

New Policy and Regulatory Reforms for Ontario Conservation Authorities

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Abstract: First established in the 1940s, Ontario Conservation Authorities are internationally recognized as leading examples of integrated water resources management. In late 2021 and early 2022, the Ontario government published two reports focused on regulatory proposals and rules of conduct for conservation authorities (CAs). A primary aim of the provincial government's pro-growth proposals was to increase the supply of affordable housing by speeding up new development review and approval processes. The following topics were identified as mandatory programs for CAs related to risks posed by natural hazards within their jurisdiction: flooding, erosion, dynamic beaches, hazardous sites as defined by a Provincial policy statement in 2020, and low water/drought. The overall intent of the Ontario government proposals is for CAs to focus on identifying natural hazards, assessing and managing associated risks, and improving public awareness of hazards. In this commentary, we summarize key changes for the CAs proposed by the Ontario government, and identify implications for the future, including CAs having less autonomy and discretion over core mandatory programs, increased emphasis on local funding, and municipalities having more say in CA programs and services for which they pay.

Keywords: Conservation Authorities, More Homes Built Faster Act 2023, natural hazards, Ontario, watershed management

Introduction

In our previous two Commentaries (Mitchell, Shrubsole and Watson, 2021; 2022), we examined the role and evolution of the conservation authorities (CAs) since their founding in the mid-1940s. Founded on principles of watershed-based management, municipal cooperation, local-provincial partnership and cost-sharing, CAs are internationally recognized as successful examples of integrated resource and environmental management. Further details regarding the history and development of the CAs are provided in our previous two Commentaries published in this journal. The Ontario government in December 2020 created a Working Group to identify changes for the future role of conservation authorities. During 2023, the Ontario government then introduced regulatory and policy changes under the Conservation Authorities Act to “improve the governance, oversight, transparency and accountability of conservation authority (CA) operations.” (Ontario, Environmental Registry of Ontario, 2022, 2). Those

changes can be viewed as parts of a broader provincial government initiative aimed at increasing the provision of affordable housing and generally facilitating economic development and growth throughout Ontario.

In our first Commentary, we examined experience of the CAs from their founding in the mid-1940s until the end of 2020. We noted that the Working Group established by the Ontario government in December 2020 was directed to provide advice on proposed regulations under the Conservation Authorities Act, and also to advise about how conservation authorities were governed, with particular regard to three matters: (1) mandatory core programs and services conservation authorities would provide, (2) agreements between municipalities and conservation authorities and the transition period associated with non-mandatory programs and services, and (3) how local members of the community can better participate in their conservation authorities through community advisory boards (Ontario, Environmental Registry of Ontario, 2021).

In the second Commentary, we examined the position taken on those matters by the provincial Conservative Government as expressed in reports published late in 2021 and in January 2022 (Mitchell, Shrubsole and Watson, 2022). The subsequent sections in this third Commentary identify new changes identified by the provincial government and then share reactions to such changes.

Regulatory and policy specifications in a modified Conservation Authorities Act.

On November 23rd, 2022, Bill 23 received Royal Assent and became the More Homes Built Faster Act, with the goal of building 1,500,000 homes over the next 10 years. Central to achieving this goal are many changes to provincial, regional and local government planning and approval processes, including those of Conservation Authorities, which will result in reducing approval fees, and reducing the time required to approve development proposals.

The new regulatory and policy changes affecting Conservation Authorities are intended to, "... improve conservation authority governance, oversight, transparency, and accountability...."(Ontario Environmental Registry of Ontario, 2022, 1). Further, the

new regulations and policies were designed to facilitate a “smooth transition by January 1, 2024 of CAs (conservation authorities) to the new funding framework and three categories of programs and services established by recent amendments to the Act and first phase of regulations.” (Ontario, Environmental Registry of Ontario, 2022, 3).

Below, the significant changes related to the functions and roles of the Conservation Authorities are summarized, along with reactions to the changes.

