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May 24, 2019

Ministry of Municipal Affairs  
Provincial Planning Policy Branch  
777 Bay Street, 13th Floor  
Toronto, ON M5G 2E5

Municipal Finance Policy Branch  
Municipal Affairs and Housing  
13th Floor, 777 Bay St.  
Toronto, ON, M5G 2E5

Great Lakes and Inland Waters Branch  
40 St. Clair Avenue West  
10th floor  
Toronto, ON  
M4V 1M2  
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The Corporation of the County of Dufferin  
55 Zina Street, Orangeville, ON L9W 1E5  
([planner@dufferincounty.ca](mailto:planner@dufferincounty.ca))

Dear Sirs and Madams:

Re: **Bill 108**

This letter is our response to "More Homes, More Choices, Ontario's Housing Action Plan, May 2019", and Bill 108, More Homes, More Choice Act, 2019.

Staff are concerned with the short commenting period that has been provided for this very important subject and proposed Bill. Short commenting periods do not provide staff with enough time to properly review proposed legislation for their Municipal Councils and often results in additional costs to the Township coordinating last-minute special council meetings to meet commenting deadlines.

Schedule 2 – Conservation Authorities Act

The Township agrees that the Conservation Authority has been increasing the services it provides and commenting on matters that are beyond what its function was historically. The Township agrees that the Conservation Authority's mandate should be clearly defined. The Township recognizes that as a result of the Bill the Township would have a choice on which additional services it wishes to receive from the

Conservation Authority. The Township appreciates the ability to make choices and develop a memorandum of understanding with the Conservation Authority and have control over its budget for these matters.

Schedule 3 – Development Charges Act and Schedule 12 – Planning Act

The Township has significant concerns with the proposed changes to the Development Charge Act and Planning Act with respect to timing of payments and collection for soft capital costs through a Community Benefit Charge By-law.

The Township is concerned that sufficient information has not been provided to allow staff to assess the financial implications to the Township and its residents.

Schedule 9 – LPAT

The Township appreciates the proposed reintroduction of “good planning” at the Local Planning Appeal Tribunal.

Schedule 12 – Planning Act

The Township has already implemented policies to encourage secondary suites throughout the rural areas of Mulmur. The proposed amendments will not significantly change opportunities for additional units in Mulmur. There are areas within the settlement area that the additional units may impact on parking.

The Township will continue to work within the timelines established by legislation. The proposed timing will expedite development but may result in difficult applications being appealed to LPAT opposed to resolved at the local municipality, with additional costs and delays.

Thank you for providing us with an opportunity to comment on the proposed Bill. We look forward to reviewing more information as it comes available.

Kind regards,

Township of Mulmur

*Tracey Atkinson*

Tracey Atkinson, BES MCIP RPP  
Planner