

**Submission to the Standing Committee on
Heritage, Infrastructure and Cultural Policy
Re: Bill 23 – More Homes Built Faster Act, 2022**

**Prepared by the
Canadian Association of Physicians for the Environment
Ontario Regional Committee
PO BOX 19008 Walmer,
Toronto ON M5S 3C9**

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Summary

Bill 23 is not in the interest of Ontario or Ontarians. It contains the potential to unleash incalculable health harms starting immediately and to be entrenched for generations to come. Bill 23 will harm not only human health, but the health of our environment, our economy and our democracy. The Bill will worsen fundamental social determinants of health including housing and food security, while escalating deadly air pollution and the climate crisis which represents the single greatest human health crisis today. Bill 23 threatens Conservation Authorities, Municipalities and their Green Standards, the world's largest protected Greenbelt, farmland, and public/expert consultations. Resulting massive economic and insurance burdens will fall to taxpayers. The active suppression of public participation in climate decision-making by Bill 23 may contravene Article 12 of the Paris Agreement [1]

CAPE Ontario urges the Government of Ontario to fulfill its mandate to serve the well-being of Ontarians by ensuring this Bill does not proceed to implementation. We recommend sustainable and equitable development avoiding sprawl, respecting Municipal Green Standards, coordinated by experienced urban planners. Detailed plans have already been completed by such urban planners working with other appropriate experts in many municipalities. These should be implemented as ready solutions to achieve the thriving future we can still achieve if good governance is exercised. There has never been more at stake as the ways in which we use our land, move, eat and live over just the next few years will determine our chances of a healthy livable future for all.

The Canadian Association of Physicians for the Environment, Ontario Regional Committee (CAPE-ON) presents this submission with regards to Bill 23, the More Homes Built Faster Act. CAPE is a non-partisan, non-profit physician based organization advocating on the understanding that environmental health directly impacts human health and must be a priority in all policy decisions.

Judicious land use planning is increasingly essential to public health, the economy, housing supply and affordability, equity, food security and the escalating climate crisis. As the world convenes at COP27 to address our dire planetary situation, the UN Intergovernmental Panel on Climate Change stated this year “The scientific evidence is unequivocal: climate change is a threat to human wellbeing and the health of the planet. Any further delay in concerted global action will miss a brief and rapidly closing window to secure a liveable future.” [2, p.1]

Sustainable urban planning accommodates population growth models by optimizing densification while avoiding sprawl and enforcing evidence-based greenhouse gas emissions targets to mitigate adverse environmental impacts. This produces many significant health and economic co-benefits. In Ontario, the Conservation Authorities, protected Greenbelt land, Municipal Green Standards and public/expert consultations and oversights all play a critical role in achieving sustainability. These are now all threatened by Bill 23 which poses serious risks to the health of Ontarians associated with massive environmental, and economic harms. The Bill also poses deep concerns in eroding the health of Ontario’s democratic process.

A multitude of far-reaching negative impacts will arise from this Bill including the following health impacts:

(1) Bill 23 will create a smaller supply (only 50,000 of the 1.5 million units promised during the 2022 provincial election campaign) of larger sized, more expensive and more isolated housing units by promoting suburban sprawl, as compared to sustainably planned densification within existing urban boundaries.

- This will worsen the current crises of both housing supply and affordability, deepening social inequity.
- Inequity will be further worsened by eliminating the requirement for rental unit replacement, stripping municipalities' inclusionary zoning powers (IZ) while cutting the percentage of affordable housing mandated in new developments and the duration of time they remain affordable units before assuming market value, as well as multiple other mechanisms in the Bill.
- Access to housing is an essential social determinant of health: "The impact of housing on health is now being widely considered by policy makers. Housing is one of the best-researched social determinants of health, and selected housing interventions for low-income people have been found to improve health outcomes and decrease health care costs...many health care systems, payers, and government entities are seeking to better understand ... health and housing literature to determine where they might intervene effectively." [3, p.1]. Has this government considered the public health and cost impacts in this context?

- Fossil fuel use will be amplified with proposed sprawl housing compared with planned sustainable densification both by increased transportation needs as noted below and heating/cooling the larger and isolated homes. Transportation and the built infrastructure represent two of the highest sources of fossil fuel emissions in Ontario. Both are escalated with sprawl development. Resultant health impacts are explored below.
- Many powerful combined health, environmental and economic solutions will be made impossible by sprawl development including low emissions public transit, healthy active transport (walking, cycling) and district energy systems.

(2) Bill 23 will promote private vehicle dependent communities and lifestyles.

- Increased road infrastructure required to access sprawl housing and services/amenities is known to increase vehicular traffic and car use [4].
- Private car dependent lifestyles decrease physical activity and mental health.
- Increases in obesity, diabetes, heart and lung disease as well as motor vehicle accidents will result [5].
- GHG emissions and air pollution will be escalated with further damage to human health.

(3) Bill 23 will destroy critically important wetlands, greenspaces and farmland.

- These lands function as natural carbon sinks. Their destruction will worsen the climate crisis. Natural undeveloped land is neither an untapped monetary asset waiting to be exploited for profit, nor an unnecessary indulgence in areas of growing population pressure. These lands are increasingly critical to human health and survival and must be recognized as such.

