



South Armour Heights Residents' Association



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May 31, 2019

D. Ford, Premier of Ontario (premier@ontario.ca)

S. Clark, Minister of Municipal Affairs and Housing (steve.clark@pc.ola.org)

R. Martin, MPP Eglington-Lawrence (robin.martin@pc.ola.org)

Subject: Bill 108 – More Homes, More Choices Act, 2019

Premier Ford, Minister Clark, MPP Martin:

The following submission is from the South Armour Heights Residents' Association (SAHRA). For reasons outlined below, we support the requests of the City of Toronto, the Large Urban Mayors' Caucus of Ontario (LUMCO), the Federation of North Toronto Residents' Associations (FoNTRA), the Confederation of Ratepayers and Residents Associations (CORRA), the Federation of Urban Neighbourhoods (FUN), other municipal and resident associations and many citizens of Ontario that the Province extend the imposed June 1 deadline to allow adequate time for review and to suggest modifications to the proposed Bill 108. Failing that, we are opposed to Bill 108 in its present form.

We are a Residents' Association in Toronto covering the geographic area of the 401 south to Brooke Avenue, from the west side of Yonge Blvd to the east side of Avenue Road. Our Association is very involved with Committee of Adjustment, North York Community Council, TLAB and OMB/LPAT applications as well as with the Avenue Road Avenue Study and commercial developments on Upper Avenue (from Lawrence Avenue up to the 401). We are involved with Section 37 monies for these developments and their allocation within our *Neighbourhood*. Besides dealing with residential and commercial development issues, our mandate also calls for us to enhance the environment and social life within the community – so we are concerned about the parks, libraries, childcare facilities, schools, places of worship and community centres that are available to our residents and their families. We liaise with the other Residents' Associations within our area of Ward 8, our Councillor, FoNTRA, CORRA and the FUN as well as the City.

The changes proposed in Bill 108 will have a significant impact on our residents. The Bill is all encompassing, involving 13 Acts. As stated by other organizations, despite its title, Bill 108 does very little to support an increased supply of **affordable** housing. Even the proposed deferral of development charges for rental apartments is of questionable benefit given virtually all new rental units (apart from government subsidized units) are luxury units.

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Bill 108 is a response to requests by the **development industry** to reduce citizen and municipal input, control and appeal rights through changes to the Planning Act, the Local Appeals Tribunal Act and the Development Charges Act, at the same time as severely reducing environmental and heritage protections by restricting and limiting Conservation Authority oversight, the Environmental Assessment Act, the Endangered Species Act and the Ontario Heritage Act.

The following changes will directly impact our *Neighbourhood*.

Changes to the Planning Act and the Local Planning Appeal Tribunal Act 2017 will result in Municipal council decisions, provincial policies/plans and municipal official plans returning to being given much less weight. Hearings would be "de novo" which means they basically start new, ignoring local planning processes and community input. Citizen rights as Participants to make our views directly to LPAT will be severely restricted (limited to written submissions with no ability to speak – LPAT will ignore these submissions / they have no weight). To have our voices heard, a Residents' Association would have to register as a Party which means paying the costs for a Lawyer and a Planner – very few Associations can afford this expense.

Bill 108 proposes to consolidate Section 37 contributions and Section 42/51 parkland dedication requirements into a single fee, referred to as the community benefits charge (CBC). Collectively these changes significantly restrict the ability of municipalities to secure parkland and community facilities, forces them to choose between parkland and community facilities (parkland dedication and the CBC charge cannot both be applied to a project) and limits the overall value of parkland and community facility/benefits. As communities intensify, these facilities and parkland are integral to creating healthy and economically successful communities. Today many Neighbourhood enhancements occur with Section 37 funds. The legislation requires that 60% of parkland/community benefits funds be spent annually – it will be very difficult to plan/organize/implement significant projects in that timeframe/it also inhibits assembling funds over several years for major projects. These proposed changes absolve builders from their financial responsibility for community liveability.

We ask that the Province extend the imposed June 1 deadline to allow adequate time for review and to suggest modifications to the proposed Bill 108.

Sincerely



Sheila Dunlop (Secretary)

Cc: Geoff Kettel, Cathie Macdonald (Federation of North Toronto Residents' Associations)
William Roberts (Confederation of Ratepayers and Residents Associations)
William Phillips (Federation of Urban Neighbourhoods)
Councillors Mike Colle, Josh Matlow, Jaye Robinson
Jim Sadler, Bob Williams, Gary Langdon, Ron Johnson (SAHRA)
Lytton Park Residents Organization, Bedford Park Residents Organization,
and the Upper Avenue Community Association

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