Simcoe County Greenbelt Coalition

June 1, 2019

Mr. John Ballantine, Manager
Municipal Finance Policy Branch
Municipal Affairs and Housing
13th Floor, 777 Bay St.
Toronto, ON M5G 2E5
john.ballantine@ontario.ca

Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay Street
13th floor
Toronto, ON M5G 2E5
planningconsultation@ontario.ca

RE: SCGC Comments on ERO 019-0017, 019-0016, 019-0018

Please accept our submission to the aforementioned reviews as they relate to Bill 108 and a proposed modification to transition regulations. We appreciate your consideration of our comments.

About Simcoe County Greenbelt Coalition

With our 35 member groups from urban, rural and semi-urban communities, we aim to promote community development that is financially, environmentally and socially sustainable, such that provides a net benefit to residents. A major part of this is to recognize the value that natural heritage, agriculture and water gives to our communities, including the numerous benefits and co-benefits of ecosystem services. Ensuring the people of Simcoe County, and Ontario broadly, continue to receive these benefits requires an approach to economic development that is evidence based, transparent and accountable to the public, and with full consideration of the long-term impacts that communities will either have to deal with or benefit from.

With that in mind, our members also fully appreciate that housing should be accessible for all - especially for those who are in the lower income brackets. Simcoe County is lacking in rental supply as well as smaller homes that would be affordable and accessible to seniors, young people or those with lower incomes.

Overall, we must caution the government that simply increasing housing supply will not eradicate the majority of problems that people face with housing in our region. In Simcoe County, for example, there is a surplus of residential housing units that could house over 150,000 people.[1] However, this impending supply does little to address housing shortages within specific populations since few units are purpose-built or are pegged as affordable housing. In fact, the vast majority of the oversupply units are single detached units, far from reliable transit or a strong job growth area. These are the types of communities that are really only designed for middle to high income persons/families, but do little for seniors, low income families or youth. We fear that the changes proposed under Bill 108 will only add to this oversupply of homes for middle to high income residents and do little for other demographics.

As outlined in a recent report by County of Simcoe's Social and Community Services, the living wage in the region is $18.01.[2] In most regions of the county, child care costs were the single largest expense for families, not housing. While housing was the second largest annual cost, transportation and food costs combined were more than housing. This is not to say that housing costs do not need to be addressed, rather, making life more affordable for Ontarians is not just about increasing supply to drop housing prices. For instance, making transit more reliable and accessible would provide options for people to reduce their transportation costs which represents an average of 14% of a household's annual budget in Simcoe County.[3] However, recent changes to the Growth Plan reduce the densities for Simcoe County making financially sustainable transit unfeasible. It will set a pattern of growth that continues to be car dependent which is costly for residents both financially and environmentally.

Moreover, the changes proposed in Bill 108 that impact the Endangered Species Act, Environmental Assessment Act and Conservation Authorities Act unnecessarily threaten our most precious habitats, water resources and public health as a result. As can be clearly seen within Simcoe County, the environmental protections and regulations have done little to slow down or deter planning applications since we have a surplus of residential units and employment lands. The efforts to deregulate the development industry at the expense of our shared environment and public health is unnecessary and unwise in the best of times, but especially within the context of climate crisis, mass biodiversity loss and increased pressure on water resources.

Finally, we would like to address ERO-0018 - Proposed Modifications to O. Reg 311/06. Within that there is a proposal to exempt the County of Simcoe Official Plan Amendment 2 from natural heritage policies within the Growth Plan. You should be made aware that there is a current LPAT hearing focusing on those policies as they relate to an environmental resource recovery

---

[1] https://www.simcoe.ca/dpt/pln/growth

[2] County of Simcoe, Social and Community Services (Jan. 2019) "2018 Living Wage Recalculation for Simcoe County" Available at www.simcoe.ca

[3] Ibid.

centre in the middle of a forest. It would seem that exempting this particular project from those policies would jeopardize the due process of the LPAT hearing thereby the province would be interfering in an irregular and undemocratic way. Also, the aims of the project are widely supported by the public, but the specific location is under contention by a majority of residents and the local municipality. A resource recovery centre such as this is a major fire hazard and thusly should be located in an urban location that has ample supply to water, fire services and away from active agriculture operations, forests and residences. At the very least, the location should be reconsidered to ensure it is not unnecessarily threatening headwaters, agricultural businesses, vulnerable species or nearby residences. Exempting this particular amendment from these policies would disable any such review and discussion. We urge the province to remove this exemption for the County of Simcoe and let the LPAT hearing continue unfettered.

