

December 9, 2022
Ministry of Natural Resources and Forestry

RE: *Proposed Planning Act and City of Toronto Act Changes (Schedules 9 and 1 of Bill 23 - the proposed More Homes Built Faster Act, 2022)*, ERO number 019-6163

Please accept this Written Submission with respect to the ERO 019-6163 posting, part of Bill 23.

I am writing to the Committee as an individual and as a Registered Professional Planner in the Province of Ontario with over 30 years of professional practice in this province. I'm also writing as an individual who has spent the majority of my professional experience working for municipalities as a land use planner responsible for the review of development proposals and the development of greenland networks within neighbourhoods. Over the course of my career, I have facilitated the development of numerous parks, trails and open space systems and housing through subdivision approvals while attempting to safeguard nature and balance the competing interests of the public and developers. My deep experience of how our land use planning processes work as a manager and director provides me with a broad understanding of the mechanics across the Acts and spectrum of changes being proposed.

Addressing the Missing Middle

The changes proposed will allow up to 3 units per lot in many existing residential areas, presumably within the existing footprint. With the elimination of site plan control for less than 10 residential units developments, this will mean no analysis will occur for any additional hard surfacing. This specific proposal while supportable from a housing choice will, when combined with the changes to site plan control and removing formal review by Conservation Authority staff could have significant impacts on a neighbourhood caused by parking issues and increased run-off. To maintain resiliency municipalities should have the ability to require permeable surfacing and other green infrastructure as part of the addition of ADUs through site plan control. Further, it should be up to the municipality, who know and understand the concerns of the local residents whether parking is required or not. The approach of one size fits all will not work in urban areas that do not have a mature public transit system.

Higher Density Around Transit

For the most part the proposals regarding Higher Density Around Transit are supported although the arbitrary timelines may need to be adjusted as they do not account for the capital and human resources being required to carry out the necessary studies.

Streamlining Municipal Planning Responsibilities

In the early 1970s the Provincial government created Regional Municipalities to plan for the co-ordination of services and infrastructure which lower-tier municipalities were not co-

ordinating and providing in an equitable manner across large geographical and populous areas. The proposal is to roll back the responsibilities for land use planning and leave the infrastructure and services at the Regional level. However, to have the services in place some level of long-range planning such that resources can be allocated and ready to absorb the anticipated population growth must occur. It is unclear how this will be addressed should Regional Governments no longer be responsible.

Third Party Appeals

Limiting appeal rights for third parties restricts citizens' democratic rights. Third parties have been involved in the planning process and have a perspective that should be heard and addressed in such a manner that everyone can "live" with the resolution. With the restriction on timeframes and the rush to decision-making interferes with the process of understanding the myriad of issues and nuances to be balanced to make "good" plans resulting in high likelihood that mistakes will be made. In land-use mistakes are not easily addressed thus, the precautionary principle is to avoid making mistakes; however to do so takes time and the input of all involved, which included the neighbours.

Public Meetings - Plans of Subdivision

Removing the public meeting requirement for draft plans of subdivision is meant to speed up the process. It also means that public involvement and awareness of changes that are being proposed within a community are not being addressed by the development community. In my career, I have found that consulting with the public early in the process and keeping them informed leads to greater acceptance and integration of the new development within the existing community.

Site Plan –Architectural Details and Landscape Design

In addition to the concerns expressed above regarding the need for site plan review to address parking, hard surfaces and run-off; the proposed limitations on architectural details and landscape design will mean the erosion of standards for urban design.

Facilitating Aggregate Applications

Removal of the "2-year timeout" period for mineral aggregate operations is appropriate. The timeout period for new official plans, secondary plans and new comprehensive zoning by-laws is appropriate except if municipally supported.

Conservation Authorities

The proposal to limit conservation authorities to only appeal matters related to natural hazard policies is removing their ability to appeal on matters that involve natural heritage and ecological issues. As they are the experts in this area they should not be muzzled in such a manner. CAs are funded by Municipalities and their Boards are made up of

municipal politicians, therefore, they should be allowed to operate on behalf of their partner municipalities.

The need to address affordability and increase housing options for Ontarians is well known. What is not known is whether the Provincial efforts to streamline and find efficiencies in processes will address housing supply and affordability. I along with many other urban planners are concerned that the changes will have significant adverse impacts on residents quality of life and municipalities fiscal ability to provide parks, services and infrastructure.

Sincerely,