- While evidence-based targets for preserving undeveloped green and blue spaces are accepted as 30% by 2030, southern Ontario currently only has 15% coverage which will be further compromised by Bill 23.
- Building over more land will increase heat islands. These amplify the health impacts of global warming and disproportionately affect lower socioeconomic populations worsening inequities [6]
- Building over more land will increase overland flooding risks. Ontario's protected Greenbelt lands and Conservation Authorities were largely set up in recognition of the risk of flooding to help protect Ontarians from these risks. Dismantling these protections by dismantling the Conservation Authorities through multiple deliberate pathways built into Bill 23 and selling off parcels of the previously protected Greenbelt without Conservation Authority involvement will harm Ontarians. Health risks, massive costs, problems with insurability and potential legal liabilities may result. The Ontario government was already named in a \$1 billion class action lawsuit for rampant poorly planned development upstream directly resulting in flooded properties downstream in Oakville, Ontario [7].
- Decreased access to greenspaces and nature has multiple proven negative health repercussions including increased rates of stroke, heart disease, asthma, high blood pressure, poor mental health such as stress and anxiety [8].
- Further proven benefits of increased exposure to nature and/or greenspaces include improved memory, creativity, work satisfaction, longevity in seniors, and healthier birth weight babies. Children demonstrate healthier body weights and physical fitness,

improved function in ADHD (attention hyperactivity and deficit disorder), better school test scores and school graduation rates [9].

- Building over already dwindling farmland will decrease local food production. Climate change worsened by development further reduces the productivity of any remaining land. This compounds food insecurity and affordability. We are currently already seeing record high food bank use in Ontario in October 2022 [10]. Access to affordable nutritious food is another essential social determinant of health threatened by Bill 23 [11], in addition to the loss of provincial revenue and well being of Ontario's farmers.

(4) Bill 23 will escalate deadly air pollution.

- Air pollution will be increased by Bill 23 with the increased motor vehicle use associated with sprawl development and increased natural gas burned to service larger isolated homes.
- As the 4th largest cause of death and illness globally, air pollution prematurely kills 6600 Ontarians every year with an impact of over \$49 billion dollars [12, Sec. 2.3].
- Air pollution particles especially PM2.5's enter the human body and bloodstream via the lungs and cause disease of multiple body systems including: lungs (asthma, COPD, bronchitis); cardiovascular (high blood pressure, heart attacks, irregular heartbeats); neurologic (dementia, Alzheimer's, Parkinsons, ADHD, others); cancers (lung, breast, leukemia); and endocrine (diabetes, obesity).
- Air pollution exposure is also linked to low birth weight babies, birth defects and stillbirths ,and increases risks of COVID-19 infection, transmission and deaths.

- The worst health impacts of air pollution are disproportionately and inequitably borne by lower socioeconomic, marginalized and racialized communities [13].

(5) Bill 23 will escalate uncontrolled GHG emissions fuelling the climate crisis.

- The climate crisis represents the single greatest human health crisis of our time [14]. A number of far-reaching health impacts exist.
- Extreme heat is a significant risk factor for death and illness. Canada's single deadliest weather-related event was the 2021 BC heat dome which killed 815 Canadians, mostly elderly and/or of lower socioeconomic strata [15].
- Direct illness and death also result from flooding, extreme wind events, drought and wildfires. Wildfires in turn escalate air pollution, able to travel thousands of kilometres and causing further health harms. Ontario's worst wildfire season on record occurred in 2021 [16].
- Many infectious diseases are increasing and/or emerging due to the climate crisis. Many experts have already predicted and warned that pandemics such as COVID-19 and other zoonotic infections (spreading from animals to humans) will be increasingly common due to effects of the climate and environmental crisis globally.
- Lower crop yields directly resulting from climate change affecting health and nutrition through food insecurity have already been discussed.
- The climate crisis has many major increasing negative mental health impacts including anxiety, depression, addictions, suicidality and solastalgia.

(6) Bill 23 will impose massive costs and insurability concerns for municipalities and taxpayers while removing their democratic participation in the process.

- Bill 23 is unsustainable not only from an environmental and health perspective but also economically.
- Ontario's Financial Accountability Office (FAO) calculated the extra costs generated simply to maintain public transportation infrastructure due to climate change at \$1.5 billion annually, non-inclusive of cost of wildfires and ice storms [17].
- **It is clearly understood that the costs of failing to take climate action are far higher than the cost of taking urgent action.**
- Sprawl development costs the public more than double the cost of planned densification [18]. **Key**
- Ontario's economy already loses over \$49 billion every year to air pollution. This will increase further with Bill 23 [12, Sec. 2.3].
- By escalating non-renewable energy use, air pollution, climate change, infrastructure costs for sprawl development, healthcare costs, decimating efficiencies in coordinated higher level urban planning, **reducing municipal revenues from development charges**, and numerous other damaging mechanisms, Bill 23 will result in massive costs that will fall on taxpayers facing unaffordable tax hikes.
- Homeowners will face a crisis of insurability with insurance either being unaffordable or unavailable. Insurance industry reports have already stated: "insurance providers may start to withdraw property coverage in areas deemed too costly, or worse, avoid insuring certain risks altogether, if circumstances do not change. This could put tremendous financial pressure on the government." [19, p.1] **Key**

- Conservation Authorities, Municipalities, citizen input and expert oversight are silenced by design by the Bill. The valuable informed work of experienced urban planners and professional city staff who have worked to produce sustainable development solutions that would help Ontario thrive are being ignored and rejected. Painstaking land use and boundary expansion decisions such as in Hamilton and Halton, achieved with countless hours of effort, citizen engagement and due democratic process over the past year are unilaterally being overturned. **Appeal processes are being eliminated. This may contravene Article 12 of the Paris Agreement [1].**
- The timing of release of the Bill the day after the 2022 Ontario Municipal Election and inexplicably tight timeline imposed for public consultation while newly elected Municipal Councils are still in transition severely restricts scrutiny, oversight and response by citizens, experts and municipalities.
- The public record documents in 2018 the current premier promised he would not develop the Greenbelt, the world's largest such protected greenspace [20]. Ontarians expect the government to keep its promises and govern with integrity. Our collective future depends on it.

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