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The Annex and Harbord Village Residents' Associations have analyzed the Province's recently announced changes to planning and heritage. If you share our concerns, please circulate and submit comments to the website at the end of this document.

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The Province's Big Lie

Bill 23, the Provincial government's promise to build 1.5 million homes by 2031 is nothing short of an early Christmas gift to developers.

There's no guarantee homes will be built, nothing to ensure they will be affordable and there's no help for renters.

Here's what Doug Ford delivered on his pre-Christmas sleigh to his developer buddies:

- right to evict existing tenants with no obligation to take them back
- rights to demolish buildings that are listed heritage unless the city designates them
- the sole right to appeal planning decisions
- relief from $200 million in city charges that ensure new residents will have basics like sewer and water and providing parkspace
- a pass on making their new buildings energy efficient so Toronto won't meet its climate change emergency targets.

The province has even expanded the boundaries of some cities to allow for building and given a green light to pave over parts of the Green Belt the size of the City of Guelph.

Little wonder radio ads from the development industry are exultant. In return for this grab bag of blessings, developers are not required to deliver on anything.

They now say they will start building to serve newcomers and give people hope. Which newcomers and what hope? Without built-in social services and communities to support the adjustment to Canadian life, this bill looks to promote a ghetto in the sprawl, serving only prosperous Canadians and rich immigrants who can afford their own transportation.

It's scattershot legislation designed to rid the development industry of their perception of price penalties, land frustrations, meddling neighbours, and interfering bureaucrats.

Toronto needs 40,00 rental units, 18,000 deeply affordable units, and 4,000 affordable ownership houses in the next seven years. Last year, it built 17,000. In the first six months of 2022, 1,436 units of rental housing were started.

Where is the requirement that any of the proposed housing be the rental, affordable, and deeply affordable housing needed to get residents off urban streets, and students, low-income tenants, those on fixed incomes and newcomers into units they might be able to afford?

The 2021 census showed 48.1% of the population of Toronto are renters, hanging on in a city where average rents have increased 27% in the last year according to Bullpen Research. A CBC home financial columnist tells her clients the income now needed to afford the average $2,474 rent on 1-bedroom units in the open market in Toronto would be more than $120,000. For cheaper accommodation, as of Nov. 6 the Rentals.ca website listed just 15 units available between Dufferin Grove and Leslieville under $1,500 and one at 230 square feet for $1,475.

Until now, Toronto by-laws guaranteed tenants displaced by development a subsidy from landlords during construction, and the right

of return to the new building at the same square footage and at their original rent. A few days ago, the minister removed similar protections from the Ottawa official plan to allow developers to evict and leave tenants to the mercies of the overheated rental market. Toronto will not be far behind.

There are 130 tenants who will be displaced if the 145 St. George development is approved, who would be hard pressed to remain in Toronto, let alone return home once the new building is complete. This means Bill 23 will almost certainly reduce the lower income renter population—at least in the parts of the City of interest to developers. We will lose our residents. They will lose their homes, their communities and us.

The bill further diminishes the capacity to create affordable rental in new buildings even though cities can pass by-laws to create such housing. The changes in the City cannot require more than 5% of affordable units in those areas. By comparison, the Mirvish Village development, which has become the poster child of progressive city building, has set aside 40% of its 916 units as affordable, with contributions from the developer and Canadian Mortgage and Housing Corporation (CMHC).

The bill also acts on the chronic but unproved complaint that zoning appeals have stood in the way of development. This, when Ontario Land Tribunal reports its caseload down 50% in the last four years, and a minority launched by individuals.

Where is the justification for taking away all rights for the members of the public or interest groups to appeal when there are tens of thousands of units ready to be built. Between 2016 and 2020, 140,848 residential units were approved but only 76,513 built—a completion rate of 54%. Close to 600 units between 316 Bloor St. West and the Just Desserts site at 306-326 Davenport are stalled. Three years later, the existing house form building at Just Desserts has been demolished and replaced by a

surface parking lot. Are developers banking permissions, playing the market for better gains?

The province puts up not a dime to build the housing it says it wants. Instead, it has put existing Toronto taxpayers on the hook for $200 million in lost revenue—fees charged on developments to pay for necessary upgrades to provide vital services like subways, water and sewage services for the new residents. Likewise, parks and other infrastructure for benefit of new and existing residents are now up to local taxpayers to finance. The only added rental in the amalgamated cities of Toronto from Bill 23 will be in scattered basement units and granny suites—and those will be up to individual property owners to finance.

Finally, 3,973 buildings in Toronto have been given heritage listing status, which protects buildings from demolition for 90 days to allow time for Heritage Preservation Services to decide whether a time-consuming and exhaustive full heritage designation is warranted. Under new rules, unless the City designates, present listings would expire in two years and the affected property would be exempt from heritage consideration for the next five years.

This bombshell of changes to planning and heritage was brought down without any hint or signal to the provincial electorate who voted only five months ago; it was introduced the day after a municipal election where these ideas would have been the hot debate, and at a time when new councillors were still trying to find their new offices.

It is an avalanche of random change, incoherent, seemingly vengeful, autocratic, tailor-made for a single sector, that does piecemeal violence to the coherent city plans that have emerged after years of consultation and rips asunder the democratic process.

We all agree sensibly priced housing of all kinds is an urgent need.

Our priorities are simple:

We need to

- plan our cities in considered ways
- protect our most vulnerable

The province needs to put money in the game and build the rental housing we need now, and embark on a full-scale public consultation process before Bill 23 becomes law.

Should you wish to write your concerns, the legislative committee is accepting letters until Nov. 17. Follow the procedures here: https://www.ola.org/en/apply-committees