



May 31, 2019

Dear Madam/Sir,

Please accept these comments as Environment Hamilton's formal input on Bill 108 – the *More Homes, More Choice Act*.

More specifically, we are offering feedback on Schedules 3, 11 and 12 of Bill 108 – the schedules currently posted for public comment through the Environmental Registry of Ontario. Each schedule is addressed in the sections below.

Proposed changes to Schedule 11 – The Ontario Heritage Act

We are concerned that the proposed changes will make it more difficult for communities to protect historically significant buildings. Here in Hamilton, we have lost far too many heritage buildings already. For many important reasons – including sense of place, as well as ensuring that we are not losing the sustainability benefits of preserving and repurposing existing buildings – we do not support the proposed changes to the *Ontario Heritage Act*.

Proposed Changes to Schedule 3 - The Development Charges Act:

We are concerned about the negative impacts that proposed changes will have on the ability of municipal governments to ensure communities have access to what the province is categorizing as 'soft services' – including libraries, parks and recreational facilities. These are all critically important elements of basic quality of life in any community. Further, parkland is serving increasingly essential roles as habitat and green infrastructure, helping with absorption of stormwater flows, filtering air particulate pollution out of Hamilton's challenged local airsheds, and mitigating the impacts of climate change. We need parks now more than ever before!

Proposed Changes to Schedule 12 – The Planning Act:

We have some deep concerns about the proposed changes to the provincial Planning Act. We do not support proposed reductions in timelines by which municipalities must make decisions on planning applications. This will only generate more conflict; municipalities must be empowered to plan in an orderly manner at the local level. And we believe that providing community with meaningful opportunities for input is essential to ensuring better planning decisions in the long run. We do not support limiting community rights to weigh in on planning decisions.

One Area of Support – Changes to Facilitate Secondary Dwelling Units

We do support the changes designed to facilitate secondary dwelling units. We believe that this

is a helpful step in the right direction as far as encouraging 'gentle density'. In cities like Hamilton there is plenty of potential to accommodate growth through gentle density rather than through urban expansion into rural areas.

We want to close by noting that Environment Hamilton is an active member of the Ontario Greenbelt Alliance (OGA) and we have reviewed and fully endorse the detailed submission prepared by the OGA on behalf of its member organizations.

Yours truly,

A handwritten signature in black ink, appearing to read "L. M. Lukasik". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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