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October 28, 2015

Peter Tabuns  
MPP Toronto – Danforth  
Chair, Standing Committee on Social Policy  
Room 165, Main Legislative Building, Queen's Park  
Toronto, Ontario M7A 1A5

Dear Mr. Tabuns:

As Bill 73 progresses to the Committee on Social Policy, which you chair, I am writing to indicate that ROMA has supported AMO's position on the Bill. ROMA appreciates the action being taken on review of the *Development Charges Act* and the *Planning Act, 1990* and the Province's commitment to providing citizens a greater say in how their communities can grow and municipalities increased abilities to cover costs of growth-related infrastructure. However, ROMA is supportive of the concerns AMO has outlined, and in particular, the issues included below.

First, it seems in some circumstances the "once a severance always a severance" principle has been frustrated. The principle should be more fully ensured, as there are still cases of unintended merging of land titles, which becomes evident during succession planning of agricultural properties. This is of particular concern to rural municipalities. ROMA recommends this issue be referred to the planning working group or some other body that will address the situation.

Second, the requirement for a Planning Advisory Committee at every upper tier in southern Ontario will add to administrative burden but will likely not have a meaningful impact. The current regime where these are permitted but not required, serves all well. Public impact on planning decisions evolves from many sources such as modernized notice, innovative engagement techniques and better educating the public and council members about the parameters of planning so that expectations are realistic. To create another committee for the purpose of having a non-council member as eyes and ears with the perception that it is a decision making committee, simply cannot meet the expectations of groups when they are advocating for a specific result. It may also put an onus on them that is consequential as to politicize the system. It is unclear what problem this is to solve.

A third concern with Bill 73 is the potential for unintended consequences as a result of the two year freeze in amending planning documents. While this can bring some assuredness to urban planning, where growth is understood in rural Ontario a proposal for job creation is not necessarily part of the nature of O.P.S. AMO has suggested that the Ministry consider identifying low and no growth municipalities as an exception. In that way council can consider a proposal without being the proponent, which could be complex if appealed to the OMB.

ROMA appreciates the action being taken on a number of positive proposed amendments to the *Development Charges Act* and the *Planning Act, 1990* put forth in this Bill and is in favour of additional amendments that AMO has identified. We look forward to continuing to work with you on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Ron Holman". The signature is written in a cursive style.

Ron Holman  
ROMA Chair