

Provincial Planning Policy Branch
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RE: Comments of BV Realty Partners on Proposed Amendments to the *Planning Act*, R.S.O. c. 1991, under Bill 185: *Cutting Red Tape to Build More Homes Act*

BV Realty Partners (“**BV Realty**”) is submitting this letter to the Provincial Government to provide comments on Bill 185: *Cutting Red Tape to Build More Homes Act*, 2024, which proposes amendments to the *Planning Act*, R.S.O. c. 1991, in addition to other legislation.

BV Realty is a residential real estate development firm that uses a pragmatic and forward-thinking urban planning approach centered on building value through the acquisition and redevelopment of underutilized properties. BV Realty, which prides itself on creating new housing and supportive community infrastructure, is currently developing 15 separate real estate residential development projects in Ontario that will lead to the creation of approximately 7,000 homes.

As a stakeholder in the development process, BV Realty supports changes to the law that will cut red tape, speed up government approval processes and limit the costs of new development.

BV Realty is concerned, however, with the proposal to eliminate third-party appeal rights for municipally-initiated planning instruments, including official plans and zoning by-laws. These amendments will give municipalities an unchecked power to pass policies or zoning regulations that threaten the development viability of land. In the absence of an appeal right, BV Realty would have to submit expensive planning applications to amend municipally-initiated official plans or zoning by-laws that redesignate or downzone its land holdings. This will add further complication to the planning process and could ultimately impede the Provincial Government’s goal of addressing the housing crisis by increasing the housing supply. In other words, municipalities could pass official plans and zoning by-laws that will result in the creation of less, not more homes, and these decisions would not be subject to challenge.

In closing, the right of appeal for landowners impacted by a proposed planning instrument is an important and longstanding tool in Ontario to ensure that the planning decisions of a municipality are consistent with Provincial direction and conform to the principles of good land use planning. BV Realty therefore respectfully asks the Provincial Government to ensure that the right to appeal municipally initiated official plans, official plan amendments, and zoning by-laws, is maintained.

We thank you in advance for your attention to this letter.

BV Realty Partners

