



December 15, 2022

The Honourable Doug Ford, Premier of Ontario
Premier's Office
Room 281
Legislative Building, Queen's Park
Toronto ON M7A 1A1

Re: Bill 23, the More Homes Built Faster Act

Dear Premier Ford,

On behalf of the Ontario Council of the Canadian Federation of University Women (CFUW), a voluntary, self-funded, non-partisan organization with over 96 clubs across Canada and 5,000 members in the province of Ontario, I ask you to reconsider the **More Homes Built Faster Act** (Bill 23). This bill will not only damage fragile and irreplaceable ecosystems, but will also negatively impact those who need affordable housing, vulnerable women and children in particular.

The environment and climate change have long been national concerns of CFUW. As advocates for the preservation and stewardship of the environment, we believe that Ontario's critically important farmlands and wetlands are at risk and that the voice of conservation authorities is being disregarded.

Failing to acknowledge the importance of biodiversity and of wetlands indicates a lack of scientific understanding. The farmlands under threat include specialty crop areas, home to microclimates that cannot be replicated elsewhere. Such land is vital to our future food security, and irreplaceable. Complex wetlands are not separate entities, as defined by Bill 23, but are ecologically linked, naturally moderating flood surges and facilitating wildlife movement between adjacent habitats. They also serve as carbon sinks, soaking up greenhouse gas emissions. Bill 23 drastically limits the power of conservation authorities to prohibit land speculators from destroying these vital ecosystems within their jurisdiction.

Many of Ontario's rarest and most at-risk natural species are to be found on the outskirts of our cities, where the pressure to create commercial and residential sprawl is greatest. If this bill passes, conservation authorities no longer have the right to refuse building permits based on "pollution or the conservation of land" and the Minister is not required to consider those matters in appeals. We see this policy as draconian and short-sighted.

Numerous environmental groups, municipal governments, local community associations, and Indigenous groups are alarmed by the negative implications of Bill 23. Affordable housing advocates agree that passing this bill would not mitigate the housing and homelessness emergency, but would exacerbate it by reducing inclusionary zoning. Rather than developing walk-able residential neighborhoods served by public transportation within urban boundaries, Bill 23 encourages the construction of larger, more isolated and car-dependent housing units that would not be accessible financially to those at risk, many of whom are women.

Sprawling cities inevitably increase the toxic transportation emissions that impact climate change and human health. The Canadian Association of Physicians for the Environment (CAPE) provides scientific data to demonstrate the extensive detriment to citizens who must bear the brunt of health care and private transportation costs. Moreover, if urban sprawl is further encouraged, the ability of municipalities to meet their greenhouse gas emission targets will be in jeopardy.

The legislation proposed in the ***More Homes Built Faster Act*** cannot solve the housing affordability crisis. It will benefit only the real estate development industry, at the expense of the environment, of local democracy, and the most vulnerable among us.

This year, both CFUW and the UN adopted a Resolution recognizing that *A Clean, Healthy & Sustainable Environment is a Human Right*. In the light of this declaration, please will you rescind Bill 23?

Sincerely,

Teresa A. Habs

[Teresa A. Habs \(Dec 14, 2022 09:42 EST\)](#)

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c.c. Hon. Steve Clark, Minister of Municipal Affairs and Housing

