



November 21, 2021

Ministry of Municipal Affairs & Housing
17th Floor – 777 Bay Street
Toronto, ON M7A 2J3
Delivered via email: PlanningConsultation@ontario.ca

Comments on Schedule 19 of Bill 13 and Response to ERO 019-4419

To Whomever it May Concern,

I am a Registered Professional Planner (RPP) 12 of experience practicing planning in the Province of Ontario.

My primary role in the planning system is providing consulting services to developers and land owners. My practice focuses on assisting developers and land owners with various development approval processes and feasibility studies.

With that perspective, I am pleased to provide feedback on the Ministry's consultation regarding the Proposed Additional Delegation of Planning Decisions (ERO 019-4419) as outlined within Schedule 19 of Bill 13, *Supporting People and Businesses Act*, 2021.

Comments on Planning Act Changes

The government's decision to increase flexibility for Councils to delegate more minor planning related items is a step in the right direction. Proponents often have to return to Council seeking approval for implementation matters on applications that have already received Council support.

This can often add months to the approvals process without any significant value add. For example, a number of zoning amendments include holding provisions which then have to return to Council for subsequent approval, and further, there are small matters (such as temporary zones, minor zoning amendments, and other similar planning approvals) that do not necessitate nor are they justified in requiring the full review by Council. It is very time consuming and thus very costly. Costs of which are then filtered down to the end user, being through commercial leases or residential costs.

Providing Councils with the ability to delegate decisions for temporary use by-laws, lifting of holding symbols and other minor zoning by-law amendments will help streamline the approvals process for many of our clients. In turn, this will clear logjams at Councils and help Councils focus on key priorities of the day, unlocking major housing and economic development projects.

Other Considerations for Delegation Framework

In addition to expanding delegations, the framework around delegation must also be complete. Matters such as who can be recipients of delegated authority and what oversight exists on their conduct are also important considerations.

To that effect, I recommend:

1. The recipient of the delegated authority must be a Registered Professional Planner (RPP).
2. Appropriate oversight for planners making these decisions should exist by way of adequate authorities provided to the regulator of professional planners in Ontario, the Ontario Professional Planners Institute.

Additional Delegations

There are a number of minor housekeeping issues that the Ministry should also address as part of the list of items that can be delegated to appropriate persons.

Section 45, sub 1.3 and 1.4 indicates that an application for a minor variance is prohibited within two-years of a zoning by-law amendment unless Council allows it.

This extra layer of approval can be streamlined by allowing Councils to delegate the authority for an exemption to this ban (i.e. staff be allowed to grant the ability for a proponent to seek a minor variance through the Committee of Adjustment).

Thank you for reviewing my comments on the proposed changes. Please feel free to contact me at 613-850-8345 or christine@q9planning.com if you have any questions on my submission.

Regards,



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