We strongly support the submissions of the Ontario Greenbelt Alliance and the Canadian Environmental Law Association. We hope that there is willingness to take a second sober thought about planned actions in light of feedback received from municipalities, community organizations and affordable housing advocates.

Sincerely,

Margaret Prophet
Executive Director on behalf of the Simcoe County Greenbelt Coalition

AWARE Simcoe

Bass Lake Ratepayers Association

Blue Dot Barrie

Blue Dot New Tecumseth

Blue Dot Orillia

Blue Mountain Watershed Trust

Carden Field Naturalists

Chippewas of Georgina Island First Nation

Climate Action Now Barrie

Concerned Citizens of Adjala-Tosorontio Inc.

Earthroots

Eco-Spark

Elmvale Foundation

Federation of Tiny Township Shoreline Associations (FOTTSA)

Food and Water First (NDACT)

Friends of Simcoe Forests

Ganaraska Hiking Trail Association

Huronia Land Conservancy

Innisfil District Association

Lake Simcoe Association

Living Green Barrie

Midhurst Ratepayers' Association

Midland-Penetanguishene Naturalist Club

Nature Barrie

North Gwillimbury Forest Alliance

Nottawasaga Steelheaders

Ontario Farmland Preservation

Ontario Headwaters Institute

Ontario Nature

Protect Wasaga Beach Wetlands

Rescue Lake Simcoe Coalition

Save Oro Inc.

Save the Oak Ridges Moraine *Coalition (STORM)*

Couchiching Conservancy

Water is Life: Coalition for Water Justice

West Oro Ratepayers Association

APPENDIX 1: OGA SUBMISSION RE: BILL 108

RE: Ontario Greenbelt Alliance Submission on Bill 108, ERO 019-0017 and 019-0016

Thank you for considering our submission on Bill 108. The Ontario Greenbelt Alliance represents over 120 groups across the Greater Golden Horseshoe. With a short four- week submission period many of our members are unable to make submissions. As there are only three days between the June 1st submission deadline and the proposed June 4th final vote on the Bill the Alliance is concerned that the government will not have time to fully consider our submission. Amendments are needed to ensure that this bill can deliver on its stated objective to provide more low-cost housing and protect municipal government autonomy, a healthy environment and continued citizen involvement in community planning. As a result, we encourage the government to defer the June 4th vote on Bill 108.
The More Homes, More Choice Act amends 13 pieces of legislation with the stated intention of making it easier to bring affordable housing to market. Unfortunately, as written the Province's Housing Supply Action Plan and Bill 108 do very little to increase the supply of affordable housing (i.e. housing for the 20th-60th household income percentiles). In addition, certain policy changes contained within the Bill are actually contrary to the government's stated intention, such as restricting the use of inclusionary zoning to the vicinity of transit stations only.

Ontario Greenbelt Alliance members are generally YIMBY's (yes in my backyard). We have been supportive of encouraging a diversity of housing types to provide housing for seniors and low-income Ontarians to create complete communities. Rather than moving forward to support this type of housing, many of the changes in Bill 108 are aimed at increasing the supply of single-family houses built on Greenfield (farm land and natural areas). Detached single family homes are the most expensive type of housing for new homebuyers and they are also more expensive for municipalities to service.
Perhaps the most discouraging aspect of Bill 108 is its bias toward the recommendations made exclusively by the development industry. The Bill does nothing to satisfy other business interests including farmers, or business owners who will suffer from increased sprawl and its associated gridlock and impact on employee commute times, health and productivity. Bill 108 reduces developer costs but increases the burden on municipal taxpayers from lower phased in development charges. Deferring development charges on commercial and industrial development projects requires taxpayers to subsidize developers and municipalities to take on debt. Collectively, the changes increase municipal debt, reduce citizen and municipal input and control and restrict appeal rights.

Increasingly Ontario has been moving to a funding model for new development that requires growth to pay most of its share of capital costs. This model has enabled our municipalities to develop parks and community facilities ready for new residents without burdening existing residents with increased capital costs. Moving away from this model, capping fees that support sustainable growth and reducing parkland in cities will reduce the livability and prosperity of new communities and cause citizens and municipal councils to strongly resist new developments.

