

November 30, 2022

**Hon. Steve Clark**  
**Ontario Ministry of Municipal Affairs and Housing**  
**777 Bay Street, 17<sup>th</sup> Floor**  
**Toronto, ON M7A 2J3**  
**Via Email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)**

**Re: Bill 23, More Homes Built Faster Act**

Dear Minister Clark,

Town of Orangeville acknowledges Bill 23, titled the More Homes Built Faster Act, 2022 is part of a long-term strategy to provide attainable housing options for families across Ontario. We at the Town understand that Bill 23 is focused on the provincial government's stated goal of having 1.5 million homes built over the next 10 years and aims to do so by reducing bureaucratic costs and delays in construction. While the Province's goals to resolve the housing crisis in the next decade is ambitious and necessary, it could potentially have unintended long-term financial and planning related consequences on municipalities, such as the Town of Orangeville.

On behalf of the Town of Orangeville Council, I put forward a list of concerns of potential unintended consequences arising from Bill 23:

1. Bill 23 could have a direct impact on the state of good repair mandate rolled out by the province in their recent legislation, O.Reg. 588/17. If growth is no longer paying for growth, that means **we may have to reallocate some of our lifecycle asset management dollars**, as required by the same legislation, towards growth related infrastructure.
2. Although we support the overarching message and intention of Bill 23 as it relates to housing affordability, we do question whether **overall quality of life and affordability of our citizens would be severely impacted due to higher taxes** and user fees. The Town of Orangeville has limited cost-recovery avenues, meaning Bill 23 may require cost-recovery within the recent Asset Management plan, resulting in a more significant infrastructure funding gap. This situation will be further exasperated if specific provisions of Bill 23 dilute our ability to cover infrastructure improvements through Development Charges.
3. Town of Orangeville is a fast-growing community with a comprehensive economic outlook for Industrial and Commercial developments. This could be compromised if we find ourselves having to **levy higher development charges for industrial, commercial and institutional (ICI) developments to mitigate loss of Residential Development Charges**.

4. Under the current climate of impending global inflation, the Town is already struggling to keep its service levels affordable. Without any direct financial incentive from the province such as interest-free loans from Infrastructure Ontario, **we will lose our ability to build capacity for growth in service areas like Water and Wastewater.**
5. Improving residential development efficiencies and costs by limiting the role and scope of Conservation Authorities (CA) in the planning approval process is unclear. Like many municipalities, Orangeville relies on Conservation Authority support to provide guidance on natural hazard avoidance and ecological protection to ensure that the provincial policy framework around these issues is upheld in our planning decisions. **If CAs are removed from this advisory role, we must find alternative means in assuring such policies remain adhered-to.** It is unclear how this would improve approval timing efficiencies or save costs to residential developments. It could inevitably shoulder more costs to development in subsidizing municipal costs and/or consultant peer review support.
6. Orangeville supports the province's objectives of lowering costs and improving efficiency for residential development to deliver more housing to Ontarians; However, like many municipalities, our challenges for facilitating more housing within our community are not simply costs and process inefficiencies for developments. Instead, we are challenged by our limited municipal land availability and servicing capacity constraints. We ask that the province **explore actionable measures and tangible resource deployment to support our efforts to increase our land supply and infrastructure servicing capacity.**

According to the Association of Municipalities of Ontario's (AMO) recent submission to the Steering Committee of Bill 23, it states "The province has offered no evidence that the radical elements of the bill will improve housing affordability. It is more likely that the bill will enhance the profitability of the development industry at the expense of taxpayers and the natural environment." As the frontline level of government, municipalities are also eager to resolve the housing crisis and are the most informed on what is needed to create complete communities that Ontarians want and expect. We ask that the province view us as one of the strategic partners in further refining the More Homes Built Faster Act, and open more robust channels of communication and consultation.

Sincerely,



Lisa Post  
Mayor

CC Doug Ford, Premier of Ontario  
The Honourable Michael Parsa, Associate Minister of Housing  
The Honourable Sylvia Jones, Dufferin-Caledon Member of Provincial Parliament  
Association of Municipalities of Ontario (AMO)  
All Ontario Municipalities