



Waterloo Region Nature
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Sent via e-mail

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Re: Bill 23

Dear Mr. Harris, Mrs. Dixon, Mr. Riddell, Mrs. Lindo, and Mrs. Fife,

I am writing to you on behalf of Waterloo Region Nature. Waterloo Region Nature is a naturalist club from the Region of Waterloo and a charity engaged in conservation activities. One of our goals is to promote public interest in nature and the preservation of ecosystems by supporting the enactment of sensible legislation. We have 300 members throughout the Region of Waterloo, and are affiliated with Ontario Nature, an organization with 30,000 members within its Nature Network.

We would like to express our serious concern with respect to Bill 23, the More Homes Built Faster Act. We agree that there is a need for affordable housing in Ontario, but believe that this growth must be done in a way that meets the needs of our community while maintaining prosperity for future generations.

Bill 23's attempt to address the current housing problem by promoting growth at any cost, seriously undermines the health and safety of future generations. It is our opinion that several

parts of Bill 23 will be counterproductive and have unintended consequences for Ontarians. If changes are not made to Bill 23 it should not pass third reading.

As a club we have many concerns. We agree with many of the opinions already expressed by organizations such as [Conservation Halton](#), [50x30WR](#), and [Conservation Ontario](#). We would like to emphasize that our main concerns are as follows.

1. **We are disappointed that this legislation has not been given the time it deserves to be properly reviewed by Ontarians.** It is a huge bill (277 pages), with sweeping changes to multiple acts and regulations in Ontario. It cannot be properly reviewed, let alone discussed, in the time-frame proposed by the government. In the interest of democracy, *we ask that more time be provided so that Ontarians can review this legislation and comment on its merits.*
2. **The requirement for developers to conserve green space and create natural elements has been eroded.** Our members deeply appreciate the great beauty and enrichment that natural amenities and greenspaces bring to our community. Natural infrastructure improves property values, reduces urban heat island effects, improves air quality, creates healthy places for our children to play, protects our homes from flooding, and so much more.

Bill 23 reduces the requirements for developers to provide such amenities, robbing these communities of elements that make them want to live there in the first place. This is not the type of development we wish to see in Ontario, we ask that these amenities be protected in Bill 23 as integral parts of a healthy community.

3. **Natural heritage features owned by Conservation Authorities are precious and deserve to be protected.** The proposed changes to the Conservation Authorities act are especially troubling to us.

Our club and many of our members have donated land to Conservation Authorities with the express intent that it be protected as nature reserves in perpetuity. Under these new laws, the land we donated could potentially be sold to developers.

This is unacceptable and violates the intent behind our donations. It is hard to express our outrage politely. Justifying this action by creating undefined 'offsets' is not a fair trade. *The few remaining natural heritage features protected by conservation authorities are irreplaceable.*

4. **Removing conservation authorities' ability to protect our community from floods and pollution by preserving habitats is a direct attack on our communities future health and safety.** Taking away the ability of Conservation Authorities to enact effective conservation policies in order to promote sprawl serves no good purpose in Ontario. We can meet the need for housing with the land that is already designated for development.

The 2022 Report of the Ontario Housing Affordability Task Force states clearly that shortage of land is not the problem. The land we need to support housing for Ontarians is already available, both inside the existing built-up areas and on undeveloped land outside greenbelts. At a time when extreme weather events are becoming more frequent, we need Conservation Authorities to protect people and property from these natural events. Conservation Authorities have a wealth of experience and expertise balancing current and future needs. We need to make decisions that will strengthen our communities, protect our future prosperity, and safeguard our health and property. *At the least, Conservation Authorities should not be prevented from entering into memorandums of understandings with municipalities for their services, if this cannot be accommodated, we would ask that proposed changes to the Conservation Authorities Act be removed from Bill 23.*

- 5. The Bill, as written, promotes urban sprawl. Waterloo Region has clearly stated that it wants to protect rural land and natural spaces from this type of development.** We are proud of our community's commitment to limiting urban sprawl into agricultural lands, wetlands and forests. We value these spaces for the natural functions they provide our community, and we wish to preserve them. The amendments this Bill makes to section 23 of the Planning Act would allow the government to impose sprawl on our community, destroying the flood regulation, carbon sequestration, erosion control and ecological integrity these spaces provide. *We ask that the Bill be amended to respect a community's ability to limit sprawl.*

We ask that you please consider our requests. This legislation is being pushed through without proper consideration of the impact it will have on people and nature. It erodes the ability of Conservation Authorities to protect our communities. We call on this government to engage with Ontarians to find more effective ways to create affordable housing in Ontario.

Sincerely,

Levi Moore
Conservation Director,
Waterloo Region Nature