

November 17, 2022

Standing Committee on Heritage, Infrastructure and Cultural Policy
Legislative Building
Queen's Park
Toronto, ON M7A 1A1

Attn: MPP Laurie Scott, Chair

Dear Mrs. Scott and Committee Members,

RE: Proposed Changes to Contemplated Bill 23, the More Homes Built Faster Act, 2022

We are writing to propose changes to the More Homes Built Faster Act (Bill-23) being proposed by Ontario.

We support the goal of increasing access to affordable housing by removing conditions that are not valuable parts of the process to new housing development. However, one of the conditions that the Bill proposes removing is municipal authority to set “sustainable design” requirements for building construction (not just homes). This will hinder homeowner affordability and reduce Ontario business competitiveness.

1. VALUE OF GREEN DEVELOPMENT STANDARDS

Municipal Standards that address sustainable design set performance targets that reflect the priorities and economic conditions of each municipality. These Standards have been developed over many years and provide predictable conditions for developers, such as advance notice of performance target improvements over time. They are generally consistent with Standards in effect across North America.

These Standards support the aim to make Ontario the best place to build the businesses of the future. They motivate real estate supply chain innovation, which has had the least productivity improvement of any industry¹. Enabling this made-in-Ontario capacity enhances the province's economic prospects and creates opportunities for business in local, national, and global markets. Without addressing sustainable design, or a similarly effective set of provincial standards, Ontario businesses and communities are at a disadvantage for investment and migration prospects, each of which are increasingly influenced by climate change risks.



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¹ Filipe Barbosa, Jan Mischke and Matthew Parsons. “Improving construction productivity.” McKinsey Global Institute, July 18, 2017. <https://www.mckinsey.com/capabilities/operations/our-insights/improving-construction-productivity>

Sustainable design practices help Ontario deliver housing that meets our societal and environmental needs affordably into the future. Buildings constructed today to comply only with Ontario Building Code will require massive renovations to meet the carbon emissions reductions necessary for society to thrive. Renovating later costs far more than constructing to a higher standard in the first place and will severely disrupt residents forced to live through them, which is inconsistent with housing affordability.

Municipal Standards that address sustainable design are well established, accepted, and currently represent the only policy in effect that provides a pathway to construct new buildings to serve residents and society. We therefore propose changes to contemplated Bill 23 as follows.

2. PROPOSED CHANGES TO THE ACT

We support both of the following changes to Bill 23 as proposed by The Atmospheric Fund:

- Delete in Schedule 1 “(2) Subparagraph 2 iv of subsection 114 (5) of the Act is repealed” and delete in Schedule 9 “(2) Subparagraph 2 (d) of subsection 41 (4) of the Act is repealed.”
- Replace those two sections with the following wording in both: (d) matters relating to sustainable design if an official plan and a by-law passed under subsection (2) that both contain provisions relating to such matters are in effect in the municipality.

3. RESULTS

These changes streamline the development process while empowering municipalities and businesses to take the action needed to both improve housing affordability and create a thriving economy that can endure for generations.

Yours Truly,

Purpose Building Inc.



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