Other amendments severely reduce long held protections that support the health and prosperity of our communities and natural areas. These include restricting and limiting Conservation Authority oversight, changes to the Environmental Assessment Act, gutting the Endangered Species Act and weakening the Ontario Heritage Act.

The proposed amendments to the Planning Act regarding the Local Planning Appeals Tribunal favours developer interests, diminishes the important role of our elected officials in managing growth and development and limits the ability of citizens to participate in a meaningful way. Returning to the old OMB rules will result in housing delays and higher prices, the opposite of the government's stated intention to speed up and lower the cost of new housing.

As a result, many municipalities oppose or are requesting a deferral of Bill 108. To date, local and regional municipalities including Burlington, Halton, King, York Region, Kingston, Oakville, Aurora, Brant, Guelph, Hamilton, Archipelago and Lennox-Addington have expressed concerns with the Bill.

The Ontario Greenbelt Alliance encourages the government to provide more time for municipalities and stakeholders to comment on Bill 108 and to take the time to carefully consider our specific amendments below.

Sincerely,

Susan Lloyd Swail
On behalf of the Ontario Greenbelt Alliance

cc. Minister Steve Clark, Municipal Affairs and Housing

APPENDIX 2: CELA SUBMISSION ON BILL 108

Canadian Environmental Law Association
T 416 960-2284 • 1-844-755-1420 • F 416 960-9392 • 55 University Avenue, Suite 1500
Toronto, Ontario M5J 2H7 • cela.ca
May 30, 2019
Planning Act Review
Provincial Planning Policy Branch
777 Bay Street
13th floor
Toronto, ON
M5G 2E5
planningconsultation@ontario.ca

RE: Bill 108 - (Schedule 12) – the proposed More Homes, More Choice Act: Amendments to the Planning Act (ERO Number 019-0016)

The Canadian Environmental Law Association ("CELA") welcomes this opportunity to provide submissions in relation to Bill 108, Schedule 9 (Local Planning Appeal Tribunal Act, 2017) and Schedule 12 (Planning Act) in response to ERO posting number 019-0016.
In CELA's view, any analysis of the land use planning system should be viewed through the lens of ensuring access to justice for members of the public. Any Ontarian interested in, or affected by, land use planning decisions should have a meaningful opportunity to participate in the decision-making process. Bill 108's reforms to the Planning Act and Local Planning Appeal Tribunal Act ("LPAT Act") do not address this critical issue.
CELA supports the return to de novo hearings at the Local Planning Appeal Tribunal ("LPAT") to restore procedural rights and ensure that evidence on serious environmental issues is tested. However, we recommend that amendments which restrict public participation in appeals in the planning system, including short timelines for decisions and limits on the types of appeals to LPAT, be removed.
A. Background on Canadian Environmental Law Association
CELA is a public interest law group founded in 1970 for the purposes of using and enhancing environmental laws to protect the environment and safeguard human health. Funded as a specialty legal aid clinic, CELA lawyers represent low-income and vulnerable communities in the courts and before tribunals on a wide variety of environmental issues. Since our inception, CELA's casework, law reform and public outreach activities have increasingly focused on land use planning matters at the provincial, regional and local levels in Ontario. For example, CELA lawyers represent clients involved in appeals under the Planning Act in relation to official plans, zoning by-laws, subdivision plans and other planning instruments. In some cases, CELA clients are the appellants, while in other cases, CELA clients are added by the LPAT as parties or participants in response to appeals brought by other persons or corporations.

CELA's planning cases tend to occur outside of the Greater Toronto Area. The overall objective of CELA's clients in these hearings include to conserve water resources; protect ecosystem functions; preserve prime agricultural lands; safeguard public health and safety; and otherwise ensure good land use planning across Ontario.

B. Analysis

(1) Schedule 9 – Local Planning Appeal Tribunal Act, 2017

i. Restore paramountcy of Statutory Powers Procedure Act

The Statutory Powers Procedures Act ("SPPA") applies generally to Ontario tribunals and applied to the Ontario Municipal Board. It provides important procedural protections, for instance a parties' right to notice1, the right to attend or access hearings2, the right to examine and cross-examine witnesses3, and the right to reasons for decision4. The LPAT Act established that the SPPA would not prevail if there was a conflict between it and the SPPA.5 In CELA's view, the paramountcy of the SPPA and its procedural safeguards should be restored.

