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November 16, 2022

Standing Committee on Heritage, Infrastructure and Cultural Policy
Government of Ontario
Whitney Block
Room 1405
99 Wellesley Street W
Toronto, ON M7A 1A2

Dear Committee Members:

Ontario Bill 23 - More Homes Built Faster Act, 2022

I am writing to you on behalf of the Willow Beach Field Naturalists. Founded in 1953 under the auspices of the Ontario Field Naturalists, WBFN is a club that brings citizens in Northumberland County together to explore, enjoy, and learn more about the County's diverse natural environment, and to encourage its preservation. We have also worked with local government in their conservation planning activities, including in the development of the Natural Heritage System for the County of Northumberland, which has been incorporated in its Official Plan, and which will inform the development of updated Official Plans for municipalities in this County. This system is intended to preserve and enhance our natural environment and is the result of extensive public consultation over the past few years.

We are deeply concerned by the numerous and complex changes to the Province's land development planning processes contained in Bill 23, and related actions such as *the Proposed Updates to the Ontario Wetlands Evaluation System*. We will not list all of them, the following are of particular concern:

- restrictions to the important role of Conservation Authorities,
- weakening of protections for wetlands,
- changes to the Provincial Policy Statement that weaken protections to provincially-significant natural heritage features,
- disengagement of municipalities and citizens from decision making on land use, and
- the removal of protections to lands within the Oak Ridges Moraine.

We recognize the need to improve access to housing, particularly to enable properly-serviced, higher-density housing in urban areas. This cannot be done at the expense of what little remains of the natural environment, or of standards for Green Buildings and energy efficiency. It is particularly a challenge in Southern Ontario, which in pre-settlement times supported the highest level of biodiversity in Canada, and where the population pressures are greatest, but now has an unacceptably low amount of protected land according to Ontario's own biodiversity targets, as well as national and international targets. The approach outlined in Bill 23 would dramatically and possibly permanently worsen this situation. The Province of Ontario has not presented evidence to demonstrate that such a wholesale repudiation of the evidence-based science that supports existing land conservation policy is necessary.

The following proposed changes are deeply concerning to us.

Restrictions to the authorities of Conservation Authorities (CAs)

WBFN has worked closely with our local CA on projects ranging from natural area assessments to higher-level education. The impacts of Bill 23 will be devastating, as CAs will no longer be able to provide comments on applications under the Planning Act (except for flooding and erosion hazards). This will eliminate their ability to provide advice to municipal partners on matters such as natural heritage, groundwater, stormwater management, etc. Specifically, the following should be repealed:

- Removal of the power of conservation authorities (CAs) to regulate or prohibit development that negatively impacts wetlands, rivers or streams;
- Prohibition of CAs from entering into agreements with municipalities to provide expert review of planning applications;
- Limits to CAs right to appeal land use planning decisions;
- Requirements for CAs to identify conservation authority-owned or controlled lands that could support housing development for sale - without public consultation.

Weakening of protection for wetlands

Proposed Updates to the Ontario Wetlands Evaluation System calls for a major overhaul of the Ontario Wetland Evaluation System, removing recognized wetland complexes. If approved, this will ensure that very few wetlands will be deemed Provincially Significant in the future; furthermore, many, if not most, existing Provincially Significant Wetlands will be vulnerable to losing that designation, leaving them open to destruction. This is hugely significant, and in our County would impact severely on the ecological connections between the Oak Ridges Moraine and the shoreline of Lake Ontario. This would have a serious negative impact on biodiversity, since these areas provide habitat for a large number of species including invertebrates, fish, amphibians, reptiles and birds. This policy change will, without any exaggeration, contribute to the decline of natural species and is a backward step in meeting our biodiversity goals. It should be repealed.

Changes to the Provincial Policy Statement (PPS) that weaken protections to provincially-significant natural heritage features

We are reliant on the PPS to provide protection to significant natural heritage features (such as Significant Woodlands) that are described in official natural heritage systems. It also protects farmland. Bill 23 will replace the PPS with a new planning policy instrument that would remove protection and/or streamline existing policies to facilitate development. It will also create a natural heritage offsetting policy where existing natural areas can be sacrificed on the premise that they can be recreated or

restored elsewhere. This greatly underestimates the time, complexity and difficulty to recreate natural habitat that truly supports survival and breeding, and will fail to balance its loss. This new policy should be reviewed for its impact on the natural environment. We are also greatly concerned about the continued erosion of the protections that should be provided under the Species at Risk Act.

Disengagement of municipalities and citizens from decision making on land use

Bill 23 will negatively impact people from being able to engage in decision making, including:

- Removal of requirements regarding public meetings on certain planning matters;
- Removal of appeal rights for planning decisions (e.g. Official Plans, zoning by-laws, minor variances);
- Elimination of the role of seven regional municipalities (Simcoe, Durham, Halton, Peel, Niagara, Waterloo and York) in planning matters, thereby compromising coordinated efforts to protect farmland and natural areas, determine optimal locations for development and infrastructure, and efficiently deliver municipal services; and
- Disengagement of the Conservation Authorities as described above will choke off their considerable knowledge and experience from planning and approvals.

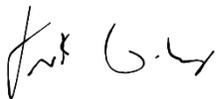
The removal of protections to lands within the Oak Ridges Moraine

We are concerned that the new “Supporting Growth and Housing in York and Durham Regions Act, 2022”, which would be created by Bill 23, aims to facilitate York Region’s boundary expansion by forcing a massive sewage tunnel through the Greenbelt and the sensitive Oak Ridges Moraine. This law would exempt the project from many features of an Environmental Assessment, and even from the Environmental Bill of Rights.

We feel that a full assessment of the impact of Bill 23 and related policy changes on the environment, climate change and biodiversity must be undertaken.

The WBFN asks the Committee to provide the public and agencies with more time to consider these very significant changes to our land development planning system, and to ensure that well-conceived policy changes that facilitate necessary and appropriate residential housing growth are developed that do not negatively impact nature. We fear that the proposed changes, in combination with related policy changes that, among other things, will remove lands from the Greenbelt protection areas, will lead to rapid urban sprawl and the irreversible loss of critical natural heritage lands throughout Southern Ontario. Bill 23 as it stands dismantles 70 years of environmental policy development by multiple governments, and will have an enormous negative impact with respect to biodiversity and climate change.

Yours very truly,



Frank Godfrey, President, Willow Beach Field Naturalists

Cc: Hon. David Piccini, Minister MECP and MPP Northumberland - Peterborough South