Changes to the Role of Conservation Authorities under the More Homes Built Faster Act, 2023

Bill 23 introduces four key changes for Conservation Authorities:

- In commenting on development proposals, CAs must focus on natural hazards (i.e., flooding, erosion and slope issues) rather than broader issues of resource conservation and management related to other aspects of the environment (e.g., wetlands, groundwater).
- With regards to land use planning decisions under the Planning Act, Conservation Authorities can only appeal matters: (i) affecting the land they own; (ii) where they are an applicant for a proposal; or (iii) as a public agency, can only appeal matters related to the natural hazard policies contained in the Provincial Policy Statements.
- The Minister of the Environment, Conservation and Parks has the ability to require a Conservation Authority to maintain the fees it charges for programs and services (e.g., review of proposals in the floodplain, admission to conservation areas) at the current level.
- The Minister can also require a Conservation Authority to identify and inventory all the properties it owns or controls that may provide opportunities for future housing development.

In essence, the changes significantly reduce the remit and role of the CAs and shift responsibility for development review and approval to the municipalities. However, there is no evidence or prior experience to suggest that this shift will reduce review and approval times. It is conceivable that reviews and approvals may take longer or may not

be as effective. Some municipalities have already indicated they do not have the required organizational resources and expertise to cope with the volume and complexity of development proposals. In addition, and in contrast to the watershed and upstream-downstream perspectives of the CAs, municipalities are more likely to apply a purely local perspective when reviewing proposals and applying their development-related responsibilities as ascribed to them in the Ontario 1990 Planning Act.

Reactions to the changes to the role of CAs stipulated in the More Homes Built Faster Act, 2023 are numerous and have been provided by many different types of interests and organizations, including legal experts, environmental groups, municipal mayors and staff, journalists and concerned citizens. The comments below provide a sense of some of the main points raised.

For example, the law firm Aird Berlis (2022) provided the following observations in early December 2022, after the More Homes Built Faster Act had been passed. In its view,

“Amendments to the *Conservation Authorities Act* will:

Redefine the scope of, and limit, conservation authorities’ ability to review or comment on a development application, including any supporting studies made under a “prescribed Act.” While the regulation listing the “prescribed Acts” has not yet been promulgated, it is anticipated that it will include (but not be limited to) the *Planning Act*, *Endangered Species Act*, *Environmental Assessment Act*, *Environmental Protection Act* and *Niagara Escarpment Planning and Development Act*. This will impact development applications that would have received conservation authority comments on municipal and “other” programs and services as defined in the *Conservation Authorities Act* but will not affect the applications that would have received comments on mandatory programs and services (including programs and services related to the risk of natural hazards, among others). These amendments will come into force on January 1, 2023.

Exempt development authorized under the *Planning Act* from the requirement to obtain a conservation permit, provided that certain prescribed conditions and restrictions are satisfied. The regulation containing the prescribed conditions and restrictions is forthcoming. These amendments are not yet in force and will come into force on a day

to be named by proclamation of the Lieutenant Governor unless otherwise noted.” (Aird Berlis, 2022).

Another example is the comment from the Canadian Environmental Law Association (2022) which stated that it had four primary areas of concern regarding Bill 23, one of which was “The need to preserve the essential roles of conservation authorities and upper-tier municipalities in protecting water and natural heritage”.

The County of Brant (2022), in the southern portion of the Grand River basin, expressed concern in the following manner about environmental impacts. It observed that the Act would result in environmental impacts as a result of “Reduced requirements for conservation authorities and downloading of environmental development review onto municipalities, ultimately requiring additional County of Brant resources, to maintain responsible development that protects the natural features and supports safe and responsible development approvals”. Since the Conservation Authorities and municipalities are not permitted to increase their service fees, all additional costs would be borne by the Ontario taxpayer rather than paid for by the development proponent(s).

The City of Richmond Hill maintained that the changes to the role of Conservation Authorities in the land use planning process “will result in technical and capacity issues for the City” because limiting the CAs to comment only on flooding, erosion and landslide hazards would result in the City being responsible for areas in which it did not have expertise, such as “ecology, natural heritage, wetlands...biodiversity...geomorphology and hydrogeology” (City of Richmond Hill, January 31 2023, 9). Since the Province prohibited any Memorandum of Understanding to be signed between the CAs and the City regarding support for these types of issues and that Conservation Authority staff were also unable to attend appeal hearings along with City staff, the City of Richmond Hill believed that they may be forced to “seek additional staff resources in order to fill this gap in technical reviews and gaps in subject matter expertise for appeals” or hire consultants (City of Richmond Hill, January 31 2023, 9). In a more general context, the Regional Planning Commissioners of Ontario (2022, 5) stated that “it is unclear why Bill 23 does not enable area municipalities to contract with Regional Governments”, and by extension other public agencies such as Conservation Authorities, “to provide growth-related services, particularly for small rural municipalities with minimal planning resources.”