Recommendation 1: Bill 108 should restore the applicability of the Statutory Powers and Procedures Act to Local Planning Appeal Tribunal cases, including in cases of conflict between the Statutory Powers Procedures Act and the Local Planning Appeal Tribunal Act, 2017.

ii. Repeal of restricted Local Planning Appeal Tribunal Hearing rules in Schedules 9 and 12

CELA opposed Bill 139's amendments to the Ontario Municipal Board regime because it eliminated important procedural and substantive rights for the public and community groups within the land use planning appeal framework. It has been our experience representing community groups in the current LPAT regime that the following issues arise:

The current system requires parties to submit their evidence, including expert reports, to the local municipality or planning board making the initial planning decision. It is difficult for community groups to incur significant expenses at this earlier stage of the proceeding.

At the municipal or planning board level, there is no opportunity to cross-examine experts or ensure that the authors of expert reports are duly qualified to offer expert evidence. Smaller or rural municipalities often do not possess in-house capacity to critically assess planning applications and the supporting technical documentation. The restrictions on parties controlling what evidence to call and the cross-examination of witnesses at LPAT is problematic because expert evidence may never be tested adequately.

1 Statutory Powers Procedure Act, RSO 1990, c S22 ("SPPA"), s. 6

2 SPPA, s. 9

3 SPPA, s. 10.1

4 SPPA, s. 17

5 Local Planning Appeal Tribunal Act, 2017, SO 2017, c 23, Sched 1, ("LPAT Act"), s 31(1)(b), (3)

The requirement to create a written record which includes all affidavits and legal argument within 20 days of receipt of the Notice of Validity is time consuming and resource-intensive.

In our view, it is not efficient to have a two-stage appeal process whereby the LPAT is restricted in its potential remedy on a first appeal to returning the matter to the municipal decision-maker, but allowing a full de novo hearing on a second appeal.

However, CELA does not recommend restoring the pre-Bill 139 status quo without further reform. There is a pressing need to strengthen and improve Ontario's existing land use planning system, particularly in terms of protecting provincial interests, enabling local decision-making, ensuring meaningful public participation, and providing effective appellate oversight by a specialized administrative body.

In particular, Bill 108 does not address the fundamental access to justice issue in our land use planning system, namely, the financial barriers facing residents and non-governmental organizations who seek to participate in decision-making. The current land use planning system is difficult to access and relies heavily on expensive experts. It is incumbent on the Ontario government to address the fiscal imbalance in parties' resources to ensure that the public can participate and contribute to the development of their communities in a fair manner.

We also note that the Ontario government's decision to discontinue funding for the Local Planning Appeal Support Centre ("LPASC"), which provided legal and planning support to the public, exacerbates this access to justice issue. We recommend that funding for the LPASC be restored.

Recommendation 2: CELA recommends that the Ontario government provide funding assistance for lawyers, planners and other experts to eligible members of the public and community groups at the Local Planning Appeal Tribunal to improve access, fairness, and the quality of decisions.

Recommendation 3: Funding for the Local Planning Appeal Support Centre should be restored.

iii. Participants should be able to make an oral statement to the LPAT

Section 5 of Schedule 9 proposes to add section 33.2 to the LPAT Act, which would restrict the participation rights of participants to written submissions only.6 CELA's clients often wish to participate at LPAT by making a presentation to the tribunal, but do not have the resources to assume the role and responsibilities of a full party. It is very useful for the tribunal to receive presentations directly from the public, who are typically unrepresented residents with considerable local knowledge and valuable perspectives on the issues in dispute.

6 Bill 108, More Homes, More Choice Act, 2019, Schedule 9, Local Planning Appeal Tribunal Act, 2017, section 5 [amending section 33.2 of the LPAT Act]

Recommendation 4: The proposed section 33.2 of the LPAT Act (section 5 of Schedule 9) should be deleted to allow participants to participate in the Local Planning Appeal Tribunal process either in writing or by making an oral statement to the tribunal.

iv. Repeal of power of Tribunal to state case for opinion of Divisional Court

CELA disagrees with section 6 of Schedule 9, which repeals section 36 of the LPAT Act (previously subsection 94(1) of the Ontario Municipal Board Act). Section 36 allows for the parties to a tribunal hearing or the tribunal itself to refer a stated case to the Divisional Court for opinion. This power is not used frequently, but it is useful to efficiently and fairly resolve issues that could affect a multiplicity of cases, for instance on the constitutional authority of the LPAT or procedural issues.

