

# Summerhill Residents Association

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VIA EMAIL: [Steve.Clark@pc.ola.org](mailto:Steve.Clark@pc.ola.org)

Hon. Steve Clark, Minister  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto Ontario M7A 2J3

## Bill 23: More Homes Built Faster Act, 2022

Dear Minister:

The *Summerhill Residents Association* ("SRA") represents a residential community in the centre of Toronto in public policy debates affecting our members. It has followed with interest the government's initiatives to address the housing affordability crisis and supports all effective and reasonable measures in this regard. Our review of the proposed omnibus bill finds that, while there may be real value in streamlining municipal processes, the proposed wholesale revamping of the entire planning system developed over the last fifty years may ignore the complexities of some key issues. Accordingly, we urge the government to disentangle the various legislative proposals to allow for a more focused public consultation and debate.

In the meantime, the SRA brings to your attention a few initial issues that, from our perspective, are problematic and require re-thinking, as follows:

- third-party appeals of decisions under the *Planning Act* are a fundamental right to participate in a democratic process when multiple interests are at stake and need to remain;
- the proposed increased powers of the OLT to order costs against the party who loses at a hearing is intended to inflict substantial costs on parties to chill their participation and is wrong;
- the determination of the parkland dedication location needs to remain with the municipality, not passed to the landowner, to ensure a comprehensive municipal parkland strategy;
- the formula for calculating the Community Benefits Charge needs to ensure that the funds raised reasonably correspond to the additional impacts imposed on existing services by the development;
- architectural details and landscape design need to be part of the site plan control scope since they are key elements for ensuring a fit of the new development within the existing and planned context; and,
- the replacement of rental housing if a demolition is involved is a key strategy to provide affordable housing and needs to remain.

The SRA, respectfully, urges you and your government to make the necessary changes to the process to allow for a more informed public debate.

Yours sincerely,

**Summerhill Residents Association**



Deborah Briggs  
President

### Copies:

Hon. Doug Ford, Premier of Ontario  
John Fraser, Interim Leader of Ontario Liberal Party  
Peter Tabuns, Leader, Official Opposition  
John Tory, Mayor of Toronto  
Jessica Bell, MPP, University-Rosedale  
Dianne Saxe, City Councillor, University-Rosedale