



Ms. Olivia Chow
Mayor
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2
mayor_chow@toronto.ca

RE: Deputation to the Planning and Housing Committee - Bill 185: "Cutting Red Tape to Build More Homes Act, 2024"

Dear Mayor Olivia Chow and Members of the Planning and Housing Committee,

I write to you on behalf of Neighbourhood Pods TO, a collective of grassroots organizations, community workers, and advocates committed to securing affordable housing and promoting responsible development in our communities.

We appreciate the opportunity to submit our comments and recommendations concerning Bill 185, titled "Cutting Red Tape to Build More Homes Act, 2024".

In light of the critical provincial update outlined in agenda **PH12.7 - City Comments on Proposed Bill 185 - Cutting Red Tape to Build More Homes Act, 2024, Provincial Planning Statement 2024, and New Minister Zoning Order framework** - we find it imperative to voice our strong opposition to the recommendations put forth by the Ministry of Municipal Affairs and Housing that introduced Bill 185 – Cutting Red Tape to Build More Homes Act.

The proposed Bill affects 17 acts, including the City of Toronto Act, Planning Act, Development Charges Act and others. Bill 185 has reached second reading and was referred to the Province's Standing Committee on Finance and Economic Affairs. On April 10th, the Province also released a revised Provincial Planning Statement, 2024 (the "Planning Statement") and a new Minister Zoning Order (MZO) framework. The Planning Statement, which if adopted, will replace the existing Provincial Policy Statement, 2020 (the "PPS") and include some policies from A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"). The Growth Plan is proposed to be repealed.

The City of Toronto has proudly committed to advancing the right to adequate housing, acknowledging it as fundamental to the inherent dignity, well-being of individuals, and the development of sustainable, inclusive communities. This noble commitment compels us to advocate for legislation and policies that not only protect but also empower all residents, particularly those most at risk of housing insecurity.

Key Concerns with Bill 185:

1. Reduced Community Engagement:

Bill 185 significantly limits public input on development projects, reducing the community's role in crucial planning decisions that directly affect their lives and neighborhoods. This reduction in engagement undermines democratic processes and disregards the value of community insights in urban planning.

2. Dismissal of Existing Appeals:

By denying third party appeals, the bill proposes to disregard current and future community appeals against developments, effectively eroding the community's capacity to advocate for just and inclusive urban planning. This dismissal of appeals denies residents a critical tool for addressing grievances and ensuring equitable development.

3. Limited Municipal Oversight:

Bill 185 seeks to strip local municipalities of their ability to consult on major planning applications. This reduction in municipal oversight weakens the power of local leaders to protect community interests and to mediate balanced development that considers both growth and community needs.

4. Encroachment on Green Spaces:

The enactment of this bill poses a significant risk to protected greenbelt areas and threatens to undermine efforts to include necessary community benefits and support affordable housing within new developments. Green spaces are vital for environmental sustainability and public well-being, and their encroachment should be carefully considered against the broader impacts on the community.

Recommendations:

- **Reinstate Community Engagement:** We strongly recommend that the provisions limiting public input be reconsidered to allow for robust community involvement in all stages of the development process. Engaged and informed communities are foundational to the success of urban development projects.

- **Preserve Appeal Rights:** It is crucial to maintain the community's right to appeal development decisions, ensuring a checks and balances system that promotes fair and equitable urban planning.

- **Maintain Municipal Consultation:** We advocate for the retention of mandatory consultations with local municipalities on major planning applications, thereby ensuring that developments are not only economically beneficial but also socially and environmentally sustainable.

- **Protect Green Spaces:** We urge the government to protect our greenbelt areas rigorously and to require that any encroachment be coupled with stringent assessments of environmental and community impacts, ensuring that development is both responsible and sustainable.

Acknowledging Useful Measures of Bill 185:

While we express these concerns, it is also important to recognize some of the beneficial measures proposed in Bill 185:

- The bill seeks to remove minimum parking requirements in Major Transit Station Areas to promote denser, more sustainable urban environments.
- It introduces pre-approved standardized designs and sets time limits for already approved developments to start construction, facilitating faster and more efficient building processes.
- The bill proposes innovative measures like a "Use It or Lose It" framework to encourage timely development, and it revises the phase-in delay of Development Charges increases.


As we anticipate the discussions at the May 9th Planning & Housing Committee meeting, we look forward to contributing our perspectives and advocating for policy improvements that genuinely reflect the city's commitment to housing as a right. We implore the Mayor, this Committee, and the City Planning department to demonstrate the courage to stand up for what is equitable and just by rejecting the harmful provisions of Bill 185.

We appreciate your attention to this matter and welcome the opportunity to contribute to meaningful policy changes that will ensure equity and human dignity for all residents of Toronto.

NPTO believes that development should not only aim to "build more homes" but also to build better communities. As such, we stand ready to collaborate with the City of Toronto to advocate for amendments to refine Bill 185 and ensure that it supports the long-term interests of all Ontario residents.

Thank you for considering our deputation.

Sincerely,



Walied Khogali Ali

Coordinator

Neighbourhood Pods TO (NPTO)

The Neighbourhood Pods TO (NPTO) embodies a consortium of grassroots organizations, community workers, and advocates, all rallying under a unified mission to bolster the economic livelihoods and enhance the overall well-being of low-income individuals and communities across Toronto.