



19 December 2017

VIA E-MAIL: [ken.petersen@ontario.ca](mailto:ken.petersen@ontario.ca)

Mr. Ken Petersen, Manager  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
777 Bay Street, Floor 13  
Toronto Ontario, M5G 2E5

**Regulations to Prescribe Transition Provisions for Bill 139 - (EBR Registry Number 013-1788)**

Dear Mr. Petersen:

The *Federation of North Toronto Residents' Associations* ("FoNTRA") has reviewed the proposed new regulation under the *Planning Act* to prescribe transitional provisions for Bill 139 with great interest and agrees with all of them with one notable exception: The proposed ability to file an appeal to be still considered by the *Ontario Municipal Board* even after Royal Assent and before the Proclamation Date (which remains unknown at this time), in FoNTRA's view, would be unfair and only create confusion.

All appeals filed after Royal Assent on 12 December 2017 should be considered under the new rules by the *Local Planning Appeals Tribunal* regardless of the date of complete application.

A further delayed transition date denies due process to residents who already struggle with limited resources to appropriately consider the avalanche of new applications within the stipulated 180 days. Furthermore, the time period of more than six (6) months, between the introduction of Bill 139 on 30 May 2017 and Royal Assent on 12 December 2017, provided more than sufficient lead time for any developments in the approval pipe line for an informed choice on the preferred appeals venue.

Sincerely Yours,  
**Federation of North Toronto Residents' Associations**

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Copies:

Hon. Kathleen Wynne, Premier of Ontario and MPP, Don Valley West  
Hon. Bill Mauro, Minister of Municipal Affairs  
Hon. Yasir Naqvi, Attorney General  
Hon. Michael Coteau, MPP, Don Valley East  
Hon. Eric Hoskins, MPP, St. Paul's  
Hon. David Zimmer, MPP, Willowdale  
Mr. Mike Colle, MPP, Eglinton-Lawrence  
Mayor John Tory and Toronto City Council

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of more than 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.