

## November 22, 2022 - Special Emergency Guelph Council Meeting

Dear Mayor, Councillors and Staff,

RE: Impacts to Guelph Community: Implications of Bill 109, More Homes for Everyone Act and Bill 23, More Homes Built Faster Act

Where do I begin with all this? Thank you for organizing this opportunity for the community to respond to this important planning and overall new governance topic. It is difficult to put into a few words the troubling notions that the present government has put before you and all of us. I'm reviewing this matter as a planning academic now. I have over a 40-year planning career, 20 of those years working in the Planning Department at the City of Guelph.

The request for comment by the Province is being made without any justification analyses being provided. Simply put, the changes being put forward are part of the current governments' war on so called 'red tape', i.e., things that get in the way of building more. I would urge City Council to 'push back' for the reasons outlined below. Our contrary stance can be tied to the way that Guelphites think a bit differently than others, i.e., how we voted in a different political stripe in the office of our local MPP.

The Provincial Government is pushing forward with a flawed development plan that as best as I can see it has had only one concerned stakeholder at the planning table – the development sector. The proposed changes to our planning system are a rough-shod attempt to dismantle the things we hold dearly as a Guelph community – the protection of our natural heritage features, our drinking water resources, and our cherished cultural heritage elements that define this place as 'special'.

I offer you the following:

- 1) The City has ample development capabilities already in the City; a simple request for information from your planning staff will be able to verify this fact. The Provincial Policy Statement (PPS) that we must abide by requires that municipalities be development-ready ALREADY so I'm unsure of what all the fuss is about by the Province.
- 2) Development in Guelph for the future may be somewhat problematic as the Province wants to double our development rate to grow beyond 200,000 people in the next few decades. This development rate is beyond the capacity of the system to deliver relative to our past historic housing unit development rate trend. From the 2018 Development Charges Watson Background Study, our past average annual unit production rate has been approx. 1000 units per year (2008 – 2018). We as a community – government, developers/builders are expected to ramp this up to over 2000 units annually which is not possible. This is asinine as there is more to life than simply adding more housing development without the requisite components that add to quality of life – like hospitals, schools, recreation facilities, parks, available infrastructure to support growth.
- 3) On the proposed planning system changes to cut so-called red tape, I will focus on the following subpoints that I believe are most relevant to Guelph:
  - a. In the quest to build affordable/attainable housing (new definitions again being set by the Province that are different from past definitions), all matters of consideration for climate change impacts are being sacrificed in order to provide a cheap, quick housing form. Matters of municipal innovation as permitted by the PPS are to be 'stamped up' as they get in the way of the current governments' maniacal quest for housing quantity over quality. <https://www.thestar.com/news/gta/2022/11/01/doug-fords-new-housing-bill-guts-green-building-law-he-voted-for-as-toronto-councillor-say-critics.html>

- b. The City's planning efforts are being undermined on the environmental front in many ways. Watershed planning (that Guelph has been on the forefront in many of the sub-watershed plans it has completed over the past 50 years) is to be done away with. The requirements for environmental impacts studies are to be diminished substantially and the Conservation Authority's role in providing expertise/guidance in this area and the identification of natural heritage features is to be done away with. <https://ontarionature.org/bill-23-what-you-need-to-know-blog/>
- c. The recognition of the significance of cultural heritage assets in Guelph are to be curtailed as they get in the way of building cheap new buildings. The City needs to alter its processes and efforts. <https://www.guelphtoday.com/local-news/heritage-designation-sought-for-albion-hotel-3-other-properties-6080005> The creation of faceless-placeless communities by way of not recognizing the uniqueness of special places such as Guelph will follow by the Provinces' actions. Is this what we want?

The government is centralizing further planning 'power' into Queen's Park with a one size-fits all mentality to plan for more housing everywhere. They are diminishing watershed/natural heritage system planning efforts (at a time with increasing biodiversity loss and climate change impacts). The proposals seem to fit a planning regime that was in vogue back in the 1990s – for those that remember that time, i.e., 1994 PPS. The proposals being put forward include significant local revenue source cuts for new housing development (DCs, parkland dedication) and these costs will need to be added onto the backs of local taxpayers. While the Province mandates "we must provide new housing", they do not mandate how the additional costs of growth will be picked up by that senior level of government; hence, local taxpayers will suffer a diminished quality of life, i.e., access and availability of services (hospitals, schools, parks, hard/soft infrastructure); additional congestion and crime; poorer environmental conditions; higher property taxes). This does not appear to be a winning planning strategy to build a sustainable, resilient, happy community. Does it? One final note, this government cannot be trusted, i.e., the current government has broken a promise 'not to touch' the Greenbelt.

<https://www.cbc.ca/news/canada/toronto/ontario-just-got-14-000-hectares-of-land-to-develop-so-why-does-doug-ford-want-the-greenbelt-too-1.6647857>

In conclusion, the Provinces' plan for more houses everywhere is a bad plan. Their mantra of 'tall and sprawl' and 'building more housing endlessly' will come back to haunt us all. In addition, the Province is formulating more and more rules for you, mayor and councillors, to serve as trustees to provincial dictates.

I'm sorry I will not be able to join you in your important discussions on Tues. I'm pre-occupied at the moment in helping my wife as she/we queue-up for health care service at our over-stretched hospital. Also, for your reading pleasure I have added some additional links (on the next page) to other well - known organizations that have damning indictments of the proposed actions by the government.

Best Regards as we live in interesting times,

ORIGINAL SIGNED

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**Stakeholders other than developers expressing concerns with government proposals (only a sampling):**

**AMO**

<https://www.amo.on.ca/advocacy/health-human-services/amo-submission-bill-23-more-homes-built-faster-act-2022>

<https://www.amo.on.ca/advocacy/health-human-services/unpacking-bill-23-more-homes-built-faster-act-2022>

**Agriculture (including Ontario Federation of Agriculture)**

<https://www.farms.com/ag-industry-news/ofa-president-discusses-potential-greenbelt-development-778.aspx>

<https://ontariofarmlandtrust.ca/2022/11/10/bill-23/>

**Planners (Victor Doyle, Kevin Eby)**

<https://thepointer.com/article/2022-11-12/doug-ford-s-more-homes-built-faster-act-is-a-trojan-horse>

<https://www.cbc.ca/listen/live-radio/1-104-the-morning-edition-k-w/clip/15948572-former-urban-planner-mystified-province-opening-greenbelt-development>

**Conservation/Environmental Agencies**

<https://conservationontario.ca/policy-priorities/planning-and-regulations>

<https://cela.ca/reviewing-bill-23-more-homes-built-faster-act-2022/>

<https://npca.ca/newsroom/article/npca-comments-environmental-registry-of-ontario-postings-019-6160-019-2927-019-6141-and-019-6161>

<https://www.rvca.ca/media-releases/bill-23-less-protection-more-cost-diminished-local-decision-making>

**General**

<https://www.theglobeandmail.com/opinion/editorials/article-ontarios-greenbelt-is-supposed-to-be-a-protected-legacy-not-a-reserve/>

<https://www.therecord.com/news/waterloo-region/2022/11/08/regional-councillors-voice-concerns-about-doug-fords-new-housing-bill.html>

<https://www.thestar.com/opinion/editorials/2022/11/09/greenbelt02.html>

<https://www.thestar.com/opinion/contributors/2022/11/10/doug-fords-housing-bill-is-short-sighted-and-will-undermine-long-term-prosperity.html>

<https://thenarwhal.ca/ford-ontario-greenbelt-cuts-developers/>