For example, the most recent use of this power was in Craft et al v. City of Toronto et al, 2019 ONSC 1151, which clarified the ability of parties to cross-examine witnesses called by the

LPAT. This use of the stated case power was useful and efficient because it provided guidance on a procedural issue common to all LPAT appeals.

Administrative law principles generally prohibit parties to an administrative tribunal hearing from judicially reviewing interlocutory decisions, such that a recurring procedural concern may not be quickly resolved by the Divisional Court.

Recommendation 5: Section 6 of Schedule 9, which repeals section 36 of the Local Planning Appeal Tribunal Act, 2017, should be removed. The power of the LPAT or the parties to refer a stated case to the Divisional Court for opinion should be maintained.

(2) Schedule 12 - Planning Act

i. Restricted appeal rights for the public

CELA opposes Bill 108's proposal to remove the public's ability to appeal several Planning Act decisions. The following proposed amendments should be removed:

Under the proposal, there is no appeal of Minister-ordered development permit system provisions in Official Plans, unless the Minister himself appeals.7

The ability for a member of the public to appeal a non-decision on an Official Plan has also been removed. Now, it is only a municipality, the Minister, or the proponent of an amendment who can appeal.8

7 Bill 108, Schedule 12, Section 3(2) [amending sections 17(24.1.4), 17(24.1.5), 17(24.1.6) of the Planning Act], Section 3(8) [amending section 17(36.1.8), 17(36.1.9), 17(36.1.10) of the Planning Act], and section 19 [amending section 70.2.2(1) of the Planning Act]

8 Bill 108, Schedule 12, Section 3(11) [amending s. 17(40) of the Planning Act]

The public's ability to appeal decisions on plans of subdivision has been removed. In the current system a person who made oral or written submissions to the municipality or planning board could appeal. The term "person" has been removed from subsections 51(39) and 51(48) of the Planning Act. Instead, the list of the persons who can appeal is now found in subsection 51(48.3) and only includes corporate entities, such as a corporations operating an electric utility, Ontario Power Generation Inc., and a corporation operating telecommunication infrastructure.9 We also note that the ability of the public to appeal official plans and official plan updates has not been restored.

Restricting access to the LPAT is contrary to sound, participatory decision-making and will likely result in more issues being litigated in the court system, which is more costly and lacks the planning expertise of the LPAT. It is advisable to ensure that the LPAT has a robust appeal authority and the public is not excluded from appealing to LPAT on important land use planning matters.

Recommendation 6: Sections 3(2), 3(11), 14(3), 14(4), 14(6), 14(7) of Schedule 12, Bill 108 should be removed to allow the public to appeal development permit system provisions in Official Plans, non-decisions on an Official Plan, and plans of subdivision.

ii. Shorter timelines for decision by municipalities and planning boards

The proposed amendments to the Planning Act significantly shorten the timelines for decision by municipalities and planning boards. CELA opposes those amendments because the timelines are set arbitrarily with no reference to the significance or complexity of any particular decision. Short timelines will also decrease efficiency in the overall planning approval process

by resulting in more developer appeals to the LPAT for non-decisions, which will start the costly appeal process. Providing municipalities and planning authorities with a reasonable amount of time to make a decision would lower costs and conflict.

We also note that the proposed timelines are shorter than the timelines for decision under the Planning Act before the amendments to the planning system by Bill 139.

Examples of the shortened timelines for decision include:

Subsection 17(40) relates to decisions in respect of all or part of an Official Plan. The timeline for decision has been shortened from 210 days to 120 days. Prior to the amendments to the Planning Act in Bill 139, the timeline for decision was 180 days.10 The discretion to lengthen the timeline in appropriate circumstances, which existed in the pre-Bill 139 system and exists in the current system, has also been repealed.11

9 Bill 108, Schedule 12, Section 14(3), (4), (6), (7) [amending sections 51(39), (48) and (48.3) of the Planning Act]

10 Bill 108, Schedule 12, Section 3(11) [amending section 17(40) of the Planning Act]

11 Bill 108, Schedule 12, Section 3(12) [amending section 17(40.1) of the Planning Act]

Subsection 22(7.0.2) shortens the timeline for decision on amendments to Official Plans to 120 days from 210 days. The previous standard prior to the Bill 139 amendments was 180 days.12