In response to the idea of dividing CA responsibilities into mandatory and non-mandatory activities, the Association of Municipalities of Ontario (AMO) (2022) identified the need to identify a ‘standard’ of service that CAs should achieve in providing mandatory activities. Concerning non-mandatory activities, AMO (2002, 2) advocated the need for municipalities and CAs to have to use existing agreements when appropriate as well as flexibility in determining new agreements in order that local circumstances and needs, such as “growth pressures, existing infrastructure, staff skills base at the municipality and CA, council philosophy on green infrastructure, and asset management” could be adequately considered. AMO (2022, 2) also supported the role of CAs in watershed planning, particularly as local governments increased their use of a “climate change lens” for their development strategies.

The Regional Planning Commissioners of Ontario (2022, 18) identified that “one of [their] biggest worries is the greater potential for catastrophic events to occur, like widespread groundwater contamination and permanent groundwater table draw-down. In the absence of any government level (including Conservation Authorities) being responsible for the planning-related protection of watershed-scale natural systems, there is a big gap.” Issues of greater risk, liability, and litigation as a result of the changes created by Bill 23 were very important consequences associated with Bill 23 from the Commissioners’ viewpoint.

The Region of Durham (2023, 5) expressed satisfaction with the previous services the five Conservation Authorities within its boundaries had provided to protect “sensitive natural heritage features”....and provided insight and advice to support the review of new development applications.” Many of these functions and responsibilities, excluding flooding, erosion, and landslides, were now being transferred to municipalities. The Region was also alarmed that in asking Conservation Authorities to review their lands and identify what, if any, properties could be used for housing, residents would no longer be able to use and enjoy the conservation areas that they often travel to. The Region of Durham (2023, 5) believed that Bill 23 risked “houses being built in locations that were not suitable for development.”

In a similar vein, 35 Eastern Ontario mayors expressed concern that implementing Bill 23 would negatively affect the local development review process, download new responsibilities on municipalities, increase costs to taxpayers, increase the risk of

flooding, erosion and slope failures, and damage the local environment (Raisin Region Conservation Authority, 2022, 1). They asked the government to reconvene the multi-stakeholder Working Group to better consider the impacts of the Bill.

As a final example, Birds Canada (2022) expressed concern about Bill 23. In its view, Bill 23 represented a major threat to wildlife in Ontario. Specifically, in its view there would be serious negative impacts on natural heritage conservation, urban and rural land use planning, and environmental protection as a result of many and complex changes to the Conservation Authorities Act, greenbelt boundary regulations, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan, the Ontario Heritage Act, and the Planning Act. Birds Canada was particularly concerned that Bill 23 would “.... Weaken environmental protections, infringe on Indigenous rights, limit public involvement in land use planning, and decision making, remove cities’ green building standards, as well as remove farmland needed for food production.” Birds Canada also observed that it was “....disappointed that the Ontario government has passed the bill and frustrated by the lack of time provided for public input.”

Further responses and concerns

The changes relating to the roles and functions of CAs have stimulated personal reactions from a mix of observers, as well as from the CAs themselves. A selection of such reactions is provided in this section.

For example, Ted McMeekin (2022, A9), a Hamilton City Councillor and former Minister in the provincial government, observed that:

“Perhaps most alarming, the critically important role and function of conservation authorities will be severely limited over the stewardship of the 145,000 hectares of land they currently manage. This at the very time we are witnessing an increase in severe storms due to climate change. This reality must be met with greater protection of our wetlands, not some political agenda designed to remove what little protection remains.”

The above view was shared by Graham Macdonald, from Waterloo (2022, A11). In his view:

“Our excellent conservation authorities oversee development plans across municipal boundaries. Without the broad view of these authorities, we will have piecemeal municipal development plans that are without informed and professional advice and approval, with disastrous impacts on the environment and climate resilience.”

Ron Dahmer from Cambridge (2022, A. 11) had further concerns about Bill 23:

“It is an omnibus bill that takes planning of property developments out of the hands of locally elected or appointed planners and conservation authorities, and puts it in the hands of provincial government (Conservative) appointed bureaucrats that he [Premier Doug Ford] can control.”

