



Via Online Submission
<https://ero.ontario.ca/>

May 10, 2024

Ministry of Municipal Affairs and Housing
777 Bay St, 17th Fl
Toronto, ON M7A 2J3

RE: Comments on Bill 185, Cutting Red Tape to Build More Homes Act, 2024 and Associated Notices
ERO 019-8365 - Bill 185, the Proposed Cutting Red Tape to Build More Homes Act, 2024 – Housing Initiatives
ERO 019-8369 – Planning Act, City of Toronto Act, 2006, and Municipal Act, 2001 Changes
ERO 019-8366 - Proposed Regulatory Changes under the Planning Act Relating to the Cutting Red Tape to Build More Homes Act, 2024 (Bill 185): Removing Barriers for Additional Residential Units
ERO 019-8370 - Proposed Changes to Regulations under the Planning Act and Development Charges Act, 1997 Relating to the Bill 185, Cutting Red Tape to Build More Homes Act, 2024 (Bill 185): Newspaper Notice Requirements and Consequential Housekeeping Changes
ERO 019-8371 - Changes to the Development Charges Act, 1997 to Enhance Municipalities' Ability to Invest in Housing-Enabling Infrastructure
ERO 019-8462 - Review of proposed policies for a new provincial planning policy instrument

Thank you for the opportunity to comment on the proposed legislative and policy changes proposed by *Bill 185, Cutting Red Tape to Build More Homes Act, 2024*. The Town of Renfrew is supportive of proposals that have the effect of expediting the construction of housing, simplifying policy and process requirements while ensuring adequate consultation, and reducing the administrative and financial burden on municipalities.



The Town offers the following comments for consideration in finalizing the proposals under Bill 185:

1. Amend the last item under Schedule 1 of the Regulations for each Planning Act application type (543/06, 544/06, 545/06, 197/96, & 200/96) to **remove the requirement for an affidavit/sworn declaration**. Instead use the Ontario Building Code requirement for a standard declaration (not sworn). The requirement for a sworn declaration necessitates a meeting with a notary/commissioner to have them seal/sign the application, who in many cases will not provide the service virtually. This requirement presents a significant barrier to fully electronic planning applications/e-permitting. Making this change will immediately **enable the mass adoption of e-permitting for Planning Act applications across the province**.
2. Add provisions to the Planning Act that provide a **mechanism for eligible persons and public bodies to waive their appeal rights**, to allow for uncontested applications to proceed to construction more quickly.
3. Provide a mechanism in the Development Charges Act to **allow municipalities to utilize funds for infrastructure projects required to enable the construction of housing, but that were not originally identified in the calculation of the development charge** as part of the Background Study. This could be done through a resolution of Council or passing of a by-law not requiring a new Background Study, and could require the removal of an equal value project that was originally included in the calculation of the charge, but that is now considered to be a lower priority.
4. It is important that Ministry of Finance population projections do not have the effect of **limiting the ability of municipalities to designate land for development, expand settlement area boundaries, or restrict conversions of employment areas** where it is otherwise appropriate to do so. Municipalities should not be required to undertake land budgeting in an effort to restrict the amount of land available for development.



5. Consider **extending the time allocated for municipal review and comment** when the Province publishes draft proposed policies and legislation for consultation. This will allow municipalities to participate in the legislative and policy review process more meaningfully.
6. Simplify the commenting process by **consolidating the consultations into as few ERO notices/bulletins as possible**. The total number of ERO postings related to large pieces of legislation and associated policy often adds to the difficulty of navigating the materials, including at least six (6) ERO numbers in the case of Bill 185.
7. The attached commenting matrix (**Appendix "A"**) includes detailed comments related to the draft policy and legislation.

If you have any questions in respect of the above comments, please contact the undersigned at your convenience.

Yours sincerely,

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CC: Robert Tremblay, CAO
Tom Sidney, Mayor



Renfrew

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