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**Sent:** Tuesday, January 24, 2023 8:00 PM

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**Cc:**

**Subject:** Coming Up Short: A Submission Re: Bill 23 (Special Council Meeting, January 30, 2023)

Dear Councillors:

I have no doubt that you have received more samples and examples than you need or want of internal, external, and interminable opinions, reports, backgrounders, foregrounders, screeds and screeches from provincial and municipal officials, special and sometimes not-too-special interest groups, pressure groups, influencers, aspirant influencers, chronic complainers and frustrated loners with too much time on their hands ... as well as profit-seekers and community sustainers, developers and social planners, builders and environmentalists, investors and residents, consultants, experts, and both subtle and not-so-subtle political operatives (right, left, certifiably "extremist," and the clinically *dead* centrists) on behalf of political parties and factions, non-governmental organizations, and various nests of sycophants, fraudsters, and the eternally "usual suspects" in, around, and on the periphery of local and provincial politics). It must be exhausting.

I nonetheless wish to add this little article to the pile in your virtual in-tray and highly commend it to your attention.

It is succinct yet comprehensive, accessible but not patronizing, and (in my not-so-humble opinion) just about as accurate an assessment of *Bill 23* as is likely to be made available in the next few days, months and years.

My only complaint is with the "rhetorical question" posing as a title. The answer is too intuitively obvious; it is a monstrous, monotonal, monosyllabic "YES!" ... perhaps only to be followed by the sardonic inquiry: "Why would anyone expect any different from the currently governing party at Queen's Park which derives its almost uncontested, unfettered power, and dubious legitimacy from the consent of about 17% of the governed.

## Has Ontario's housing 'plan' been built on a foundation of evidentiary sand?

By Mark Winfield (with Joe Castrilli, Counsel with the Canadian Environmental Law Association)

*The Conversation* - January 22, 2023

Mark Winfield is a Professor of Environmental and Urban Change, York University, in Toronto.

In late 2022, the Ontario government adopted [Bill 23](#), the *More Homes Built Faster Act*. The legislation made [sweeping changes](#) to the province's land use planning system.

The province also passed [Bill 39 — Better Municipal Governance Act, 2022](#) — which allows the mayors of Toronto and Ottawa to pass [bylaws related to provincial "priorities" like housing](#) with only a third of the support of their councils.

Premier Doug Ford's government justified the adoption of this sweeping housing legislation, as well as the opening of parts of [Ontario's Greenbelt](#) for development, on the basis of the need to address "the housing supply crisis."

Specifically, the [province pointed](#) to a [February 2022 provincial housing affordability task force report](#), which said that Ontario needed to build 1.5 million homes over the next decade to address the shortage of housing.

The task force report provided the foundation for shredding of much of the province's land-use planning and local governance structures, all in favour of development interests. But there has been very little [serious examination](#) of how the task force arrived at the 1.5 million homes figure.

### **A report that doesn't add up**

The provincial housing task force report stated that Ontario was 1.2 million houses short of the G7 average and needed to build 1.5 million new homes over the next 10 years. This would imply building 150,000 new dwellings per year.

In order to reach this conclusion, the task force report claimed that Canada has the lowest number of houses per 1,000 people of any G7 nation. However, [it has been observed](#) that the number of dwellings per 1,000 people is not a very useful comparison because people live in households.

In Ontario, because the average household size is [2.58 people per household](#), 1,000 people would only require 388 housing units, whereas in [Germany](#), for example, 1,000 people would require 507 dwelling units because of an average household size of only 1.97.

[It has also been suggested](#) that the task force report was over-aggressive in calling for 150,000 new dwellings per year.

Ontario's population grew by an average of [155,090 per year from 2016 to 2021](#). Applying the Ontario average household size to this population growth rate reveals that the need for housing is roughly 60,000 new households per year, not 150,000.

The construction of 60,000 houses [is actually lower](#) than the 79,000 housing starts Ontario averaged per year between 2016 and 2021.

What's more, [Ontario's population](#) grew by 10.7 per cent from 2011 to 2021, while the number of occupied dwellings grew by 12.5 per cent. This means that the number of dwellings has actually been growing faster than the population.

### Unnecessary Greenbelt developments

Ontario's construction industry is already [working at capacity](#). Toronto is reported as having the [largest number](#) of active construction cranes in North America and [has recorded high](#) numbers of condominium completions.

With respect to the supply of land — which was a key justification for the government's decision to remove lands from the Greenbelt — [the task force report itself confirmed](#) that there is plenty of land available in existing urban areas. This includes at least 250,000 new homes and apartments that were approved in 2019 or earlier but [have not yet been built](#).

Research undertaken for the environmental organization Environmental Defence revealed that the Greater Toronto and Hamilton Areas have [88,000 acres](#) of already designated new (or greenfield or undeveloped) development lands within existing settlement area boundaries.

That is more than three times the amount of greenfield land (26,000 acres) used for development over the preceding two decades.

### **Building a sustainable and liveable province**

All of this evidence suggests that there was neither a shortage of already authorized housing starts to accommodate Ontario's growing population, nor a shortage of already designated land on which to build homes.

Simply put, the province's sweeping housing strategy has been built on a foundation of sand.

The reality is that the region is already in the midst of a [major development boom](#). The problem is that it has been a boom that has done little to [improve housing affordability](#), particularly for those at the lower end of the income scale who need it the most.

The housing "crisis" has had less to do with housing supply, and far more to do with the nature and location of what is being built.

The [draconian measures](#) in Bills 23 and 39, and the province's accompanying moves to remove lands from the Greenbelt and allow development in the [Duffins-Rouge Agricultural Reserve](#), seem likely to make these problems worse than ever.

The [regressive changes](#) being made under the province's housing legislation will accelerate urban sprawl and the accompanying losses of prime agricultural and natural heritage lands.

They would undermine efforts to build and protect real affordable housing and liveable communities, respond to a [changing climate](#) and ensure democratic governance at the local level.

The questions of housing and development in the Greater Toronto Area are far more [complicated](#) than a need to simply build more and faster.

Increased federal immigration targets put [additional stress](#) on the housing market. But if anything, that reinforces the need for a vision for a sustainable, liveable and affordable region and not one focused on maximizing the development industry's returns on investment.

The debates prompted by the Ford government's housing strategy may mark the beginning of a conversation about what that future might look like. They cannot be its end.