

SAMUEL SARICK LTD.

Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON M7A 2J3

PlanningConsultation@ontario.ca

RE: Comments of Samuel Sarick Limited on Proposed Amendments to the *Planning Act*, R.S.O. c. 1991, under Bill 185: *Cutting Red Tape to Build More Homes Act*

Samuel Sarick Limited (“**Sarick**”) is submitting this letter to the Provincial Government to provide comments on Bill 185: *Cutting Red Tape to Build More Homes Act, 2024*, which proposes amendments to the *Planning Act*, R.S.O. c. 1991, in addition to other legislation.

Sarick is a real estate investment, development and construction company that owns and manages a portfolio of buildings that total over 1.2 million square feet. Sarick has significant real estate interests in Ontario, including properties in the City of Toronto and the Town of Aurora, and prides itself on its reputation for integrity and professionalism.

As a stakeholder in the development process, Sarick supports changes to the law that will cut red tape, speed up government approval processes and limit the costs of new development.

Sarick is concerned, however, with the proposal to eliminate third-party appeal rights for municipally-initiated planning instruments, including official plans and zoning by-laws. These amendments will give municipalities an unchecked power to pass policies or zoning regulations that threaten the development viability of land. In the absence of an appeal right, Sarick would have to submit expensive planning applications to amend municipally-initiated official plans or zoning by-laws that redesignate or downzone its land holdings. This will add further complication to the planning process and could ultimately impede the Provincial Government’s goal of addressing the housing crisis by increasing the housing supply. In other words, municipalities could pass official plans and zoning by-laws that will result in the creation of less, not more homes, and these decisions would not be subject to challenge.

In closing, the right of appeal for landowners impacted by a proposed planning instrument is an important and longstanding tool in Ontario to ensure that the planning decisions of a municipality are consistent with Provincial direction and conform to the principles of good land use planning. Sarick therefore respectfully asks the Provincial Government to ensure that the right to appeal municipally-initiated official plans, official plan amendments, and zoning by-laws, is maintained.

We thank you in advance for your attention to this letter.

Samuel Sarick Limited