manner.

2. **Third Party Appeals** – the government’s intent appears to seek to remove frivolous appeals that slow down much needed housing development from the process. However, the proposed change would remove appeal rights for legitimate concerns. For example, an entity seeking to increase housing density beyond that in municipally proposed zoning bylaws would not be able to appeal that decision. Appeals to the OLT are a form of public input. Removing that public input from the process is counter to the standards our profession upholds. Our work as land-use planners is in the public interest so removing that avenue of public input runs counter to our ethical standards. We believe there is a better way to improve the appeal process and shorten the timeframe for having appeals heard.
3. **Conservation Authorities (CAs)** – the government’s intent appears to seek to limit the role of CAs to a narrower scope in the approvals process. However, many smaller municipalities with limited staff resources rely on CAs through service agreements to provide natural heritage review of development applications. The loss of this resource may further strain those municipalities’ ability to process applications in a timely manner. We recommend that municipalities be able to continue to delegate to CA’s, through a service agreement, the review and comment on the natural heritage aspects of development applications.

These are just a few of many issues we see with Bill 23; amendments that will have unintended consequences in the near or long term.

Our organization supports the policy objective of building more housing in the Province of Ontario. However, we ask the Committee to provide more time to OPPI and other stakeholders so we can thoroughly analyze the proposed measures and provide our best recommendations to limit any unintended consequence.

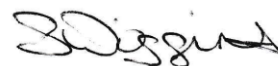
We look forward to continuing to work with the government, members of this committee and all members of the Legislative Assembly of Ontario on this important file.

Please feel free to contact Susan Wiggins at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,



Paul Lowes, M.E.S., MCIP, RPP  
President  
Ontario Professional Planners Institute



Susan Wiggins, CAE, Hon IDC  
Executive Director  
Ontario Professional Planners Institute