



# Recommendations to the Province of Ontario on Bill 185: Cutting Red Tape to Build More Homes Act

Posted by Jin Huh on June 06, 2024

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We are writing to express our recommendations concerning Bill 185, titled [Cutting Red Tape to Build More Homes Act, 2024](#).

Black, Indigenous, racialized, 2SLGBTQ+, low-income and other equity-deserving communities are already underrepresented within public planning processes. As the affordable housing crisis continues to worsen across Ontario, it is imperative that equitable planning principles remain at the forefront of provincial planning decisions. We recognize that Ontario's population is growing rapidly, and that we need to continue supporting development that is affordable and accessible to all, however, this cannot be done at the cost of losing our environmentally protected lands.

In summary, we urge the Province to:

1. **Reinstate Community Engagement:** Reconsider provisions limiting public input to allow for robust community involvement in all stages of the development process.

2. **Preserve Appeal Rights:** Maintain the community's right to appeal development decisions to promote fair and equitable urban planning.
3. **Maintain Municipal Consultation:** Retain mandatory consultations with local municipalities on major planning applications to ensure developments are both economically beneficial and socially and environmentally sustainable.
4. **Protect Green Spaces:** Rigorously protect our Greenbelt areas, ensuring any encroachment is coupled with stringent assessments of environmental and community impacts.

Planning for density and expediting the development of affordable and deeply-affordable housing should be prioritized while still ensuring we are not destroying our valuable ecosystems and the Greenbelt. As we plan for population growth, we must remind ourselves that there is no going back once our ecosystems are paved over. Sprawl clears green spaces, increases car dependency and congestion, raises the costs of infrastructure services (i.e. garbage, hydro, roads etc.), and increases the cost of housing.

Increasing affordable and deeply affordable housing developments in walkable communities already connected by strong public transit systems and amenities considerably reduces carbon emissions and car dependency. We support the notion of planning complete, affordable and accessible communities that can age in place with connections to public transit, social services, affordable grocery stores, community spaces, green space and other amenities. Moreover, public consultation is one of the most important drivers of co-developing these complete communities; these processes must be expanded to engage as many equity-deserving communities as possible, not limit them from participation.

**As such, we are disappointed to learn of the proposal to limit public input on development processes, one being to limit third-party appeals to the Ontario Land Tribunal (OLT). We are equally concerned about removing the requirement for developers to consult with municipalities on site plan applications, rezoning or plan amendment.** Removing these requirements limit the ability of municipalities to ensure adequate and robust consultation and engagement with community members. These are sweeping changes that undermine our democratic planning processes; they could have detrimental consequences that contribute to missed opportunities to support longer term supply of affordable, attainable, non-profit and rental housing, and a major loss of environmentally-protected lands.

Additionally, Bill 185 hinders the improvement of community benefit frameworks and local planning initiatives that have helped our neighbourhoods protect permanent deeply affordable housing, green spaces, and spaces for arts, culture, community services.

Regional and municipal planning systems play a very important role in ensuring that we continue following planning practices that strive for equity, inclusivity, accessibility and affordability in our neighbourhoods. Community engagement in planning processes allow for new developments to reflect the needs of the community and our diverse populations, and also become more desirable places to live. To limit public consultation further would mean that we could be diminishing our potential as a province to alleviate the affordability crisis, and runs the risk of further eroding public trust in the Province and government-led planning processes.

Though we understand it will take time and resources, we would like to work in collaboration with the Province to improve transparency and accountability within municipal and provincial planning processes—this starts with creating opportunities where communities are meaningfully engaged at every stage of development. We are pleased to see some important strides have been proposed by the Province—eliminating development application fee refunds introduced by Bill 109, and removing minimum parking requirements from Protected Major Transit Station Areas while requiring accessible and visible parking spaces for lands within these areas. We hope you will consider continuing meaningful partnerships and consultation with communities and municipalities as we work together to address our province's affordability crisis.