Another perspective was provided by Ben Vanderbrug (2022), a former General Manager of the Hamilton Conservation Authority. In his view, the proposed changes were “misguided” and “worrisome”. The term ‘misguided’ was used because in his view the provincial government was not correct in believing that in order to increase the housing inventory in Ontario it had to remove checks or controls that might hinder achieving it. The approach of the Ontario government, in his view, was to restrict activities of CAs in the belief that flood control is a focused effort to reduce or eliminate flood threats without recognizing that flood control will only be realized through using a wide mix of ancillary environmental and human initiatives, through identifying flood prone areas and prohibiting development there, preserving wetlands, protecting and achieving public ownership of environmentally sensitive areas as well as forested land, protecting groundwater, using urban and rural planning principles to reduce soil erosion, storm water runoff, reforest non-productive agricultural lands, and strive for urban development that protects and maximizes environmental features rather than seeking to circumvent or eliminate whatever hinders unbridled development. All these types of actions had been within the scope of CA mandated responsibilities and were now at the risk of being removed or limited.

The views of Dahmer were reiterated by Allison Jones (2022). She observed that when

the Ontario government passed its housing bill in late November 2022, critics observed that “the result could be higher property taxes, weakened conservation authority powers, and not actually make homes more affordable”. Savor (2022, A15) shared a similar view, and observed that the same bill “... would eliminate conservation authorities’ capacity to deny a development on the basis of anticipated pollution”. Brennan (2021, A11) had earlier reinforced the above views, when commenting that proposed changes to the Ontario Planning Act would “... allow MZO [Ministerial Zoning Order] approved developments to be retroactively exempted from provincial planning rules, such as for environmentally sensitive areas, effectively tying the hands of local conservation authorities”. His view was shared by Wilson (2021, A11), who remarked that “changes to the Conservation Authorities Act [would] ... remove their ability to protect natural areas”.

The above account of reactions indicates that discomfort and alarm have emerged in response to the Ontario government’s approach to support housing construction by, among other initiatives, significantly limiting the role of CAs related to land use planning. Within this context, the Provincial Conservative Government introduced Bill 162: *The Get it Done Act, 2024* in February 2024 with the objective of getting “shovels in the ground” and accelerating the construction and completion of development-related projects, such as transit, infrastructure and housing (Legislative Assembly of Ontario, 2024). It proposes regulatory changes to the Environmental Assessment Act and the Official Plan Adjustments Act, 2023 to increase the review and implementation of development proposals.

Future Implications for Conservation Authorities and resource protection

In our view, the changes associated with Bill 23 have five main implications for the future role of the CAs, land development, and the protection of water and other resources throughout Ontario.

First, the More Homes Built Faster Act significantly alters the role of Conservation Authorities related to decisions as to whether homes can be constructed in areas vulnerable to flooding. In particular, the role of CAs related to determining whether

homes can be built in areas vulnerable to flooding has been sharply constricted, given the limitations on their role in commenting about housing development proposals. The main onus on making decisions as to whether housing development in areas vulnerable to flooding is shifted to municipalities, and CA's will have a significantly reduced role to comment about the appropriateness of homes being built in areas already deemed vulnerable to flooding, especially if there is upstream housing development.

Furthermore, municipalities are unlikely to have the necessary capacity to effectively deal with major housing development applications. Municipalities are also prevented under the new regulation from contracting with their CA or with other organisations to acquire additional expertise and strengthen their decision making with regards to housing development.

Second, given the increased role of municipalities regarding decisions as to where future homes can be built, one of the key advantages of having Conservation Authorities take a 'catchment' or 'river basin' perspective will be significantly constrained. In making decisions about housing development, the upstream municipalities will not be obligated to consider the implications for downstream municipalities and communities. This change, in particular, undermines a fundamental principle and CA function in seeking to ensure coordinated development and management of land and water.

Third, in situations where a municipality does not support a new housing development application (including situations where there are concerns about possible downstream impacts), the changes mean that the provincial government could grant development approval and dismiss local concerns or opposition. Thus, on the one hand, the changes imply that authority for housing development decisions is being passed to a local,

municipal, level and yet, on the other hand, there is a clear implication that power is actually being concentrated at a provincial government level.

