**TPRA Comments on Bill 108: More Homes, More Choice Act**

1. There are significant reductions in opportunities for public input in planning

* More decision-making at the modified LPAT ignores Council's decisions where residents had a voice
* There are major reductions in time frames for review of development applications so insufficient time for input and more applications going to LPAT as Council cannot respond in time. The time allowed for review under the LPAT provisions was 210 days. The proposed time allowed for review under Bill 108 is only 90 days. This is a 233% reduction in opportunity for resident’s review
* D*e novo* hearings allowed again so resident input at municipal level can be ignored  
  - participants at LPAT can only make submissions in writing in advance not present oral witness statement
* The Minister can impose areas for DPS with no public input
* There are set rules about public benefits eliminate consultation with councillors or appropriate decisions

2. There are significant reductions in the City's ability to plan for livable communities

* The City will not be able to pay for appropriate Park space as same park space required on a site no matter what the density and no “payment in lieu” allowed
* The role of city councillors in determining appropriate public benefits from a development will be greatly diminished
* The allowable types of benefits will be reduced. This will reduce the ability of the City to provide needed benefits for an area and extra costs will be borne by existing residents and businesses
* Expanded intensification areas around major transit stations (MTSAs) will increase from 500M to 800M radius which is a 256% increase in area. There is no detail regarding which stations will be defined a “major”. Lawrence Station is not deemed to be a development “node” in the Official Plan so the TPRA would not define Lawrence Station as “major”. This will increase the impact on existing low and medium density areas around those “major” transit stations.

3. The Act is called More Homes More Choice but there is no evidence that the provisions in the Act will achieve this.

* Giving developers a free reign is not the answer
* Provisions for inclusionary zoning will be severely restricted
* There are no incentives for supportive or affordable housing

4. There have been no draft regulations released with Bill 108. Without those the extent to the impact of the bill cannot be ascertained.