



**RESCON presentation to Standing Committee on Justice Policy  
Bill 108, *More Homes, More Choice Act*  
Friday May 30, 2019, 4PM  
Committee Room 1, Main Legislative Building**

**Intro and Background**

Thank you for inviting RESCON to make a brief presentation to the Standing Committee on Bill 108

RESCON is Residential Construction Council of Ontario. The Council represents over 200 Ontario low, medium and high-rise residential builders, accounting for about 90% of residential construction in the Greater Golden Horseshoe.

RESCON has a long-standing interest in building innovation as well streamlining the building regulatory system to remove unnecessary impediments to more affordable housing.

In July of last year RESCON released a report called “Streamlining the Development and Building approvals Process in Ontario”. We are pleased to see that recommendations from that report and from more recent submissions to the province on housing supply, the growth plan and the Planning Act, were reflected in Bill 108.

**Problem of slow planning approvals**

Ontario’s planning and development approval process is far too slow.

Slow planning approvals not only delay but supply but actually **reduce supply** over time as builders tend to avoid projects that are compliant with all the rules but slightly more complex.

According to the World Bank “Doing Business” metrics, Toronto, representing Canada, ranks 63 globally in terms of the efficiency of the building and



development permit approval process. The metric is based on a relatively benign building project – a warehouse in an areas zoned for warehouses.

One of the main reasons for the delay was very slow planning approvals – specifically site plan control. Residential projects typically face much bigger delays even for routine planning approvals. So we are very pleased that Bill 108 will speed up the planning and development approval process.

We are here to comment mainly on schedule 12 which amends the Planning Act.

Firstly, we want to commend to government for taking a very big and bold step in the right direction.

The changes in Bill 108 will contribute very substantially to streamlining the planning process which will contribute to more housing supply and more housing choice.

Bill 108 introduces several important changes, we will comment on a few that we think are especially important.

### **Reduction in decision timelines:**

We strongly support the substantial reduction in planning approval timelines in Bill 108 for official plans, zoning bylaws and plans of subdivision.

One of RESCON's main recommendations to the government was to speed up very slow planning approval times that increase uncertainty and risk for developers leading to reduced housing supply.

### **Community Planning Permit System (CPPS):**

We are also very pleased that Bill 108 provides for expanded use of Community Planning Permits also known as development permits, which combine zoning and site plan control in one package.



Bill 108 would allow the Minister to require CPPS in major transit station areas or MTSAs. This is something that RESCON had specifically recommended to speed up approvals near transit stations. This is key to increasing supply because many areas adjacent to subway stations and GO stations are very under-developed.

By some estimates MTSAs and adjacent arterial roads could accommodate over 100,000 additional housing units in addition to office and commercial development.

Bill 108 is a very important first step for making efficient use of our transit system and MTSAs, but for CPPS to be implemented municipalities also need to update their official plans. Currently municipalities are given too much time to do this – 8 years. Updates to official and secondary plans need to happen much faster.

The province also needs to be prepared to step in an up-zone with a CPPS if that does not happen. Several US states are already taking such an approach to increase housing supply and capitalize and valuable transit infrastructure.

### **Community benefit charge and section 37**

Bill 137 makes a very important changes that will result in more certainty and predictability regarding development -related charges.

Section 37 of the Planning Act allows the municipality to charge a developer for services and facilities, in exchange for an increase in building height or density. These Section 37 fees are in addition to those growth-related costs covered by development charges parkland dedication fees.

Section 37 therefore had the perverse effect of encouraging municipalities to under-zone land relative to the Provincial Growth Plan. RESCON and other associations had strongly recommended eliminating section 37.

Changes to section 37 in Bill 108 should eliminate that incentive and encourage more up to date zoning or CPPSs in MTSAs.



## **Input on regulations**

Thank you again for inviting RESCON to comment on Bill 108.

Our comments have focused on Schedule 12 which amends the Planning Act.

We think that changes to the Planning Act and the planning regime in Ontario resulting from Bill 108 are a very important first step.

RESCON looks forward to providing it's input as the government develops regulations to support these Planning Act changes and other legislative changes that affect residential construction in Ontario.

Thank you and we would be happy to answer questions of a more general nature related to schedule 12 and changes to the Planning Act.