



May 31, 2019

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

Re: Bill 108 More Homes, More Choice Act, 2019

On May 2, 2019, the Province of Ontario introduced Bill 108, More Homes, More Choice Act, 2019 (Bill 108), and subsequent public consultation on various Schedules of the Bill through the Environmental Registry of Ontario (ERO), with the comment period ending June 1, 2019. Due to the complexity of the proposed statute changes and their direct impact to the Town of Caledon we require additional time to review and will provide the Province with more detailed and informed comments.

The Town of Caledon is supportive of the making housing more affordable by increasing housing supply and mix, encouraging opportunities for employment and protecting resources for our residents. However, we do have concerns with the implementation and direction of certain policy recommendations of Bill 108.

As Caledon embarks on a provincial conformity exercise and the creation of a new Official Plan that will plan our growth to 2041, we face challenges on how to balance considerable future growth without sacrificing good planning and unnecessary financial burdens.

While policy amendments contained within Bill 108 may provide the Town with innovative means to develop and implement its forthcoming Official Plan, without an adequate timeframe to analyze the proposed amendments the Town is currently unable to determine how the changes will ultimately affect its abilities to support the growth of complete communities, its economy and employment alongside the preservation of the Towns rural areas.

The current comment period timeframe and implementation process initiated by the Province lacks sufficient opportunity for many of Ontario's municipalities to adequately analyze how the changes will affect good planning practice and the efficiency of planning processes.

An initial analysis of the proposed amendments by Town staff suggests that the proposed policies expose the Town to significant risks of reduce housing supply and decision-making authority as communities will be forced to contend with financial challenges, infrastructure lags, and additional demand on Town staffing resources within significantly reduced planning approvals timelines and an reliance on LPAT.

Without providing additional opportunities for municipalities to engage with the policy development process the Province will impose a substantial degree of undue risk upon municipalities that carries the potential to undermine good planning principals and fiscal responsibility.

Given the degree of uncertainty surrounding how the proposed amendments will affect how planning is undertaken by the Town, we are requesting that the Province extend the commenting period and provide significantly more opportunity to allow analysis, feedback and subsequent revisions to be brought forward.

Sincerely,



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c: **Mike Galloway, CAO**
Carey Herd, Town Clerk