



LONDON DEVELOPMENT INSTITUTE

April 30, 2024,

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch

ERO: 019-8370

Dear Ministry Staff,

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our city for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

LDI wants to thank the Provincial Government for their commitment in supporting housing supply in Ontario. Your efforts will provide housing availability and affordability for all.

LDI is supportive of the proposed changes to the Provincial Planning Act regarding modernization of the public notice requirements.

LDI does not agree with the proposed changes to limit third party appeal rights for official plans, official plan amendments, zoning by-laws and zoning by-law amendments.

The proposed list of appellants being limited to the applicant, minister, public bodies, and specified persons, eliminating third party appeals, has unintended consequences that are detrimental to the development and building industry.

First, the proposal would abolish the right of the industry to appeal municipal initiated changes to new Official Plans, new Zoning by-laws and OP and ZB amendments. This would eliminate the industry's ability to challenge, on planning grounds, changes to these fundamental policies that have a direct impact on our ability to build more homes in our community. A municipal council's ability to change Official Plans and Zoning policies, without our ability to challenge them at the OLT, will result in less housing being built, not more.

Secondly, the proposed changes to third party appeal rights of new Official Plans and Zoning by-laws will eliminate industry associations such as the London Development Institute's ability to challenge unworkable land use policies that are detrimental to our industry and will result in less homes being built.

As a concrete example, LDI was the major appellant of the London Plan (City of London's Official Plan) which was passed in 2016. Our organization working collaboratively with our members and pooling our resources appealed hundreds of the clauses, maps and tables contained in the new OP. Through the appeal process at the OLT, we were able to work with the City to organize our

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appeals into three phases with phase 1 going to a hearing and phase 2 and 3 being able to be resolved through settlement talks. The ability to be a third-party appellant worked for the industry and under the current recommendation this would not be possible.

Clearly, the intention of eliminating third-party appellants is an attempt to reduce the number of appeals not based on planning principles and good planning and therefore speed up the development of more homes. Unfortunately, this puts more power in Municipal Council hands and eliminates industry's ability to affect change to Official Plan and Zoning by-laws.

Our recommendation is to withdraw the proposed changes to third party appeal rights.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Mike Wallace". The signature is fluid and cursive.

Mike Wallace
Executive Director