



April 11, 2022

Standing Committee of the Legislative Assembly
99 Wellesley Street West, Room 1405, Whitney Block
Queen's Park, Toronto, Ontario M7A 1A2
Attention: Tanzima Khan

RE: Bill 109 - More Homes for Everyone Act

The Federation of Urban Neighbourhoods (Ontario) is an umbrella group of community associations throughout Ontario. As such we maintain a close interest in the changes to provincial planning legislation introduced by the Government. The latest changes amount to another massive overhaul of the planning process and a new set of directives focussed on supply, rather than demand for homes, but in addition, reducing the role of duly elected municipal councils, and attacking residents who devote their time and energy to contribute to their communities' development.

The Government's policy changes, including moving forward with Highway 413, and making municipalities designate more farmland for development, have favoured companies looking to build low-density sprawl outside Toronto.

Bill 109 includes:

1. measures to speed up decision-making by moving responsibility for site plan application (SPA) reviews to municipal staff rather than local council;
 - We oppose the removal of elected officials from having a role in SPA of behalf of residents. While most SPAs proceed with no need for council involvement, such involvement should not be denied.
2. a requirement that municipalities refund application fees to developers if they don't make a decision within legislated timelines;
 - We oppose this punitive and ridiculous proposal (appropriately described by Gregg Lintern as the "Pizza-Pizza" proposal).
 - We note that the currently legislated timeframes in the *Planning Act* for municipalities to make decisions on planning applications are already too short to allow municipalities to adequately evaluate large development proposals, which typically raise complicated issues, including adequacy of water and sewage services, transportation infrastructure, and public safety capacity.
3. designating a tiered percentage of parkland that municipalities could require of developers for Transit-Oriented Communities;

- We are neutral on this matter- it appears to be necessary due to the Government abolishing the Parks levy and moving to the a new (and financially insufficient) approach to community benefits charges
4. increasing transparency by requiring public reporting on MZO development applications and approvals;
- We oppose the Government's practice of using Ministerial Zoning Orders (MZOs) to avoid municipal approval and public scrutiny. The new "Community Infrastructure and Housing Accelerator" to speed up projects such as hospitals and community centres, "while increasing transparency and accountability" appears to be an effort to mitigate the widespread criticism (including from the Provincial Auditor) focussed on MZOs.

Finally, we understand that the Province plans to create a housing supply working group of key stakeholders to examine the "missing middle" in Ontario's housing needs. We recommend that this group (1) look at demand issues as well as supply and (2) include public stakeholders and civic engagement.

Respectfully submitted,

Geoff Kettel

Geoff Kettel
President

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[France Gélinas](#) MPP Nickel Belt
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