Fourth, the focus on hazard assessment and management, while very important, could mean that other important CA functions and responsibilities such as water source protection, river water quality, habitat restoration and protection receive less attention and are not prioritised for funding, therefore undermining integrated management and risking the long-term health and integrity of catchments/basins. The comments provided by municipalities clearly indicate that they had previously relied on CAs to inform them on a wide range of issues beyond flooding, erosion and landslides, such as ecology, natural heritage, wetlands, biodiversity, geomorphology, groundwater quantity and quality. As noted in the earlier comments, focusing too much on managing hazards without giving sufficient consideration to other dimensions and aspects of a river basin or catchment system, is unlikely to be effective. Unfortunately, there is no provision in Bill 23 for those kinds of broader considerations to be incorporated into Ontario's processes and procedures for assessing the desirability, risks, and vulnerabilities of new housing developments in Ontario.

Fifth, the changes imply that CAs will be even more dependent on municipal funding and other local sources, such as user fees, for non-core programs and activities that fall outside their core natural hazard assessment and management remit. It is a basic reality that some municipalities have larger budgets than others due to, for example, differences in revenue generation from local property taxes. It therefore appears likely that populations in some CA regions will be able to benefit from broader and more comprehensive sets of conservation programs than in other, less prosperous, regions. What could the changes mean overall for the management of land, water, and related resources in Ontario? Whether approvals are given by municipalities or through the

higher authority of the provincial government, significant growth in new housing development is highly likely. A key challenge and priority will be to ensure that development proposal review and approval process are both thorough and timely, enabling demand for new housing to be met in a manner that simultaneously provides high levels of environmental protection and will not expose new homeowners to increased risks of flooding, erosion or other hazards. CAs can be expected to focus more of their attention and resources on protecting housing from natural hazards and working to ensure new developments do not, as far as is possible, exacerbate risks from flooding, erosion, landslides, and other types of threat. However, the ability of CAs to be effective in that regard is restrained by a de-prioritization of other functions related to other aspects of river basin management, including surface and groundwater quality, river and lake ecology, and wetlands. It cannot be fully known or predicted how the changes to CAs and development approval processes will play out over the coming years, although there are legitimate concerns in addition to valid arguments regarding the need for housing. Recognizing the uncertainties would be a useful step towards dealing with those uncertainties. In addition, learning could be enhanced by closely monitoring and evaluating the impacts of the changes on future land development and on the role of the CAs, particularly in watersheds and regions where housing development is most heavily concentrated. Attention should also be given to assessing the implications and impacts of funding changes on the abilities of CAs to fulfill their mandates. Academic researchers and practitioners might also find it useful to investigate how these policy and legislative changes might affect water governance in Ontario more generally, including the capacities of communities to avoid and collectively manage impacts related to climate change.

Looking beyond Ontario, we should be mindful of the different cultural, economic and political contexts that exist across Canada and of the dangers in drawing too-wide conclusions or making blanket prescriptions. Nevertheless, recent experience in Ontario regarding the CAs and planning approval processes does illustrate particularly well how policy and legislative changes, even if well-intended, can have unintended and adverse consequences. Ensuring an adequate supply of affordable housing is a legitimate concern and objective, but that should not be at the expense of environmental protection or undermining a collective approach for watershed management which has shown itself to be highly effective for nearly 80 years.

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References:

Aird Berlis, 2022, “More Homes Built Faster Act, 2022 receives Royal Assent: A Quick Guide to What’s in Force”, December 2, 2022, Available at:

www.airdberlis.com/insights/publications/publications.more-homes-built-faster-act-2022-receives--royal-assent-a-quick-guide-to-what-is-in-force.

Association of the Municipal Authorities of Ontario, (February 25, 2022), Re: Proposed Regulatory and Policy Proposals (Phase 2) under the *Conservation Authorities Act*, ERO Posting #019-4610. Available at:

[MECP LTR AP Conservation Authorities Act ERO Posting #019-4610 2022-02-25.pdf](http://meqp.on.ca/MECP_LTR_AP_Conservation_Authorities_Act_ERO_Posting_#019-4610_2022-02-25.pdf)
(amo.on.ca)

Birds Canada, 2022, Bill 23 threatens wildlife in Ontario, December 1. Available at:

<https://www.birdscanada.org/bill-23>.

Brennan, R.J., 2021, “Ford government is making frequent use of MZOs”, *Waterloo Region Record*, March 16, A 11.