Subsection 34(11) shortens the timeline for decision on zoning by-law amendments to 90 days from 150 days. The previous standard prior to the Bill 139 amendments was 120 days.13

Subsection 51(34) shortens the timeline for decision on plans of subdivision to 120 days from 180 days. The previous standard prior to the Bill 139 amendments was 180 days.14

Recommendation 7: Sections 3(11), 4(2), 6(1) and 14(2) of Schedule 12, Bill 108 should be removed to maintain the current timelines for decision in Planning Act matters.

Recommendation 8: Section 3(12) of Schedule 12, Bill 108 should be removed to maintain municipal discretion to extend the timeline for Official Plan decisions in appropriate circumstances. Municipalities or planning boards should also be granted similar discretion to extend any Planning Act decision timeline in appropriate circumstances.

iii. Repeal of restricted appeal grounds

The proposed repeal of sections 17(24.0.1), 17(25), 17(36.0.1), 17(37), 22(7.0.0.1), 22(8) and 34(19.0.1) restores more fulsome appeal grounds in appeals to the LPAT. The current system restricts appeals by only considering whether a decision on Official Plans or zoning by-law amendments are inconsistent with a policy statement, fail to conform with or conflict with a provincial plan, or fail to conform with an applicable official plan. We welcome the ability to raise other appropriate planning grounds on appeal, for instance prematurity, land use incompatibility, non-conformity with provincial interests listed in section 2 of the Planning Act, non-compliance with statutory prerequisites, or conflict with other provincial legislation.

Recommendation 9: CELA’s supports Bill 108’s restoration of more fulsome appeal grounds to the Local Planning Appeal Tribunal.

C. Summary of Recommendations

In summary, CELA makes the following recommendations in relation to Schedule 9 and 12 of Bill 108:

Recommendation 1: Bill 108 should restore the applicability of the Statutory Powers and Procedures Act to Local Planning Appeal Tribunal cases, including in cases of conflict
12 Bill 108, Schedule 12, Section 4(2) [amending section 22(7.0.2) of the Planning Act]
13 Bill 108, Schedule 12, Section 6(1) [amending section 34(11) of the Planning Act]
14 Bill 108, Schedule 12, Section 14(2) [amending section 51(34) of the Planning Act]

between the Statutory Powers Procedures Act and the Local Planning Appeal Tribunal Act, 2017.
Recommendation 2: CELA recommends that the Ontario government provide funding assistance for lawyers, planners and other experts to eligible members of the public and community groups at the Local Planning Appeal Tribunal to improve access, fairness, and the quality of decisions.
Recommendation 3: Funding for the Local Planning Appeal Support Centre should be restored.
Recommendation 4: The proposed section 33.2 of the LPAT Act (section 5 of Schedule 9) should be deleted to allow participants to participate in the Local Planning Appeal Tribunal process either in writing or by making an oral statement to the tribunal.
Recommendation 5: Section 6 of Schedule 9, which repeals section 36 of the Local Planning Appeal Tribunal Act, 2017, should be removed. The power of the LPAT or the parties to refer a stated case to the Divisional Court for opinion should be maintained.
Recommendation 6: Sections 3(2), 3(11), 14(3), 14(4), 14(6), 14(7) of Schedule 12, Bill 108 should be removed to allow the public to appeal development permit system provisions in Official Plans, non-decisions on an Official Plan, and plans of subdivision.
Recommendation 7: Sections 3(11), 4(2), 6(1) and 14(2) of Schedule 12, Bill 108 should be removed to maintain the current timelines for decision in Planning Act matters.
Recommendation 8: Section 3(12) of Schedule 12, Bill 108 should be removed to maintain municipal discretion to extend the timeline for Official Plan decisions in appropriate circumstances. Municipalities or planning boards should also be granted similar discretion to extend any Planning Act decision timeline in appropriate circumstances.
Recommendation 9: CELA’s supports Bill 108’s restoration of more fulsome appeal grounds to the Local Planning Appeal Tribunal.
CANADIAN ENVIRONMENTAL LAW ASSOCIATION
Jacqueline Wilson, Counsel