Canadian Environmental Law Association 2022, “Action Alert: Bill 23 – More Homes Built Faster, 2022”. Available at:

cela.ca/reviewing-bill-23-more-homes-built-faster-2022/.

City of Richmond Hill, January 30, 2023, “Staff Report for Special Council Meeting, January 30, 2023 Subject: SRPI.23.018 – Request for Comments – Bill 23, The More Homes Built Faster Act, 2022”. Available at:

[SRPI.23.018 - Request for Comments - Bill 23, The More Homes Built Faster Act, 2022 \(scribemeetings.com\)](https://www.scribemeetings.com/Document/SRPI.23.018-Request-for-Comments-Bill-23-The-More-Homes-Built-Faster-Act-2022).

County of Brant, 2022, “Bill 23 – More Homes Built Faster Act, 2022 – Updates and Comments: Impacts and Mitigation”. Available at:

<http://pub-brant.scribemeetings.com/filestream.ashx?Document=53353>.

Dahmer, R., 2022, “Supposed housing plan nothing but a power grab”, *Waterloo Region Record*, December 9, 2022, A 11.

Jones, A., 2022, “Ontario passes housing bill amid growing criticism”, *Waterloo Region Record*, November 29, 2022, A.6.

Legislative Assembly of Ontario. 2024. Bill 162, Get It Done Act, 2024. Available at:

[Bill 162, Get It Done Act, 2024 - Legislative Assembly of Ontario \(ola.org\)](https://www.ola.org/bills/bill-162-get-it-done-act-2024).

Macdonald, G., 2022, “New provincial laws will damage the environment”, *Waterloo Region Record*, December 16, A11.

McLaren, D.M., 2021, “MZOs are a handy tool in playing pork barrel politics”, *Waterloo Region Record*, April 24, A10.

McMeekin, T., 2022, “Bill 23 is an attack on farmers, Greenbelt”, *Waterloo Region Record*, December 5, 2022, A9.

Mitchell, B., D. Shrubsole and N. Watson, 2021, “Ontario Conservation Authorities – end, evolve, interlude or epiphany?” *Canadian Water Resources Journal*, 46(3): 139-152. <https://doi.org/10.100/0701184.2021.1930585>, Published on-line on June 7, 2021.

Mitchell, B., D. Shrubsole and N. Watson, 2022, “Prescribed future pathway for Ontario Conservation Authorities: Regulatory impacts and implications”, *Canadian Water Resources Journal*, 47(4): 176-183.

Ontario, Environmental Registry of Ontario, 2021, *Regulatory proposals (Phase 1) under the Conservation Authorities Act*, Number: 019-2986, ero.ontario.ca/notice/019-2986, first accessed on 7 December 2021.

Ontario Environmental Registry of Ontario, 2022, *Regulatory and Policy Proposals (Phase 2) under the Conservation Authorities Act*, Number 019-4610. ero.ontario.ca/notice/019-4610, April 22, 2022.

Ontario Ministry of the Environment, Conservation and Parks, 2022, *Regulatory and Policy Proposal Consultation Guide: Regulations regarding Municipal Levies, Conservation Authority Budget Process, Transparency, and Provincial Policy for the Charging of Fees by Conservation Authorities*, January 26, 21 pp.

Raisin Region Conservation Authority. November 18, 2022, “Over 35 Eastern Ontario Mayors Support Conservation Authority Bill 23 Concerns.” Available at:

[Raisin Region Conservation Authority \(rrca.on.ca\)](http://rrca.on.ca)Over 35 Eastern Ontario Mayors Support Conservation Authority Bill 23 Concerns : Raisin Region Conservation Authority (rrca.on.ca).

Region of Durham 2023, “Impacts of the More Homes Built Faster Act, 2022 (Bill 23)”. Available at: [Bill 23 - Region of Durham](#).

Regional Planning Commissioners of Ontario 2022, “Making Room: Shaping Big Housing Growth and Affordability in Ontario” mimeo. Available at:

Making Room - Final Report - Regional Planning Commissioners of Ontario (rpco.ca).

Savor, S., 2022, "Ford's new laws are a perversion of democracy", *Waterloo Region Record*, November 24, A15.

Vanderbrug, B., 2022, "The misguided unravelling of conservation authorities", *Waterloo Region Record*, November 11, A8.

Wilson, A., 2021, "Ford should cancel plans for problematic Hwy. 413", *Waterloo Region Record*, March 19, 2021, A11.